

PRESS RECOGNITION PANEL

Consultation on guidance on the Royal Charter and online and digital news-related material

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About the PRP

1. The Press Recognition Panel (PRP) is the independent body set up following the Leveson Inquiry into press standards. Its purpose is to ensure that any organisation regulating the press is independent, properly funded and able to protect the public while recognising the important role carried out by the press.¹

Our purpose

2. Our role is to consider whether independent press self-regulators meet, and continue to meet, the recognition criteria set out in the Royal Charter. Our specific functions are to:
 - grant recognition to regulators that meet the Charter's criteria;
 - undertake cyclical and ad hoc reviews of those regulators;
 - withdraw recognition if a regulator no longer meets the criteria; and
 - report on the successes or failures of the recognition system.
3. Fundamental to how we discharge our obligations under the Charter is our independence from external influences such as Government and the press industry. This underpins our work to ensure that recognised regulators of the UK press are independent, properly funded and able to protect the public.
4. The PRP do not regulate the press, and we cannot compel any regulator to apply for recognition.

Background

5. On 30 October 2013, the Royal Charter on Self-Regulation of the Press ("the Charter") was granted, and on 3 November 2014, the PRP formally came into existence.
6. On 24 October 2016, the PRP recognised Impress as a regulator under the Charter. It remains the sole recognised regulator to date.
7. Since the Charter was granted, the press industry has continued to evolve, with the online and digital material playing an increasingly central role in the delivery of news. Print circulation has steadily declined, and many publications now operate exclusively online.² At the same time, artificial intelligence (AI) is being increasingly used in the production of news content.³

¹ [Creation of the Press Recognition Panel](#) (PRP)

² [News consumption in the UK: 2024](#) (Ofcom, 2024)

³ [How is AI being used in journalism?](#) (IBM, 2024)

8. The Leveson report shows that Lord Leveson received evidence of the changes the internet was bringing to the news industry. However, his recommendations, and consequently the criteria set out in Schedule 4 of the Charter (“the criteria”), do not specifically reflect those changes.
9. One example is Criterion 19, which distinguishes between requiring publishers to publish corrections for factual errors and apologies for all other standards code breaches. This distinction is most applicable in the context of a one-off printed publication of an article. For example, where a printed report is factually accurate but unlawfully identifies a child victim of crime, a published apology rather than a correction would be appropriate. However, in the case of online content, the publisher has the opportunity to correct the article itself.
10. The PRP, together with Impress and its publishers, is therefore required to interpret the criteria in the context of modern publishing practice.
11. However, any reinterpretation should not extend to contradicting the plain meaning or clear intent of the criteria.

About this consultation document

12. This consultation sets out the PRP’s draft guidance under paragraph 13 of Schedule 2 of the Charter on four key issues arising from news publication in the internet age:
 - (1) Whether the criteria give a recognised regulator the power to order a publisher to remove online material.
 - (2) Whether the criteria give a recognised regulator the power to order a publisher to amend online material.
 - (3) Whether the responsibilities of publishers under the standards code required by Criteria 7 and 8 extend to user-generated content.
 - (4) The recognised regulator’s remit over AI-generated content.
13. Respondents are invited to comment on the draft guidance and suggest alternatives. The PRP Board will consider all responses before publishing the final guidance.

How to respond

14. The consultation will run for 6 weeks, from 10 November 2025 to 19 December 2025.
15. You can respond in writing by emailing consultation@pressrecognitionpanel.org.uk. The PRP will also consider requests

from people who wish to provide feedback in an alternative format, for example, through a face-to-face meeting or by telephone.

Confidentiality and data protection

16. The PRP is not currently listed in the Schedule to the Freedom of Information Act 2000 and is therefore not subject to its provisions. However, we have taken a decision to operate as though the Act applies, including its provisions relating to considering and responding to information requests. Unless you state otherwise – and an automatic disclaimer generated by your IT system will not be taken as such – we will assume that you are content for us to publish your response to this consultation, including your name, and to share it with other relevant bodies and stakeholders.
17. We encourage named responses where possible, particularly from representative organisations, so that we can identify the range of interests reflected in the feedback. If you do not wish us to publish all or part of your response because it contains confidential information, please indicate this clearly.

What happens next?

18. After the consultation closes, we will review all responses received, including feedback from those who have met with us. We will then publish a summary of the responses and explain how they have informed our final guidance.

Draft guidance – the Royal Charter and online and digital news-related material

1. This guidance, issued under paragraph 13 of Schedule 2 of the Royal Charter (“the Charter”), sets out the PRP’s views on key issues relating to the interpretation of the criteria in Schedule 3 of the Charter (“the criteria”) arising from press regulation in the internet age.
2. This guidance applies to online and digital news-related material produced by a relevant publisher, including via its website, social media platform, app, online forums, etc and includes videos and podcasts but not broadcasting services.

Do the criteria give a recognised regulator the power to order a publisher to remove online material?

3. In the PRP’s view, the criteria do not give a recognised regulator the power to order a publisher to remove online material, whether it is an article or other content, such as videos or podcasts.
4. Criterion 17 provides:
“The Board [of the recognised regulator] should not have the power to prevent publication of any material, by anyone, at any time although (in its discretion) it should be able to offer a service of advice to editors of subscribing publications relating to code compliance.”
5. Criterion 17 primarily refers to pre-publication matters and advice. Indeed, the discussion of the recommendation in Lord Leveson’s report – reflected word for word in the criterion – concerns pre-publication issues. However, in the PRP’s view, the inclusion of the phrase “at any time” precludes a recognised regulator from preventing the continued publication of any online material, whatever its nature.
6. In any event, the importance of press freedom means that, in our view, such a power would need to be explicitly contained in the criteria for it to be available to a recognised regulator.
7. In Volume 2, Chapter 7, paragraph 3.3 (page 737) of his report, Lord Leveson stated:
“Ultimately, this is most decidedly not a debate about free speech. A newspaper’s right to publish what it chooses within the general law (whether or not it complies with the Editors’ Code) is not in question, although within a more robust regulatory framework the consequences of a breach of the Code, publication having occurred, might well be such as to have a deterrent effect.”

