

IMPRESS Cyclical Review

self-assessment

Date

13 November 2024

Cover Sheet

Organisation name	The Independent Monitor for the Press
Other trading names	IMPRESS
Legal form of organisation	Community Interest Company
Registration number	9655520
Date of registration	
Address	16-18 New Bridge Street, London EC4V 6AG
Website	Impressorg.com

Chair	Richard Ayre
Chief Executive	Lexie Kirkconnell-Kawana

Please provide details of at least one person with responsibility for administering the cyclical review.

First name	Lexie
Last name	Kirkconnell-Kawana
Email address	lexie@impressorg.com
Telephone number	020 3325 4281
Job title or role	Chief Executive

I declare that the information provided demonstrates compliance with the criteria listed in the document accurately.

Chair	Richard Ayre
Chief Executive	Lexie Kirkconnell-Kawana
Date	13 November 2024

IMPRESS Cyclical Review – Self-assessment Matrix

We have developed a matrix to assist you in preparing your self-assessment as part of the Cyclical Review. Please see our [guidance](#) for the role of this self-assessment in the review process. Your replies will be published as part of a call for information.

The first three columns of the matrix remain as in the original application for recognition. Please note the field titled, “*Continued compliance*”. You should complete this section or to provide the same information separately. In doing so you are not required to repeat information or resubmit supporting evidence that you provided with the application or at subsequent cyclical reviews. The focus should be on providing details of changes to your regulatory arrangements, appointments or the ways in which you comply with the criteria that have occurred since the date of the last cyclical review. This should include changes which you have already notified to the PRP in that period.

When detailing those changes you should set out how the criteria are met and provide copies of the relevant evidence. Where regulatory arrangements have changed since the last cyclical review, please provide clean and tracked versions of the documents showing the changes. We would encourage you to provide extra narrative where this explains the background to your changes –for example outlining any difficulties that you were facing that led to you make the amendments. If you are planning any further changes in future please also outline them where relevant.

We have included additional questions and requests for information for you to respond to in relation to some of the criteria. Again, these concern the period since the last cyclical review.

Charter criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review confirming how the criteria are met. Please also respond to the additional PRP questions set out below .
1 An independent self-regulatory body should be governed by an independent Board. In order to ensure the independence of the body, the Chair and members of the Board must be appointed in a genuinely open, transparent and independent way, without any influence from industry or Government. For the avoidance of doubt, the industry's activities in establishing a self-regulatory body, and its participation in making appointments to the Board in accordance with criteria 2 to 5; or its financing of the self-regulatory body, shall not constitute influence by the industry in breach of this criterion.	Indicators clearly included in the criterion.	- Evidence to demonstrate fairness, transparency, openness and independence, including: - Appointments process, governance structure and supporting documents. - Board members' biographies and conflict of interest declarations from each Board member. - Any other supporting information to demonstrate independence.	(1) Have there been any structural changes to your organisational governance or advisory fora. Yes, please see the attached an explanation of the changes to organisational governance and advisory fora (DOC: 1.1 Company Structure Changes and Advisory Committee Explanation). (2) Has IMPRESS had any communication or correspondence with IPRT, AMCT or their representatives or of any other funder concerning IMPRESS' regulatory arrangements or decision-making If so, please provide details. Impress has not had any communication or correspondence with IPRT, AMCT or their representatives concerning Impress' regulatory arrangements or decision making. Impress provides a bi-annual report to the IPRT updating it

			on our regulatory activities. (3) Excluding regulatory fees income and income under the IPRT Grant Agreement, please provide details of any funds received from other sources including the amount, funder and terms of the funding Impress has not recieved any funds from other sources aside from regulatory fees income and income under the IPRT Grant Agreement. (4) Please provide a recusal information table for the last 3 years. Please see the recusal information table attached (DOC: 1.4 Recusal Information Table 2024). (5) Please provide an updated register of interests for Board members. Please see the updated register of interests for each individual Board member attached (DOC 1.5.1-1.5.11).
Charter criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review confirming how the criteria are met. Please also respond to the additional PRP questions set out below.

2	The Chair of the Board (who is subject to the restrictions of criterion 5(d), (e) and (f)) can only be appointed if nominated by an appointment panel. The selection of that panel must itself be conducted in an appropriately independent way and must, itself, be independent of the industry and of Government.	Indicators clearly included in the criterion.	- Evidence to demonstrate fairness, transparency, openness and independence, including: - Process used to select members of the appointments panel. - Process used by the appointment panel to appoint the Chair.	(1) Please confirm when the tenure of the current Chair of IMPRESS expires. The tenure of the current Chair of Impress will expire on 1 April 2025. A recruitment campaign for Impress' next Chair will begin in December 2024, with an appointment likely to take place in early 2025.
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Charter Criteria		Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met.
3	The appointment panel: a) should be appointed in an independent, fair and open way; b) should contain a substantial majority of members who are demonstrably independent of the press; c) should include at least one person with a current understanding and experience of the press; d) should include no more than one current editor of a publication that could be a member of the body.	Indicators clearly included in the criterion.	- Evidence to demonstrate fairness, transparency, openness and independence, including: - Process used to select members of the appointment panel. - Composition of the appointment panel, clearly identifying those members that are persons with a current understanding and experience of the press; are serving editors; and those considered independent of the press.	The appointment panel: a) should be appointed in an independent, fair and open way Impress has appointed 4 new panel members since the last cyclical review, these members are: Brian Pelan, Ozzie Clarke-Binns, Laura Dawson & Emma Jones; the terms of four other members ended during the period. The Impress Appointments Panel conducted two separate recruitment processes, advertising on the Impress website, social media & job boards. Please find attached the job description 2022 (DOC 3.a.1 Appointment Panel - New Members Job Advert 2022), job description 2024 (DOC 3.a.2. Appointment Panel - New Members Job Advert 2024, recruitment timetable (DOC 3.a.3. Appointment Panel - New Members Recruitment Timetable) & appointment letters (CONFIDENTIAL) (DOC 3.a.4. Letter of Appointment Brian Pelan) (DOC 3.a.5. Letter of Appointment

