

PRP

INDEPENDENTLY
OVERSEEING
PRESS REGULATION

BOARD PAPERS

81st Press Recognition Panel Board Meeting

Monday 17 February 2025

PRESS RECOGNITION PANEL BOARD MEETING

81st Meeting of the Press Recognition Panel
10:00 – 13:00 Monday 17 February 2025
Mappin House, 4 Winsley Street, London, W1W 8HF

AGENDA

			Indicative timings
<u>Public session</u>			
1.	Welcome	Chair	10:00 – 10:00
2.	Apologies for absence	Chair	10:00 – 10:00
3.	Declarations of interest	Chair	10:00 – 10:05
4.	Minutes of the meeting held on 10 December 2024, outstanding actions and matters arising <i>For noting</i>	Chair	10:05 – 10:10
5.	Chief Executive's report Dec 2024 & Jan 2025 Paper PRP01(25) <i>For noting</i>	SU	10:10 – 10:15
6.	Finance report December 2024 Paper PRP02(25) <i>For noting</i>	SU/JS2	10:15 – 10:20
7.	Finance report January 2025 and draft budget Paper PRP03(25) <i>For noting</i>	SU/JS2	10:20 – 10:25
8.	Annual Governance procedures and policies review Paper PRP04(25) <i>For decision</i>	Chair	10:25 – 10:45
9.	Any other business and close of public session <i>Including comments from the floor</i>	Chair	10:45 – 10:50
<u>Confidential session</u>			
10	Minutes of the meeting held on 10 December 2024, outstanding actions and matters arising <i>For noting</i>	Chair	10:50 – 10:55

11.	Chief Executive's report, Dec 2024 & Jan 2025 Paper PRP01(25) <i>For noting</i>	SU	10:55 – 11:00
12.	Finance report December 2024 Paper PRP02(25) <i>For noting</i>	SU/JS2	11:00 – 11:05
13.	Finance report January 2025 and draft budget Paper PRP03(25) <i>For noting</i>	SU/JS2	11:05 – 11:10
14.	Draft Business Plan 2024/25 Paper PRP05(25) <i>For decision</i>	SU	11:10 – 11:30
15.	Final Draft SORR Paper PRP06(25) <i>For decision</i>	SU	11:30 – 12:00
16.	Forward Plan Paper PRP07(25) <i>For noting</i>	SU	12:00 – 12:10
17.	Any other business and close of meeting	Chair	12:10 – 12:15

Date and time of next meeting: Tuesday 22 April 2025, 10:00 – 13:00
Location: Mappin House, 4 Winsley Street, London, W1W 8HF

PRESS RECOGNITION PANEL

Minutes of the 80th Meeting of the Press Recognition Panel Board

Tuesday 10 December 2024, 10:00 – 13:00

Held at Mappin House, 4 Winsley Street, London W1W 8HF

Present: Kathryn Cearns (Chair), Mark Williams (joined online), Annie Mullins, Suzanne Rab and Hayley Stallard

In attendance: Susie Uppal, John Speed and Hal Briggs

BOARD MEETING — PUBLIC SESSION

Welcome and Opening

1. The Chair welcomed the Members and attendees to the 80th meeting of the Press Recognition Panel (PRP) and opened the meeting at 10:00.

Apologies for absence

2. Zahera Harb.

Declaration of member's interests

3. Suzanne Rab informed the Board confidentially that as of the 1 January 2025 she will be taking up tenancy at Matrix Chambers. Redacted.
4. The Chair informed the Board that her appointment as NED and Chair of the Audit and Risk Committee of National Highways ceases on the 31 December 2024.

Matters of the meeting held 22 October 2024, outstanding actions and matters arising

5. The minutes of the meeting held on 22 October were **noted** as being factually correct. The Chair **agreed** to sign a copy of the minutes as a correct record.
6. The Chair noted and thanked Board member Hayley Stallard for the detailed follow up suggestions on the risk action taken at the previous meeting around potential AI risks and suggestions for what to include in the policies and risk register. The Chief Executive confirmed that the suggestions would be considered during the annual review of all governance policies that is due to be undertaken in February and April 2025.

Chief Executive Report November 2024

Paper PRP31(24)

7. The Board **noted** the contents of the Chief Executives report for November 2024 and papers with thanks.
8. The Board noted the inclusion and release of the letters to the Prime Minister and the Rt Hon Lisa Nandy MP.

Finance Reports October and November 2024

Paper PRP32(24) and Paper PRP38(24)

9. The Board **noted** the contents of the Finance reports and supporting annexes for the periods ending 31 October and 30 November 2024.
10. The Board **noted** that the Impress fee was received during November and that we are currently running under forecast on consultancy costs however the Chief Executive stated that this is expected to catch up with the consultancy work being undertaken on the Cyclical Review of Impress. The Cyclical Review is running from 5 December 2024 to 15 January 2025.

Board Remuneration and Roles

Paper33(24)

11. The Chief Executive outlined the paper and **confirmed** that under the Royal Charter the Board is allowed to set and agree its own remuneration rates for the Board, Independent members and Executive.
12. The Board **noted** the benchmarking annex and **agreed** that it was difficult to identify comparable sector rates.
13. The Board **noted** that at its meeting on the 9 December 2023 it was stated that the members had not received an increase in the previous 8 years. Following discussions the members were awarded an increase of 7.5% to keep pace with inflation.
14. John Speed stated that an annual cost of living increase across the public sector is standard practice and advised that annual inflationary increases take place as there is no logical or budgetary reason not to do this.
15. The Board agreed to increase the Board members and Independent members daily rate by 2.79%, taking the daily rate from £430 to £442 per day from the 1 April 2025.
16. The Chair was asked to leave the room whilst the members discussed the Chairs remuneration. The Board agreed to increase the Chairs daily rate by 2.79%, taking the daily rate from £645 to £663 per day from the 1 April 2025.

17. The Board discussed the time commitment for 2025 and **agreed** that whilst some of the members undertake additional variable duties for ARC and NOMCO (when required) that these are not deemed overly onerous. However, it was noted that more involvement might be required during the Cyclical Review period and that this would be kept under review and flexed as required. The Board **agreed** that the time commitment currently set for the members and the Chair was reasonable and no changes were required.
18. The Chair asked the Chief Executive and Executive Administration Manager to leave the room whilst the Board discussed the salaried staff's remuneration. The Board agreed an inflationary increase of 2.79% from the 1 April 2025.
19. The Board at its meeting on the 11 September 2023 **agreed** access to someone with industry expertise and broad knowledge and experience in the media and broadcast sector would be helpful.
20. The Board were **asked** to discuss the recommendation to procure a subject matter expert act as an expert advisor to the PRP in relation to the current press industry, regulation and media landscape.
21. The Board **agreed** that due to the Royal Charter recruitment requirements it had been difficult historically to retain persons with this relevant level of experience due to conflicts of interest arising. The Board agreed that Chris Waiting has the necessary background and generally fits the criteria outlined in the role specification. It would be useful for the PRP to access his expertise.
22. It was **noted** that the Chief Executive had sought guidance from Julie Ferguson, Independent member of NOMCO who agreed that as the PRP have been through a process which had identified that Chris has the relevant experience required, the Board can proceed and offer him a role if they wished.
23. The Board unanimously **agreed** that the Chief Executive should write to Chris Waiting formally offering him the role of an expert advisor. If accepted, the Board agreed that the Chair and CEO would consider on an ongoing basis what meetings, if any, Chris would be invited and where his input may be useful. Any conflicts arising from his role as Chief Executive of The Conversation would be managed accordingly.
24. The Board **agreed** the role would be paid at the rate of £430 a day rising to £442 from 1 April 2025
25. The Board **agreed** a time commitment of a maximum of 10 days. The role and time commitment will be reviewed again in 12 months' time.

Any other business

26. None raised.
27. The Chair closed the public session at 11:00.

BOARD MEETING — CONFIDENTIAL SESSION

Matters of the meeting held 22 October 2024, outstanding actions and matters arising

28. The minutes of the meeting held on 22 October 2024 were **noted** as being factually correct. The Chair agreed to sign a copy of the minutes as a correct record.

Chief Executives Report November 2024

Paper PRP31(24)

29. The Board **noted** the contents of the Chief Executives report for November 2024 and papers with thanks.
30. Redacted
31. Redacted
32. Redacted

Finance Reports October and November 2024

Paper PRP32(24) and Paper PRP38(24)

33. The Board **noted** the contents of the Finance reports and supporting annexes for the periods ending 31 October and 30 November 2024.

Annual Board effectiveness evaluation

Paper PRP34(24)

34. The Chair **noted** the paper and annex with thanks.
35. Redacted
36. Redacted
37. Redacted

Draft SORR planning

Paper PRP35(24)

38. Redacted

Research paper

Paper PRP36(24)

39. Redacted
40. Redacted
41. Redacted
42. Redacted
43. Redacted
43. Redacted

Strategy session

44. Redacted

45. Redacted

Forward Plan

46. The Board **noted** and **agreed** with the matters being brought forward for February 2024 and **asked** the Executive to update the plan for the remainder of 2025.

Any other business

47. None noted.

Date and time of the next meeting

48. The next scheduled meeting of the Board will take place at 10:00 on Monday 17 February 2025 at Mappin House.

Meeting close

49. The Chair closed the meeting at 12:50.

Drafted: Halina Briggs, PRP Executive Administration Manager

Signed: Kathryn Cearn, the Chair

PRESS RECOGNITION PANEL BOARD

Chief Executive's Report — December 2024 and January 2025

Meeting: 17 February 2025

Status: For noting

Lead responsibility:

Susie Uppal, Chief Executive

Contact details:

contact@pressrecognitionpanel.org.uk

Purpose

1. The purpose of this paper is to provide an update to the Board on executive activity since the November 2024 report.
2. The Board is invited to note the contents of the Chief Executive's report.

Executive Summary and Board Matters

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

Operational Updates

Communications

4. On 5 December 2024, the Chief Executive wrote to 1,108 MPs and members of the House of Lords regarding the call for information on the third cyclical review of IMPRESS' recognition as an approved regulator. The Chief Executive also wrote to our contacts list. See copies of correspondence at Annex A.
5. On 6 December 2024, we posted on X, Bluesky and LinkedIn about the call for information on the third cyclical review of IMPRESS. The post has been viewed 79 times on X and reached over 280 members on LinkedIn, where it received 16 engagements.
6. On 22 January 2025, we issued a press release to 235 press contacts in response to the news of a settlement in the High Court case between the Duke of Sussex and News Group Newspapers. Contacts included the national press, Impress publications, and royal correspondents. The statement was picked up by BBC News Live reporting, the West Wales Chronicle, and Tea & Banter. See copy of press release at Annex B.
7. On 22 January 2025, we posted a short statement on X, Bluesky and LinkedIn regarding the settlement. The thread on X has so far been seen over 950 times and received more than 20 engagements. On LinkedIn, it has reached 210 members and received 36 engagements.

DCMS

8. On the 19 December 2024 the Chair submitted the PRPs response to the consultation on updating the media mergers regime, see copy of response at Annex C.
9. Redacted

10. On the 20 January, the Chair and Executive held a meeting with the DCMS to discuss what, if any, plans the government had in respect of press regulation.

11. Redacted

Freedom of Information Request

12. As the Board are aware the PRP received an email from a Freelance Journalist on the 29 November 2024 requesting information relating the PRPs contractor contracts and payments. The Executive contacted the contractors that the request directly related to and sought their permission to share the contracts with any commercially sensitive information redacted. All of the contractors reviewed the redacted contracts and approved them for submission.

13. I can confirm that the Executive have now fully responded to the FOI request within the required timescales and supplied redacted copies of the contracts requested. At the time of writing, we have not received any further enquiries since the submission and acknowledgement of correspondence.

14. Redacted

Letters issued

15. The Chair received a letter from Mandy Godridge, Head of Direct Communications Unit on behalf of the Prime Minister on the 15 January 2025 apologising for the delayed response to letters issued to the Prime Minister which also mistakenly recognised the PRP as a civil society organisation. The Chair believes the response received could have been issued on a wrong template and responded on the 28 January informing Ms Godridge that the PRP are not a civil society organisation, and outlined the status and remit of the PRP under the Royal Charter, see copies of correspondence at Annex F.

16. The Chair wrote to the Prime Minister, Sir Keir Starmer and Lisa Nandy MP on the 31 January 2025 informing them that we have now met with officials from the DCMS and that we were deeply concerned (redacted) that there does not seem to be any clear direction regarding the Government's position on independent press self-regulation, the Chair again stressed the importance of a meeting to explore what the Government's future intentions are, see copies of correspondence at Annex G.

IMPRESS

17. The third Impress cyclical review call for information launched on the 5 November and closed on the 15 January 2025.

18. Redacted

19. Redacted

External Matters Update

20. Annex H includes an update on key external matters relevant to our work.

Devolved Nations

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

Communications

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

Risks

23. There are a range of risks involved in the areas of work covered in this paper.

24. The repeal of Section 40 represented a risk to the wider Recognition System. Without a suitable alternative being put in place, there continues to be little advantage for news publishers to join an Approved Regulator. This means that there is little prospect that the Recognition System can gain sufficient traction with the industry to work as intended and the public will not be protected from press harm.

Recommendations

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

Attachments

Annex A: Copy of mailshot to MPs and Peers re 3rd cyclical review of Impress – 5 December 2024

Annex B: Copy of press release re Prince Harry vs New Group Newspapers settlement - 22 January 2025

Annex C: Copy of PRPs response to DCMS consultation on updating the media mergers regime – 19 December 2024

Annex D: Redacted

Annex E: Redacted

Annex F: Copies of correspondence between Mandy Godridge and the Chair

Annex G: Copies of letters issued to Sir Keir Starmer, Prime Minister and Lisa Nandy MP – 31 January 2025

Annex H: External matters update



INDEPENDENTLY
OVERSEEING
PRESS REGULATION

Call for information on the third cyclical review of IMPRESS

Dear <<Formal Salutation>>

I am writing to inform you that the Press Recognition Panel (PRP) has launched a public call for information on the third cyclical review of IMPRESS' recognition as an approved regulator.

