

PRP

INDEPENDENTLY
OVERSEEING
PRESS REGULATION

BOARD PAPERS

87th Press Recognition Panel Board Meeting

Wednesday 11 February 2026

PRESS RECOGNITION PANEL BOARD MEETING

87th Meeting of the Press Recognition Panel
 10:30 – 13:00 Wednesday 11 February 2026
 Mappin House, 4 Winsley Street, London W1W 8HF

AGENDA

<u>PUBLIC SESSION</u>		Indicative timings	
1.	Welcome	Chair	10:30 – 10:30
2.	Apologies for absence	Chair	10:30 – 10:30
3.	Declarations of interest	Chair	10:30 – 10:35
4.	Minutes of the meeting held on 9 December 2025, outstanding actions and matters arising <i>For noting</i>	Chair	10:35 – 10:40
5.	Chief Executive's report Dec 2025 & Jan 2026 Paper PRP01(26) <i>For noting</i>	SU	10:40 – 10:45
6.	Finance report December 2025 Paper PRP02(26) <i>For noting</i>	SU/JS2	10:45 – 10:50
7.	Finance report January 2026 and draft budget Paper PRP03(26) <i>For noting and decision</i>	SU/JS2	10:50 – 10:55
8.	Annual Governance procedures and policies review Paper PRP04(26) <i>For decision</i>	Chair	10:55 – 11:15
9.	Consultation on guidance on the Royal Charter and online and digital news-related material PRP06(26) <i>For decision</i>	SU/PR	11:15 – 11:25
10.	Any other business and close of public session <i>Including comments from the floor</i>	Chair	11:25 – 11:35

CONFIDENTIAL SESSION

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| 11. | Minutes of the meeting held on 9 December 2025,
outstanding actions and matters arising
<i>For noting</i> | Chair | 11:35 – 11:45 |
| 12. | Chief Executive's report, Dec 2025 & Jan 2026
Paper PRP01(26)
<i>For noting</i> | SU | 11:45 – 11:55 |
| 13. | Finance report December 2025
Paper PRP02(26)
<i>For noting</i> | SU/JS2 | 11:55 – 12:00 |
| 14. | Finance report January 2026 and draft budget
Paper PRP03(26)
<i>For noting and decision</i> | SU/JS2 | 12:00 – 12:10 |
| 15. | Draft Business Plan 2025/2026
Paper PRP05(26)
<i>For decision</i> | SU/JS2 | 12:10 – 12:20 |
| 16. | Final Draft SORR
Paper PRP07(26)
<i>For decision</i> | SU/AS | 12:20 – 12:30 |
| 17. | Research Paper
Carried-forward Paper PRP45(25)
<i>For further discussion</i> | SU/PR | 12:30 – 12:40 |
| 18. | Forward Plan
Paper PRP08(25)
<i>For noting</i> | SU | 12:40 – 12:45 |
| 17. | Any other business and close of meeting | Chair | 12:45 – 12:55 |

Date and time of next meeting: Tuesday 21st April 2026, 10:30 – 13:00

Location: Mappin House, 4 Winsley Street, London, W1W 8HF



PRESS RECOGNITION PANEL BOARD MEETING

86th Meeting of the Press Recognition Panel

10:30 – 13:00, Tuesday 9 December 2025
Mappin House, 4 Winsley Street, London W1W 8HF

In attendance

Board members: Kathryn Cearns (Chair), Mark Williams, Annie Mullins, Zahera Harb, Suzanne Rab, Hayley Stallard

Executive: Susie Uppal, Alan Shade, Charlie Billingham (JS2), Wendy Collinson

BOARD MEETING – PUBLIC SESSION

Welcome

1. The Chair welcomed the Members and Attendees to the 86th meeting of the Press Recognition Panel and opened the meeting at 10.30 am.

Apologies for absence

2. Apologies were received from John Speed (JS2). Charlie Billingham attended in his place.

Declaration of Members' interest

3. None.

Matters of the meeting held 20 October 2025, outstanding actions and matters arising

4. Board members noted the following main items for correction:
 - Board member Mark Williams noted that in paragraph 23.2, "seeking bank authorisations" should be replaced by "bank certifications."
 - Board member Suzanne Rab noted the misspelling of her name in the list of attendees and in paragraph 34.2 (now paragraph 36).

5. The Board agreed that subject to the amendments referred to the minutes of the PRP Board meeting of 20 October 2025 are approved.

Chief Executive's report – November 2025

6. The Board noted the contents of the Chief Executive's report for November 2025 and papers with thanks.

Finance Report – November 2025

7. The Board noted the contents of the Finance report and management accounts for November 2025 with thanks.
8. The Chief Executive noted that the Budget is a permission to spend and if costs are predicted to significantly increase the Board will be notified for discussion and approval.
9. Board member Suzanne Rab queried why there are two Travel and Subsistence lines of expenditure. JS2 representative Charlie Billingham confirmed that one is for Board costs, the other for Executive costs. The Chair further explained that Board costs are kept separate so that the cost of governance is easily calculable.

Board Remuneration and Roles

10. The Chief Executive outlined the paper and confirmed that, under the Royal Charter the Board is required to set and agree its own remuneration rates for the Board, Independent members and Executive.
11. The Chief Executive confirmed that, in respect of Executive salaries, to ensure fairness and separation, JS2, as usual, were asked to prepare an update on the cost of living in the year to September 2025, confirming a CPI rate of 3.8%.
12. The Board noted the benchmarking annex and agreed that it was difficult to identify comparable sector rates. The Chief Executive noted that the two most comparable organisations are the Professional Standards Authority and the Legal Services Board, both oversight regulatory bodies, albeit with significantly different remits.
13. The Board noted that at its meeting on 10 December 2024, Board members were awarded the first increase in 8 years: 7.5% to keep pace with inflation, with effect from 1st April 2025.
14. The Board **agreed** to increase the Board members' daily rate by 3.8%, to keep pace with inflation, taking the daily rate from £442 to £458.80 from 1 April 2026.

15. The Chair was asked to leave the room whilst the members discussed the Chair's remuneration. The Board **agreed** to increase the Chair's daily rate by 3.8%, taking the daily rate from £663 to £688.19 from 1 April 2026.
16. The Board **agreed** to increase the Independent members' daily rate by 3.8%, to keep pace with inflation, taking the daily rate from £442 to £458.80 from 1 April 2026.
17. The Board reviewed the performance and value of having an Independent Member to advise on Industry Matters over the last 12 months. The Board noted that Independent Member Chris Waiting's first term is due to expire 6 January 2026.
 - The Board agreed on the need to have an Industry Matters advisor.
 - The Board **agreed** to extend Chris Waiting's term for a further 6 months and that the Chair will meet with him to discuss how his contribution can be developed and how we can support him in this.
18. The Board discussed the respective time commitments for the Chair, Board and Independent members and **agreed** that these were sufficient and no changes were necessary at this time.
19. The Chief Executive noted that there was an omission in the Appendix to the Roles and Remuneration Board paper, regarding the 3 additional days carried out by Board member Mark Williams who has specific responsibility for financial matters.
20. The Chair asked the Chief Executive and Executive Administration Manager to leave the room whilst the Board discussed the salaried staff's remuneration.
21. The Board noted that the Executive Administration Manager was still in probation and was due a 5% increase on successful completion.
22. The Board discussed the pay of the Chief Executive and any potential pay rise. As well as the inflationary element, it was felt that there were factors that ought to lead to a slightly higher increase, including (a) the fact that although there had been inflationary increases in recent years, there had been some erosion of pay in earlier years which had not caught up, (b) the work the Chief Executive did in acting as solicitor for the organisation which defrayed costs the PRP might otherwise pay externally, and (c) an appreciation that the current Chief Executive carried a great deal of both corporate history and responsibility for the PRP, both of which were very valuable, and which were reflected in the amount and quality of work she undertakes. The Chair also undertook to look at pay history and benchmarking for the next discussion on Chief Executive pay so a wider view could be taken

23. The Board **agreed** an increase of 5% from the 1 April 2025 for the Chief Executive, from £87,223.80 (FTE £145,373) to £91,585.20 (FTE £152,642).
24. Senior Independent Board Member Zahera Harb noted that she had previously been happy to extend her term as SIB, which expired on 11 September 2025, but due to increased work commitments, expressed concern at possibly having to cover any absence on the part of the Chair over the coming year. She could extend her term to end June 2026. The Chair thanked Zahera for this and confirmed that she would be conducting a review of roles and would bring a paper to the Board early in 2026.

Any other business and close of public session

25. None.

BOARD MEETING – CONFIDENTIAL SESSION

Matters of the meeting held 20 October 2025, outstanding actions and matters arising

26. Board members noted the main confidential items for correction:
- Redacted.
 - Redacted.
27. The Board agreed that subject to the amendments referred to the minutes of the PRP Board meeting of 20 October 2025 are approved.

Chief Executive's report – November 2025

28. The Board noted the contents of the Chief Executive's report for November 2025 and papers with thanks.
29. Redacted.

State of Recognition Report (SORR) - Planning

30. Redacted.
31. Redacted.
32. Redacted.
33. Redacted.
34. Redacted.

Correspondence

- 35. The Chair noted that the letters we have chosen to redact in Chief Executive's November report, are in line with our new Publications Policy.
- 36. Redacted.
- 37. The Board discussed the principles of redacting content in the Board papers. The Chief Executive confirmed that anything that is ongoing will be redacted, but then published once the process is complete, e.g. the SORR. Board member Suzanne Rab noted that the rationale is the same as the FOI exemption, where publication of progress would prejudice progress.
- 38. The Chair noted that the Chair and the Chief Executive were responsible for redaction decisions but added that Board can and must challenge if they need to.