				Letter Laura Dawson signed (DOC 3.a.6. Letter of Appointment Ozzie Clarke-Binns signed) b) should contain a substantial majority of members who are demonstrably independent of the press; Two members of the Appointments Panel are career journalists: Brian Pelan and Emma Jones; they represent a minority of the Appointments Panel membership. Please find website link attached with bios of all members which demonstrates this. c) should include at least one person with a current understanding and experience of the press; Brian Pelan is the current editor of View Digital. Please find his CV attached (Confidential) (DOC 3.C.1 Brian Pelan CV). Emma Jones is a career journalist, author and broadcaster. Please find her CV attached (Confidential). (DOC 3.c.2. Emma Jones CV) d) should include no more than one current editor of a
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				publication that could be a member of the body. Brian Pelan is the current editor of View Digital, an Impress regulated publisher. (DOC 3.C.1 Brian Pelan CV).
4	The nomination process for the appointment of the Board should also be an independent process, and the composition of the Board should include people with relevant expertise. The appointment panel may only nominate as many people as there are vacancies on the Board (including the Chair), and the Board shall accept all nominations. The requirement for independence means that there should be no serving editors on the Board.	Indicators clearly included in the criterion.	- Evidence to demonstrate fairness, transparency, openness and independence, including: - Process for selecting Board members and the selection criteria used. - Board members' biographies and conflict of interest declarations from each Board member. - Governance arrangements and supporting documentation.	Process of appointment of Sam Reagan-Asante, Hannah Wickes & Caro Kriel to the Board: The Board met to review its skills and experience needs in the light of the terms of various directors coming to an end. The 2023 campaign sought to attract Board members with journalism and business development experience. Advertisements were placed on social media and on various websites, including the Impress website. To be considered for the role, all candidates were required to submit an application in a standard format to a set deadline. In the 2023 campaign 96 applications were received. Some initial sifting was undertaken by the Executive to filter out candidates who did not meet the basic advertised criteria. The Appointment Panel met to shortlist candidates for interview. Due diligence was undertaken on any

				conflicts of interest and public statements, including social media accounts. Prior to interview the CEO met with all candidates to explain the requirements of the role and the impartially requirements expected of Impress representatives. An interview panel was selected from the Appointment Panel, which interviewed 14 candidates. Following the interviews, the interview panel submitted a report to the wider Appointment Panel for approval. Once approved by the whole Appointment Panel, a nomination report was presented to the Board. The Board approved the nominations of the Appointment Panel and a letter of appointment was sent to the newly appointed Board members. Board reappointments: Following discussions at the Appointment Panel meeting on 19th June 2023, Chair Richard Ayre confirmed at the 18th June 2023 Board meeting the reappointment and appointment lengths for Board members. He confirmed that Pam Vick's second term would end in April 2027, Cordella Bart-Stewart's term
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				would end in October 2026, Shelina Janmohamed's term would end in October 2027 and Debrah Harding's terms would end in October 2028. Andrea Wills term would end her second term in November 2025. Attached are website bios, appointment letters for Sam Reagan-Asante, (CONFIDENTIAL) (DOC 4.1 Samuel Regan Asante Offer Letter), Hannah Wickes (CONFIDENTIAL) (DOC 4.2 Hannah Wickes Offer Letter) & Caro Kriel (CONFIDENTIAL), (DOC 4.3 Caro Kriel Offer Letter), job advert (DOC 4.4 Job Advertisement Board), Press Release (DOC 4.5. Press Release New Board Members), conflicts of interests (DOC 1.5.1-1.5.11).
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Charter Criteria	Indicators	Examples of evidence	Continued compliance
5 The members of the Board should be appointed only following nomination by the same appointment panel that nominates the Chair, together with the Chair (once appointed), and should: a) be nominated by a process which is fair and open; b) comprise a majority of people who are independent of the press; c) include a sufficient number of people with experience of the industry (throughout the United Kingdom) who may include former editors and senior or academic journalists; d) not include any serving editor;	Indicators clearly included in the criterion.	- Composition of appointments panel complies with criteria 1 and 3. - Process used by the appointments panel to nominate and appoint Board members. - Board members' biographies, evidence of compliance with criteria 5(a) to (f), and conflicts of interest declarations.	Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. The Board is nominated by a process which is fair and open (this process remained unchanged since the last cyclical review); the Board comprise a majority of people who are independent of the press; the Board includes a sufficient number of people with experience of the industry; the Board does not include any serving editor; the Board does not include any serving member of Parliament; all Board members in the view of the Appointment Panel can act fairly and impartially in the decision-making of the Board. Please see the website for

	e) not include any serving 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) or a Minister of the Crown, a member of the Scottish Government, a Northern Ireland Minister or a Welsh Minister; and f) in the view of the appointment panel, be a person who can act fairly and impartially in the decision-making of the Board.			biographies of all Appointment Panel members and all Impress Board members. Please find the updated register of interests for Board members attached (DOC1.5.1-1.5.11).
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Charter Criteria	Indicators	Examples of evidence	Continued compliance
6 Funding for the system should be settled in agreement between the industry and the Board, taking into account the cost of fulfilling the obligations of the regulator and the commercial pressures on the industry. There should be an indicative budget which the Board certifies is adequate for the purpose. Funding settlements should cover a four or five year period and should be negotiated well in advance.	• The regulator is funded adequately to fulfil its Charter obligations. • The regulator adopts policies and mechanisms to ensure that funding arrangements cover the prescribed period and undertakes reviews in an appropriate time. • The timing for negotiating funding settlements is not such as to create a concern that the negotiation would impact on the independence or perceived independence of the Board.	• Contract/Articles of Association/Agreements between the regulator and subscribers and/or any other funders on existing and/or planned funding arrangements, including subscription rates agreed. • Audited accounts and statement of going concern. • Annual budget, including income and expenditure forecasts. • Statement/assurance/minutes from regulator's Board to certify that the indicative budget is adequate for the purpose. • Indicative timescales and processes for negotiating the funding settlement.	Provide details of any changes since the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below. (1) Please update on developments with the funding model including the fees regime for subscribing publishers and grant agreements with charitable foundations to secure the financial sustainability of the organisation through the next period. Impress has consulted annually with subscribing publishers over its fees regime. Following a consultation held in March 2019, fees were set at 0.1% of a publisher's turnover, with a fixed fee of £50.00 a year for publishers with turnover of £50,000 or less. On 15 March 2022 Impress signed a funding agreement with IPRT that guarantees core minimum annual funding of £920,000 (£4.6m in total) for the five-year period 01/01/22 to 31/09/27; please see attached (DOC 6.1.1 Impress - IPRT Funding Deed of

				Grant). We consider this to be sufficient to meet the basic running costs of Impress and to meet the criterion 6 for funding settlements to cover a four- or five-year period and to be negotiated well in advance. In addition to the core grant Impress receives from IPRT, Impress plans to generate additional 'non-guaranteed' income from new products and services. Please see the revised rolling Impress CIC budget for 2025-2029 (DOC 6.1.2. 4 year budget for the PRP). In summation the cost of delivering approved regulation for the Impress membership has been ringfenced and secured against the income raised from the IPRT grant agreement. (2) How is IMPRESS preparing to cope with the expected reduction in funding from the IPRT from £1090,000 a year to £597,142 a year from 01/11/2026? Please see the revised rolling Impress CIC budget for 2025-2029 (DOC 6.1.2. 4 year budget for the PRP). which demonstrates that this funding decline does not impact on the operational cost of delivering approved regulation.
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			(3) Is IMPRESS planning any changes to its structure which could impact on this or any other criterion? If so, please provide details. Please see attached an explanation of the company structure changes and advisory Committee changes (DOC 1.1. Company Structure Changes and Advisory Committee Explanation). Impress considers that this change in structure will not impact on this criterion for the reasons stated in the explanation of the changes.
Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.