The PRP was created following the Leveson Inquiry as part of the new system of regulatory oversight to ensure the freedom of the press whilst also protecting the interests of the public.

In October 2016, following a detailed and thorough assessment of an application for recognition from IMPRESS, the independent PRP Board determined that IMPRESS met the 29 criteria in the Royal Charter, so [IMPRESS was recognised](#) as an approved regulator.

Our Charter requires us to review approved regulators to ensure they continue to meet the Charter's recognition criteria. A cyclical review must be carried out as soon as reasonably practicable, two years after a regulator has been recognised and every three years after that. The first cyclical review was completed in March 2019, and the second in June 2022. It is now time to conduct IMPRESS' third cyclical review.

In line with [our guidance](#), we asked the approved regulator to assess itself against the recognition criteria and submit evidence to demonstrate that it continues to meet the Charter criteria. We specifically requested that IMPRESS identify areas of its arrangements that have changed since its original application for recognition.

The documents submitted by IMPRESS have been [published on our website](#), along with details of how you can take part in the call for information.

The call for information closes on **15 January 2025**.

If you have any questions, please do not hesitate to contact me.

Yours sincerely,



Susie Uppal
Chief Executive
Press Recognition Panel



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PRP

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Press release

22 January 2025

For immediate release

Press Recognition Panel statement on settlement of High Court case between the Duke of Sussex and News Group Newspapers

The Press Recognition Panel (PRP), the independent body set up to oversee the system of press self-regulation created in the wake of the Leveson Inquiry, has issued the following statement in response to the announcement today of a settlement in the case between the Duke of Sussex and News Group Newspapers (NGN).

Kathryn Cearn's OBE, Chair of the Press Recognition Panel, said:

“The Press Recognition Panel is very concerned that senior executives at News Group Newspapers appear to have misled not only the Leveson Inquiry, but also the many victims of press intrusion over a period of nearly 20 years through their previous denials of unlawful activities taking place at The Sun newspaper, and that today’s settlement will allow them to evade accountability for their actions.

“Our [August 2024 report into press intrusion](#) highlighted the damage that has been done by a largely unaccountable press in the pursuit of headlines at the expense of ordinary people who, unlike Prince Harry, are unable to afford expensive legal teams to seek redress.

“Even where people are able to bring a case, the current legal system more often than not obliges victims of press intrusion to agree to a settlement or risk being hit with huge legal costs. Today’s settlement has once again allowed powerful media companies to avoid the scrutiny and accountability that shining a light on the practices and decision-making by executives would have revealed.

“Some news publishers have been responsible and joined the approved regulator, Impress, which has been successful in keeping proper public interest standards in

place. However, those who have been involved in unlawful activities have joined the largely ineffective Independent Press Standards Organisation (IPSO). IPSO's industry-controlled standards code continues to deny justice to ordinary people. The Government will fail in its duty to protect the public if it does not require news publishers to sign up to a press self-regulator that is both independent and impartial according to the criteria recommended by the Leveson Inquiry and overseen by the PRP."

-ENDS

For media enquiries, please contact Hal
Briggs: hbriggs@pressrecognitionpanel.org.uk

Notes to editors:

The Press Recognition Panel (PRP) is an independent body set up to ensure that regulators of the press and other news publishers are independent, properly funded and able to protect the public, while recognising the important role carried out by the press and other news publishers.

We were created as a result of the Leveson Inquiry into press standards. The Leveson Inquiry followed widespread concern about unlawful activities carried out by some sections of the media, such as phone hacking. Lord Justice Leveson [published his report](#) into the culture, practices and ethics of the press in November 2012.



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

Department of Culture, Media and Sport

By email: media-mergers@dcms.gov.uk

19 December 2024

Dear Consultation Team

PRP response to the consultation on updating the media mergers regime

Thank you for the opportunity to respond to your consultation on updating the media mergers regime, published on 6 November 2024.

The Press Recognition Panel (PRP) is the body established under Royal Charter on Self-Regulation of the Press, following the Leveson Inquiry recommendations, to provide independent oversight of press regulatory bodies. Our interest in the matters being considered in this consultation is therefore narrowly set to the boundary and interface between broadcast regulation and press regulation, and whether there is justification, in the public interest, in applying different standards to each.

Requirement to have a genuine commitment to standards

We note your proposal to amend Section 58(2C)(c) of the Enterprise Act 2002 to carve out newspapers from the commitment to broadcasting standards so that it remains applicable to broadcasters only. This seems sensible; however, it highlights a disparity between the public interest considerations applicable to broadcasters versus newspapers relating to standards, contrary to what appears to be the general intention to align the treatment of all 'news media' in relevant merger situations.

The effect of the current drafting is to fetter the Secretary of State's decision making in relation to newspapers in relevant merger situations as the public interest considerations relating to standards are narrower compared to broadcasters. These are limited to those considerations contained in Section 58(2A) which provides for:

- a) accurate presentation of the news; and
- b) free expression of opinion;

While these are both important elements of the standards which apply to news publishers, they are not as comprehensive as the reference to the standards objectives set out in Section 319 of the Communications Act 2003 applicable to broadcasters.

The equivalent provision as far as newspapers are concerned are contained in Criteria 8 of Schedule 2 of the Royal Charter on Self Regulation of the Press:

“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.”

We recommend adding a new clause to follow the same logic as Section 58(2C)(c) and make reference to the general standards framework. An additional clause to reflect Section 42 of the Crime and Courts Act 2013 would enable this equivalent provision to be adopted with relatively straightforward drafting, mirroring the approach taken in 58(2C)(c), perhaps along the lines of:

‘The need for persons carrying on enterprises consisting or including the supply of newspapers, and for those with control of such enterprises, to have a genuine commitment to the attainment in relation to a Standards Code published by an Approved Regulator as defined in Section 42(2) of the Crime and Courts Act 2013.’

This would align the public interest considerations that the Secretary of State must take into account before intervening in a relevant merger situation involving newspapers with the treatment of broadcasters.

Drafting treatment of Section 58(2H)

Relating to the definition of ‘news-related material’, we would also highlight that the definition in Section 41(5A)(7)(c) of the Crime and Courts Act includes, additionally to the proposed list at Section 58(2H), ‘gossip about celebrities, other public figures or other persons in the news’. This definition in 58(2H) therefore appears to be somewhat narrower and we would recommend legislative consistency here.

I hope you find this response helpful and if it would be useful to discuss these matters further, I would be very happy to arrange a meeting with my team.

Yours sincerely,



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



10 DOWNING STREET

LONDON SW1A 2AA

www.gov.uk/number10

Head of the Direct Communications Unit

15 January 2025

Dear Ms Cearns,

I would like to thank you for your correspondence to the Prime Minister. I hope you will understand that the Prime Minister has asked me to reply on his behalf. I apologise for my delay in replying.

The Government recognises the importance of civil society's contribution and fully appreciates the significant ongoing contribution of civil society organisations to the UK. You will be aware that the Prime Minister and his team are already engaging with key civil society representatives. This signals the start of a period of wider commitment to forge a bold new partnership between Government and civil society. I know you will be pleased to hear of the creation of a 'Civil Society Covenant' that will usher in a new era of partnership, which will tackle some of the UK's biggest challenges.

The Press Recognition Panel does important work which is rightly recognised and praised. On behalf of the Prime Minister, I would like to thank you and your colleagues for all the hard work you do.

Beyond its direct economic contribution, civil society helps create the environment that growth and prosperity depend upon. It provides people with a sense of belonging and it offers people a sense of control over their future. Civil society occupies a unique place in public life by also providing support to those in need and binding communities together. Across the UK, there are countless examples of what partnership between civil society and Government can achieve, including youth activities to support vulnerable teenagers and tools to support people into work.

Unfortunately, as I am sure you can appreciate, due to pressures on his diary, the Prime Minister is unable to meet with you on this occasion.

The Government is committed to creating an inclusive and fairer society and understands that civil society is a significant key to achieving this aim. Thank you, once again, for writing.

Yours sincerely,



MANDY GODRIDGE



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

Ms Mandy Godridge
Head of Direct Communications Unit
10 Downing Street
London
SW1A 2AA

28 January 2025

Dear Ms Godridge

Press Recognition Panel

Thank you for your letter of 15 January 2025 in response to my letter to the Prime Minister. I should point out that the Press Recognition Panel (PRP) is not a civil society organisation. We are the body established, following cross party agreement in Parliament, under Royal Charter following the Leveson Inquiry to oversee independent press self-regulation in the UK.

We are classified by the Office of National Statistics as a market regulatory body subject to public sector control and are partially publicly funded, although we have a uniquely independent status protected by the terms of our Royal Charter.

We have met with officials from DCMS and it seems apparent that there is no clear policy direction on the issue of press regulation at the moment. Given the events of the last week which underscore again how difficult it is to obtain remedy and redress through the courts if you are a victim of press harm and intrusion, and the carefully worded apology from News Group Newspapers raising serious questions as to whether the Leveson Inquiry was misled, we do not find this acceptable.

Public protection is being failed as are those news publishers who do participate in independent press self-regulation. Consequently, I have written again to the Prime Minister rehearsing our concerns about the failures of successive Governments to fully implement the findings of the Leveson Inquiry and make the system of independent press self-regulation work in the interests of public protection and safeguarding news publishers freedom of speech.

I have enclosed this letter for your information.

Yours sincerely,



Kathryn Cearns
Chair
Press Recognition Panel
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4 Winsley Street
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Press Recognition Panel
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The Rt Hon. Sir Keir Starmer KC MP
Prime Minister
10 Downing Street
London
SW1A 2AA

31 January 2025

Dear Prime Minister

Future of independent press self-regulation

Following my previous correspondence to you, we have subsequently had a meeting with officials from the Department of Culture, Media and Sport.

Recognising our independence from Government, the meeting was useful to establish a dialogue on policy matters that impinge on the Recognition System and press self-regulation. We have committed to sharing a briefing note outlining some of the legislative issues which have caused considerable inconsistencies and have the effect of undermining independent press self-regulation.

We were however deeply concerned to hear that there does not seem to be any clear direction regarding the Government's position on independent press self-regulation. Without a clear direction, the current fractured press regulatory landscape will persist. Importantly, responsible newspapers who have chosen to be accountable under a truly independent system of self-regulation and the public will remain unprotected.

As we have seen over the last few days, sections of the press are prepared to go to great lengths to avoid genuine accountability and it requires significant time, effort and expense to obtain an apology and redress. It also raises serious questions as to whether the Public Inquiry into the Culture, Practices and Ethics of the Press were misled given the admissions made in the apology by News Group Newspapers relating to phone hacking, surveillance, misuse of private information and intrusion.

However, the majority of the public do not have the resources to pursue a claim through the courts in the way that the Duke of Sussex and Lord Watson have done. The fact that it has taken so long underscores, again, the need for a timely, low-cost and effective system to deal with complaints and arbitrate disputes without require recourse to the courts. That system exists, is ready and fit for purpose. All that is required is for industry, as a whole, to engage.

There are already proposals in the Leveson Inquiry Report that were never fully implemented. Recognising that the Government does not see Section 40 of the Crime and Courts Act 2013 as the answer, there are other options available.

We remain somewhat confused and disappointed that the Government seems willing to listen to voices amongst the industry but not to the body charged with the oversight of system of independent press self-regulation.

Unless there is a clear direction from the Government to address the deficiencies in the current system to put in place alternative mechanisms to ensure that news publishers do engage with independent press self-regulation, instances of press intrusion and harm will continue to be a recurring theme with the majority of victims denied access to justice. The improving effect of an effective self-regulation system on professional and editorial standards working to reduce the likelihood of these types of incidents occurring in the first place will also be lost.

It is important that we meet, with you (or if you wish, with the Secretary of State for Culture, Media and Sport) to explore what the Government's future intentions are regarding independent press self-regulation. It cannot be acceptable to abandon the public to the commercial interests of sections of the press.

I have written in similar terms to the Secretary of State for Culture, Media and Sport and I look forward to hearing from you.

Yours sincerely,



Kathryn Cearns
Chair
[Press Recognition Panel](#)
[Mappin House](#)
[4 Winsley Street](#)
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Weblink: [PRESS RECOGNITION PANEL](#)

CC: Janis Makarewich-Hall, Deputy Director of Radio, Advertising and the Press
Georgia James, Head Media Regulation Strategy

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

The Rt Hon. Lisa Nandy MP
Secretary of State for Culture, Media and Sport
Department for Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ
United Kingdom

By email: [REDACTED]

31 January 2025

Your ref: [REDACTED]

Dear Secretary of State

Future of independent press self-regulation

Further to your letter of 18 December 2024, I was grateful to meet with Janis Makarewich-Hall, Deputy Director of Radio, Advertising and the Press, and her team on 19 January 2025 to discuss the Government's plans for independent press self-regulation.

Recognising our independence from Government, the meeting was useful to establish a dialogue on policy matters that impinge on the Recognition System and press self-regulation. We have committed to sharing a briefing note outlining some of the legislative issues which have caused considerable inconsistencies and have the effect of undermining independent press self-regulation.

We will also share our next Annual Report to Parliament once it is published and have agreed that we will stay in touch with the team meeting on a semi-regular basis to keep the dialogue going. The team have also committed to reflect further on the points we raised in the meeting, review the available evidence and seek to develop thinking.

We were however concerned to hear that there does not seem to be any clear direction regarding the Government's position on independent press self-regulation. Without a clear direction, the current fractured press regulatory landscape will persist. Importantly, responsible newspapers who have chosen to be accountable under and a truly independent system of self-regulation and the public will remain unprotected.

As we have seen over the last few days, sections of the press are prepared to go to great lengths to avoid genuine accountability and it requires significant time, effort and expense to obtain an apology and redress. It also raises serious questions as to whether the Public Inquiry into the Culture, Practices and Ethics of the Press were misled given the admissions made in the apology by News Group Newspapers relating to phone hacking, surveillance, misuse of private information and intrusion.

However, the majority of the public do not have the resources to pursue a claim through the courts in the way that the Duke of Sussex and Lord Watson have done. The fact that it has taken so long underscores, again, the need for a timely, low-cost and effective system to deal with complaints and arbitrate disputes without requiring recourse to the courts. That system exists, is ready and fit for purpose. All that is required is for the industry, as a whole, to engage.