YouGov Polling report

- 39. The Board expressed its appreciation of the work by the Executive team on promoting the YouGov report.
- 40. Redacted.
- 41. Redacted.
- 42. Redacted.
- 43. Redacted.

Finance Report – November 2025

- 44. Redacted.
- 45. The Board noted the contents of the Finance report and management accounts for November 2025 with thanks.

Annual Board Effectiveness Evaluation 2025

- 46. The Chair noted the paper and annex, thanking Board members and the Chief Executive for taking part in the Evaluation, which is part of the governance code. The Chair confirmed that the current form is the one that has always been used by the PRP, which enables comparison.
- 47. Redacted.

48. Redacted.

49. Redacted.

Draft SORR Report

50. Redacted.

51. Redacted.

52. Redacted.

53. Redacted.

54. The Chair thanked Alan Shade for all the work he is doing, on behalf of the Board and the Chief Executive.

Research

55. Redacted.

56. Redacted.

57. Redacted.

58. The Chair concluded that the proposal required more consideration and that there was insufficient time to consider this further at this meeting. The Chief Executive confirmed that the same paper could be included for consideration in the next Board meeting in February 2026.

Strategy session

59. Redacted.

Forward Plan

60. The Board noted and agreed with the matters being brought forward for February 2025.

Any other business

61. None presented. The meeting was closed at 13:05.

Date and time of next meeting

62. The 87th PRP Board meeting will be held on Wednesday 11 February 2025, 10:30 – 13:00, at Mappin House, 4 Winsley Street, London W1W 8HF.

PRP01(26)

PRESS RECOGNITION PANEL BOARD

Chief Executive's Report — December 2025 and January 2026

Meeting: 11 February 2026

Status: for noting

Lead responsibility:

Contact details:

Susie Uppal, Chief Executive

Wendy Collinson, Executive Administration
Manager

Purpose

1. The purpose of this paper is to provide an update to the Board on executive activity since the November 2025 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

2025/26 Annual Report and Audit (ARA)

4. Redacted.
5. Redacted.

Annual Insurance Review

6. Redacted.

Communications

7. On 8 December, we posted a new blog, Now You See Me, arguing that press accountability and public protection are mostly an illusion in the UK. The blog was shared on X, Bluesky, and LinkedIn and as of 30 January, has been viewed 236 times, with 28 engagements.
8. On 10 December, we issued a media release to national broadcasters, press, online news providers and specialist media, including a comment from the Chair reacting to the interviews given by Gerry McCann about his treatment by the press. The statement was also shared with stakeholders, together with social

media posts, which have attracted almost 1,500 views and 100 engagements as of 30 January. During the month, we also continued to share social media posts referencing our YouGov polling and pitch interviews with the Chair on both topics.

9. Given the ongoing legal case between Prince Harry and others Vs Associated Newspapers, on 21 January, we issued a media release to national broadcasters, press, online news providers and specialist media. This included a comment from the Chair, who pointed out that, unlike those involved in this case, most ordinary people are unable to afford expensive legal teams and are powerless to seek justice when they feel they've been wronged by the press, a message backed up by data from our YouGov polling. We shared the same messaging across social media posts, which have received 3,400 views and 290 engagements, as of 30 January.

State of Recognition Report – Call for Information Responses

10. Redacted.
11. Redacted.
12. Redacted.
13. Redacted.
14. Redacted.

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

15. The consultation period closed on 19 December 2025, with no responses received. A late submission from Impress was agreed and received on 12 January 2026, which will be shared with the Board as an annex to the decision paper on this matter, at its next meeting on 11 February 2026.

Letters

16. Redacted.
17. Redacted.
18. Redacted.
19. Redacted.

External Matters Update

20. Annex G 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: Redacted.
Annex B: Redacted.
Annex C: Redacted.
Annex D: Redacted.
Annex E: Redacted.
Annex F: Redacted.
Annex G: External matters update

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 national newspaper circulation figures for December showed continuing steep year-on-year declines across most audited titles, with the Sunday People recording the biggest annual fall for the second month in a row, down 25.2% to an average weekly circulation of 35,649. There were significant annual drops for the Sunday Mirror (down 22.7%), Sunday Express (down 22.5%), and Sunday Mail (down 20.4%), while only a small number of papers recorded single-digit annual falls (including the Daily Mail down 8%, Mail on Sunday down 7.7%, and the Financial Times down 6.5%). Metro and the Daily Mail were the only titles to increase month-on-month in December (both up 0.2%).
3. Press Gazette reported that its monthly Ipsos iris ranking of the 50 biggest UK news websites in November 2025 found the BBC remained the largest brand by audience (40.9m), followed by the Sun (22.0m), the Guardian (21.9m), the Independent (20.7m), and Mirror (20.3m), while US-based titles led month-on-month growth, with CNN (+26%), Screenrant (+25%), and Forbes (+17%) among the biggest.
4. As reported by Press Gazette, Ipsos iris data on UK news apps in November found that while BBC News remained the biggest app by audience (15.1m) and engagement (1.6bn minutes) – ahead of Apple News (14.1m and 1.2bn) – the most engaged users of any newsbrand were those of Mail+ and the Times/Sunday Times, with Mail+ recording the highest average minutes spent per person (758 mins) followed by the Times/Sunday Times (539 mins). There was strong year-on-year growth for Substack Reader (up 153% in total mins) and GB News (up 94%), alongside steep declines for CNN (down 73%) and Google News (down 45%).
5. Press Gazette reported that Mirror editor-in-chief Caroline Waterston is stepping down at the end of 2025 after less than two years in the role. She will be succeeded by Chloe Hubbard, who has been UK editor at the Independent since the start of this year. Hubbard's remit, like Waterston's, will include leading Reach's magazines team, including OK!.
6. The New World reported that former Guardian and Prospect editor Alan Rusbridger has joined the publication as Editor-at-Large. Editor-in-Chief Matt Kelly described Rusbridger's appointment as a significant "statement of intent" for the title, and Rusbridger said he is looking forward to returning to reporting and praised the publication's "ambition, sense of mischief and willingness to swim

against the tide". He will continue to write his weekly columns at the Independent and Prospect.

7. Press Gazette reported that The Independent is set to take over running the Standard's website from 1 March, with editorial and commercial staff told they could transfer or apply for voluntary redundancy. Evening Standard Limited would continue publishing its weekly print edition. The move follows discussions to expand the existing relationship between the two organisations – which share a controlling shareholder, Lord Evgeny Lebedev – with executives describing the aim as strengthening the Standard's digital operations, audience, and commercial proposition. The Independent is already significantly larger and more engaged online (20.7m UK audience in November vs 10.7m for the Standard).

Legal

8. As reported by Press Gazette, Guardian News and Media is considering next steps after a pre-trial libel judgment found it was defamatory for an Observer and theguardian.com article to describe journalist, author, and social media influencer Andy Ngo as an "'alt-right' agitator". Ngo is suing GNM for libel, arguing that the descriptor "alt-right" was synonymous with racist or far-right beliefs and that "agitator" suggested that he took action on those beliefs and was not just an "armchair observer". Lawyer Ben Gallop, for The Guardian, said that the article was a "humorous, opinionated and pithy music review".
9. Press Gazette reported that Reach subsidiary MGN Ltd is seeking legal disclosures in an attempt to show that 61 remaining privacy claims linked to alleged unlawful newsgathering, including phone hacking, are out of time under the six-year limitation rule. It argues that claimants (and legal researchers involved in the litigation) knew about the relevant allegations more than six years before bringing their claims. According to Press Gazette's analysis of annual reports, Reach has allocated more than £150m in non-recurring costs since 2014 to deal with the fallout of historic phone-hacking and unlawful information gathering claims.
10. As reported by Press Gazette, Tortoise Media co-CEO Richard Furness said the Observer is "completely on plan" nine months after its takeover, with early subscription and registration numbers described as "really encouraging" following the launch of a registration wall, paywall, and app in November. Furness said the Observer now has "momentum", including a major traffic spike driven by its investigation into allegations regarding the non-fiction book, 'The Salt Path'. The Observer had a 2.6m monthly UK audience in July, up from 1.6m in June. He also said print newsstand performance is "holding up" despite a cover price rise from £4 to £4.50.
11. BBC News reported that the first week of the Prince Harry and others v Associated Newspapers Ltd (ANL) trial opened with wide-ranging allegations that the publisher of the Daily Mail and Mail on Sunday engaged in unlawful

information-gathering over many years, including the use of private investigators, blagging and alleged phone tapping/bugging. ANL argued that the claimants are “clutching at straws” and relying on “generic” claims previously struck out. It also alleged the claimants relied on friendly journalists publishing articles to create artificial “watershed moments” when it could be claimed the victims had “discovered” the truth about what the papers had done, when in reality they were trying to get around the six-year time limit for claiming breaches of privacy. The claimants strongly deny that. During the first week, Prince Harry gave emotional evidence about the impact on his relationships and wellbeing, describing feeling under constant surveillance and saying the publisher made the Duchess of Sussex’s life “a misery”, while the trial also heard evidence from Liz Hurley, who said private investigators bugged her landline and placed microphones at her home in what she described as a “brutal invasion of privacy”.