7	The standards code must ultimately be the responsibility of, and adopted by, the Board, advised by a Code Committee which may comprise both independent members of the Board and serving editors. Serving editors have an important part to play although not one that is decisive.	Indicators clearly included in the criterion.	- Terms of reference and agreements between the Board and a Code Committee. - Minutes of relevant meetings or other documentation between the Board and a Committee to validate the Board's responsibility for the code and its compliance with criterion 8. - Information on the composition of the Code Committee, including their experience and expertise, and the number of, and role played by, serving editors.	Please see website for the Code Committee Terms of Reference. Please see the website for Board Minutes confirming the Board's adoption of the revised Code upon advice of the Code Committee on 13 September 2022. Please see the website for biographies of all Code Committee members, including their experience and expertise. Two out of twelve of the Code Committee members are serving editors: Paul Hutchinson and Craig Gent. There is no role distinction between members that are and are not serving editors on the Code Committee.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance
8 The code must take into account the importance of freedom of speech, the interests of the public (including but not limited to the public interest in detecting or exposing crime or serious impropriety, protecting public health and safety and preventing the public from being seriously misled), the need for journalists to protect confidential sources of information, and the rights of individuals. Specifically, it must cover standards of: a) conduct, especially in relation to the treatment of other people in the process of obtaining material; b) appropriate respect for privacy where there is no sufficient public interest justification for breach; and c) accuracy, and the need to avoid misrepresentation.	• The regulator has demonstrably considered relevant legislation, codes, rules and/or guidance in developing the code. • The regulator meets the requirements set out in the criterion including in 8 (a), (B) and (c). • The code is framed in a manner consistent with the potential for complaints to be heard and decided upon by the regulator under criterion 11 (a) To (c).	• A copy of the code with an explanatory note of how the code takes into account the requirements of the criterion.	Provide details of any changes since the date of the last cyclical review , confirming how the criteria are met (1) Please describe the changes made to the Code in 2023 and how these continue to ensure compliance with the Charter. In summary, the key changes to the Standards Code are as follows (a more detailed breakdown of these changes can be found in the PowerPoint document 'Impress Standards Code Review and Changes' (DOC. 8.1. Impress Standards Code Review and Changes). • In relation to user-generated content, the Code now clarifies that publishers can breach our guidelines by allowing comments on articles from external parties to go unchecked. • Publishers are now required to take additional precautions when referring to third-party sources, particularly such sources online. This includes ensuring the accuracy of

				content produced by an AI system, as well as clearly labelling and providing hyperlinks to sources. • The Code has improved child safeguarding. Publishers must now consider anonymity requests from children both during newsgathering and publication. This acknowledges children's autonomy and media literacy while acknowledging the protections and assistance they need to develop as people. • In relation to Clause 4 – Discrimination, the threshold for breaching Clause 4.3 has been lowered. Publishers are now advised to take care not to <i>encourage</i> hatred or abuse against a group, or risk breaching the Code. • A new sub-clause has been introduced under Clause 7 – Privacy in accordance with data protection law to ensure that publishers also consider requests from adults to be anonymised where they have been previously identified in an article. • When writing about sensitive issues such as self-harm or suicide, publishers are now
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				required to provide details of where the public can find support on such issues within the publication. • Publishers are now advised not to use misleading or clickbait headlines to attract the attention of potential readers. • In relation to corrections, the Code advises that where an error in a social media post is widely shared, it may be appropriate to pin it to the social media in the interests of transparency. • The Code now requires publishers to ensure human editorial oversight and clear labelling of AI-generated content. • Publishers are now required to carefully consider the settings of a subject's social media accounts. They must also note that a lack of account restrictions does not remove the subject's right to privacy. The Code continues to ensure compliance with the Charter by taking into account the importance of: • Freedom of speech (see 'About the Impress Standards Code' and 'Scope and Remit')
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			• Interests of the public (See 'Public Interest' section) • The need for journalists to protect confidential sources of information (See Clause 8.1 - Sources) • The treatment of other people in the process of obtaining material (See Clauses 5.1 and 5.2 – Harassment) • Appropriate respect for privacy where there is no sufficient public interest justification for breach (see Clause 7.1 – Privacy) • Accuracy and the need to avoid misrepresentation (See clause 1 – Accuracy and Clause 1.3 specifically in relation to avoiding misrepresentation) Please see via the website the Impress Standards Code and Guidance.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance
8A A self-regulatory body should provide advice to the public in relation to issues concerning the press and the standards code, along with a service to warn the press, and other relevant parties such as broadcasters and press photographers, when an individual has made it clear that they do not welcome press intrusion.	• General and specific advice to the public is provided in a way which makes it easily accessible. • The service to warn the press is easily accessible and available. • The regulator identifies appropriate tools and mechanisms to notify relevant parties on timescales which ensure that the recipients of it can respond promptly.	• Information on provision of advice to the public in relation to the code, Including information on how it operates for vulnerable individuals and those who need additional support. • Information on how the service to warn the Press operates, including information on how it operates for vulnerable individuals and those who need additional support. • Contacts, if any, with individuals, broadcasters and other parties, and actions taken where relevant.	Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below. (1) How many advisory notices have been requested and how many have been issued in the last 3 years? Impress received 3 advisory notice requests and subsequently issued 3 accordingly. A list of issued advisory notices can be found here: https://www.impressorg.com/regulatory-services/advisory-notices/issued-advisory-notices/

Charter Criteria		Indicators	Examples of evidence	Continued compliance
				Provide details of any changes since the date of the last cyclical audit, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.