I noted that you are speaking to affected families regarding developing proposals. There are already proposals in the Leveson Inquiry Report that were never fully implemented. Recognising that the Government does not see Section 40 of the Crime and Courts Act 2013 as the answer, there are other options available and we will include these in our briefing note to your officials.

Unless there is a clear direction from the Government to address the deficiencies in the current system to put in place alternative mechanisms to ensure that news publishers do engage with independent press self-regulation, instances of press intrusion and harm will continue to be a recurring theme with the majority of victims denied access to justice. The improving effect of an effective self-regulation system on professional and editorial standards working to reduce the likelihood of these types of incidents occurring in the first place will also be lost.

It is important that we meet, with you (or if you wish, with the Prime Minister if this is about central policy) to explore what the Government's future intention regarding independent press self-regulation is, especially as your officials do not appear to have received any direction on this matter. It cannot be acceptable to abandon the public to the commercial interests of sections of the press.

I have written in similar terms to the Prime Minister and I look forward to hearing from you.

Yours sincerely,



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Georgia James, Head Media Regulation Strategy

Update on key external matters

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

Commercial Landscape

2. Press Gazette reported that the latest ABC figures show that the Daily Mail's print circulation was 673,578 in December, 0.9% higher than in November. The biggest month-on-month print decline was at Reach's Scottish weekly, the Sunday Mail, down 5% to 42,044. On a year-on-year basis, the i Paper saw the smallest decline among paid-for papers (down 4% to 122,949), while the biggest drop was at the Daily Star Sunday (down 22.7% to 61,230), followed by the Sunday People (down 21.2% to 47,629). Free paper Metro kept its print distribution steady at 952,104.
3. As reported by Press Gazette, Mail Online grew its UK audience in December to 21m, up 15% month on month though down 9% year on year, according to the latest monthly data from Ipsos iris, making it the biggest individual commercial news publisher for both reach and engagement. 1.4bn minutes were spent with the site in the UK in December, up 3% month on month, though down 9% compared to December 2023. It was also the top individual commercial news brand for page views (516.9m). The Daily Express saw the biggest month-on-month audience growth, up 17% to 15.9m and up 35% year on year. The biggest drops were the Guardian, down 5% month on month to 18.5m, and the Sun, down 20% year on year to 19.5m.
4. BBC News has overtaken Apple News as the biggest news app in the UK in Press Gazette's annual ranking. According to the latest Ipsos iris data, BBC News had a UK app audience aged 15+ of 14.2m people in October, growing 12% in a year. The Apple News app had a UK audience of 14m after 4% growth. Samsung's free news app, Upday, faced the biggest year-on-year drop, losing 44% of its audience (1m), followed by Mail+ (down 27% to 229,328) and the Mirror (down 24% to 217,468). Google News fell by 13% to 1.6m. The biggest growth was at Substack, up 249% to reach 468,803 people in October. Sky News was the third-biggest news app (3.5m, up 24%), followed by Money Saving Expert (2.4m, up 40%) and the Guardian (2.2m, down 4%).
5. Press Gazette reported that Reddit has seen the biggest audience growth in a year among the 25 biggest website publishers in the UK in October, according to Ipsos iris. Its audience was up by 48.2% year-on-year, reaching 27.4m people (aged 15 and over) in the UK. Reddit is now the 14th biggest online publisher in the UK, compared to 29th last year. Meanwhile, there were eight news media organisations in the top 25 online publishers in the UK, but only two in the top ten: the BBC in fifth place with an audience of 40m (up 4.3% year-on-year) and Reach (33.8m, down 4.5%) in sixth. Every other news publisher in the top 25 saw

a year-on-year decline, the biggest of which was at Mail Metro Media (audience of 26.4m, down 11.4%) which dropped from ninth to 16th place.

6. Press Gazette reported that Tortoise Media has formally signed a deal to buy the Observer and appointed current Observer acting editor Lucy Rock, previously deputy to Paul Webster, who stepped down in November, as the title's editor (print). Rock will work alongside a digital editor, yet to be named, who will establish the Observer as its own brand online away from the Guardian. Tortoise founder and editor James Harding will be editor-in-chief. The first Observer under its new ownership is expected to be published in the spring following a transition period.
7. Press Gazette reported that marketing business and Irish local publisher Media Concierge has agreed a deal to take over Scotsman and Yorkshire Post parent company National World, promising it will not make editorial job cuts and will invest in local news. Media Concierge upped its initial offer of 21p per share to 23p, a premium of 15p relative to National World plc's closing price the day before the offer became public. The deal values National World at £65.1m. The takeover is expected to come into effect in the first quarter of 2025. National World will be de-listed from the London Stock Exchange as part of the acquisition and all the current non-executive directors will resign.
8. As reported by Press Gazette, Byline Times has put 2% of its share capital up for sale. 2,331 shares are being offered at £85.81 each, valuing the title at £9m, and have the potential to raise more than £200,000. The directors of Byline Times Ltd wrote in a prospectus for potential buyers that the company, which launched in 2019, "is no longer a scrappy start-up, and has professionalised its operation and is now ready for the next stage". Money raised "will be used to increase marketing spend, including PR and paid-for advertising, with the objective of doubling awareness by the end of 2027". The prospectus revealed that Byline Times Ltd generated revenue of more than £1m in 2024, an increase of 22% compared to 2023.
9. Press Gazette reported that City AM is ending its Monday print edition and will invest instead in more video and audio products. However, editor Christian May said the brand may still publish on a Monday in response to "major events". He also said the business newspaper would consider increasing its circulation on its remaining print days of Tuesdays, Wednesdays and Thursdays and that it is still committed to the City AM Magazine, which prints four times a year. He also noted that the City AM app has been downloaded by almost 100,000 people since its 2023 launch.
10. As reported by Press Gazette, UK national newspaper cover prices have increased by 12.1% compared to the start of 2024, while the price of digital news subscriptions have remained fairly stable. Daily newspapers' Monday to Friday editions were up by an average of 11.9% between January 2024 and January 2025, Saturday papers cost 12% more, and Sunday titles were 12.6% more. For

comparison, consumer price inflation in the UK was at 3.5% in the year to November and no higher than 4% throughout 2024. The biggest price increases were at all the Telegraph titles, the Saturday edition of The Times, and The Sunday Times, which all went up by 50p. In percentage terms, the Daily Star's cover price rose the most in the year: by 22.2% from 90p to £1.10. It would now cost £159.20 to buy a copy of every UK national newspaper on each day for one week, compared to £144.80 a year ago and £129.85 two years ago.

11. Press Gazette reported that the Independent has promoted its deputy editor Chloe Hubbard to UK editor. Hubbard, who joined the paper as assistant editor in 2017, will report to Geordie Greig as the brand's global editor-in-chief. The Independent said in a release that she will oversee the UK newsroom amid its mission "to be the world's most trusted, biggest and fastest growing news title". Meanwhile, the FT reported that the Independent Media Group has secured funding from Bill Gates' foundation to invest in new reporters and investigative stories.
12. As reported by Press Gazette, shares in national and local newspaper owner Reach rose by 26% after the publisher said it expects to beat analysts' forecasts of £97.4m in adjusted operating profit for 2024. Reach said the profit upgrade was because of a strong final quarter last year. The company's share price is up 41% over the past 12 months. Investment bank Panmure Liberum has raised its forecast for Reach's profit before tax to £98.1m for 2024 and earnings before interest and tax to £101.8m, although it expects annual profits to decline this year. Reach cut almost 800 roles two years ago and made further cuts last year. Many high-profile editorial executives have left during rounds of restructuring.
13. Press Gazette reported that Daily Star editor-in-chief Jon Clark is stepping down, having edited the paper since March 2018 following Reach's acquisition of the Star and Express titles from Richard Desmond's Northern & Shell. Reach nationals audience director Ben Rankin will be the new Daily Star Online editor-in-chief. Daily Star deputy editor Denis Mann will run the print editions and has been promoted to editor of the daily and Sunday titles.
14. As reported by Press Gazette, the Jewish Chronicle has announced Daniel Schwammenthal as its new editor, replacing Jake Wallis Simons, who has been in the role since 2021 and will continue as a columnist for the title. Schwammenthal is a former EU correspondent for Dow Jones Newswires and was an editorial writer for the Wall Street Journal from 2004 to 2011. For the last 13 years, he has been director of the American Jewish Committee Transatlantic Institute in Brussels. The title also unveiled a revamped website and reader membership scheme. The London-based title has a weekly newspaper with a circulation of 12,000 and a website attracting around 860,000 visits per month (according to Similarweb).
15. The Guardian reported that staff at the Daily Mail and MailOnline have been told to expect job cuts by the publisher. In a letter to colleagues, the Daily Mail's

editor-in-chief, Ted Verity, and the publisher and chief executive of parent group DMG media, Danny Groom, announced that plans to bring print and digital teams together would “result in a number of job losses”. They added that operations would “fully come together with reporters and editors producing stories for online and the papers” while the Mail on Sunday would “become even more integrated” with the Monday to Saturday title.

Academic

16. The Reuters Institute for the Study of Journalism has published its annual report on industry trends, which says that news organisations should prepare for “multiple challenges” in 2025. The main findings, drawn from a sample of 326 digital leaders from 51 countries and territories, show that:

- Four in ten (41%) editors, CEOs, and digital executives say they are confident about the prospects for journalism in the year ahead, with one in six (17%) expressing low confidence.
- Just over half (56%) say they are confident about their own business prospects, a significant jump on last year’s figure.
- Around three-quarters (74%) of respondents say they are worried about a potential decline in referral traffic from search engines this year.
- Publishers will be putting more effort this year into building relationships with AI platforms (+56 net score) and social content platforms, including YouTube (+52), TikTok (+48), and Instagram (+43).
- However, sentiment towards X/Twitter (-68 net score) has worsened this year, with Bluesky (+38) a key beneficiary. Google Discover (+27) is becoming a more important traffic source.
- Publishers are ambivalent about their dependence on platforms overall, with a similar proportion looking to cut ties (31%) as strengthen them (31%). Most of the rest (36%) are planning to maintain ties at existing levels.
- Subscription and membership remain the biggest revenue focus (77%) for publishers, ahead of both display (69%) and native advertising (59%). Other revenue streams include events (48%), affiliate revenue (29%), donations (19%), and related businesses (15%).
- More than a quarter of publisher respondents say they are actively thinking about or planning to launch new products around games (29%) or education (26%). More than four in ten (42%) say they’ll be looking to launch or trial a ‘youth’ product this year.
- News organisations’ use of AI technologies continues to increase. Most (87%) say that newsrooms are being fully or somewhat transformed by generative AI, with just 13% saying not so much or not at all.

Legal

17. Press Gazette reported that Associated Newspapers has apologised and paid “very substantial” damages to a doctor and academic wrongly portrayed as “statin deniers” who published “fake news” about the cholesterol-lowering drug. Zoë

Harcombe PhD and Dr Malcolm Kendrick sued Associated Newspapers and the Mail on Sunday's head of health, Barney Calman, for libel over articles published in March 2019.

18. As reported by the Guardian, Gordon Brown has said there is "no hiding place" for senior executives at News Group Newspapers (NGN), as Scotland Yard continues to investigate claims the former prime minister was "falsely" implicated along with the Labour peer Tom Watson in a "fake security threat" to "justify" the deletion of millions of emails. Brown said: "The Metropolitan police have confirmed their investigations into my allegations of misbehaviour within the Murdoch group are ongoing and will run into 2025."
19. The Guardian reported that hedge fund manager Crispin Odey is seeking at least £79m in damages from the Financial Times after suing the publication for libel. Odey began legal action against the FT in May 2024 over four articles published in 2023 which contained allegations that he had sexually assaulted or harassed multiple women. Five women are separately suing him over alleged misconduct between 1995 and 2023. Odey has previously denied the allegations against him, telling the FT they were "rubbish". The paper said that it would be "vigorously defending" its reporting. The FT must file its defence of the claim by the end of January 2025, with a further hearing in the case expected later.
20. As reported by the Guardian, 32 people are to give evidence supporting the Guardian's defence of legal action brought against it by the actor and producer Noel Clarke. Clarke's legal team confirmed he intends to call on 15 witnesses. A defamation and data protection trial is scheduled to start at the beginning of March. Clarke is suing Guardian News and Media (GNM) for libel over articles published in 2021 and 2022 after an investigation that set out multiple claims of misconduct against him, including sexually inappropriate behaviour. At a hearing this month, Clarke's lawyers applied for GNM's defence case to be struck out ahead of a full trial. Mrs Justice Steyn rejected the application, saying that written reasons for her decision would be provided at a later date.
21. BBC News reported that NGN has agreed to pay "substantial damages" and apologised to the Duke of Sussex to settle the High Court case over claims of unlawful intrusion into his life. NGN apologised for "serious intrusion" by the Sun between 1996 and 2011 and admitted "incidents of unlawful activity" were carried out by private investigators working for the newspaper. It also apologised for the distress it caused Harry through the "extensive coverage" and "serious intrusion" into the private life of Princess Diana. NGN also issued an apology to Lord Watson for the intrusion into his private life by those working for the News of the World, including "being placed under surveillance" by journalists and people they instructed. Lord Watson said his legal team would pass a dossier to the Metropolitan Police. The Guardian later reported that the Met have requested transcripts of the pre-trial hearings.

Political

22. Lord Watson of Wyre Forest (Labour Life Peer) tabled a question asking His Majesty's Government what the dates and times of meetings that ministers in the Department for Culture, Media and Sport have held with representatives of UK newspapers since 5 July.

Baroness Twycross (Labour Life Peer) responded: "Ministers and officials working in the Department for Culture, Media and Sport regularly engage with stakeholders on a range of press-related issues. Details of ministerial meetings are published on a quarterly basis on Gov.uk."

23. Lord Watson of Wyre Forest (Labour Life Peer) tabled a question asking His Majesty's Government what discussions ministers in the Department for Culture, Media and Sport have had since 5 July regarding the protection of victims of illegal press intrusion.