Academic

12. The Journalism, Media, and Technology Trends and Predictions 2026 report by the Reuters Institute for the Study of Journalism argues that news publishers are entering a period of intensifying pressure, driven by the twin forces of generative AI and the creator economy, with particular concern that search and social platforms will send substantially less traffic to publisher websites as “answer engines” and AI summaries increasingly replace clicks.

Key predictions include:

- Publishers expect major traffic decline from search, including a projected 43% fall over the next three years, amid fears that AI-generated summaries in search will reduce referrals further.
- “Answer engines” (AI chat/search) are reshaping discovery, with publishers worried they will lose visibility, attribution, and revenue as users get answers without visiting news sites.
- Business strategy shifts away from scale/traffic and towards direct relationships, especially subscriptions, memberships and other reader revenue models, because platform-driven reach is seen as less reliable.
- Video and platform presence are becoming central – more publishers plan to prioritise formats and distribution via YouTube/TikTok and other social/video channels as audiences fragment and referral patterns change.
- Newsrooms are doubling down on AI (carefully) – focusing on efficiency and workflow support (e.g., editing, summarising, translation, automation), while grappling with trust, transparency and reputational risk.
- More emphasis on “personality-led” journalism and creators – including encouraging journalists to behave more like creators and experimenting with influencer partnerships to reach audiences.

Political

13. Kevin Hollinrake (Conservative, Thirsk and Malton) tabled a question asking the Secretary of State for Culture, Media and Sport, what assessment she has made

of the current operational status of the IPSO Arbitration Scheme, including whether arbitrators are presently being appointed to claims, and what evaluation she has made of the implications of any such delays for the public's ability to access timely and effective redress.

Ian Murray (Labour, Edinburgh South) responded: "The UK has a self-regulatory system for the press, which is independent from Government. This is vital to ensure the public has access to accurate and trustworthy information from a range of different sources. The Government therefore does not intervene in or evaluate the work of IPSO.

However, under Section 179 of the Data Protection Act every three years the Secretary of State must lay before Parliament a report on the use and effectiveness of alternative dispute resolution procedures, such as arbitration, in cases involving a failure or alleged failure by relevant media organisations to comply with data protection legislation. The most recent report was presented to Parliament in May 2024 and was carried independently of DCMS by David Rossington, as the Independent Reviewer. The report is published on the Gov.uk website:

https://assets.publishing.service.gov.uk/media/67d2ded5fb8db2176d5e97d0/Formatted_240312_SECOND_REPORT_UNDER_SECTION_179_OF_THE_DATA_PROTECTION_ACT_v3__FINAL__accessible.pdf."

14. Matt Vickers (Conservative, Stockton West) tabled a question asking the Secretary of State for Culture, Media and Sport, what assessment her Department has made of the resilience of local journalism; and what plans she has to provide support to help sustain local news providers.

Ian Murray (Labour, Edinburgh South) responded: "Resilience of local journalism across the country is an area of particular concern for this Government, including in Stockton West and more broadly across County Durham. The Government understands the important work that local news providers do across the UK, including outlets such as The Darlington and Stockton Times and The Northern Echo. We are developing a Local Media Strategy, in recognition of the importance of sustaining 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. DCMS ministers held a roundtable discussion with local news editors in the spring to discuss the planned approach and collaboration with industry on the Strategy. An industry working group has since been set up to consider the issues in more detail and has been meeting regularly since June. More will be announced on the Strategy in the coming months."

15. Alex Mayer (Labour, Dunstable and Leighton Buzzard) tabled a question asking the Secretary of State for Culture, Media and Sport, on what dates the industry working group established to support development of the local media strategy has met to date, and what the planned timescale is for its next meeting.

Ian Murray (Labour, Edinburgh South) responded: “The Government is developing a Local Media Strategy, in recognition of the importance of local journalism. 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.

Following a roundtable between ministers and local news editors in the Spring to discuss our planned approach to the Strategy, an industry working group was established to consider the issues in more detail and explore areas for collaboration. The group has met so far on six occasions, on the following dates:

5th June 2025
25th June 2025
10th July 2025
24th July 2025
2nd September 2025
16th October 2025

At least one more meeting of the group is intended in 2026 before the Strategy is published.”

16. Jim McMahon (Labour, Oldham West, Chadderton and Royton) tabled a question asking the Secretary of State for Culture, Media and Sport, if she will make an assessment of the potential implications for her policies of trends in the number of online platforms scraping news articles produced by UK newspapers.

Ian Murray (Labour, Edinburgh South) responded: “UK newspapers at national and local level play an invaluable role in the fabric of our society and we are committed to supporting a free, sustainable and plural media landscape. Rapid recent developments in generative AI pose both significant risks and opportunities for news media, including with regard to the scraping of news articles for use in AI development.

We are engaging with press stakeholders on this. The Media Minister and the Technology Secretary each held roundtables earlier this year with publishers and broadcasters to discuss the impact of AI on journalism.

The Government intends to support our news media to capitalise on the huge potential benefits of the technology, while mitigating its risks. This includes with regard to our work to ensure a copyright framework which values and protects human creativity, can be trusted, and unlocks new opportunities for innovation across creative sectors, including news media, and the wider economy. A number of news media representatives are also involved in the Government’s

Technical Working Groups established in November to consider this work in more detail.

The Digital Markets, Competition and Consumers Act (2024) gave new powers to the Competition and Markets Authority (the CMA) to both boost competition and innovation in the UK digital tech sector, and ensure the largest digital firms treat consumers and UK businesses fairly, including news publishers. The CMA concluded its first investigations in October 2025, designating Google with SMS in search, and both Apple and Google with SMS in mobile ecosystems. The CMA will now consult on conduct requirements which Google and Apple must adhere to. These conduct requirements will be based on fair dealing, open choices, and increasing trust and transparency.”

17. Jim McMahon (Labour, Oldham West, Chadderton and Royton) tabled a question asking the Secretary of State for Culture, Media and Sport, what estimate she has made of the notional lost revenue to newspapers of online platforms using content without payment in return.

Ian Murray (Labour, Edinburgh South) responded: “The challenges of quantifying the value exchange between newspapers and online platforms have been explored by a number of studies, including the independent Cairncross Review into sustainable journalism and advice from the CMA and Ofcom on how a digital markets regime might govern the relationship between platforms and content providers such as news publishers.

Regardless of the exact transfer of value, the imbalanced commercial relationship between newspapers and online platforms has been raised as a key driver in the financial sustainability challenges facing news publishers in recent years. The Digital Markets, Competition and Consumers Act (2024) gave new powers to the Competition and Markets Authority to boost competition in digital markets and help rebalance the relationship between online platforms and the businesses which rely on their services, including news publishers. The Government will continue to monitor this relationship and whether further action is required to ensure a level playing field with online platforms as AI and other new technologies continue to disrupt the market.”

18. Jim McMahon (Labour, Oldham West, Chadderton and Royton) tabled a question asking the Secretary of State for Culture, Media and Sport, what assessment she has made of the potential impact of local and regional press and media monopolies on the adequacy of levels of varied and balanced reporting.

Ian Murray (Labour, Edinburgh South) responded: “The Government remains committed to a pluralistic media landscape. A free, strong and plural media plays an essential role in democracy. It is a key source of trustworthy information and plays a vital role in holding power and public institutions to account.

Under the Enterprise Act 2002’s newspaper merger regime, the Secretary of State for Culture, Media and Sport has a quasi-judicial role and can intervene on public interest grounds to refer a merger to the Competition and Markets

Authority (CMA), subject to a jurisdictional test. These public interest grounds for intervention include plurality of views and plurality of persons with control, within the United Kingdom, or a part of the United Kingdom.

More broadly, the Government is concerned about the sustainability of local journalism and DCMS is developing a Local Media Strategy, in recognition of the importance of this vital sector. We recognise that the industry has faced significant financial challenges for some time, and consolidation and mergers have been a part of the response in order to keep many struggling titles open. 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 in a varied and balanced way, 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. More will be announced on the Strategy in due course.”

19. Freddie van Mierlo (Liberal Democrat, Henley and Thame) tabled a question asking the Secretary of State for Culture, Media and Sport, what plans the Government has to meet with the victims of press abuse who have written to the Government to request a meeting.

Catherine West (Labour, Hornsey and Friern Barnet) tabled a question asking the Secretary of State for Culture, Media and Sport, whether she plans to take steps to implement the recommendations of the Leveson inquiry.

Ian Murray (Labour, Edinburgh South) responded to both questions: “The Leveson Inquiry led to changes in the regulatory system of the press, which included the creation of the Press Recognition Panel, by Royal Charter and two new press regulators, the Independent Press Standards Organisation (IPSO) and the Independent Monitor of the Press (Impress). This is a self-regulatory system, which was established to be independent from Government and protect press freedom. We are also clear, however, that with this freedom comes responsibility. Publishers must operate within the bounds of the law and set and uphold high professional and ethical standards.

The news landscape has changed substantially over the past decade, and looking ahead, we want to maintain press freedom, whilst being clear the public must be protected from the harm caused by clear instances of intrusion and harassment. The Government is carefully considering next steps to determine the best route forward to ensure public trust and accountability in our evolving news media.

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. The Secretary of State for Culture, Media and Sport has previously met with families who have experienced press intrusion. She remains committed to considering the issues they have raised.”