8B	A self-regulatory body should make it clear that subscribers will be held strictly accountable under the standards code for any material that they publish, including photographs, however sourced. This criterion does not include advertising content.	• Approach taken to defining advertising content takes account of the Advertising Standards Authority's definition to ensure that regulatory gaps do not emerge.	• Approach to defining advertising content. • Contract/terms and conditions between the regulator and subscribers demonstrating accountability and enforcement powers of the regulator. • Guidance issued to subscribers regarding compliance with the code (including how 'advertising content' is defined).	(1) Please include any changes made to the regulatory scheme since the 2023 consultation. Please see the document 'Regulatory Scheme Changes Board Paper' (DOC 8B.1. Regulatory Scheme Changes Board Paper) for a breakdown of the changes made to the Regulatory Scheme and the rationale behind each change.
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Charter Criteria		Indicators	Examples of evidence	Continued compliance
				Provide details of any changes since the date of the last cyclical audit confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
8C	A self-regulatory body should provide non-binding guidance on the interpretation of the public interest that justifies what would otherwise constitute a breach of the standards code. This must be framed in the context of the different provisions of the code relating to the public interest.	Guidance is provided in a way which makes it easily accessible.	Examples of guidance, demonstrating how it relates to the provisions in the code.	Impress continues to publish non-binding guidance on the public interest, please see the website on the Guidance to the Standards Code.
8D	A self-regulatory body should establish a whistleblowing hotline for those who feel that they are being asked to do things which are contrary to the standards code.	- Concerns are welcomed, valued and treated seriously. - Individuals are not victimized for contacting the hotline. - Safeguards are in place to prevent victimization. - The regulator ensures that the hotline is easily accessible and available to anyone who might reasonably want to access it.	- Details of how the policy was developed and the review process. - Details of hotline operation, process and budget. - Published guidance on whistleblowing policy. - Data on its use and conclusions of whistleblowing.	(1) How many calls have been received by the whistleblowing service? What was the outcome? There have been no calls to the whistleblowing service during the review period. (2) Has any action been taken arising from calls to the

	• Concerns identified through the hotline are dealt with appropriately and effectively through mechanisms available to the regulator. • Confidentiality and anonymity are assured at all times, where requested. • The regulator demonstrates clear leadership and commitment to whistleblowing. • The regulator monitors and records data arising from any use of the hotline and learns from and acts appropriately on: concerns raised; action taken; and outcomes. • The regulator has appropriate tools to support individuals who raise concerns.	• Details of senior person(s) in the regulator responsible for leadership/sponsorship of hotline.	whistleblowing service? No further action has been taken. Please note that we will be in contact in due course should our whistleblowing charity partner provide an update on the information above.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance
9 The Board should require, of those who subscribe, appropriate internal governance processes (for dealing with complaints and compliance with the standards code), transparency on what governance processes they have in place, and notice of any failures in compliance, together with details of steps taken to deal with failures in compliance.	• The regulator requires subscribers to have procedures in place for dealing with complaints and standards compliance, recording and reviewing of compliance failures (Whether escalated or not) and remedial actions taken/ reports made. • The regulator requires the subscriber to nominate a senior individual to take responsibility for dealing and complying with the standards code. • The regulator requires subscribers to be transparent in their processes. • The regulator ensures that the subscriber's complaints mechanism manages conflicts of interest.	• Contract/terms and conditions/Articles of Association between regulator and subscriber demonstrating requirements in criterion 9. • Associated practices and procedures.	Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below. (1) Please provide a breakdown of the number of applications (by publisher) for IMPRESS membership. From February 2022 to October 2024, 63 publishers applied to be regulated by Impress. (2) Of those applications, please confirm how many were granted or refused and how many remain outstanding. 46 of these publishers successfully came under the remit of the Impress Regulatory Scheme. 10 dropped out during the onboarding process. 4 had their application to Impress accepted, however are still subject to completing the required compliance steps before they can be formally accepted as regulated members. 3 had their applications rejected by Impress.