Baroness Twycross (Labour Life Peer) responded: "Ministers and officials working in the Department for Culture, Media and Sport regularly engage with stakeholders on a range of press-related issues. Details of ministerial meetings are published on a quarterly basis on Gov.uk."

24. Lord Watson of Wyre Forest (Labour Life Peer) tabled a question asking His Majesty's Government, following the remarks by the Secretary of State for Culture, Media and Sport at the RTS London Convention in September that media organisations telling the truth is not just a right but a duty, what steps they intend to take to ensure that broadcasters and newspapers uphold this standard, and what sanctions are being considered in cases where they fail to do so.

Baroness Twycross (Labour Life Peer) responded: "The government is committed to a free and independent media. Having a free and fair press that is completely independent of the Government, is important to ensure the public have access to accurate and trustworthy information from a range of different sources. We are clear, however, that with this freedom comes responsibility, which the media must take seriously. An independent self-regulatory regime is important to ensure the press adheres to clear and high standards, and offers individuals a means of redress where these are not met. These regulators enforce codes of conduct which provide guidelines on a range of areas, including discrimination, accuracy, privacy, and harassment. If they find that a newspaper has broken the code of conduct, they can order corrections. IPSO can also order critical adjudications and Impress can levy fines.

Ofcom is the UK's regulator for broadcasting and by law carries out its duties independently of the Government. Ofcom's Broadcasting Code contains rules to ensure that broadcast news is reported with due accuracy and presented with due impartiality. It is for Ofcom, as the independent regulator, to determine whether there has been a breach of their rules and whether to apply sanctions."

25. Lord Watson of Wyre Forest (Labour Life Peer) tabled a question asking His Majesty's Government what assessment they have made of the work of the Local

Democracy Reporting Service; and whether they plan to enhance its effectiveness in supporting local journalism and democratic accountability.

Baroness Twycross (Labour Life Peer) responded: "The Local Democracy Reporting Service (LDRS) plays an important role in supporting local journalism. LDRS reporters have been able to uncover stories that publishers may have otherwise been unable to discover due to increasing constraints on their resources. This is an area of reporting that is often significantly under provided but is essential to journalism's role of holding those in authority to account.

The Secretary of State has recently announced her plans to develop a Local Media Strategy, in recognition of the importance of this vital sector. We are working across Government and with the sector and other stakeholders as we develop this strategy, and recognise the continued importance of the LDRS."

26. Nick Timothy (Conservative, West Suffolk) tabled a question asking the Secretary of State for Culture, Media and Sport, if she will make an assessment of the potential impact on the freedom of the press of the recent IPSO ruling in relation to a complaint made by Juno Dawson against the Spectator newspaper.

Stephanie Peacock (Labour, Barnsley South) responded: "The Government is committed to protecting press freedom, which is essential to a strong and functioning democracy. In the UK, there exists an independent, self-regulatory system for the press, which is crucial to maintain press freedom. It would therefore be inappropriate to comment on a specific ruling by IPSO, as an independent press regulator."

27. Satvir Kaur (Labour, Southampton Test) tabled a question asking the Secretary of State for Culture, Media and Sport, what steps her Department is taking to support the sustainability of local journalism including (a) magazines and (b) print media (i) nationally and (ii) in Southampton Test constituency.

Stephanie Peacock (Labour, Barnsley South) responded: "Sustainability of local journalism is an area of particular concern for this Government, across the country and in Southampton Test. We are developing a Local Media Strategy, in recognition of the importance of this vital sector. Our vision is a thriving local media that can continue to play an invaluable role as a key channel of trustworthy information at local level, reporting on the issues that matter to communities, reflecting their contributions and perspectives, helping to foster a self-confident nation in which everyone feels that their contribution is part of an inclusive national story.

We are working across Government and with other stakeholders as the Strategy develops and will announce further details in due course."

28. Siân Berry (Green Party, Brighton Pavilion) tabled a question asking the Secretary of State for Culture, Media and Sport, pursuant to the Answer of 22 November 2024 to Question 14270 on Press: Regulation, what work her

Department is undertaking on this issue; which other Departments have participated; and if she will publish the work completed to date.

Stephanie Peacock (Labour, Barnsley South) responded: "DCMS works with a range of other Departments, including the Department for Science, Innovation and Technology, the Ministry of Justice, the Ministry of Housing, Communities and Local Government, and the Home Office, to support a free, plural, and financially sustainable press sector. This includes work to develop a Local Media Strategy and to deliver the National Action Plan for the Safety of Journalists.

We will update Parliament in the usual way on any policy developments in this area and work will be published as appropriate."

29. Saqib Bhatti (Conservative, Meriden and Solihull East) tabled a question asking the Secretary of State for Culture, Media and Sport, what discussions she has had with (a) the Guardian Media Group and (b) Tortoise Media on the proposed buyout of the Observer newspaper.

Stephanie Peacock (Labour, Barnsley South) responded: "It would be inappropriate to comment on any live merger case. As is clear under the Enterprise Act, this is a quasi-judicial process for the DCMS Secretary of State alone to exercise the statutory powers based on the evidence and following the established regulatory process. If there are any updates to report, Parliament will be informed in the usual way."

30. Cameron Thomas (Liberal Democrat, Tewkesbury) tabled a question asking the Secretary of State for Culture, Media and Sport, what steps her Department is taking to promote local journalism in (a) Gloucestershire and (b) other rural areas.

Stephanie Peacock (Labour, Barnsley South) responded: "Sustainability of local journalism is an area of particular concern for this Government, across the country and in Gloucestershire and other rural areas.

We are developing a Local Media Strategy, in recognition of the importance of this vital sector. Our vision is a thriving local media that can continue to play an invaluable role as a key channel of trustworthy information at local level, reporting on the issues that matter to communities, reflecting their contributions and perspectives, and helping to foster a self-confident nation in which everyone feels that their contribution is part of an inclusive national story.

We are working across Government and with other stakeholders as the Strategy develops and will announce further details in due course."

31. Charlotte Cane (Liberal Democrat, Ely and East Cambridgeshire) tabled a question asking the Secretary of State for Culture, Media and Sport, what steps she is taking to ensure access to high-quality local journalism.

Stephanie Peacock (Labour, Barnsley South) responded: "Sustainability of high-quality local journalism is a priority for this Government.

We are developing a Local Media Strategy, in recognition of the importance of this vital sector. Our vision is a thriving local media that can continue to play an invaluable role as a key channel of trustworthy information at local level. This means reporting on the issues that matter to communities, reflecting their contributions and perspectives, and helping to foster a self-confident nation in which everyone feels that their contribution is part of an inclusive national story.

We are working across Government and with other stakeholders as the Strategy develops and will announce further details in due course.”

32. Reacting to a speech by the Prime Minister about social media misinformation, Science, Innovation and Technology (SIT) Committee Chair, Chi Onwurah MP, announced an inquiry to examine how algorithms used by social media platforms can spread false and harmful content. As part of this, the committee has extended an invite to X Chairman Elon Musk. Onwurah said: “We want to understand the technology he has shaped and his views on X’s approach to misinformation and free speech. ... I hope that he will take up our invitation and take the opportunity to engage with the democratic process and give us his thoughts directly.”
33. As reported by the i Paper, Culture Secretary Lisa Nandy called on families affected by the phone-hacking scandal to draw up proposals for change so those who believe they have been wronged can secure justice. Speaking to BBC’s World at One following the settlement of the High Court case between the Duke of Sussex and NGN, she said the fact that not everybody was able to pursue a case through the courts was a “very important point” that families from the Hacked Off campaign had flagged. She continued: “... I think the families do understand, too, that a free and fair press is an absolute cornerstone of democracy.” Asked about a second-stage Leveson Inquiry, she said: “We don’t think that the Leveson Two inquiry is fit for purpose...” Later, Downing Street reaffirmed this, saying: “You’ve got the Government’s plans as set out in the manifesto, [we’re] not going ahead with a new inquiry.”

Approved regulator

34. Impress has responded to Meta’s decision to withdraw fact-checkers as a tool to combat mis- and disinformation from its platforms, including Facebook and Instagram, and replace them with a community notes system similar to that of X. Impress Chair Richard Ayre said: “Decades ago American journalism pioneered factcheckers to aim for accuracy in news. Today, any online platform that regards the search for truth as ‘mission creep’ is choosing to be complicit in misleading and misdirecting the public.”

IPSO

35. Press Gazette reported that IPSO has reprimanded the Spectator for calling author Juno Dawson “a man who claims to be a woman”. The ruling is a rare

finding of a breach by the press of the discrimination section (Clause 12) of the Editors' Code of Practice. Spectator editor Michael Gove, who was not at the magazine at the time of publication, criticised the ruling, saying: "I am in no doubt this is an outrageous decision, offensive to the principle of free speech and chilling in its effect on free expression." Conrad Roeber, a management consultant hired by IPSO in 2019 to write an independent report on how the press treated trans-related issues, accused the complaints handler of adopting "the core principles of trans identity ideology" and said that it cannot claim to be a "neutral arbitrator".

36. IPSO has announced plans to increase its focus on complaints that raise a potential breach of the Editors' Code of Practice, following an amendment to its regulations, giving it greater discretion to make decisions about handling complaints that do not raise matters of regulatory concern. The change will only affect complaints that raise no possible Code breach. Alice Gould, Joint Head of Complaints and Pre-publication Services, said: "We will continue to make case-by-case decisions and send a bespoke response to people complaining about matters that have affected them personally, or where there is a public interest in doing so."
37. IPSO has appointed new members to its Board and Complaints Committee. Alison Gow has joined IPSO's Board. She has worked in journalism for more than 30 years and is a former editor of WalesOnline, Wales on Sunday, and the Daily Post, as well as an audience and content director with Reach plc. George McInnes has joined the Complaints Committee. He retired from Poole Hospital/University Hospitals Dorset in 2024 having been a consultant radiologist and Clinical Director of Radiology. With experience as a lawyer, regulator, and arbitrator, Sarah Havlin joins the Complaints Committee as a lay member. Harriet Wilson, formerly at Condé Nast, joins as a member with recent senior editorial experience in magazines.
38. Press Gazette reported that former defence and education secretary Sir Gavin Williamson has won a complaint against a Birmingham Live article that described a village in his constituency as the "grimmest" in the UK. IPSO ruled that the description in the article of "arson hit infrastructure" in Featherstone, with a bus stop "torched not long after its installation", was inaccurate. It added that the inaccuracy was significant because "reporting as established fact that there had been an arson attack had the clear potential to adversely affect the locally community".
39. The Editors' Code of Practice Committee has updated the clause on children to reflect society's changing understanding of who has the right to provide consent on behalf of a child. The change came into effect on 1 January 2025. The change to the Code clarifies that 'Children under 16 must not be interviewed or photographed on issues involving their own or another child's welfare unless an adult with legal parental responsibility or similarly responsible adult consents'.

40. Byline Times reported that The Times newspaper has been made to issue a correction regarding its reporting on electric vehicle (EV) sales following a successful complaint to IPSO by the Energy and Climate Intelligence Unit (ECIU). The ruling came after ECIU challenged claims made in an article by Political Editor Steven Swinford last September about a supposed “fall in demand” for electric vehicles. The claim was contradicted by market data showing EV sales are actually rising.

Campaigners' news

41. Sarah Whitehead, Director of Newsgathering and Operations at Sky News, has been announced as the new President of the Society of Editors. Whitehead was unanimously elected at the Society's Annual General Meeting on 4 December and takes over from Kamal Ahmed, Director of Audio at The Telegraph. Joy Yates, Regional Editor at Newsquest Cumbria, was elected Vice-President of the Society.
42. Hacked Off has responded to the news that Gordon Brown has reiterated his calls for News UK to face a police investigation into his allegations of misbehaviour within the Murdoch group. A spokesperson for Hacked Off said: “... there is nowhere to hide for News UK. It is in the publisher's interest to end its longstanding refusal to face accountability, put itself forward for investigation and abandon its nakedly self-serving and hypocritical opposition to Leveson Part Two.”
43. The National Union of Journalists (NUJ) has said the commitments made by Media Concierge as part of its takeover of National World need to be backed up with concrete actions to ensure the survival of quality local journalism. Laura Davison, NUJ general secretary, said: “David Montgomery's tenure saw already hard-working journalists pushed to even higher levels of stress from constant cuts and overwork. But our members will want to see more than words and promises from the new owners, with proper investment in newsrooms, and a commitment for real and meaningful consultation with the NUJ.”
44. Having urged Apple to remove its AI-generated news summaries after the tool reported inaccurate news to readers, the NUJ has welcomed the decision to halt the Apple Intelligence-driven service. Séamus Dooley, NUJ assistant general secretary, said: “[We] now call for increased scrutiny addressing inaccuracies as part of any developments to the feature. Our calls for its suspension recognised the huge risks to public confidence and trust in journalism; recent errors relayed by AI-generated summaries serve as a stark reminder of how easily misinformation can be fuelled, and the need for human-centred approaches in journalism.”
45. Hacked Off has published a report on IPSO, calling it “the watchdog that won't bite”. The report reveals that only 52 complaints (0.7%) were upheld in 2023 out of thousands received. The rest were either dismissed or abandoned, with the

average waiting time for complaints to be adjudicated upon standing at 161 days. Also, for the tenth year running, IPSO has issued zero fines and held zero standards investigations into any of its members. The report concludes: “In the absence of newspaper action to leave IPSO and join or establish an independent regulator (such as the leading alternative, Impress), it falls to legislators to step in and make independent regulation compulsory. Without legislative action, the public - and the journalism industry - will continue to suffer.”