20. Anna Turley, the Labour and Co-op MP for Redcar, has spoken out on X about a Telegraph article that incorrectly stated that she lived in a £825,000 Haringey home, which attracts band F council tax. Turley said: “Well this is a total lie @Telegraph. I don’t own any property in London. I live in Redcar. I have one home and one home only, in my constituency of Redcar. What appalling journalism. How dare you just make things up?! Please retract.” The Telegraph subsequently edited the online article and posted a correction.
21. Responding to a question from Andy Slaughter MP, the Prime Minister has told the Liaison Committee at the House of Commons that he will meet with the victims of press abuse. The news followed a letter sent by over 30 victims of press harm, including Gerry McCann, Christine Flack, and Mandy Garner. Gerry McCann told BBC Radio 4’s Today programme that it was “not acceptable” that Labour had gone back on its commitment to start Leveson 2. He said that lives were being “destroyed on a daily basis” by the press.
22. Press Gazette reported that Culture Secretary Lisa Nandy said she is “minded to” intervene in DMGT’s proposed takeover of the Telegraph, on the basis of two public-interest grounds – whether the deal would maintain a “sufficient plurality of views” and a “sufficient plurality of persons with control” – with Ofcom asked to assess the public-interest concerns and the Competitions and Market Authority considering whether a relevant merger situation has been created and any impact on competition. Nandy said she will not intervene to investigate foreign state influence in the deal. The takeover could give DMGT more than 50% of the UK national newspaper circulation by publisher.
23. Green Party Leader Zack Polanski posted on X that “We badly need media reform and actual regulation with a commitment to truth”, after he criticised an Independent article as “completely fabricated”. The article stated that Polanski’s first preference for Labour leader would be Andy Burnham, to which Polanski posted, “I’ve literally never said I have a preference for who the Labour leader is - never mind ‘first preference’”. He added: “Call me old fashioned but I don’t think people should just be able to make things up and publish them”.

Approved regulator

24. Impress has published its 2024-25 annual report, setting out key organisational achievements from the past year while outlining how the regulator is adapting to a rapidly changing media landscape, expanding its role to address information harm, declining trust and sustainability in news, and gaps in global media regulation, alongside new initiatives including guidance on AI in journalism, training for ethical media, alternative dispute resolution services, and a shift towards preventative support for publishers.

IPSO

25. Jenny Watson CBE has been appointed the next Chair of IPSO, succeeding Lord Faulks, who will step down in April following his completion of two terms. Watson is currently the Deputy Chair of the University of East Anglia and Chair of the Broadland Housing Group. Formerly, she was chair of the Electoral Commission (2009-16) and chaired the Independent Complaints Panel for the Portman Group (2013-20). She will also chair IPSO's Complaints Committee.
26. IPSO has upheld a complaint about the conduct of a reporter acting on behalf of dailymail.co.uk, finding that the journalist's actions breached Clause 2 (Privacy) and Clause 4 (Intrusion into grief or shock) after he entered the complainant's porch and knocked on her internal front door while she was in a state of acute distress following a family tragedy. IPSO ruled that this constituted an unjustified intrusion into her home and showed insufficient sympathy and discretion. However, IPSO did not find a breach of Clause 3 (Harassment), noting that there was no evidence of persistent pursuit or behaviour amounting to intimidation once it became clear the complainant did not wish to engage. IPSO required dailymail.co.uk to publish an adjudication to remedy the breach of the Code.
27. IPSO has invited suggestions from the public, editors, journalists and others working in the media, and anyone else with an interest in journalistic standards on how the Editors' Code of Practice "might be revised to improve the system of self-regulation of the press". Public consultations on the Code are held every three years. The closing date for submissions is 10 April.

Campaigners' news

28. Hacked Off reported in a guest blog that the Times misrepresented the findings of a JL Partners poll on HS2 by using a headline claiming "Half of Britons support scrapping HS2" without including key polling disclosures, such as who commissioned the poll or the exact question wording, and by paraphrasing the data in a way that overstated what the results actually showed. It argues that, when the full context and framing of the question are examined, the poll did not justify the headline or wider claims in the article. A complaint to the Times about the lack of transparency and multiple inaccuracies about HS2 was quickly rejected.
29. The News Media Association reported that Lord Black of Brentwood (Deputy Chair of Telegraph Media Group) has become the organisation's Chair, having taken up the role on 1 January, following the departure of Tindle Newspapers Chief Executive Danny Cammiade. Jeremy Spooner, CEO of Baylis Community Media and Chair of the NMA's Independent Publishers Forum, has been appointed Vice Chair.
30. The National Union of Journalists (NUJ) reported that it would welcome a formal investigation into the proposed takeover of Telegraph Media Group by Daily Mail and General Trust (DMGT), following comments by culture secretary Lisa Nandy indicating she is minded to intervene to trigger regulatory scrutiny. The NUJ said

it will consult members at the Telegraph before responding to any investigation, and reiterated its longstanding concerns about consolidation of media ownership – arguing that media plurality is essential for democracy and calling for a maximum market share cap of 25% across platforms and within each of radio, TV, newspapers, and online.

31. The Media Reform Coalition (MRC) reported that it has written to the Culture Secretary welcoming her statement that she is “minded to” intervene in DMGT’s proposed takeover of Telegraph Media Group, and urged the Government to proceed with a formal intervention notice triggering investigations by Ofcom and the Competition and Markets Authority. The MRC argued that the deal would significantly worsen already high levels of media concentration in the UK and would be damaging to media plurality



PRESS RECOGNITION PANEL BOARD

FINANCE REPORT – DECEMBER 2025

Meeting: By email

Status: for noting

Lead responsibility: Susie Uppal, Chief Executive

Contact details: Susie Uppal, John Speed (JS2)

Purpose

1. The purpose of this paper is to update the Board on the finance and banking position as at 31 December 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 December 2025 is attached at Annex A. The management accounts also include the original budget for the year to March 2026 and the 6-month reforecast carried out in October 2025.
4. The deficit for the period to date is £59,421 against a year-to-date forecast deficit of £58,138. This represents a negative variance of £1,283 compared to the year-to-date forecast. The variance is largely due to additional Executive team and meeting room costs, partly offset by a provision for legal costs not yet utilised. The additional Executive team costs are due to an uptake in the call for information responses and work required in relation to the SORR.

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 2025

Press Recognition Panel
Period ended 31st December 2025

	9 months to December 2025			Full year to March 2026	
	Actual £	Reforecast Oct 2025 £	Variance £	Budget £	Reforecast Oct 2025 £
Income					
Subscription fees	218,956	218,956	-	291,896	291,896
Bank interest	40,094	39,420	674	44,525	50,670
Total Income	259,050	258,376	674	336,421	342,565
Expenditure					
Board and Committee costs					
Salaries & NIC	61,736	62,620	884	84,370	84,647
Travel & Subsistence	1,571	1,438	(133)	1,920	1,888
Other costs	-	-	-	3,500	3,500
Total Board and Committee Costs	63,307	64,058	751	89,790	90,034
Communications					
Publications	-	-	-	3,750	2,450
Website and Upgrades	443	942	499	2,474	1,587
Total Communications Costs	443	942	499	6,224	4,037
Other costs					
Executive team costs	194,693	187,624	(7,069)	260,825	254,491
HR & Recruitment	875	1,305	430	2,137	1,735
Strategic research	13,800	13,800	-	54,000	43,800
Office costs	5,116	5,277	161	7,498	7,207
Meeting rooms	5,279	4,111	(1,168)	4,043	4,479
Travel & Subsistence	1,060	1,024	(36)	2,240	1,784
IT Hardware	1,433	1,433	-	1,920	1,433
Information Technology	5,938	6,070	132	7,920	8,230
Accountancy	19,088	19,368	280	32,533	32,411
Audit Fees	-	-	-	16,500	16,500
Printing & Stationery	999	339	(660)	2,605	1,599
Insurance	4,000	3,997	(3)	5,201	5,303
Legal	-	5,000	5,000	10,000	10,000
Subscriptions & publications	2,293	2,021	(272)	2,115	2,558
Finance charges	147	145	(2)	180	175
Sundry expenses	-	-	-	8,049	9,677
	254,721	251,514	(3,207)	417,766	401,382
Total Expenditure	318,471	316,514	(1,957)	513,780	495,453
Surplus / (Deficit) for the period	(59,421)	(58,138)	(1,283)	(177,360)	(152,888)
Reserves Bfwd	1,894,436	1,894,436			
Reserves Cfwd	1,835,015	1,836,298			

Additional costs incurred in Nov 25

Provision of £5k not yet utilised

Press Recognition Panel

Period ended 31st December 2025

	Dec-25		Mar-25	
	£	£	£	£
Current Assets				
Current account	248,737		178,003	
Fixed term deposit accounts	1,483,020		1,296,913	
Deposit account	210,659		208,101	
Cash at bank		1,942,416		1,683,017
Prepayments	4,075		7,427	
Accrued Income	15,140		435,722	
Third Party Deposit	926		911	
Sundry debtors		20,141		444,060
Creditors: amounts falling due within one year				
Trade creditors	-		7,236	
Deferred income	100,906		171,956	
Social security and other taxes	7,497		7,766	
Pensions	654		3,578	
Sundry creditors and accruals	18,485		42,105	
		127,542		232,641
Net Current Assets		1,835,015		1,894,436
Net Assets		1,835,015		1,894,436
Funds brought forward				
Funds bought forward at 31 March		1,894,436		1,564,782
(Deficit)/ surplus for the period		(59,421)		329,654
		1,835,015		1,894,436

PRESS RECOGNITION PANEL BOARD

FINANCE REPORT – JANUARY 2026

Meeting: 11 February 2026

Status: for noting and decision

Lead responsibility: Susie Uppal, Chief Executive

Contact details: Susie Uppal, John Speed (JS2)

Purpose

1. The purpose of this paper is to update the Board on the finance and banking position as at 31 January 2026.
2. The Board is invited to note the latest financial position.
3. Redacted

Background and analysis

Finance

4. A bank-reconciled set of management accounts as at 31 January 2026 is attached at Annex A. The management accounts also include the original budget for the year to March 2026 and the 6-month reforecast carried out in October 2025.
5. The deficit for the period to date is £69,778 against a year-to-date forecast deficit of £59,295. This represents a negative variance of £10,483 compared to the year-to-date forecast. The variance is largely due to additional Executive team and meeting room costs, partly offset by a provision for legal costs not yet utilised. The additional Executive team costs are due to an uptake in the call for information responses and work required in relation to the SORR.
6. A draft budget for the year to 31 March 2027 is attached at Annex B. Please note this comprises of draft figures and will be updated following the Boards consideration.