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10	The Board should require all those who subscribe to have an adequate and speedy complaint handling mechanism; it should encourage those who wish to complain to do so through that mechanism and should not receive complaints directly unless or until the internal complaints system has been engaged without The complaint being resolved in an appropriate time.	• The complaints procedure is easily accessible. • The regulator requires subscribers to have a mechanism for dealing with complaints which is adequate and speedy including that it should: - be publicized in a way which ensures that people who might wish to take advantage of it would know of its existence and how to use it; - identify when a complaint is being made; - facilitate the complainant's understanding of how the complaint relates to the code; - acknowledge receipt of the complaint and notify the complainant how the complaint will be handled in an appropriate timeframe;	• Complaints handling policy and process. • Written agreements between the regulator and subscribers regarding the handling and escalation of complaints, including performance indicators. • Data on volume and type of complaints received by (a) Subscribers and (b) the regulator; time taken to handle each stage of the complaint and total time taken to resolve (including measured from the point of first contact). Analysis provided of such data. • Data on volume of complaints escalated to regulator and/or arbitration etc.	(1) Please can you provide details of any work you have undertaken to assure that subscribers are compliant with the requirements to make information available to the public regarding their membership of IMPRESS and the complaints system. At the end of each financial year Impress contacts all regulated publishers to confirm that they continue to comply with the requirements outlined in the Impress Regulatory Scheme. The statistics on publishers' compliance failures are reported annually, please see the website for Annual Reports. In addition to this, Impress undertakes frequent spot checks throughout the year to monitor on-going publisher compliance on a quarterly basis. Attached are Excel files for 2023-24 (complete) (DOC 10.1.1. 2023-24 compliance checks) and 2024-25 (in progress) (DOC 10.1.2. 2024-25 compliance checks). The new process ensures that all publications are checked twice per year in relation to five key requirements, with our annual returns process functioning as one of those checks during Q1. A third of all publications are then checked manually by Impress staff each of the
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				following quarters. The five requirements reflect original core regulatory requirements as well as new features of the updated 2023 Regulatory Scheme, and they are: • Impress logo displayed • Complaints information displayed and accessible • Publicised mission statement • Editorial transparency and/or attribution • Continued publishing
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met.
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| | | <ul style="list-style-type: none">- share findings of investigations and conclusions with the complainant; and- if the complaint is not resolved, provide details on how the complaint can be referred to the regulator. <ul style="list-style-type: none">• The regulator has in place mechanisms which ensure that subscribers deal with complaints in a timeframe that is effective and proportionate for the subscriber and type of complaint, in accordance with performance indicators.• The regulator requires subscribers to have an accessible complaints mechanism that considers vulnerable individuals and those who need additional support. | | |
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met.
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11	The Board should have the power to hear and decide on complaints about breach of the standards code by those who subscribe. The Board will need to have the discretion not to look into complaints if they feel that the complaint is without justification, is an attempt to argue a point of opinion rather than a standards code breach, or is simply an attempt to lobby. The Board should have the power (but not necessarily the duty) to hear complaints: a) from anyone personally and directly affected by the alleged breach of the standards code, or b) where there is an alleged breach of the code and there is public interest in the Board giving consideration to the complaint from a representative group affected by the alleged breach, or c) from a third party seeking to ensure accuracy of published information. In the case of third party complaints the views of the party most closely involved should be taken into account.	The complaints and escalation procedure: • Is publicised and explained in a way which makes it easily accessible. • Operates in a manner and on a timescale which ensures complaint adjudications are effective. • The Board ensures that both parties understand how the complaint relates to the code.	• Contract, terms and conditions or Articles of Association between the regulator and the subscriber demonstrating the power to hear and decide on complaints. • Policy and procedures for dealing with complaints. • Criteria for dismissing complaints and examples of documentation/publications to demonstrate the process is clearly available to the public and subscribers. • Documentation/guidance on the handling of public interest and third party complaints (including published policies).	(1) Please provide a breakdown of the number of complaints IMPRESS has received from which category of complainant, how many were accepted, referred back to the publisher or otherwise not within IMPRESS's scope, the outcome of each complaint (including any sanctions) and the current number of cases still being considered at each stage of the process. Impress received a total of 147 complaints during the period 1 February 2022 – 13 November 2024. Of these 147 complaints, 5 were accepted for investigation, 69 were rejected for not being within Impress' scope, 69 were referred to or resolved by the publisher, 1 was withdrawn by the complainant and 3 are currently open. Of the 147 complaints, 85 were submitted by a third party, 57 were submitted by an affected party and 5 were submitted by a representative group. In relation to the 5 complaints accepted for investigation, 3 were upheld, 1 was upheld in part and 1 was dismissed. Regarding the upheld cases, 1 ruling
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			required the publisher to remove a video and publish a short clarifying statement in its place, 1 required the publisher to display a notice statement and link to the full adjudication, and 1 required the publisher to remove or amend a video. In the partially upheld case, the publisher was required to publish a summary of the finding and link to the full adjudication. Further information on these complaint decisions can be found here: https://www.impressorg.com/standards/complaints/complaint-decisions/ (2) Please provide the mean and median length of time taken to deal with a complaint at each stage of the process (acceptance, investigation, adjudication) for each year in the review period 2023: The mean length of time between acceptance of an escalated complaint and completion of an investigation was 18 days. The median length of time between acceptance of an escalated complaint and completion of an investigation
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				was 14 days. The mean length of time between completion of an investigation and issue of a proposed adjudication was 21 days. The median length of time between completion of an investigation and issue of a proposed adjudication was 25 days. The mean length of time between issue of a proposed adjudication and publication of a final adjudication was 16 days. The median length of time between issue of a proposed adjudication and publication of a final adjudication was 10 days. 2024: The mean length of time between acceptance of an escalated complaint and completion of an investigation was 27 days. The median length of time between acceptance of an escalated complaint and completion of an investigation was 27 days. The mean length of time between completion of an investigation and issue of a proposed adjudication was
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				17 days. The median length of time between completion of an investigation and issue of a proposed adjudication was 17 days. The mean length of time between issue of a proposed adjudication and publication of a final adjudication was 28 days. The median length of time between issue of a proposed adjudication and publication of a final adjudication was 28 days. Overall (2023-2024): The mean length of time between acceptance of an escalated complaint and completion of an investigation was 20 days. The median length of time between acceptance of an escalated complaint and completion of an investigation was 21 days. The mean length of time between completion of an investigation and issue of a proposed adjudication was 20 days. The median length of time between completion of an investigation and issue of a proposed adjudication was
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				21 days. The mean length of time between issue of a proposed adjudication and publication of a final adjudication was 19 days. The median length of time between issue of a proposed adjudication and publication of a final adjudication was 19 days. N.B. The average length of time between issue of a proposed adjudication and publication of a final adjudication was higher across the review period due to several applications to stay publication of the final adjudication. These are detailed below under Question 12A. (3) Please describe the steps IMPRESS has taken to ensure that the failings in dealing with the complaint 669/2023 Vanessa Boon and Derby News are not repeated? Impress Issues Apology For Service Standard Failure - Impress (impressorg.com) The Impress team met with the Chair to discuss the existing documented internal staff complaints handling process. It was acknowledged that this case was exceptional in terms of complexity but there should nevertheless be a
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				clear contingency plan in place for where challenges are made to a proposed adjudication. This has now been implemented, along with some further changes to improve the efficiency of the process overall. The key change to the process document is at 'Step 10B – Comments from Parties or Stay of proceedings/Committee reconvened'. Impress has now included a paragraph explaining how to respond when a party to a complaint proposes significant changes to the wording of the Committee's proposed remedy. Please see '11.3. Impress Complaints Process' (DOC 11.3. Impress Complaints Process) to view this change, along with further changes highlighted in yellow.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
12 Decisions on complaints should be the ultimate responsibility of the Board, advised by complaints handling officials to whom appropriate delegations may be made.	Indicators are clearly included in the criterion.	- Organisation structure and details of scheme of delegations to committees and/or individual staff members for handling complaints. - Terms of reference/minutes demonstrating delegation powers and terms and the approach to conflicts of interest. - Process to investigate complaints and present findings to Board for decision.	Decisions on complaints continue to be the ultimate responsibility of the Board. The Board may also from time-to-time delegate complaints handling responsibility, as set out in the Articles of Association at 17, found on the website. Please see the website for the Impress Regulatory Scheme which sets out complaints and investigations powers. The regulatory team that supports complaints handling administration and management is listed on the website. Supplementary Regulatory Lay Committee members can sit on complaints committees alongside Board members. The terms of reference for the Regulatory Committee are available on the website, alongside the biographies of supplementary regulatory lay members.