46. As reported by Press Gazette, the Anti-SLAPP Coalition has described as “baffling” the Solicitors Regulation Authority’s (SRA) decision to take no further action against Discreet Law, the firm that represented Russian warlord Yevgeny Prigozhin in a libel case against Bellingcat founder Eliot Higgins. Prigozhin sued Higgins in 2021 over tweets linking him to the Wagner Group, but the case was struck out in 2022 after Higgins spent £70,000 defending himself. Higgins filed a complaint with the SRA, arguing that Discreet Law had violated industry rules by facilitating a SLAPP lawsuit despite Prigozhin being subject to international sanctions at the time. The SRA took nearly two years to respond, ultimately finding “no evidence” the firm knew of Prigozhin’s Wagner ties and ruling it had exceeded due diligence requirements. An appeal was unsuccessful, with the SRA concluding in August 2024 that Discreet Law had acted appropriately.
47. Press Gazette reported that research by the Public Interest News Foundation has suggested UK news publishers are owed £2.2bn by Google for their contribution to the platform in 2023 alone. Google responded that such studies are “misleading” and have been “debunked”, insisting it makes very little money from news content. The Public Interest News Foundation worked with FehrAdvice to calculate the value of journalism to Google with a survey of 1,484 people which observed their internet browsing habits. 67% of participants using Google for news said they get all the information they need on the platform without clicking out of it.

PRESS RECOGNITION PANEL BOARD

FINANCE REPORT – DECEMBER 2024

Meeting: 17 February 2025

Status: for noting

Lead responsibility: Susie Uppal, Chief Executive

Contact details: Susie Uppal, Charlie Billingham (JS2)

Purpose

1. The purpose of this paper is to update the Board on the finance and banking position as at 31 December 2024.
2. The Board is invited to note the latest financial position.

Background and analysis

Finance

3. A bank-reconciled set of management accounts as at 31 December 2024 is attached at Annex A. The management accounts also include the original budget for the year to March 2025 and the 6 month reforecast carried out in October 2024.
4. The deficit for the period to date is £37,161 against a year to date forecast deficit of £61,155. This represents a positive variance of £23,994 compared to the year to date forecast. This is largely due to an underspend on Executive costs and a small underspend on Communication costs.

Devolved Nations

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

Communications

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

Risks

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

Recommendations

8. The Board is invited to **note** the latest financial position regarding the PRP's finances.

Timeline for future work

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

Attachment

Annex A: Management accounts as at 31 December 2024

Press Recognition Panel
Period ended 31st December 2024

9 months to Dec 2024				Full year to March 2025	
	Actual	Reforecast Oct 2024	Variance	Budget	Reforecast Oct 2024
	£	£	£	£	£
Income					
Subscription fees	209,920	209,920	-	281,238	281,238
Bank interest	42,567	43,322	755	56,000	56,612
Total Income	252,487	253,242	755	337,238	337,850
Expenditure					
Board and Committee costs					
Salaries & NIC	56,216	56,648	(432)	81,930	76,808
Travel & Subsistence	1,393	1,250	143	1,270	1,550
Other costs	-	-	-	2,000	3,000
Total Board and Committee Costs	57,609	57,898	(289)	85,200	81,358
Communications					
Publications	-	1,300	(1,300)	3,800	3,800
Communications tools	1,014	2,014	(1,000)	4,500	3,514
Website and Upgrades	1,716	1,599	117	2,516	2,356
Total Communications Costs	2,730	4,913	(2,183)	10,816	9,671
Other costs					
Executive team costs	154,822	172,900	(18,078)	260,279	243,574
HR & Recruitment	15,000	15,767	(767)	17,057	18,697
Strategic research	15,000	15,000	-	40,000	20,000
Office costs	4,945	5,275	(330)	8,097	7,272
Meeting rooms	5,835	6,109	(274)	9,500	7,609
Travel & Subsistence	850	1,130	(280)	1,440	1,359
IT Hardware	1,387	2,887	(1,500)	1,600	2,887
Information Technology	5,484	5,368	116	7,920	7,358
Accountancy	15,860	16,152	(292)	25,939	28,637
Audit Fees	-	-	-	15,000	15,000
Printing & Stationery	306	1,265	(959)	1,480	1,325
Insurance	3,742	3,739	3	4,909	5,582
Legal	2,640	2,640	-	10,000	10,000
Subscriptions & publications	3,278	3,194	84	4,636	3,711
Finance charges	150	150	-	180	180
Sundry expenses	10	10	-	10,640	10,766
	229,309	251,586	(22,277)	418,676	383,958
Total Expenditure	289,648	314,397	(24,749)	514,692	474,986
Surplus / (Deficit) for the period	(37,161)	(61,155)	23,994	(177,453)	(137,136)
Reserves Bfwd	1,564,303	1,564,303			
Reserves Cfwd	1,527,142	1,503,148			

Press Recognition Panel

Period ended 31st December 2024

	Dec-24		Mar-24	
	£	£	£	£
Current Assets				
Current account	293,054		70,606	
Fixed term deposit accounts	1,276,224		1,004,293	
Deposit account	207,013		252,474	
Cash at bank		1,776,291		1,327,373
Prepayments	4,009		8,337	
Accrued Income	14,158		433,514	
Third Party Deposit	911		911	
Sundry debtors		19,078		442,762
Creditors: amounts falling due within one year				
Trade creditors	1,228		3,220	
Deferred income	243,274		163,960	
Social security and other taxes	5,740		6,267	
Pensions	2,602		3,166	
Sundry creditors and accruals	15,383		29,219	
		268,227		205,832
Net Current Assets		1,527,142		1,564,303
Net Assets		1,527,142		1,564,303
Funds brought forward				
Funds bought forward at 31 March		1,564,303		820,488
(Deficit)/ surplus for the period		(37,161)		743,815
		1,527,142		1,564,303



PRESS RECOGNITION PANEL BOARD

FINANCE REPORT – JANUARY 2025

Meeting: 17 February 2025

Status: for noting and approval

Lead responsibility: Susie Uppal, Chief Executive

Contact details: Susie Uppal, Charlie Billingham (JS2)

Purpose

1. The purpose of this paper is to update the Board on the finance and banking position as at 31 January 2025.
2. The Board is invited to note the latest financial position.

Background and analysis

Finance

3. A bank-reconciled set of management accounts as at 31 January 2025 is attached at Annex A. The management accounts also include the original budget for the year to March 2025 and the 6 month reforecast carried out in October 2024.
4. The deficit for the period to date is £44,347 against a year to date forecast deficit of £67,205. This represents a positive variance of £22,858 compared to the year to date forecast. This is largely due to an underspend on Executive costs along with small underspends on Communication costs and HR & Recruitment.
5. Redacted

Devolved Nations

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

Communications

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

Risks

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

Recommendations

9. The Board is invited to **note** the latest financial position regarding the PRP's finances.

Timeline for future work

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

Attachment

Annex A: Management accounts as at 31 January 2025

Annex B: Redacted

Press Recognition Panel
Period ended 31st January 2025

10 months to Jan 2025				Full year to March 2025	
	Actual	Reforecast	Variance	Budget	Reforecast
	£	Oct 2024	£	£	Oct 2024
Income					
Subscription fees	234,485	234,485	-	281,238	281,238
Bank interest	47,253	47,899	646	56,000	56,612
Total Income	281,738	282,384	646	337,238	337,850
Expenditure					
Board and Committee costs					
Salaries & NIC	62,829	63,368	(539)	81,930	76,808
Travel & Subsistence	1,462	1,350	112	1,270	1,550
Other costs	-	-	-	2,000	3,000
Total Board and Committee Costs	64,291	64,718	(427)	85,200	81,358
Communications					
Publications	-	1,300	(1,300)	3,800	3,800
Communications tools	1,014	2,514	(1,500)	4,500	3,514
Website and Upgrades	1,756	1,685	71	2,516	2,356
Total Communications Costs	2,770	5,499	(2,729)	10,816	9,671
Other costs					
Executive team costs	179,734	193,880	(14,146)	260,279	243,574
HR & Recruitment	15,000	18,410	(3,410)	17,057	18,697
Strategic research	15,000	15,000	-	40,000	20,000
Office costs	5,501	5,941	(440)	8,097	7,272
Meeting rooms	5,835	6,109	(274)	9,500	7,609
Travel & Subsistence	850	1,270	(420)	1,440	1,359
IT Hardware	1,387	2,887	(1,500)	1,600	2,887
Information Technology	6,095	5,968	127	7,920	7,358
Accountancy	17,984	18,280	(296)	25,939	28,637
Audit Fees	-	-	-	15,000	15,000
Printing & Stationery	1,086	1,285	(199)	1,480	1,325
Insurance	4,164	4,160	4	4,909	5,582
Legal	2,640	2,640	-	10,000	10,000
Subscriptions & publications	3,578	3,372	206	4,636	3,711
Finance charges	161	160	1	180	180
Sundry expenses	9	10	(1)	10,640	10,766
	259,024	279,372	(20,348)	418,676	383,958
Total Expenditure	326,085	349,589	(23,504)	514,692	474,986
Surplus / (Deficit) for the period	(44,347)	(67,205)	22,858	(177,453)	(137,136)
Reserves Bfwd	1,564,303	1,564,303			
Reserves Cfwd	1,519,956	1,497,098			

Press Recognition Panel
Period ended 31st January 2025

	Jan-25		Mar-24	
	£	£	£	£
Current Assets				
Current account	260,633		70,606	
Fixed term deposit accounts	1,281,776		1,004,293	
Deposit account	207,391		252,474	
Cash at bank		1,749,800		1,327,373
Prepayments	3,350		8,337	
Accrued Income	12,915		433,514	
Third Party Deposit	911		911	
Sundry debtors		17,176		442,762
Creditors: amounts falling due within one year				
Trade creditors	624		3,220	
Deferred income	218,709		163,960	
Social security and other taxes	7,229		6,267	
Pensions	3,404		3,166	
Sundry creditors and accruals	17,054		29,219	
		247,020		205,832
Net Current Assets		1,519,956		1,564,303
Net Assets		1,519,956		1,564,303
Funds brought forward				
Funds bought forward at 31 March		1,564,303		820,488
(Deficit)/ surplus for the period		(44,347)		743,815
		1,519,956		1,564,303

PRESS RECOGNITION PANEL BOARD

ANNUAL GOVERNANCE PROCEDURES AND POLICIES REVIEW

Meeting: 17 February 2025

Status: for decision

Lead responsibility:

Susie Uppal
Chief Executive

Contact details:

Halina Briggs
Executive Administration Manger

Purpose

1. This paper invites the Board to review the first tranche of the PRP's procedures and policies as part of the 2025 annual review. The remaining policies and procedures will be brought to the Board for consideration at its meeting on 22 April 2025.

Recommendations

2. The Board is invited to:
 - a) **review and approve** the proposed revisions, where applicable, to the procedures and policies summarised in Annex A and attached in the appendices.
 - b) **note** the additional information provided in the paper relating to the drafting of a policy on Artificial Intelligence (AI).
 - c) **note** that the second tranche of policies and procedures (ARC TORs, Risk management, anti-bribery, money laundering, fraud, theft and corruption, data protection legislation policy, privacy notice, data retention and disposal policy, business continuity and emergency, disaster and recovery plan, procurement and AI will be brought to the Board on 22 April 2025 for consideration following ARC review at its meeting on 17 February 2025 as per its terms of reference.

Background and analysis

3. The PRP presently has 31 organisational procedures and policies in place, all of which have been reviewed in line with best practice and focus on operation in practice. The proposed revisions are briefly summarised at Annex A, with the documents to be considered and attached as appendices.

Board & Independent members' remuneration

4. The policy has been updated to reflect the updated remuneration rates for the Chair, Board and Independent members as agreed by the Board at its meeting on 10 December 2024. The Board also confirmed and agreed at its meeting that the current minimum time commitment remained correct, and no further changes were required.

Terms and conditions of service for Board members

5. The time commitment remains the same for 2025. Board members are expected to commit to a minimum of 15 days per annum, and the Chair to a minimum of 50 days per annum. The Board member with financial responsibility is expected to commit to a minimum of 18 days per annum. The Board are scheduled to meet 6 times during 2025 with monthly organisational and finance updates from the CEO.

Finance

6. The section on Corporate Credit Cards in appendix 1 has been updated to include the provision that the PRP credit card details must not be stored on any online payment portals/wallets and must be removed immediately on confirmation of receipt for all transactions undertaken on behalf of the PRP.

Nominations Committee terms of reference

7. The Board will be asked to review the terms of reference ahead of the next round of Board member recruitment to make sure that no changes are required.

Arrangements for affixing the PRP's Common Seal

8. The Royal Charter and the Seal are securely stored under the supervision of the CEO.

Draft AI Policy

9. On the 22 October 2024 the Board undertook its annual review of the Risk Register, and some discussion took place around potential AI risks. The Board agreed that given its size and limited reliance on AI that potential risks are currently very low, however agreed that AI has been developing and expanding rapidly across society, particularly with the development of generative AI and that we should introduce some basic governance around this.
10. Board member Hayley Stallard took the action to consider what might be required and circulated to the Board and Executive a draft AI policy for consideration. The Executive conducted some further research around the guiding principles and key components that underscore the importance of ethical considerations, legal compliance, transparency and risk accountability in AI deployment and looked at what other public bodies have introduced.

11. We sought policy guidance from Suzanne Dodds, Head of Governance at the Professional Standards Authority, which is a similar sized organisation as the PRP. Suzanne confirmed that they have not yet reviewed their policies but will be happy to share best practice and policy information once they have explored and considered what is appropriate for their organisation.
12. The Executive can also confirm that we have contacted all of the current PRPs contractors to confirm whether they use AI when they undertake tasks for the PRP. All of the contractors confirmed that they do not use AI and would notify us if this changed. Redacted.
13. Going forward the Executive will issue the supplier checklist to new and or existing suppliers on negotiation of contracts to ensure that any use of AI is documented in contracts or agreements.
14. A draft AI policy and supplier checklist has been created and will be reviewed by ARC on the 17 February 2025. ARC will discuss and consider what controls are proportionate to the organisation and once agreed in principle a draft AI policy will be brought back to board for consideration and potential adoption at its meeting on the 22 April 2025.
15. The ARC terms of reference, data protection and legislation policy, privacy statement, data retention and disposal policy, risk management policy, business continuity policy, emergency and disaster recovery plan, and the anti-bribery, money laundering, fraud and theft policy and draft AI policy will be considered by the ARC at its meeting on 17 February 2025. These will be brought to the Board on 22 April 2025 for consideration and ratification and are not included in the Appendices.

Devolved Nations

-
16. There are no specific issues identified at this stage of the paper.