Grant Funding

7. Redacted.
8. Redacted.

9. Redacted.

Devolved Nations

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

Communications

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

Risks

12. A robust position in relation to the PRP's finances is required in order to avoid reputational damage.

Recommendations

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

Timeline for future work

14. 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 2026

Annex B: Draft budget for the year to 31 March 2027

Press Recognition Panel
Period ended 31st January 2026

	10 months to January 2026			Full year to March 2026	
	Actual	Reforecast	Variance	Budget	Reforecast
	£	Oct 2025	£	£	Oct 2025
			£		£
Income					
Subscription fees	244,080	244,080	-	291,896	291,896
Bank interest	44,306	43,170	1,136	44,525	50,670
Total Income	288,386	287,250	1,136	336,421	342,565
Expenditure					
Board and Committee costs					
Salaries & NIC	68,345	69,151	806	84,370	84,647
Travel & Subsistence	1,571	1,588	17	1,920	1,888
Other costs	-	-	-	3,500	3,500
Total Board and Committee Costs	69,916	70,739	823	89,790	90,034
Communications					
Publications	-	-	-	3,750	2,450
Website and Upgrades	493	992	499	2,474	1,587
Total Communications Costs	493	992	499	6,224	4,037
Other costs					
Executive team costs	219,128	206,460	(12,668)	260,825	254,491
HR & Recruitment	875	1,448	573	2,137	1,735
Strategic research	13,800	13,800	-	54,000	43,800
Office costs	5,696	5,870	174	7,498	7,207
Meeting rooms	6,161	4,111	(2,050)	4,043	4,479
Travel & Subsistence	1,060	1,144	84	2,240	1,784
IT Hardware	1,433	1,433	-	1,920	1,433
Information Technology	6,617	6,790	173	7,920	8,230
Accountancy	21,212	21,591	379	32,533	32,411
Audit Fees	-	-	-	16,500	16,500
Printing & Stationery	999	359	(640)	2,605	1,599
Insurance	4,451	4,447	(4)	5,201	5,303
Legal	3,600	5,000	1,400	10,000	10,000
Subscriptions & publications	2,565	2,206	(359)	2,115	2,558
Finance charges	158	155	(3)	180	175
Sundry expenses	-	-	-	8,049	9,677
	287,755	274,814	(12,941)	417,766	401,382
Total Expenditure	358,164	346,545	(11,619)	513,780	495,453
Surplus / (Deficit) for the period	(69,778)	(59,295)	(10,483)	(177,360)	(152,888)
Reserves Bfwd	1,894,436	1,894,436			
Reserves Cfwd	1,824,658	1,835,141			

Additional costs incurred in Nov 25

Part of £5k provision not yet utilised

Press Recognition Panel

Period ended 31st January 2026

	Jan-26		Mar-25	
	£	£	£	£
Current Assets				
Current account	217,679		178,003	
Fixed term deposit accounts	1,493,778		1,296,913	
Deposit account	210,902		208,101	
Cash at bank		1,922,359		1,683,017
Prepayments	3,328		7,427	
Accrued Income	8,351		435,722	
Third Party Deposit	926		911	
Sundry debtors		12,605		444,060
Creditors: amounts falling due within one year				
Trade creditors	11,824		7,236	
Deferred income	75,782		171,956	
Social security and other taxes	5,968		7,766	
Pensions	204		3,578	
Sundry creditors and accruals	16,528		42,105	
		110,306		232,641
Net Current Assets		1,824,658		1,894,436
Net Assets		1,824,658		1,894,436
Funds brought forward				
Funds bought forward at 31 March		1,894,436		1,564,782
(Deficit)/ surplus for the period		(69,778)		329,654
		1,824,658		1,894,436

Press Recognition Panel

Draft budget for the year to 31 March 2027

	Full year to March 2026			
	Budget	Reforecast Oct 2025	Budget year to March 2027	Memo - key changes between 2025/26 reforecast and 2026/27 budget
	£	£	£	
Income				
Subscription fees	291,896	291,896	300,070	Increase by indexation in November 2025
Bank interest	44,525	50,670	41,625	Lower interest rates expected than 2025/26
Total Income	336,421	342,565	341,695	
Expenditure				
Board and Committee costs				
Salaries & NIC	84,370	84,647	87,738	No change in Board members - inflationary increase
Travel & Subsistence	1,920	1,888	1,920	
Other costs	3,500	3,500	4,750	
Total Board and Committee Costs	89,790	90,034	94,408	
Communications				
Publications	3,750	2,450	3,750	
Website and Upgrades	2,474	1,587	2,106	
Total Communications Costs	6,224	4,037	5,856	
Other costs				
Executive team costs	260,825	254,491	261,249	Inflationary increase
HR & Recruitment	2,137	1,735	2,136	
Strategic research	54,000	43,800	43,800	
Office costs	7,498	7,207	7,796	
Meeting rooms	4,043	4,479	7,529	Additional budget for stakeholder meetings throughout the year
Travel & Subsistence	2,240	1,784	2,240	
IT Hardware	1,920	1,433	1,920	
Information Technology	7,920	8,230	8,640	
Accountancy	32,533	32,411	33,367	
Audit Fees	16,500	16,500	16,500	
Printing & Stationery	2,605	1,599	1,340	
Insurance	5,201	5,303	5,558	
Legal	10,000	10,000	10,000	
Subscriptions & publications	2,115	2,558	3,900	
Finance charges	180	175	180	
Sundry expenses	8,049	9,677	7,909	
	417,766	401,382	414,064	
Total Expenditure	513,780	495,453	514,328	
Surplus / (Deficit) for the period	(177,360)	(152,888)	(172,634)	

PRESS RECOGNITION PANEL BOARD

ANNUAL GOVERNANCE PROCEDURES AND POLICIES REVIEW

Meeting: 11 February 2025

Status: for decision

Lead responsibility:

Susie Uppal
Chief Executive

Contact details:

Wendy Collinson
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 2026 annual review. The remaining policies and procedures will be brought to the Board for consideration at its meeting on 21 April 2026.

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** that the second tranche of policies and procedures (ARC TORs, Risk management, anti-bribery, artificial intelligence (AI) governance framework and policy, 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 21 April 2025 for consideration, following ARC review at its meeting on 11 February 2025 as per its terms of reference.

Background and analysis

3. The PRP presently has 33 organisational policies and procedures in place, which are grouped into five categories: Board and Executive, Purpose, Finance, When Things Go Wrong and Information Security / Business Continuity. Last year's annual governance review noted 31 policies – the updated number includes the new Artificial Intelligence (AI) Governance Framework and Policy,

as well as the Emergency and Disaster Recovery Plan, which is not published on our website due to the confidential personnel information it contains.

4. All policies have been reviewed in line with best practice and focus on operation in practice. The proposed revisions to those policies in tranche A are briefly summarised at Annex A, with the documents to be considered and attached as appendices.

Board and Executive

5. Policy Reference 1. Terms and Conditions of Service for Board Members:

- 5.1 Paragraph 3, bullet point 2 has been updated to remove reference to candidacy as Police and Crime Commissioner being inappropriate for a PRP Board member, as the next Police and Crime Commissioner elections (2028) have been cancelled and the role is likely to cease to exist at this point.

6. Policy Reference 3. Board and Independent Members' Remuneration

- 6.1 The policy has been updated to reflect the increased remuneration rates for the Chair, Board and Independent members, as agreed by the Board at its meeting on 9 December 2025. The Board also confirmed and agreed at the meeting to maintain the current minimum time commitment remained correct.
- 6.2 The policy now includes a new section, entitled "Statement of Policy", referencing annual reviews for remuneration and time commitment, as well as disclosure.
- 6.3 The section on 'Future Reviews of Remuneration' has been amended to clarify options as governed by the Royal Charter and the size of the PRP.

7. Policy Reference 6. Gifts, Hospitality and Expenses Policy

- 7.1 Paragraphs 15.4-15.6: the mileage rates remain current as per the [Travel — mileage and fuel rates and allowances - GOV.UK](#).
- 7.2 Paragraphs 16.1-16.3: an increase of £5 per period of qualifying travel is recommended for subsistence rates.

8. Policy Reference 7. Rules of Procedure for Board Meetings

- 8.1 Paragraph 8 – a clarification is recommended in the second sentence of this paragraph. Are we saying that sometimes we won't publish public papers because we might decide in the meeting that they are confidential? Or that papers should be confidential until the day of the meeting itself?