12A	The Board should be prepared to allow a complaint to be brought prior to legal proceedings being commenced. Challenges to that approach (and applications to stay or sist) can be decided on the merits.	Indicators are clearly included in the criterion.	Policy on complaints handling, including process for considering challenges.	(1) Have there been any challenges or applications to stay or sist? If so, provide details. Of the 5 investigations conducted, there were 3 applications to stay publication of a final adjudication, details of which are as follows: 570/2023 – A Complainant and The Stray Ferret - The publisher strongly disagreed with the approach taken by the Regulatory Committee in this case which found against them, and requested a stay to publication of the adjudication accordingly. The publisher then submitted further representations, and Impress judged that it would be necessary to reconvene a Regulatory Committee to consider these representations. The Committee provided some non-substantive clarification to the adjudication but the original finding was upheld. 608/2023 – Laura Hitchcock and Dorset Eye
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				- The publisher requested to provide some additional representations in response to the proposed adjudication. Impress made a non-substantive amendment to the adjudication to further clarify the Committee's rationale and findings, but the outcome remained unchanged. • 669/2023 – Vanessa Boon and Derby News - The publisher was dissatisfied with the final adjudication and requested amendments to the clarifying statement it was required to publish. As a result of this, Impress offered the complainant an opportunity to respond to this. Impress then considered the parties' respective representations before publishing the final adjudication.
Charter Criteria	Indicators	Examples of evidence	Continued compliance	Provide details of any changes since the date of the last cyclical review , confirming how the criteria are met. Please also respond to the additional PRP questions set out below.

13	Serving editors should not be members of any Committee advising the Board on complaints and should not play any role in determining the outcome of an individual complaint. Any such Committee should have a composition broadly reflecting that of the main Board, with a majority of people who are independent of the press.	• The regulator takes appropriate governance steps to ensure that serving editors do not advise on complaints, or determine their outcome.	• Composition of Committee (or Panel) responsible for advising Board on complaints demonstrating independence from the press, and its approach to conflicts of interest.	Please see the website for biographies of all Regulatory Lay Panel members responsible for advising the Board on complaints. No serving editors sit on this panel. Panelists are asked to declare any conflicts of interest regarding any matter when they are asked to join a committee to adjudicate on an investigation, and again at the commencement of a committee hearing by the committee Chair.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
14 It should continue to be the case that complainants are able to bring complaints free of charge.	Indicators are clearly included in the criterion.	Regulator's complaints policy and procedure.	It is still the case that complainants are able to bring complaints free of charge. Please see the website for the Impress Regulatory Scheme which does not require payment when complaints are brought to Impress under the scheme. When upgrading our new website, a new application and onboarding process was introduced. No changes were made to the meaning of the complaints policy and procedure, or suggested complaints page wording, however the formatting was changed to accommodate these updated processes (e.g. updated Impress logo, domain, and formatting). (DOC 14.1. Template Complaints Policy)

15	In relation to complaints, where a negotiated outcome between a complainant and a subscriber (pursuant to criterion 10) has failed, the Board should have the power to direct appropriate remedial action for breach of standards and the publication of corrections and apologies. Although remedies are essentially about correcting the record for individuals, the power to direct a correction and an apology must apply equally in relation to: a) individual standards breaches; and b) groups of people as defined in criterion 11 where there is no single identifiable individual who has been affected; and c) matters of fact where there is no single identifiable individual who has been affected.	• The mechanisms for achieving appropriate remedial action are designed to be credible and effective (including sufficiently fast) and operate in that way.	• Contract/Articles of Association/terms and conditions between the regulator and subscribers demonstrating the regulator's power to direct appropriate remedies including corrections and apologies. • Information on the power to direct the press, including as seen in instances when it has and has not been applied. • Information on handling breaches in criterion (a), (b) and (c) where no significant identifiable individual has been affected. • Instances of remedies directed and evidence of actions taken by the subscriber. • Information on the operation of remedies, including information about the instances of its use and non-use.	(1) Has IMPRESS directed any publication to issue an apology during the review period? Impress has not directed any publication to issue an apology during the review period.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
16 In the event of no agreement between a complainant and a subscriber (pursuant to criterion 10), the power to direct the nature, extent and placement of corrections and apologies should lie with the Board.	Indicators are clearly included in the criterion.	- Process and procedures to direct apologies and corrections. - Contracts and agreements to demonstrate that subscribers agree to adhere to directions.	Please see the website for the Impress Regulatory Scheme which sets out the power to direct the nature, extent and placement of corrections and apologies. Please see the Impress Publisher Agreement template which requires regulated members to adhere to directions through adoption of the Impress Regulatory Scheme (DOC 16.1. Impress Regulatory Scheme Agreement) The process for directing apologies and corrections can be found at paragraph 7.3 of the Regulatory Scheme. Demonstration that subscribers are required to adhere to regulatory directions can be found at paragraph 3.1 of the Regulatory Scheme.

17	The Board should not have the power to prevent publication of any material, by anyone, at any time although (in its discretion) it should be able to offer a service of advice to editors of subscribing publications relating to code compliance.	Indicators are clearly included in the criterion.	- Contract/Articles of Association/terms and conditions between the regulator and subscribers making clear that the regulator does not have the power to prevent publication. - Guidance provided to editors on code compliance.	The Board does not have the power to prevent publication as set out in the Articles of Association at 7.4, found on the website. Please see the website for the Impress Regulatory Scheme which sets out the power to direct the nature, extent and placement of corrections and apologies but does not give the Board power to prevent publication. Please see the Impress Publisher Agreement template which requires regulated members to adhere to directions through adoption of the Impress Regulatory Scheme (DOC 16.1. Impress Regulatory Scheme Agreement) Impress offers a service of advice to editors related to code compliance. Since 2021, Impress has reported on the number of requests for standards code advice it has received from Impress regulated publishers, in its annual report; see the website for annual reports.
Charter Criteria		Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the

			additional PRP questions set out below.
18	The Board, being an independent self-regulatory body, should have authority to examine issues on its own initiative and have sufficient powers to carry out investigations both into suspected serious or systemic breaches of the code and failures to comply with directions of the Board. The investigations process must be simple and credible and those who subscribe must be required to cooperate with any such investigation.	Indicators are clearly included in the criterion.	- Articles of Association/ agreements with subscribers confirming the regulator's authority to examine issues on its own initiative, including disclosure of information, and giving it the powers to carry out investigations. - Information on the approach taken to deciding what amounts to serious or systemic breaches of the code. - The investigation process. - Approved budget for independent investigations. - Internal/external reviews of compliance procedures. The Board has the authority to examine issues on its own initiative and have sufficient powers to carry out investigations both into suspected serious or systemic breaches of the code and failures to comply with directions of the Board; this is set out in the Articles of Association at 6.6 and 8.2.13, found on the website. The investigation process is set out at Part 5 of the Impress Regulatory Scheme; please see on the website. Please see the Impress Publisher Agreement template which requires regulated members to cooperate with any such investigation through adoption of the Impress Regulatory Scheme (DOC 16.1. Impress Regulatory Scheme Agreement) Please see attached the internal investigations procedural guidance for more information on the process (DOC 18.1. Impress Initiated Investigations Process). (1) Has IMPRESS instigated any investigations on their own initiative? If so, please provide