Communications

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

Risks

-
18. There are significant reputational and organisational risks if the PRP does not adopt satisfactory and robust governance procedures and policies with regular review to ensure currency. The ARC continues to keep the requirement for an internal audit under regular review. At present, the Committee have agreed that in view of the size and relative lack of complexity of the PRP and the control issues in place, an internal audit will not be commissioned. This position is reviewed annually by the Committee.

Annex A to PRP05(24)

Board & Executive	
Board & Independent members' remuneration	The policy has been updated to reflect the increase in remuneration for all Board and Independent members as agreed by the Board at its meeting on 10 December 2024. A new section has been added re Pension Scheme Contributions: <i>5. PRP Board members and staff are invited to join the PRPs pension scheme when joining the organisation. Independent members who are paid on payroll for a fixed sum per month will be invited to join the scheme. Independent members not receiving a fixed sum per month will not automatically be invited to join the scheme.</i>
Board Terms & conditions	For general review – no changes recommended
Board rules of procedures	For general review – no changes recommended
Terms & conditions for Independent Members and Expert Advisors	Updated to state Independent Members and Expert Advisors and that the time commitment will be reviewed annually.
Senior Independent Board member - Role & responsibilities	For general review – no changes recommended
Nominations Committee – Terms of reference	The Board will be asked to review ahead of the next round of Board member recruitment to check that no changes are required – no changes recommended
Equality, diversity and inclusion	For general review – no changes recommended
Gifts, hospitality and expenses	The travel and subsistence rates have been checked against the official HMRC business rates and remain unchanged from 2023/24 – no changes recommended
Purpose	
Statement of Mission and Approach	For general review – no changes recommended
Working in Northern Ireland and Scotland	For general review – no changed recommended
Arrangements for affixing the PRP's Common Seal	for general review – no changes recommended

Finance & Risk	
Finance	The section on Corporate Credit Cards in appendix 1 has been updated to include the provision that the PRP credit card details must not be stored on any online payment portals/wallets and must be removed immediately on confirmation of receipt for all transactions undertaken on behalf of the PRP.
Procurement	No changes recommended at this stage. Following ARCs review of the draft AI policy and supplier checklist we expect this policy to be updated and presented to Board for consideration on the 22 April 2025
Scheme of delegation and matters reserve	For general review – no changes recommended
Investment	For general review – no changes recommended
When things go wrong	
Disciplinary procedures for Chair and Board Members	For general review - no changes recommended
Complaints handling policy (about a PRP individual)	For general review – no change recommended .
Whistleblowing policy (Board and staff)	Note 10 – revised guidance was issued in September 2024, an updated link has been provided in the policy
Data handling	
Freedom of Information	For general review – no changes recommended
Publication Scheme	Email address updated and telephone number removed – no other changes recommended
Business Continuity	
IT policy	Note 51 has been updated around reporting and procedures for dealing with and reporting suspicious emails
Health and Safety	For general review - no changes recommended

Policy on Board and Independent Members' remuneration

1. The Royal Charter (para 5.3) sets out that 'The Board may make arrangements to pay or make provision for paying, in respect of any Member, such amounts by way of allowances or gratuities as the Board determines. The amount of any such allowances or gratuities shall be set having regard to the prevailing rates payable to the members of boards of public sector bodies'.

2. Redacted

Future reviews of remuneration

3. From a governance perspective, the Board acknowledges that it is not considered best practice for a board to set its own remuneration, but the Charter requires that here. The Board will continue to review remuneration rates annually.

4. The Board will consider what if any additional arrangements it wishes to put in place for the purposes of any further reviews of remuneration – including the establishment of a remuneration committee – at a later date.

Pension scheme contributions

5. Redacted

Terms and Conditions of Service for Board Members

Basis for appointment

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

Excluded and restricted activities

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

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

Confidentiality

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

Remuneration and time commitment

8. Board Members' remuneration is regularly reviewed in line with best practice. Board members are expected to commit to a minimum of 15 days per annum, and the Chair to a minimum of 50 days per annum.
9. The Board member with financial responsibility is expected to commit to a minimum of 18 days per annum due to the additional responsibilities that are undertaken in this role.

Expenses

10. You are eligible to claim expenses in accordance with the PRP's Gifts, hospitality and expenses policy.

Expression of views

11. All invitations addressed to Board Members to attend or speak at stakeholder events or to comment on social media in respect of PRP related matters should be referred to the Chair. Care will be taken to ensure that there is appropriate Board representation at events and that Board members are properly briefed in advance of attendance. In the normal course of events, the Chair on behalf of the Board will be the nominated spokesperson.
12. In relation to requests for meetings with the Board, these should normally be referred to the Chair in the first instance.
13. All contact with individuals and organisations will be formal and documented. Unless a meeting takes place in the context of our Whistleblowing policy, the

fact of a meeting having taken place will be subject to public record, even if the content of meetings are held confidentially.

14. Informal contact by bodies or individuals will be recorded if relevant.
15. Board members will take care to avoid saying or doing anything on social media that negatively impacts on the PRP's reputation. Board members will not engage with the media about the PRP without express agreement of the Chair.

Declaration of Registrable Interests

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

Resignation

21. Board members may resign from the Board during the period of their tenure. Board members will agree a reasonable departure with the Chair or the Board.

Indemnity

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

Additional commitments

23. Board members should not take on any additional appointments that may cause conflict with their current role with the PRP or affect their commitment capacity. Any concerns should be discussed with the Chair.



Rules of procedure for meetings of the Press Recognition Panel Board

Introduction

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

Frequency of Meetings

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

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

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

Notice of Meetings

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

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

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

Agenda and papers

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

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

9. The papers for each meeting shall comprise:

- an agenda approved by the Chair which shall indicate the matters to be discussed at the meeting (see paragraph 30 below for Order of Business);
- a copy of the agreed or draft minutes of the last Board meeting;
- the Chief Executive's report;
- the Finance report and
- such other supporting documents and information relevant to the matters to be discussed as the Chair may think appropriate.

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

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

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

Executive attendance at meetings

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

Other attendees at meetings

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

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

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

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

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

Quorum

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

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

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

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

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

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

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

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

Chair

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

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

Declaration of Conflict of Interest

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

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

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

Order of Business

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

Voting

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

Deferral of Decision

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

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

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

Urgency

38. During the course of the PRP's business, matters may arise between scheduled Board meetings that require urgent Board approval or discussion and cannot be postponed until the next convened Board meeting. If the Chair considers the matter to be of a significant nature requiring urgent approval or discussion, arrangements will be made for the matter to be considered via email or at an emergency Board meeting.

39. Where decisions that would ordinarily be taken at Board meetings have to be made on an urgent basis by email, the following process will apply:

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

40. A decision taken under this provision will be reported at the next Board meeting together with an explanation of the reasons for urgency. The decision will be recorded in the minutes of the Board meeting to which it is reported.

Governance and Records

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

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

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

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

Reserved Matters

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

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

Terms and Conditions of Service for Independent Members and Expert Advisors

Basis for appointment

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

Restricted activities

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

Confidentiality

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

Remuneration and time commitment

7. Independent Members/ Expert Advisors remuneration is reviewed annually in line with best practice. The time commitment will be as agreed in the individual appointment letters and reviewed annually.

Expenses

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

Expression of views

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

Declaration of Registrable Interests

13. The PRP maintains a Register of disclosable interests which is a public document published on the PRP's website. The purpose of the Register is to ensure transparency in relation to any interests of Board and Independent Members/Expert Advisors, or of their spouses, partners and dependent children if relevant.
14. Members/ Expert Advisors are required to make a declaration of interests for the purposes of the Register immediately on taking up appointment as an Independent Member/ Expert Advisor and are required subsequently to declare any new matter that is required to be included on the Register as soon as possible after it arises, in accordance with the PRP Board's rules of procedure.

15. Members/Expert Advisors are asked to review all aspects of their personal and professional life (and those of individuals linked to them both personally and professionally) in order to identify which interests, if any, may be perceived by the public as directly or indirectly influencing or affecting their judgement or as benefiting them. For example:
- any position of authority in a charity or voluntary body;
 - connection with anybody which contracts with or is likely to contract with the PRP;
 - directorships in public and private companies including non-executive directorships;
 - majority or controlling shareholdings in any undertaking;
 - ownership of any company, business or consultancy; and
 - remunerated employment, consultancy, trade, profession or vocation.
16. The primary consideration which will determine whether or not an interest should be declared is the reasonable perception of the public rather than whether the interest will have an actual influence or benefit. The latter is relevant only to the issue of resolving potential conflicts and not the decision to declare.
17. You may be excluded from any discussion or consideration of any matter in which you have disclosed or declared an interest.
18. It is the duty of each Independent Member/ Expert Advisor to declare any matter that is required to be included in the Register. If an Independent Member/ Expert Advisor is in doubt as to whether or not a particular matter should be declared, they should discuss the conflict or perceived conflict with the Chair who will provide confidential guidance.

Indemnity

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

Additional commitments

20. Independent Members/Expert Advisors should not take on any additional appointments that may cause conflict with their current role with the PRP or affect their commitment capacity. Any concerns should be discussed with the Chair.

Senior Independent Board Member – Role and Responsibilities

Purpose

1. The Senior Independent Board Member's role is to:
 - 1.1. act as a sounding board for the Chair of the Board;
 - 1.2. serve as an intermediary for other Board Members; and
 - 1.3. formally manage the appraisal of the Chair's performance annually.

Responsibilities

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

Term of Office

3. The term of office will be:
 - 3.1 two years with the possibility of renewal for a further two years subject to Board approval. The maximum term of office will be four years other than in exceptional circumstances and with the Board's agreement; and
 - 3.2 appointment or removal from office is a decision reserved to the Board.

NOMINATIONS COMMITTEE TERMS OF REFERENCE

Purpose

The Nominations Committee (NomCo) is an advisory committee and its purpose is to:

1. Keep under review and make recommendations in relation to the processes for the appointment, re-appointment and appraisal of Board Members and any other non-executives engaged by the PRP e.g. the Independent member of the Audit and Risk Committee;
2. Make recommendations on appointments and re-appointment processes in line with agreed policy.
3. Identify and nominate candidates for the approval of the full Board to fill vacancies as and when they arise (operating as a Selection Panel, supplemented as necessary by other Board Members and/or an Independent member).
4. Nominate for the approval by the full Board the re-appointment of any Board Member at the conclusion of their specified term of office having given due regard to their performance and ability to continue to contribute in the light of the knowledge, skills and experience required; and
6. Make recommendations to the full Board in relation to extensions and emergency appointments and the disqualification, suspension and removal from office of the Chair and Board Members.

Membership, Chair, Secretary and Quorum

7. The Committee shall comprise of a minimum of two and a maximum of four members.
8. The Committee will include the Chair of the Board. The Board may elect an external member to serve as an independent advisory member who is independent of the Board. The Independent Member's role will be to bring an external perspective to the work of the Committee whilst providing recruitment advice, support and constructive challenge across all aspects of the Committee's activities.
9. The Board Chair will chair the Committee. The Chair of the Board shall not chair the Committee when it is dealing with the matter of succession to the chairmanship of the PRP. In this case, the Committee will be chaired by the Senior Independent Board Member.
10. Appointments to the Committee will be made by the full Board, after recommendation by the Chair. The Members of the Committee will be appointed for a period of up to three years, or until the Member's appointment

to the Board expires; whichever is the sooner. Appointments will be extendable by one additional period of three years.

11. Only Members of the Committee have the right to attend and participate at Committee meetings. Other individuals such relevant executives or other advisers considered appropriate by the Chair may be invited to attend for all or part of any meeting.
12. In the absence of the Committee Chair, the remaining members present shall elect a member to chair the meeting.
13. A member of the Executive shall act as the Secretary of the Committee.
14. The quorum necessary for the transaction of business shall be two members. Members' attendance via telephone or video-link is permissible for the purposes of determining a quorum.
15. A duly convened, quorate meeting of the Committee shall be competent to exercise all or any of the authorities, powers and discretions vested in it as outlined in these terms of reference, or exercisable, by the Committee.
16. Where the Chair of the Committee considers it appropriate, decisions may be taken by email. An audit trail of decisions taken by email will be maintained by the Secretary of the Committee.
17. In the event that a decision is required by vote, where the Committee has the authority to make a final decision, the Chair will have the casting vote. In the instance of a tied vote where a recommendation is being made to the full Board, the outcome of the vote will be reported to the Board.

Frequency and Notice of Meetings

18. The Committee shall meet as required to fulfil its duties.
19. Meetings of the Committee shall be summoned by the Secretary of the Committee at the request of the Chair.
20. Unless otherwise agreed, notice of each meeting confirming the venue, time and date together with an agenda of items to be discussed and supporting papers, shall be forwarded to each member of the Committee and any other person required to attend, no later than five working days before the date of the meeting.

Minutes of Meetings

21. The Secretary of the Committee shall minute the discussion, decisions and actions of all meetings of the Committee, including recording the names of those present and in attendance.
22. Minutes of Committee meetings shall be circulated promptly to all members of the Committee once agreed by the Committee Chair.

Accountability & Reporting Responsibilities

23. The Committee is accountable to the full Board.
24. The agreed minutes of the Committee meeting will be circulated to the next meeting of the full Board, along with a report from the Committee Chair

- highlighting any issues for Board's discussion/consideration.
25. The Committee will approve a statement in the annual report about its membership, role and remit for the preceding year.

Other

26. The Committee shall, periodically review its own performance, constitution and terms of reference to ensure it is operating effectively and recommend any changes it considers necessary to the full Board for approval.

Authority

27. The Committee has authority delegated from full Board to review and make recommendations in relation to processes for the appointment, re-appointment and appraisal of Board Members. Final decisions in relation to appointments, re-appointments and appraisal are reserved to the Board.
28. The Committee is authorised by the Board to investigate any activity within its terms of reference.
29. The Committee is authorised by the Board to obtain, at the PRP's expense, outside legal or other professional advice on any matters within its terms of reference.

Review

30. These terms of reference form part of the PRP's Governance Framework and will be reviewed each year when that framework is reviewed.