- 8.2 Paragraph 13 has been updated to reflect that a member of the Executive may be asked to leave a Board meeting at the discretion of the Chair, rather than “for strategic reasons” as previously stated.
- 8.3 Paragraph 42 has been amended to reflect that where a member of the Executive, who is responsible for minuting the Board meeting, is asked to leave the meeting, a member of the Board must be appointed to minute the meeting in their absence.
- 8.4 Paragraph 45 has been updated to include reference to the PRP’s Scheme of Delegation and Matters Reserved Policy.

Purpose

9. The policies in this category have been reviewed and no changes have been made.

Finance

10. Policy Reference 15: Finance Policy

- 10.1 Paragraph 1.3 has been updated to clarify the wording in the second sentence following the issue with the NAO regarding Cabinet Office controls:

*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 the general principles of Managing Public Money** in order to achieve probity, accuracy, economy, efficiency and effectiveness.*

- 10.2 Paragraph 4.5 has been amended to remove individual names from the policy. The Board is asked to consider whether it is still true that the Board member with financial responsibility will be the Chair of the ARC, given that the current ARC Chair is not the same individual as the Board member with financial responsibility.

- 10.3 Appendix A is amended to include the Chair holding a corporate credit card, in addition to the Executive Administration Manager.

11. Policy Reference 18: Investment Policy

- 11.1 Paragraph 18.1 (Eligible Investments). The Board is asked to consider including an optional sentence to the effect that, “Any deposit investment is restricted to at least high grade from relevant ratings agencies,”

When Things Go Wrong

12. Policy Reference 21: Complaints-Handling Policy (about a PRP individual)

12.1 Stage 2 of the investigative process (paragraphs 4-8) has been expanded to include a request for specific information to be included in the complaint, in addition to how the complaint will be handled.

12.2 Stage 3, first paragraph has been expanded to include more detail about the process.

Information Security / Business Continuity

13. Policy Reference 28: Information Technology (IT) Policy

13.1 The policy has been updated to reinforce the secure and acceptable use of PRP IT.

13.2 The Board is asked to consider a Data Protection Information Assessment (DPIA) in relation to paragraphs 15 and 17 (which is recommended for deletion), regarding the monitoring of staff's use of the PRP's IT systems.

13.3 Electronic Security and Encryption, paragraph 55, regarding saving PRP files to downloadable media, has been deleted and replaced with wording regarding use of the PRP's existing Sharepoint environment.

14. The Board is **asked** to consider the need for a Data Protection Impact Assessment outside of this policy review process, to ensure our policy position is robust.

Devolved Nations

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

Communications

16. 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

17. 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.

Attachments

- Annex A: Summary of proposed changes to PRP policies
- Annex B: Terms and Conditions of Service for PRP Board Members
- Annex C: Board and Independent Members' Remuneration
- Annex D: Gifts, Hospitality and Expenses Policy
- Annex E: Rules and Procedures for Board Meetings
- Annex F: Finance Policy
- Annex G: Investment Policy
- Annex H: Complaints-Handling Policy
- Annex I: Information Technology Policy

Annex A to PRP05(26)

Board and Executive

1	Terms and Conditions of Service for Board Members	Paragraph 3, bullet point 2 has been updated to remove reference to candidacy as Police and Crime Commissioner being inappropriate for a PRP Board member, as the next Police and Crime Commissioner elections (2028) have been cancelled and the role is likely to cease to exist at this point.
2	Terms and Conditions of Service for Independent Members	For general review – no changes recommended
3	Board and Independent Members' Remuneration Policy	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 9 December 2025. The policy now includes a new section, entitled "Statement of Policy", referencing annual reviews for remuneration and time commitment, as well as disclosure. The section on 'Future Reviews of Remuneration' has been amended to clarify options as governed by the Royal Charter and the size of the PRP.
4	Equality, Diversity and Inclusion Policy	Paragraph 9 refers to a job applicant's consent to disclose personal information on a monitoring form for diversity purposes. This paragraph is to be reviewed under a Data Protection Information Assessment (DIPA) as consent is a dubious legal basis on which to collect such data.
6	Gifts, Hospitality and Expenses Policy	Paragraphs 16.1-16.3: an increase of £5 per period of qualifying travel is recommended for subsistence rates.
7	Rules and Procedures for	Paragraph 13 has been updated to reflect that a member of the Executive may be asked to leave

	Board Meetings	a Board meeting at the discretion of the Chair, rather than “for strategic reasons” as previously stated. Paragraph 42 has been amended to reflect that where a member of the Executive, who is responsible for minuting the Board meeting, is asked to leave the meeting, a member of the Board must be appointed to minute the meeting in their absence. Paragraph 45 has been updated to include reference to the PRP’s Scheme of Delegation and Matters Reserved Policy.
9	Nominations Committee (NomCo) – Terms of Reference	For general review – no changes recommended

Purpose and Mission

11	Mission and Approach	For general review – no changes recommended
13	Working in Northern Ireland and Scotland	For general review – no changes recommended
14	Policy for Affixing the PRP Common Seal	For general review – no changes recommended

Finance

15	Finance Policy	Paragraph 1.3 has been updated to clarify the wording in the second sentence following the issue with the NAO regarding Cabinet Office controls: <i>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 the general principles of Managing Public Money in order to achieve probity,</i>
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		<i>accuracy, economy, efficiency and effectiveness.</i> Paragraph 4.5 has been amended to remove individual names from the policy. The Board is asked to consider whether it is still true that the Board member with financial responsibility will be the Chair of the ARC, given that the current ARC Chair is not the same individual as the Board member with financial responsibility. Appendix A is amended to include the Chair holding a corporate credit card, in addition to the Executive Administration Manager.
17	Scheme of Delegation and Matters Reserved	For general review – no changes recommended
18	Investment Policy	Paragraph 18.1 (Eligible Investments). The Board is asked to consider including an optional sentence to the effect that, “Any deposit investment is restricted to the upper end of ratings by Standard & Poor’s, Moody’s and Fitch.”

When Things Go Wrong

20	Disciplinary Procedures for Chair and Board Members	Paragraph 22 has been updated to add the requirement for a Data Protection Information Assessment before the Board publicises the outcome of any disciplinary proceedings against a Chair or Board member.
21	Complaints-Handling Policy (about a PRP individual)	Stage 2 of the investigative process (paragraphs 4-8) has been expanded to include a request for specific information to be included in the complaint, in addition to how the complaint will be handled. Stage 3, first paragraph has been expanded to include more detail about the process.
22	Whistleblowing Policy	For general review – no changes recommended

Information Security / Business Continuity

23	Freedom of Information Policy	For general review – no changes recommended
27	Publications Policy	For general review – no changes recommended since the last Board-approved update in October 2025
28	Information Technology (IT) Policy	The policy has been updated to reinforce the secure and acceptable use of PRP IT. The Board is asked to consider a Data Protection Information Assessment (DPIA) in relation to paragraph 15, regarding the monitoring of staff's use of the PRP's IT systems. Electronic Security and Encryption, paragraph 55, regarding saving PRP files to downloadable media, has been deleted and replaced with wording regarding use of the PRP's existing Sharepoint environment.



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 endeavours 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 Whistleblowing, or freedom of information or data protection legislation create an exemption to disclosure, the default position is that 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.
17. 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.
18. 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.
19. 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.

20. You may be excluded from any discussion or consideration of any matter in which you have disclosed or declared an interest.
21. 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

22. 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

23. 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

24. 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.



Policy on Board and Independent Members' remuneration

Introduction

1. [This policy sets out the Press Recognition Panel's approach to remunerating Board Members and Independent Members of the Board.](#) 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'.

Statement of Policy

2. [Remuneration and minimum time commitment for Board members and Independent Members of the Board will be reviewed annually by the Board.](#)
3. [Any changes to remuneration or the minimum time commitment will be implemented from 1st April the following year.](#)
4. [Remuneration rates and minimum time commitments will be published in the policy and disclosed in the Annual Report's and Accounts. Disclosure will include both the amount and any uplift since the last review.](#)

Remuneration rates

5. [Current remuneration rates are as follows:](#)

Category of member	Day rate coming financial year (£)	Uplift	Minimum commitment (days)
Chair	663	2.79%	50
Board Member	442	2.79%	15
Independent Board Member	442	2.79%	No minimum

Future reviews of remuneration

6. [This policy acknowledges that it is not good practice for the Board to set its own remuneration. However, given the size and complexity of the Press Recognition Panel, and the obligation to achieve value for money, the Board does not consider that establishing a separate Remuneration Committee, necessitating the recruitment of further Independent Members \(and consequent cost\), is proportionate at this time.](#)
- ~~2.7. 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.~~

~~3.~~

7. The Board will ~~consider what if any additional~~keep under review on an annual basis any additional arrangements it wishes to put in place for the purposes of any further reviews of remuneration – including the potential establishment of a ~~Remuneration Committee or undertaking benchmarking. — at a later date.~~

Pension scheme contributions

- ~~4.8.~~ 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.



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 and Independent members, the Executive 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 and Executive, 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 channelled 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, the Executive, 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. 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:
- 15.1 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
 - 15.2 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 circumstances requires approval by the Chief Executive
 - 15.3 the same principles applied to rail travel apply also to air travel;
 - 15.4 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;
 - 15.5 for travel by motorcycle, **24 pence** per mile;
 - 15.6 for travel by bicycle, **20 pence** per mile;
 - 15.7 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).
16. 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:
- 16.1 £5 for qualifying travel of 5 hours or more,
 - 16.2 £10 for qualifying travel of 10 hours or more;
 - 16.3 £25 for qualifying travel of 15 hours or more; and, where the travel is ongoing after 8pm.
 - 16.4 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;

16.5 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'

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

18. 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

19. 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

20. 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

21. 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

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

23. 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.