				details of the investigation and their outcome. Impress has conducted two initiated investigations during the review period, details of which are as follows. • Case 511/2022 – Unity News Network - Impress received a media enquiry about a Twitter post by one of its regulated publishers, Unity News Network, which had been retweeted by former footballer Matt Le Tissier. The retweet had gained significant attention in some major UK news outlets. Considering the seriousness of the subject matter (Ukraine-Russia war), Impress decided to undertake a wider examination of all the posts made from the Publisher's official Twitter account between 1 March 2022 and 31 May 2022. Through examination of these Tweets, the Executive determined that two key themes were prevalent in the subject matter of the Publisher's social media output: reporting on the Covid-19 vaccine and the Ukraine-Russia conflict. After establishing that there were items within Impress' remit for consideration, the Regulatory
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				Committee found that the Publisher breached clause 1 – Accuracy of the Impress Standards Code in relation to 10 of the 12 items investigated. It further found that the Publisher had breached its obligations under its Agreement with Impress. The Committee agreed therefore that the proportionate remedy in this matter would be to end the Publisher’s Regulatory Scheme agreement with Impress without notice. • Case 708/2024 – 5Pillars UK - Concerns were raised via Twitter/X by a member of the public about a short 23-second video clip taken from an episode of a podcast called ‘Blood Brothers’ by 5Pillars UK. The episode was an interview with Mark Collett, who the publisher described as ‘the controversial white ethno-nationalist and founder of the British far-right group Patriotic Alternative’. Considering this growing social media attention surrounding the Tweet/X post by the individual raising concerns about the publisher’s
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				content in question, as well as the subject matter concerned, the decision was made to conduct an assessment of the content. A Regulatory Committee later considered both the short video clip in question and other footage within Impress' remit for consideration from the full podcast episode, and found that the publisher had breached Clause 4.3 – Discrimination of the Impress Standards Code in relation to the material investigated. The publisher was required to amend or remove the podcast in light of the Committee's findings. The publisher was also required to display a Notice of Adjudication statement with a link to the full adjudication on their website homepage for 48 hours. The publisher was also required to include this notice statement on the podcast episode webpage for as long as it continued to be published in its current form.
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				The full adjudications of these two Impress-initiated investigations can be found on the Impress website: https://www.impressorg.com/standards/initiated-investigations/investigation-decisions/
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met.
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19	The Board should have the power to impose appropriate and proportionate sanctions (including but not limited to financial sanctions up to 1% of turnover attributable to the publication concerned with a maximum of £1,000,000) on any subscriber found to be responsible for serious or systemic breaches of the standards code or governance requirements of the body. The Board should have sufficient powers to require appropriate information from subscribers in order to ascertain the turnover that is attributable to a publication irrespective of any particular accounting arrangements of the publication or subscriber. The sanctions that should be available should include power to require publication of corrections, if the breaches relate to accuracy, or apologies if the breaches relate to other provisions of the code.	Indicators are clearly included in the criterion.	- Contractual agreements between the regulator and subscriber on enforcement of directions and agreement to comply. - Data on where the power has been applied and/or reasons why sanctions have not been applied and action taken. - Information on how the Board will approach sanctions including deciding on what is appropriate and on proportionality - Information on how the Board will approach decisions on calculating fines. - Information demonstrating powers to gather turnover information in a manner and timescale which ensures that the overall process remains effective. - Information on, and approach to, the requirement to publish corrections.	There has been no change to this criterion since the Cyclical Review 2022. The Board has the authority to record and publish breaches of the standards code Articles of Association at 6.4, found on the website and are published, please see the website Annual Reports. The investigation process is set out at Part 7 of the Impress Regulatory Scheme; please see on the website. Regulatory scheme agreement.
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Charter Criteria		Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
19A	The Board should establish a ring-fenced enforcement fund, into which receipts from financial sanctions could be paid, for the purpose of funding investigations.	Indicators are clearly included in the criterion.	Information on how the Board has established the enforcement fund, and how the fund is separated for the purpose of funding investigations.	(1) Can you confirm the continued existence of the fund and its current balance? Yes, the fund still exists. As no fines have been issued to nor collected from any regulated publisher, the fund amount has remained constant.

20	The Board should have both the power and a duty to ensure that all breaches of the standards code that it considers are recorded as such and that proper data is kept that records the extent to which complaints have been made and their outcome; this information should be made available to the public in a way that allows understanding of the compliance record of each title.	Indicators are clearly included in the criterion.	- Agreements between the regulator and subscribers demonstrating the power specified in criterion 20. - Evidence of manner in which breaches are found and complaints have been recorded, including those complaints not escalated to the regulator. - Information on how the information is made available to the public to ensure the public understands the compliance record of each title.	There has been no change to this criterion since the Cyclical Review 2022. The Board has the authority to record and publish breaches of the standards code Articles of Association at 8.2.5 and 8.2.14, found on the website and are published, please see the website Annual Reports. The investigation process is set out at Part 10 of the Impress Regulatory Scheme; please see on the website. Regulatory scheme agreement.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met.
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21	The Board should publish an Annual Report identifying: a) the body's subscribers, identifying any significant changes in subscriber numbers; b) the number of: (i) complaints it has handled, making clear how many of them are multiple complaints, (ii) articles in respect of which it has considered complaints to be without merit, and (iii) articles in respect of which it has considered complaints to be with merit, and the outcomes reached, in aggregate for all subscribers and individually in relation to each subscriber; c) a summary of any investigations carried out and the result of them; d) a report on the adequacy and effectiveness of compliance processes and procedures adopted by subscribers; and e) information about the extent to which the arbitration service has been used.	• Annual Report is easily accessible. • Annual Report is published annually.	• Information about format and timescales for publication of Annual Report.	Impress continues to publish an annual report, please see the website Annual Reports.
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Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review, confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
22 The Board should provide an arbitral process for civil legal claims against subscribers which: a) complies with the Arbitration Act 1996 or the Arbitration (Scotland) Act 2010 (as appropriate); b) provides suitable powers for the arbitrator to ensure the process operates fairly and quickly, and on an inquisitorial basis (so far as possible); c) contains transparent arrangements for claims to be struck out, for legitimate reasons (including on frivolous or vexatious grounds); d) directs appropriate pre-publication matters to the courts; e) operates under the principle that arbitration should be free for complainants to use;¹	The regulator either itself provides, or has in place arrangements to ensure that someone else will on its behalf provide, the arbitral process.	- Information as to how the arbitral process operates in practice and a description of how it complies with criteria 22 (a) to (g). - Contracts/agreements between the regulator and its subscribers setting out arrangements for the arbitration of civil legal disputes. - Guidance for the public on the arbitral process.	(1) Please provide details of the changes in the arbitration scheme following the 2023 consultation. Changes to the Arbitration Scheme (now titled the Regulated Publishers Arbitration Scheme) and the rationale behind the changes have been appended (DOC 22.1. Changes to the Impress Regulated Publishers Arbitration Scheme). A copy of the new Scheme Rules has also been provided (DOC 22.2. Impress Regulated Publishers Arbitration Scheme Rules). (2) How will the recent opening up of the arbitration scheme for non-members impact on the scheme for members? Impress conducted a public consultation on the scheme changes on 15 June 2023 which ran for 3 weeks, during that period we did not receive any responses from Impress regulated publishers. We have not