Equality, diversity and inclusion policy

1. The Press Recognition Panel (PRP) is committed to eliminating discrimination and encouraging diversity amongst everyone who works with us. We believe that, for our organisation to be successful, we need to work with the most talented and diverse people available. The talents and resources of all individuals will be fully utilised to maximise the efficiency of the PRP.

2. In delivering our legal responsibilities including those relating to the recognition of press regulators, and as an employer, our aim is to be truly representative of all sections of society. We want everyone who we work with, to feel respected, and able to give of their best. We want everyone whose views are relevant to our work to feel included.

3. To that end the purpose of this policy is to provide equality and fairness for all in our legal and employment duties, and in the way we conduct our business, and not to discriminate on grounds of any of the protected characteristics of age, disability, gender reassignment, race, religion or belief, ethnicity, sex, sexual orientation, marriage and civil partnership, pregnancy, maternity and political belief. We oppose all forms of unlawful and unfair discrimination.

4. We will enthusiastically give effect to our obligations arising from the public sector Equality Duty (in light of the fact that the Royal Charter specifies that the PRP's functions are public functions).

5. When public authorities carry out their functions, the Equality Act says they must have due regard to the need to:

- eliminate unlawful discrimination
- advance equality of opportunity between people who share a protected characteristic and those who don't
- foster or encourage good relations between people who share a protected characteristic and those who don't.

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

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

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

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

10. Our commitments are:

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

11. The policy will be monitored and reviewed annually.

Gifts, Hospitality and Expenses Policy

Gifts and Hospitality

Purpose

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

Scope

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

General Principles

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

Gifts

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

Hospitality

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

Fees for speeches or other work carried out

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

The Gifts and Hospitality Register

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

Expenses

Scope

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

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

10. The PRP is committed to ensuring that individuals are not disadvantaged due to any factors including disability or geographical distances, that may prohibit attendance or application and reasonable expenses will be paid.

Responsibilities

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

Expenses

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

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

Travel and Subsistence Costs

14. Individuals are encouraged to choose the least environmentally damaging mode of transport for necessary travel. This includes using the train/bus rather than planes/cars/taxis, due to lower per passenger emissions associated with the former modes of transport.

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

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

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

- viii. £5 for qualifying travel of 5 hours or more,
- ix. £10 for qualifying travel of 10 hours or more;
- x. £25 for qualifying travel of 15 hours or more; and, where the travel is ongoing after 8pm.
- xi. for each night's absence in respect of accommodation up to **£200** per night plus vat. This must not include any extras such as alcohol or newspapers. These must be paid for separately by the claimant;
- xii. any hospitality to third parties must be approved by the Chief Executive and must be in accordance with the PRP's policy on gifts and hospitality (e.g. hospitality for anyone who is not an employee).

Carer costs or other 'reasonable adjustments'

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

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

Airline Frequent Flyer Schemes

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

Lost or Missing Receipts / Tickets

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

Authorisation

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

Notes

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

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



Statement of Mission and Approach

1. The Press Recognition Panel is the independent body set up by Royal Charter to ensure that regulators of the UK press are independent, properly funded and able to protect the public. The PRP works in the public interest by supporting and promoting a free press in a free and fair society.
2. We do this by:
 - deciding whether or not a regulator who applies for recognition complies with the criteria set out in the Royal Charter;
 - making sure, through review, that they continue to meet the criteria;
 - withdrawing recognition if they don't; and
 - reporting on any success or failure of the recognition system, including the impact of our work.
3. We will perform our duties:
 - **independently**, using to the full the complete freedom we have from state, government or any other interest, and expressing our views honestly and courageously;
 - **fairly**, guided by the principle of understanding the public interest, and always putting it first;
 - **openly**, asking questions, using the widest possible range of evidence available to us to make our decisions, and explaining them clearly; and
 - **transparently**, wherever possible holding our meetings in public, publishing our papers, and making our meetings formal and documented – ensuring that the public and those we serve can see how we are putting our principles into practice.
 - **Inclusively**: guided by the principles of equality and diversity as an employer, and in the way we work with colleagues and stakeholders, and in the way we conduct our business.
4. We are committed to operating with the maximum degree of openness and transparency in all our dealings. We will also encourage openness and transparency on the part of other relevant organisations.
5. We are committed to ensuring that all those who are affected by our work have a say in how we operate.
6. We are committed to engaging with all stakeholders in a way which respects disabilities and language barriers.

7. When we consult, we will seek out, and listen to, the broadest range of views. We will speak plainly and promote the widest possible dialogue with all those with an interest in our work.

8. When we take decisions, we will always consider how regulation can best respond to the developments in the industry on which it will impact, and the changing reality of people's lives, behaviour and expectations.

9. We will be challenging where challenge is necessary; we will not seek out controversy, but we will speak fearlessly.

10. Above all, we will ensure that we play a valuable, and valued, role in supporting a press independent of state regulation, but well-regulated in the public interest.

11. The Statement of Mission and Approach will be reviewed annually.



Working in Northern Ireland and Scotland

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



Policy for affixing the PRP's Common Seal

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

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

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

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

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

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

6. The sealing will be recorded by the Executive Administration Manager in the register of sealings (an electronic version is saved on the PRP's secure database). This will record the nature of the document being sealed, the names of the authorised signatories, the name of the witness and the date the Seal was fixed.



Finance Policy

1. General

1.1 Established by Royal Charter, the Press Recognition Panel ('the PRP') was granted funds from the Exchequer to enable the Board to commence its operations and fulfil its purpose for the first three years of operation. The grant of such monies was made in accordance with the general principles of *Managing Public Money*, and the PRP continues to ensure that it takes into consideration this guidance whilst in receipt of public funds.

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

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

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

2. Roles, responsibilities and delegation

2.1 The Accounting Officer exercises financial supervision and control by:

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

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

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

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

2.5 The Accounting Officer is responsible for:

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

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

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

2.7 Staff are responsible for:

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

3. Financial Systems

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

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

3.3 The Accounting Officer will ensure that suitable back-up arrangements and/or reserve facilities are in place and that when required they can be invoked with

sufficient speed to ensure that the operation and integrity of the services are maintained.

4. Business planning, budgets, budgetary control and monitoring

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

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

4.3 The Accounting Officer, with the assistance of the finance support provider (or equivalent) will devise and maintain systems of budgetary control and expenditure forecasting.

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

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

5. Annual accounts

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

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

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

6. Banking Arrangements

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

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

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

7. Payroll

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

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

8. Delegation of authority

8.1. The Board delegate authority to the Chair to agree an increase to any additional hours required by the Chief Executive (within the agreed budgeted annual staff remuneration cost) to support the Board in meeting its Charter obligations. The Board will be provided with an annual update for audit purposes.

8.2 The Board delegate authority to the Chief Executive to agree an increase to any additional hours required by the Executive staff (within the agreed budgeted annual staff remuneration cost) to support the Board in meeting its Charter obligations. The Chief Executive will provide an annual update for audit purposes.

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

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

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

9. Procurement

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

10. Payment of invoices

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

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

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

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

11. Management and Disposal of Fixed Assets

11.1. The Accounting Officer is responsible for maintaining an asset register of all capital assets leased or owned by the Panel. In addition, the finance support provider will ensure that an inventory is maintained of all valuable, attractive and/or portable assets that belong to the PRP. In respect of fixed assets, items are capitalised where the purchase price exceeds £2,000.

12. Internal Audit

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

13. External Audit

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

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

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

- how the NAO, on behalf of the Comptroller and Auditor General, plans to audit the financial statements, including how the NAO will address significant risks of material misstatement to transaction streams and balances;
- the planned timetable, fees and audit team; and

- matters which NAO are required to communicate to the PRP under the auditing standards, including the scope of the audit, respective responsibilities, and how the NAO maintains independence and objectivity.

14. Regularity, propriety and fraud

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

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

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

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

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

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

Scheme of financial delegation

The CEO is the PRP's designated Accounting Officer and holds accountability for the PRP's budget.

Non payroll expenditure

In order to provide adequate scrutiny of financial decisions, the following limits define levels above which financial decisions need to also be agreed by the Board, for non-payroll expenditure:

- *Where budgeted - £25,000*
- *Where unbudgeted - £5,000*

Corporate Credit cards – overall company monthly limit £11,250

The Executive Administration Manager holds a corporate credit card, with a maximum monthly limit of £2,500. The Executive Administration Manager has financial delegation limits for subscriptions and office sundries and the CEO approves the remainder (in accordance with limits in the budget) in advance.

The PRP credit card details must not be stored on any online payment portals/wallets and must be removed immediately on confirmation of receipt for all transactions undertaken on behalf of the PRP.

Commented [HB1]: Added for approval

Payroll costs

Any changes to payroll costs are agreed by the CEO (and Chair, if appropriate).

Payments from bank accounts

All payments from the Panel's bank accounts (including transfers between the Panel's bank and fixed term deposit accounts) must be authorised on the bank by any two of the following:

- *the CEO*
- *the Chair*
- *the Board member charged to take specific responsibility for reporting to the Board on the management of the finances of the Recognition Panel under the Charter.*

Procurement Policy

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

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

3. For items over £2,500, we will seek two written quotes from suppliers based on a clear specification.

4. For items over £20,000, we will seek three written quotes from suppliers based on a clear specification. Our decision will be based on value for money which might include an unbiased consideration of the following factors:

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

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

6. In the very unlikely event that we need to procure a very large project valued in excess of £118,000, we will comply with the publishing requirements under the UK's e-notification service 'Find a Tender'. We will seek legal advice as necessary.

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

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

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

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

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

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

12. The PRP's annual turnover falls below the £36m level which is the threshold under the Modern Slavery Act 2015 for producing an annual statement under the Act. The PRP is fully committed to preventing slavery and human trafficking in our supply chain. Our assessment process includes due diligence checks of the supplier's reputation and respect for the law, compliance with health, safety and environmental standards.

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

14. The Chief Executive periodically reviews the contracts with the suppliers to ensure that they remain fit for purpose and continue to provide value for money.

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

Scheme of Delegation and Matters reserved

Principles overall

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

Matters reserved to the Board

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

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

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

(1) Royal Charter

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

(2) Organisational Issues

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

(3) Management Issues

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

(4) Financial Reporting and controls

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

(5) Board Membership and other appointments

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

(6) Delegation of Authority

- Approval of terms of reference of Board committees.

(7) Governance

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

(8) Legal

- Anything that is by law reserved to the Board.

Investment Policy

Scope

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

Security

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

Credit Risk

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

Interest Rate Risk

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

Currency Risk

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

Liquidity

9. The liquidity of investments will be organised to meet all operating requirements that may reasonably be anticipated. This will be accomplished by structuring the portfolio so that deposit maturity is linked to the cash needed to meet anticipated demands.

Standards of care

Prudence

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

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

Ethics and conflicts of Interest

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

Delegation of Authority

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

Checks and balances

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

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

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

Investment transactions

Internal Controls

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

Eligible Investment

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

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

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

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

Investment Restrictions and Prohibited Transactions

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

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

Performance Review and Reporting

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

Record Keeping and Safekeeping

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

Policy Considerations

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

Disciplinary procedures for Chair and Board Members

Introduction and scope

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

Legal representation

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

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

Preliminary consideration

8. If the Chair becomes aware of issues relevant to this policy relating to a Member, the Chair must:
 - inform the Member in writing of the details of the issue and invite him/her to submit written comments within 14 days, or such other period as may be specified; and
 - notify the full Board that they have done so.
9. Following consideration of the Member's written comments, if the Chair is satisfied, on the basis of all the information available to them, that any concerns raised are manifestly unfounded, no further action will be taken. The Chair must inform the Member, the full Board and any person who made a relevant allegation of their decision.
10. If the Chair is satisfied, on the basis of all the information available to them, that the issue raised is not manifestly unfounded, they must immediately write to the Member concerned:
 - stating that the issue will be investigated;
 - enclosing a copy of these procedures;
 - setting a date for the individual to meet the Chair (preferably within 14 days from receipt of the letter); and
 - informing the individual of their entitlement to be accompanied or legally represented at the meeting and at any subsequent stages of the investigation.

Meeting with the Chair

11. The Chair will meet the Member concerned to discuss the alleged issue and the Chair will then decide the appropriate course of action to be taken. The Member may be accompanied or legally represented at the meeting by a person of their choosing.
12. After the meeting, the Chair, having regard to all relevant factors, including the outcome of any further investigation they may consider necessary, will submit a report to the full Board in which they may recommend that the Board should take one or more of the following courses of action:
 - dismiss any allegation and/or end the consideration of the issue;
 - direct further investigation of any allegation/issue;
 - suspend the individual's appointment to the Board pending further investigation;
 - terminate the individual's appointment to the Board; and
 - direct such other action as the Chair considers necessary.
13. On the basis of the report prepared by the Chair, the full Board will determine the matter. In accordance with the Royal Charter, the Board's decision shall require a majority of two thirds of the Members entitled to vote to concur. The Member concerned shall not be entitled to vote on this matter.

14. If the Board suspends the Member's appointment, it may direct whether such suspension is to be with or without remuneration.
15. If the Member's appointment is terminated, the Member will be notified without delay and in writing, together with reasons for the Board's decision.

Further investigation

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

Notification of decision

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

Procedure for investigating complaints made about Members in their professional capacity

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

Investigations relating to the Chair

24. Any allegation or concern relevant to this policy and relating to the Chair should be made to the Senior Independent Board member. The Senior Independent Board member will inform the Chair of the issue as soon as possible.
25. Any investigation relating to the Chair will be carried out by the Senior Independent Board member, on the Board's behalf.
26. The procedures set out in this document will apply, save that references to the Chair in the conduct of the investigation will be substituted by 'the Board' (or any person the Board directs).

Complaints handling policy

(about an individual at the Press Recognition Panel)

Scope

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

Stage 1

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

Stage 2

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

Stage 3

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

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

Timeframe

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

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



Whistleblowing Policy (for Board and Staff)

Making a Disclosure in the Public Interest

Introduction

1. The Press Recognition Panel ('the PRP') is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable the Board and staff (defined as employees and all those working with and for the PRP) to voice concerns in a responsible and effective manner. The PRP promotes a positive and open whistleblowing culture where individuals feel confident that concerns can be raised and dealt with quickly and that they will be protected for doing so.
2. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. However, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of any detrimental treatment or victimisation, and there should be arrangements to enable this to be done independently of line management. We also encourage all those that work with us to report any suspicion of slavery or human trafficking without fear of retaliation.