Rules and procedures for Board meetings

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.

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.

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.

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 all or part of the meeting at the discretion of the Chair.~~the meeting for specific items of business when the Board will periodically meet for strategic reasons.~~

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. Subject to paragraph 13, ~~The~~ a member of 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. If the meeting takes place in the absence of a member of the Executive to record any decisions made, a member of the Board must be appointed for this purpose.

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 and are detailed in the PRP's Scheme of Delegation and Matters Reserved policy. 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.



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 [the general principles of](#) 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 ~~will~~^{has} appointed one Board Member to take specific responsibility for reporting to the Board on the management of the finances of the PRP. The Board member with this responsibility will be the Chair of the PRP's Audit and Risk Committee. 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 Audit 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.

15. Special Payments Process

15.1 Special payments:

1. all special payments require the approval of two of either the Chair of the Board, the Board Member with Financial Responsibility or the CEO, and is reported to the full Board at the next meeting.

15.2 Losses

1. ending the loss and attempting to recover it;
2. establish the cause and taking corrective action;
3. correct any weakness in controls
4. establishing responsibility and whether caused by inadequate supervision, negligence or misconduct and taking appropriate
5. ensuring any lessons are picked up and applied in future;
6. reporting the loss and action taken to appropriate bodies including the Board

Appendix 1

Scheme of financial delegation

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

All credit card purchases must be approved in advance by the Chief Executive regardless of amount. 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.

Payroll costs

Any changes to payroll costs are agreed by the Chief Executive (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.*



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 PRP'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 fixed-term deposits. The maturity of these will vary to coincide with expected cash demands. Any deposit investment is restricted to at least High Grade ratings by relevant ratings agencies.

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.



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: wcollinson@pressrecognitionpanel.org.uk

4. To help us resolve the issue efficiently and fairly, please provide the following information in your complaint:

- a. Your full name
- b. Your contact details (including address, email and telephone number)
- c. How you would like us to contact you in relation to your complaint
- d. Your relationship with the PRP
- e. A detailed description of your complaint, what you think went wrong, including dates and time of any specific circumstances
- f. Any details of what you have done to try and resolve the issue so far
- g. What you think we should do to resolve the matter
- h. Any issues around confidentiality in relation to the individual(s) you are complaining about

i. Any relevant documentation underpinning your complaint.

5. The Chief Executive will review the information you have provided and may also gather further evidence as required. This may include asking you for further information or speaking to other individuals involved.
 6. We will normally tell the individual to whom the complaint relates that a complaint has been made against them unless there is a need to maintain confidentiality.
 7. Once the Chief Executive has completed the review, we will inform you of the outcome. If the complaint is upheld, we will explain the steps we are taking to put things right. This may include reviewing a particular decision and/or putting measures in place to rectify or remedy the position and/or avoid the circumstances giving rise to the complain from happening in the future.
 8. If your complaint is not upheld, we will explain why. If you remain dissatisfied, or if your complaint is about the Chief Executive, you may refer the complaint to stage 3.
- 4.

Stage 3

- ~~5.9.~~ If you remain, dissatisfied, or your complaint is about the Chief Executive, you may refer your complaint to the At stage 3 of our complaints process, the Chair of the Press Recognition Panel, ~~who~~ will review the report prepared for the Chief Executive and the decisions taken so far and may also seek further evidence. The Chair will respond to you with the outcome of the review detailing whether your complaints has been upheld or not, and why.
- ~~6.10.~~ Please You can contact the Chair via the Executive Administration Manager.
- ~~7.11.~~ 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

- ~~8.12.~~ 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.
- ~~9.13.~~ 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.



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 any device (including landline telephones, computers, tablets, mobile/smart phones or other devices whether it is a PRP-owned device or your own device) connected to the PRP's network (including the use of emails and the internet) and any other equipment or system owned or operated by the PRP that may be used to communicate, store or process information electronically (such as the PRP's website and social media accounts); 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 to protect the confidentiality, integrity and availability of PRP information to enable the PRP's Board, employees and representatives to discharge their roles effectively. The aim 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 equipment and systems 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. All use of PRP IT must conform with the relevant legislation in force at the time governing the use and monitoring of e-mails and the internet (including PRP social media accounts or personal social media accounts while representing the PRP) while accessing PRP information and/or using PRP systems and devices, 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).
7. 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.
8. 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

9. The principal purpose of the IT systems is to facilitate the legitimate business purposes of the PRP. 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.
10. 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.
11. 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.
12. 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.

13. You are responsible for the security of any IT systems or equipment assigned to you (including any unique password), and you must not allow them to be used by any other person (other than our IT consultants when providing support)
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 in a memorable passphrase only significant to you — by way of example only — W@1LTinSh1rt . You should avoid personal information or common phrases. Different passwords should be used for different 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. Any email containing confidential information should be labelled in the subject line.
17. 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. All communications on PRP social media accounts must be approved by the Chief Executive before posting. If using personal social media accounts, such as X,

Bluesky, LinkedIn or Facebook, 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 (except when reposting an already approved message from a PRP social media account).

21. This policy on personal use is dependent upon it not being abused or overused and the right to use PRP systems or equipment for personal use 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, downloading small text files called 'cookies' so that they can track your behaviour on their website.
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 either the browser or the site itself to retain the access password).
- Routinely delete all cookies and remove any files from your downloads folder which are no longer required

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 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. Where-ever possible, PRP information should be stored within the PRP's secure Sharepoint site and email traffic undertaken through PRP-registered email accounts. Downloading PRP information to non-PRP devices should be avoided. Should a laptop or other portable device storing PRP information 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

56. The PRP maintains a secure Sharepoint environment. Records relating to the PRP's work should only be stored in the PRP secure Sharepoint environment. Download to portable media should be avoided. You must set access controls for folders for which you are responsible on a 'zero trust' basis — other members of staff or the Board must only be granted access to folders where they have a legitimate business need to access the information. Where the use of downloadable media is unavoidable, these must be encrypted.

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 for example via a Virtual Private Network (VPN).

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.

Annex 1

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 2018 (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.



PRESS RECOGNITION PANEL BOARD

Online and digital news related decision

Meeting: 11 February 2026

Status: for decision

Lead responsibility:

Susie Uppal, Chief Executive

Contact details:

Susie Uppal, Chief Executive

Purpose

1. For the Board to agree the guidance on the Royal Charter and online and digital news related material (Annex A).

Recommendations

2. The Board is invited to:
 - a) **Note** the Impress response following the consultation on the draft guidance (Annex B)
 - b) **Agree** the draft decision document (Annex C) and publication of the guidance in final form.

Background and analysis

3. The PRP consulted upon draft guidance on the Royal Charter and online and digital news related material between 10 November and 19 December 2025.
4. We agreed an extension of time for Impress to provide its response (Annex B) and this was received on 12 January 2016. There were no other respondents.
5. The draft guidance covered four areas relating to the recognition criteria in Schedule 3 of the Royal Charter:
 - (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.
6. For the reasons given in Annex B, Impress disagrees with the draft guidance in relation to issues (1) to (2). It considers that the criteria do give the power to order the removal of online material.
 7. Although Impress agrees in principle that the publisher's responsibility extends to user generated content (issue 3) it has asked for clarification of this element of the draft guidance in light of the PRP's view on issues (1) and (2) on whether a regulator can order such material to be removed.
 8. Impress agrees with the PRP's approach on AI generated material (issue 4).

Recommendation

9. For the reasons given in the draft guidance (Annex A) and the draft response to consultation (Annex C) we recommend that the guidance is published as consulted upon with no amendments.

Devolved Nations

10. There are no specific issues identified.

Communications

11. The guidance and our response to the consultation will be published on the website.

Risks

12. As Impress is the only organisation impacted by the proposed decision, the Executive undertakes to notify Impress before the written decision is made public.

Attachments:

Annex A: Guidance on the Royal Charter and online and digital news related material.

Annex B: Impress response to the consultation.

Annex C: Draft PRP decision document

PRESS RECOGNITION PANEL

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

November 2025

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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?



Impress response to the Press Recognition Panel Consultation on guidance on the Royal Charter and online and digital news-related material November 2025

About Impress

Impress is the UK's only press regulator recognised as independent and effective under the terms of Royal Charter. We are a champion for news that can be trusted. We are here to make sure news providers can publish with integrity; and the public can engage in an ever-changing media landscape with confidence. We currently regulate over 200 publications, including The Bureau of Investigative Journalism, Byline Times, Prospect Magazine and Novara Media.

Introduction

1. The Press Recognition Panel (PRP) was established under the Royal Charter on Self-Regulation of the Press ('the Charter') to 'carry on activities relating to the recognition of Regulators'.
2. Among other things, the PRP is responsible for 'reporting on any success or failure of the recognition system.' Impress recognises the PRP's role in safeguarding both press freedom and public confidence in the system of press self-regulation. We share the PRP's interest in ensuring that guidance is clear, workable, and reflective of how regulation functions in contemporary online publishing environments.
3. Accordingly, in November 2025, the PRP launched a consultation, inviting respondents to comment on its 'draft guidance under paragraph 13 of Schedule 2 of the Royal Charter on four key issues arising from news publications 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.'*

4. This paper constitutes Impress' response to this consultation.
5. Impress appreciates the opportunity to engage with the PRP through this consultation. We hope this submission assists in refining the draft guidance so that it provides clarity while reflecting the practical realities of online regulation. We would welcome further dialogue with the PRP on these issues, including through discussion with other regulators, publishers and stakeholders, to ensure the guidance supports an effective, transparent and trusted regulatory system.