				had further representations from Impress regulated publishers on the new scheme. (3) Have there been any requests for arbitration during this review period? If so, please provide the number of those requests accepted, referred to the arbitrator and the final outcomes (if completed). Please also provide the number of those requests which were rejected giving the rationale for each decision Impress received one request for arbitration which was rejected (stayed until further notice) – Alex Bailey and Dorset Eye. - The claimant made a request for arbitration on the basis of malicious falsehood, harassment and defamation. A Regulatory Committee was convened to determine whether this request for arbitration met Impress' administrative criteria for arbitration. Ultimately, in consideration of a concurrent police investigation regarding some of the matters raised by the claimant, the Committee decided to stay any consideration of arbitration
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				until further notice. (4) Have members or complainants expressed any concerns regarding the operation of the arbitration scheme during this review period? If so, please provide the details. We have received no further representations from Impress regulated publishers regarding the operation of the scheme.
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¹The principle that arbitration should be free does not preclude the charging of a small administration fee, provided that:

- (a) the fee is determined by the Regulator and approved by the Board of the Recognition Panel; and
- (b) the fee is used for the purpose of defraying the cost of the initial assessment of an application and not for meeting the costs of determining an application (including the costs of the arbitration).

Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review , confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
f) ensures that the parties should each bear their own costs or expenses, subject to a successful complainant's costs or expenses being recoverable (having regard to section 60² of the 1996 Act or Rule 63 of the Scottish Arbitration Rules³ and any applicable caps on recoverable costs or expenses); and g) overall, is inexpensive for all parties. The regulator shall provide evidence about the fairness, effectiveness and sustainability of the arbitral process including (any small administration fee) and its complaints handling (to the extent that this interact with the arbitral process) including any assessment of these arrangements undertaken by the Regulator.			

	Charter Criteria	Indicators	Examples of evidence	Continued compliance Provide details of any changes since the date of the last cyclical review , confirming how the criteria are met. Please also respond to the additional PRP questions set out below.
23	The membership of a regulatory body should be open to all publishers on fair, reasonable and non-discriminatory terms, including making membership potentially available on different terms for different types of publisher.	- Any variation in terms for different types of publisher needs to be such as to facilitate membership on fair, reasonable and non-discriminatory terms. - Those terms need properly to take into account matters such as the financial position of a publisher.	- Eligibility criteria and details of policy and process for joining the regulator. - List of current subscribers by type of membership. - Anonymised sample of decision making for successful and unsuccessful membership applications.	Membership of the regulatory body is open to all publishers on fair, reasonable and non-discriminatory terms; different types of publisher are not subject to different terms. Please see the website for a current directory of Impress regulated publisher and publications. Please see the website for information

				on how a publisher can become a regulated publisher. The original compliance report for processing all applications to regulation remains the same. Per the changes to the Impress Regulatory Scheme, two new compliance requirements – Corrections page and Mission statement – were added to the onboarding process for accepted applicants (see ‘New onboarding requirements’ (DOC 23.1. New onboarding requirements) for a screenshot and ‘Regulatory Scheme Changes Board Paper’ (DOC 8B.1. Regulatory Scheme Changes Board Paper for details). (1) Please provide an update regarding the steps you have taken or are taking to ensure that IMPRESS is and is perceived to be open to all publishers on fair, reasonable and non-discriminatory terms in public statements made by IMPRESS, its Board members and executive during this review period. Impress has not received any complaints or concerns about any public statements made by Impress representatives. Specifically, no publisher who would ever consider subscribing to an approved regulator, has ever cited public statements made by an Impress
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				representative as a reason for not making an application to join Impress. Impress continues to adopt its Code of Conduct which includes specific provisions about the making of public statements. This is annually reviewed and discussed by the Board, the last review having been completed in July 2024. Following the most recent review of the Code of Conduct an email was sent out to all Impress representatives, specifically reminding them of the public statement provisions under the Code. The recruitment and appointment of all Impress representatives includes a due diligence process to ensure understanding and compliance with the Code of Conduct. For example, all new Board and Committee members are invited to review their social media accounts and are sent a copy of the Impartiality Review undertaken by Impress in 2017, as part of the appointment process. Impress' internal training questionnaire was also sent out to all new representatives to remind them of their obligations under the Code.
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				When considering reappointment nominations of Board members, the Appointment Panel considered any issues concerning public statements made by candidates where they were deemed relevant. Before participating in any regulatory decision making function whether it be an agenda item on a Board meeting or a regulatory committee meeting to adjudicate on a complaint, all participating Impress representatives are required to declare any conflicts of interest and to recuse themselves from decision making if conflicts arise. This is a standing agenda item on all Impress meetings, In the case of decisions made by regulatory committees, the executive proactively considers any conflicts of interest or perceived conflicts of interest and advises the Chair of these before any representative is appointed to sit on a specific committee. This includes an email being sent to all prospective committee members to advise them of any specific issues or parties that are relevant to a case, so that they can recuse themselves where a conflict of interest arises. Final decisions about whether to recuse an
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				individual are made by the Chair. (2) Has IMPRESS received representations from any members or publishers that were potential members to the effect that any of the terms of membership are not fair, reasonable or non-discriminatory or that, in the case of a potential member, an application had been deterred for any other reason connected with the terms, procedures, subscription rates or personnel of IMPRESS? If so please provide details (anonymised if necessary). No. (3) Confirm the number of publishers that have left the IMPRESS regulatory scheme and provide the reasons given to you by such publishers for leaving. From February 2022 to October 2024, a total of 27 publishers left the Impress Regulatory Scheme. Of these, 16 had ceased publishing, 5 had their contracts terminated due to non-compliance or non-payment, 4 triggered their notice period or did not renew at the end of their original agreement, 2 relocated outside of the UK.
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