Scope

3. The Public Interest Disclosure Act 1998, gives legal protection to employees who reasonably believe that they are acting in the public interest and where the disclosure falls into one or more the following categories:
 - a criminal offence
 - the breach of a legal obligation
 - a miscarriage of justice
 - a danger to the health and safety of any individual
 - damage to the environment
 - deliberate concealment of information tending to show any of the above five matters
4. It should be emphasised that this policy is intended to assist individuals who reasonably believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the PRP, nor should it be used to reconsider any matters which have already been addressed under other procedures.

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

Confidentiality

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

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

How to raise a concern internally

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

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

You do not need to wait for proof when reporting a concern. You only need to have a reasonable belief that wrongdoing has occurred, is occurring or is likely to occur. It is not for you to investigate or prove that your concerns are justified, as that is the responsibility of the PRP.

How to raise a concern externally

10. Where attempts to raise matters internally have been unsuccessful or exceptionally, you feel you cannot raise the concerns internally, you may consider raising the matter externally. If an individual decides to blow the whistle to a 'prescribed person' rather than their employer, they must make sure that they have chosen the correct person or body for the issue. The Department for Business, Energy & Industrial Strategy has published a list of the prescribed persons and bodies who an individual can make a disclosure to. There is also a brief description about the matters that can be reported to each prescribed person (last updated and issued 29 September 2024):

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

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What happens next

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

12. We will try to keep you informed, in writing, about the action that we are taking in relation to the concern including how we propose to deal with the matter, whether we need further assistance from you, any action that is taken and the outcome of the

investigation. We will try to keep you informed of progress and where possible provide you with an update within 28 days. However, we may not be able to provide you with all of the details of the investigation for example where we have a confidentiality duty to the parties involved.

Freedom of Information policy

Background

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

Making a request for information

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

Halina Briggs
Executive Administration Manager
Press Recognition Panel
Mappin House
4 Winsley Street
London W1W 8HF

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

Processing a request

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

Timescales

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

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

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

Refusing a request

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

- it would cost too much or take too much staff time to deal with the request;
- the request is vexatious¹;

¹ Vexatiousness will be assessed by reference to the ICO guidance 'Dealing with vexatious requests (section 14)': [dealing-with-vexatious-requests.pdf \(ico.org.uk\)](#)
See also: [When can we refuse a request for information? | ICO](#)

- the request repeats a previous request from the same person;
- the request relates to personal data and releasing it would be contrary to the General Data Protection Regulation or the Data Protection Act 2018.

12. While the PRP is not subject to the Act, we have chosen to apply the framework of exemptions set out in the Act to all information requests. The PRP will not classify information as exempt from disclosure unless there are very clear arguments for doing so. Some exemptions relate to particular types of information, for instance, information relating to the development of policy. Other exemptions are based on the harm that would arise or would be likely arise from disclosure, for example, if disclosure would be likely to prejudice a criminal investigation or prejudice someone's commercial interests.

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

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

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

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

Consultation with third parties and transferring requests

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

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

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

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

Fees

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

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

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

Complaints procedure

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

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

suppal@pressrecognitionpanel.org.uk or:

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

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

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

Kathryn Cearn, PRP Chair
Press Recognition Panel
Mappin House
4 Winsley Street
London W1W 8HF

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

Further information

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

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

T: 0303 1231113

W: <https://ico.org.uk>



Publication Scheme

A guide to the information made available routinely by the PRP

Introduction

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

What information is made available routinely by the PRP?

2. The PRP makes a significant amount of information routinely available to the public on the basis that we are committed to operating with the maximum degree of openness and transparency in all our dealings – for example, where possible, our Board discussions are open to the public and we publish our Board papers on our website. In the majority of cases, the information that you will be looking for will already be available on our website. Information that is not published under this scheme can be requested in writing and this will be considered in accordance with the provisions of the Freedom of Information Act 2000.

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

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

- Who we are and what we do;
- What we spend and how we spend it;
- What our priorities are and how we are progressing these;
- How we make decisions;
- Policies and procedures;
- Lists and registers;
- Services we offer

5. If you would like a hard copy of information available, please contact us at:

PRP, Mappin House, 4 Winsley Street, London, W1W 8HF
contact@pressrecognitionpanel.org.uk

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

Is the information available in other languages and other formats?

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

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

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

Our information

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

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

Legislation	
The Royal Charter	Online Printed copy from website
Organisations we work with	Online
Information relating to the organisations that we work with: - The recognised Regulator and link to their website - Details of meetings with stakeholders	Online Printed copy from website

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

Information	Format
- Annual report and accounts - Monthly finance reports - Annual business plans	Online Printed from website

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

Information	Format
- Annual business plans - Annual report and accounts - Annual reports on the recognition system	Online Printed copy from website

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

Information	Format
Guidance and procedures relating to recognition Guidance for applicants Our fee charging scheme PRP Board's indicative view on some elements of the Charter Guidance on cyclical and ad hoc reviews Board papers provided for consideration at Board meeting Minutes of Board meetings Board decision report on IMPRESS	Online Printed copy from website
Public Consultations – consultation papers and the results of the consultation	Online Printed copy from website
- Consultation on proposals for recognition - Consultation on cyclical and ad hoc reviews - Consultation on amendments to our guidance on cyclical and ad hoc reviews - Consultation on fees decision report	Online Printed copy from website

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

Information	Format
Board and Executive: 1. Terms and Conditions of Service for Board members 2. Terms and conditions of service for Independent members 3. Board remuneration 4. Equality, diversity and inclusion 5. Antibribery, money laundering, fraud, theft and corruption	Online

6. Gifts, hospitality and Expenses 7. Rules and Procedures for Board meetings 8. Audit and Risk Committee – terms of reference 9. Nominations Committee – terms of reference 10. Senior Independent Board member - role and responsibilities Purpose: 11. Mission and Approach 12. Corporate social responsibility 13. Working in Northern Ireland and Scotland 14. Arrangements for affixing the PRP's Common Seal Finance 15. Finance 16. Procurement 17. Scheme of delegation and matters reserved 18. Investment policy 19. Risk management policy When things go wrong: 20. Disciplinary procedures for Chair and Board Members 21. Complaints handling policy (about a PRP individual) 22. Whistleblowing policy (Board and staff) Information security/ Business Continuity: 23. Freedom of Information Act policy 24. Data Protection legislation policy 25. Privacy statement 26. Data retention and disposal policy 27. Publication Scheme 28. IT policy 29. Business Continuity 30. Health and Safety	
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15. Lists and registers – currently maintained lists and registers

Information	Format
Disclosure logs: A log indicating what information has been provided in relation to an FOI request	Available on request
Register of interests: Register of interests of Board members Register of interests of senior staff	Available on request
Register of gifts: Register of offers of gifts and hospitality provided to Board members and senior personnel	No offers of gifts and hospitality received

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

Information	Format
- Guidance for applicants - Policy advice - Preliminary discussions with prospective regulators - Our fee charging scheme - PRP Board's indicative view on some elements of the Charter - Guidance on cyclical and ad hoc reviews - Complaining about a recognised Regulator - Myths and Facts factsheets - Media releases - Stakeholder engagement	Online Printed copy from website or available on request

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



Information Technology policy

Introduction

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

Operating principles

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

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

Your use of the PRP's IT

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

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

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

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

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

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

14. Passwords should be sufficiently memorable so that you can avoid writing them down, but not obvious or easily guessed. The password should be at least 9 characters long and contain three of the four types of keyboard character (upper case, lower case, numbers and symbols – by way of example only – 2014.St0Ne%. It is sensible not to use the same password for all devices.

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

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

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

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

Personal use of the PRP's IT Systems

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

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

20. If using social media sites, such as Twitter, it should be clearly stated that any views expressed are those of the individual, rather than of the PRP. Comments in respect of PRP related matters should be referred to the CEO and / or the Chair prior to posting.

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

PRP computers

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

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

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

When using the Internet

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

When using email

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

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

37. If a recipient asks you to stop sending them personal messages then always immediately stop.

38. Never send messages from another person's e-mail account or under a name other than your own without the relevant account user's express permission or, where appropriate.

39. Never forward confidential messages by e-mail without specific authority from the original sender.

40. Never open an e-mail attachment from an unexpected or untrustworthy source.

41. Remember that e-mail messages are documents and so may be disclosed in legal proceedings if relevant to the issues.

42. Never send or forward private e-mails at work which you would not want a third party to read.

43. Do not create e-mail congestion by sending trivial messages or unnecessarily copying e-mails to those who do not have a real need to have them.

44. Do not advertise or forward "chain-mail" e-mails.

45. Always remember that text, music and other content on the Internet are copyright works. Never download or e-mail such content to others unless you are certain that the owner of such works allows this.

46. If sending important information by e-mail, always obtain confirmation of receipt (either a reply to your e-mail or by following up with a telephone call).

47. Never agree to terms or enter into contractual commitments or make representations by e-mail without having obtained proper authority.

48. When you type your name at the end of an e-mail, this act is just as much a signature as if you had signed it personally.

49. Never send strictly confidential messages via the Internet, or by other means of external communication which are known not to be secure.

50. If requested to forward such information over the Internet, make sure that the recipient knows that it is not totally secure and is willing to accept that risk.

51. Take care not to be taken in by emails falsely appearing to come from someone else associated with the PRP (particularly where the emails appear to instruct you to, for example, pay money). If in any doubt report suspicious emails to the Chief Executive and Executive Administration Manager who will take the necessary steps with the PRPs IT service provider to check that no data breach has occurred. Do not click on any links, they may contain viruses that can infect your computer and do not share personal information like passwords or account numbers unless you initiated the contact – if you do, change your password immediately.

52. All email communication concerning PRP business must be done using the pressrecognitionpanel.org.uk email address, the only exception to this is email

Commented [HB1]: Updated - HS received a suspicious email on the 15 Oct 2024, policy updated further outlining reporting procedures

communications regarding administrative matters such as the scheduling of meetings.

Physical security of electronic devices

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

Laptops and other portable devices

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

Electronic security and encryption

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

Communication

56. E-mail is a potentially insecure method of communication. Appropriate steps, such as encryption during transmission, should be taken if it is considered necessary to send particularly sensitive information by e-mail. You should never send the password required to decrypt an attachment in the same e-mail as the attachment

since this would self-evidently defeat the purpose of encryption to avoid interception. If you arrange for e-mails to be sent to your mobile telephone, smartphone or PDA, you should ensure that the device is suitably password-protected with a nine character password. Connecting to the internet via a (non PRP) wireless network presents a particular risk of interception of communication. Particular care should be taken when connecting via public and unencrypted access points. If you use a wireless network system in your home you should ensure that it is reasonably secure.

Phone calls

- 57. Reasonable usage of the PRP telephone system for personal purposes is permitted.
- 58. Such usage is based on mutual trust and an underlying assumption that everyone will use telephone system fairly and reasonably.
- 59. Personal telephone calls should only be made when necessary and should be kept to the minimum time required.
- 60. It is recommended that personal telephone calls should not be taken in any open or communal area.

Failure to comply with this policy

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

Regulation of Investigatory Powers Act 2000

1. This Act covers the extent to which organisations can monitor or record communications at the point at which they enter or are being sent within the employer's telecommunications system, and applies to public and private communication networks. It gives the sender or recipient of a communication the right of action for damages against the employer for the unlawful interception of communications.
2. There are two areas where monitoring is not unlawful. These are:
 - where the employer reasonably believes that the sender and intended recipient have consented to the interception
 - without consent, the employer may monitor in the following circumstances, as set out in the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000. These include: – to ensure compliance with regulatory practices e.g. Financial Services Authority requirements – to ensure standards of service are maintained, e.g. in call centres – to prevent or detect crime – to protect the communications system: this includes unauthorised use and potential viruses – to determine the relevance of the communication to the employer's business i.e. picking up relevant messages when someone is away from work.
3. The PRP will only monitor or record communications in accordance with these provisions. Moreover, the PRP will make all reasonable efforts to ensure that system users know that communications may be intercepted, and any such monitoring will also comply with the provisions of the Data Protection Act 1998 (see below), and in particular the Data Protection principles on fair processing.

Data Protection Act 2018

4. The Information Commissioner – responsible for enforcement of the Data Protection Act – published a code of practice to help employers comply with the provisions of the Data Protection Act 1998. The Employment Practices Code clarifies the Act in relation to processing of individual data, and the basis for monitoring and retention of email communications. Part 111 of the Code covers monitoring at work. All are available from the Commissioner at www.dataprotection.gov.uk The code of practice *Monitoring at work: an employer's guide* states that any monitoring of emails should only be undertaken where:
 - the advantage to the business outweighs the intrusion into the workers' affairs
 - employers carry out an impact assessment of the risk they are trying to avert
 - workers are told they are being monitored
 - the information discovered is kept secure
 - employers are careful when monitoring personal communications such as emails which are clearly personal

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

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

Health and Safety Policy

1. We genuinely care about the health and safety of our Board Members and staff and this is reflected in this health and safety policy.
2. The statement of general policy and arrangements at Annex A is based on a sample policy statement and other guidance available on the HSE website at www.hse.gov.uk/risk. This has helped us to think about the things that should be documented and built into our own Health and Safety policy, and includes elements such as remote working, staff consultation and training etc. Susie Uppal, Chief Executive, has been designated as the most competent (experienced and capable) person to take responsibility for health and safety issues. She is supported in her role by Hal Briggs, Executive Administration Manager.
3. Following the move of the Executive to homeworking it has been assessed that home working is low risk due to the purely office type nature of the work. No further risk assessment is deemed necessary at this stage and the CE will continue to monitor the situation.
4. The Health and Safety policy is signed off by the Board and we will review regularly and update the document.
5. Accidents and ill health at work will be reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations)
<http://www.hse.gov.uk/riddor>.

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

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