8. The PRP agrees with this statement and principle.

Do the criteria give a recognised regulator the power to order a publisher to amend online material?

9. Given the above conclusion, the PRP's view is that the criteria also do not provide a recognised regulator with the power to order a publisher to amend online material, although it can, in certain circumstances, order that a correction be published.

10. Criteria 15, 16 and 19 all refer to the power to order a correction of an article rather than an amendment of it.

11. Criterion 19, which deals with sanctions following an investigation, states:
"The sanctions that should be available should include power to require publication of corrections, if the breaches relate to accuracy, or apologies if the breaches relate to other provisions of the code."

12. For a regulator to be able to order wholesale amendments to an article or other material would again risk impinging on freedom of the press. It would also be very difficult to draw a clear line between ordering an amendment and ordering the rewriting of an article.

13. We recognise that, in an age where online publications may remain accessible indefinitely, and where links are shared widely, the inability to order amendments – for example, to remove racially discriminatory content – could be seen as a limitation on the effectiveness of regulation under the Charter.

14. However, in the PRP's view, the power of a regulator under criterion 16 to direct the nature, extent and placement of corrections and apologies will still provide an effective remedy, particularly when combined with the power to fine a publisher or terminate its membership under criterion 19.

15. Where there has been a breach of the standards code and the online version has not yet been amended by the publication at the time of adjudication, the regulator could, for example, direct that any correction or apology – in wording chosen by the regulator – should appear within the text of the article itself at the appropriate point, for as long as the article remains unamended. In such circumstances, it is likely, in our view, that the publisher would amend the article to remove the material that breached the standards code, but that would ultimately be a matter for the publisher.

16. A similar approach could apply to breaches of the standards code in other material, such as a video. Again, the regulator would have the power to order the placement of a correction or apology – for example, at the beginning of the video,

above the link to the video, or even on the publication's home page – to remain there for as long as the material continues to be published. The regulator would also direct the wording of the correction or apology. Again, it is likely that the publisher would choose to amend or remove the material.

17. Any steps taken by the publisher to correct or remove offending material can be taken into account by the regulator at the time of any adjudication when deciding on the appropriate remedy. In extreme cases, where material in serious breach of the standards code remains online, the regulator can also order fines or terminate membership following an investigation under Criterion 19.

Is user-generated content on a publication's website subject to a recognised regulator's standards code?

18. User-generated content (UGC) means material created by members of the public rather than by the publisher. It includes letters to the editor, "below the line" comments or reviews from readers, and any other material uploaded or shared by third parties in the digital space controlled by the publisher as part of its publication.
19. We consider that UGC is subject to the standards code required by Criteria 7 and 8, as it ultimately falls under the control of the publisher.
20. While, for example, comments written "below the line" by readers are not created by a relevant publisher, the publisher has editorial control over the comments in the sense that it may moderate or remove such comments or ban an online account from making further contributions.
21. We would expect a regulator to recognise that UGC may not always be pre-moderated. Publishers should therefore be given the opportunity to address material that breaches the standards code once it has been brought to their attention – for example, by a complaint.
22. The Impress Standards Code guidance makes clear that its code extends to UGC, particularly where a publisher endorses or relies on third-party material.⁴ We agree with this approach.

Does AI-generated content on a publication's website fall within the scope of a recognised regulator's standards code?

23. We consider that AI-generated content on a publication's website is subject to the standards code required by Criteria 7 and 8 in the same way as content written by editorial staff. No distinction should be applied. A publication would be

⁴ [Guidance on the Impress Standards Code](#) (Impress)

expected to consider the standards code when publishing AI-generated content just as it would for any other content.

24. This aligns with the approach taken by Impress, outlined in its best practice note on the use of AI.⁵

25. Publications are emerging that are entirely written by AI.⁶ Provided there is human editorial control of the content, such publications could fall within the scope of regulation under the Charter. If there is no such control, then the publication would not be a relevant publisher for the purposes of the Charter and therefore would not be regulatable under it.⁷

End of draft guidance

⁵ [Best Practice Note – The Use of Artificial Intelligence](#) (Impress, April 2025)

⁶ For example: [Il Foglio AI: The First Newspaper Written by Artificial Intelligence - nss magazine](#).

⁷ 'Relevant publishers' are defined in Section 41 of the [Crime and Courts Act 2013](#). In broad terms, a relevant publisher must:

- publish 'news-related' material;
- in the course of a business;
- which is written by different authors; and
- is subject to editorial control.

Consultation questions

Question 1

Do you agree with the PRP's view that the criteria do not give a recognised regulator the power to order a publisher to remove online material?

Question 2

Do you agree with the PRP's view that the criteria do not give a recognised regulator the power to order a publisher to amend online material?

Question 3

Do you agree with the PRP's view that user-generated content on a publication's website is subject to a recognised regulator's standards code?

Question 4

Do you agree with the PRP's view that AI-generated content on a publication's website falls within the scope of a recognised regulator's standards code, provided there is human editorial control?

Question 5

Do you have any other comments on the draft guidance, or are there other internet-related matters on which guidance from the PRP would be helpful?