Impress Submission

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?

Impress has significant concerns about the draft guidance produced by the PRP in response to this question.

Impress therefore invites the PRP to reconsider or clarify this aspect of the guidance, for the reasons set out below.

Ordinary and natural meaning of the Charter criterion

The rationale for the approach Impress takes to Remedies is set out in the latest Guidance approved by the Impress Board on 9 September 2025 (attached).

It sets out at the heading **Prevent publication**, the following:

Impress' Articles of Association, Clause 7.4 states that the Impress Directors shall not have the power to prevent publication of any material, by anyone, at any time.

This clause makes clear Impress cannot provide injunctive relief to a third party, an affected person or representative body, by preventing a publisher from publishing material.

Impress continues to comply with this requirement and cannot and has not directed a publisher in such a way as to prevent publication.

Impress considers that the Charter Criterion 17 does not limit its power to direct amendment or removal of content in breach of the Impress Standards Code (the Code). The operative phrase in the Criterion cited is that the Board shall not have the power to *prevent* publication. The natural and ordinary meaning of prevent is to act

before; to anticipate in action; to act in advance of. This phrase is transitive which is key to its interpretation. This criterion does not concern post-publication matters, which is central to this consultation, and therefore Impress disagrees that this criterion should be appealed to, to interpret any limitation on its post-publication remedial powers.

In the consultation document it is acknowledged that the statement in the Criterion that the PRP seeks to rely on, is proceeded by another concerning pre-publication powers, that is, to give pre-publication advice. This strengthens the argument that this criterion should be wholly understood as concerning the regulator's powers *prior to publication*. Post-publication matters are dealt with in other parts of the Charter, such as the power to issue apologies and corrections.

We disagree, that the inclusion of the phrase, "at any time", infers post-publication powers. If Parliament wished to prevent a self-regulatory body from having the power to amend or remove content post-publication, it could have done so in plain terms by stating so in the Charter. It did not. We do not consider that the draft guidance can reasonably be read to support an interpretation with such significant consequences for the operational powers of a recognised regulator. If the PRP consider this an omission or defect in the Charter than we would encourage the PRP to seek amendment by petitioning the Government, rather than addressing this matter through guidance.

The PRP also cites a quote from Lord Leveson, in his report, in support of their position which states:

"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."

Impress considers that this statement supports its position that it *does* have robust powers to act on content post-publication. The power to amend or remove content represents the very deterrent effect or consequences of a Code breach post-publication of a more robust regulatory framework described by Lord Leveson.

Finally, the PRP has suggested that due to the importance of press freedom, such a power would need to be explicitly contained in the criteria for it to be available to a recognised regulator.

We disagree. The Charter is not the ultimate source of Impress' authority to act as a self-regulatory body for the press, and our provision of services for news publishers

and the public extends beyond the terms of the Charter in several ways. We consider that we are only limited in the duties we place on the publishers that we regulate by virtue of what is explicitly set out in the Charter (as above, if the Charter intended to limit the regulator's powers on the ability to amend or remove content, it could have done so in plain terms, in the same substantive way it limits the regulator's powers in other areas).

All other additional duties owed between the parties arise by virtue of contract mutually agreed. This includes the duties set out in our Regulatory Scheme, appended to our Regulated Publisher Agreement which makes provision for other remedies beyond apologies and corrections. It is by virtue of news publishers being able to enter into such agreements voluntarily, including to be directed to issue apologies and corrections or amend or remove content (all of which fetter their absolute power), that supports press freedom.

Furthermore, there is significant legal precedent which sets out that the right to freedom of expression is not incompatible with a determination (judicial or quasi) to amend or remove content. Such orders are made by the courts, regulatory and industry bodies with due consideration for the freedom of expression and in compliance with the Art 10, Human Rights Act 1998 on a regular basis. Likewise, the Impress Board always give due consideration to the freedom of expression in determinations and on the imposition of remedies.

Longstanding precedent

Impress notes that this consultation arises after a substantial period in which recognised regulatory practice has been established and publicly operated.

Impress has operated according to its articles and Regulatory Scheme, as an approved regulator, for almost a decade. Over that period, it has regulated hundreds of independent publishers according to its Scheme rules and based on its interpretation of the Charter, endorsed by successive successful cyclical reviews by the PRP.

The first direction Impress issued on the amendment or removal of content was published on *17 May 2021*, case reference 303/2020 – 5Pillars UK.

Impress has undertaken the issuing of such directions proportionately and with due restraint, but most importantly transparently since that time; this practice has always been discoverable by the PRP, and from time to time the PRP has been put on notice of it.

All our decisions are reported on our website, in our Annual Report, our reporting to the Independent Press Regulation Trust and to the PRP as part of the cyclical review

substantiation. We also have had light press coverage of these decisions in various trade publications.

For that period our members, our stakeholders, and the public have also been aware of this practice by virtue of it featuring in our published decisions; since May 2017, we have only received complaints on the issuing of such directions from two publishers, and they were both directly affected by the outcome of relevant decisions where these directions were issued. We noted those complaints immediately, those publishers were provided opportunities to make representations in full, and those were considered by the Board as part of their decision-making on the complaint matters.

We have also recruited 170 publishers over the period, and the practice has not been represented to us as a deterrent from joining Impress.

If this consultation had been raised nearer to the first instance of the practice, we would understand that could have triggered such a consultation. Given that the practice has been undertaken for half of the regulator's lifetime as of today, Impress considers that it forms part of the precedent of its case work. There has been no significant change of context or dispute raised for Impress to require change to this practice. This raises a reasonable expectation as an organisation that this practice is compliant with the Charter. Impress would welcome further explanation as to the justification for such a significant change in approach.

Editorial discretion on removal ineffective, unaccountable, and disproportionate

Impress considers, that based on its experience of publication practice, the solution offered by the PRP, that notices (apologies and corrections) sitting alongside even the most serious content breaches sufficiently eclipses the harm that that content perpetuates where they remain accessible, is not supported by available evidence and does not, in our experience, reflect how publication practice operates in reality.

Apologies, corrections and clarifications, and amendment or removal remedies serve entirely different functions; apologies are about acknowledging harm and expressing contrition, corrections and clarifications introduce corrected or additional information to contextualise the publication and improve accuracy; amendment or removal is about limiting the likely or actual effect the perpetuation of content has. These remedies cannot be substituted for each other to the same effect. By way of example:

- A notice that content is discriminatory does not eclipse the effect of discrimination - the discrimination is able to endure;

- A notice that content breaches the anonymity of a sexual violence victim, does not eclipse the effect of their name continuing to be published in an article - the intrusion endures; and
- A notice that content identifies a child endangering their wellbeing, does not eclipse the effect of them continuing to be identified and endangered by the content remaining accessible.

Impress would be unable to operate as a regulator of any effectiveness or integrity if Impress regulated publishers were to be able to carry content described in the scenarios above (based on real scenarios on which Impress has adjudicated), with mere notices attached to them; the Impress Trustmark and endorsement that the publisher operated according to recognised ethical standards would be weakened by this, rendering the regulation ineffective and risking undue negative perceptions of the system of regulation overall.

The PRP makes four references in the guidance that “it is likely that the publisher would choose to amend or remove the material” as a consequence of being required to carry an apology or correction alongside content. Impress would welcome the opportunity to review any evidence or sectoral data the PRP is relying on in reaching this assessment, or to work jointly to identify where assumptions about practice may diverge from operational reality.

Impress considers countervailing evidence shows that news publishers do not remove content where they are directed to carry apologies or corrections for breaches of the Code. All Impress publishers, for example, archive corrected or clarified content in designated areas of websites and platforms, or as a matter of record, to demonstrate their compliance with and transparency of editorial practice. This is also recognised industry practice, across different self-regulatory or industry regulatory models, nationally and internationally.

Impress welcomes any evidence that the PRP can provide of content removal following notice of breach as a standardised or documented industry practice, or representations from news publishers that this is how they would respond to such directions, given its centrality to the justification that content which violates the Code (and in serious ways such as racial discrimination) and which remains accessible online would not limit the effectiveness of regulation.

Contrary to the Accountability and Transparency better regulation principles

Impress considers relying on news publishers to remove content in breach of the Code at their own discretion is contrary to the better regulation principles, specifically Accountability, to ensure that there is clear responsibility for outcomes and the ability

to judge effectiveness. The approach recommended by the PRP would lead to outcomes not being attributable to regulatory authority. There would be a lack of clarity for the publishers and the public in terms of process and outcome expectations, and inconsistency of outcomes overall, creating uneven regulatory effect, further weakening the role of regulation.

Under the existing model, it is transparent and intelligible to the regulator, the publisher and the public, when and why content has been amended or removed because of the regulator's determination and direction or where it has been removed at the editors' own discretion. Under the PRP recommended model, where content removal is at the editor's discretion but implicit in the requirement to carry a notice of breach, it could never be clear whether content has been amended or removed on the publishers' own volition or because of the regulatory intervention.

This 'grey area' in the decision making is likely to introduce uncertainty and perceptions of bias and/or undue influence. Under the existing model all stakeholders to a regulatory outcome can identify where the rationale and powers of the regulator begin and end, avoiding informal or opaque influence that can arise where regulatory expectations are unclear or implicit, for example, in 'behind closed doors' or private negotiations with regulatory subjects. Impress considers this practice would undermine the transparency and independence of its decision making.

News publishers rely on clear directions from the regulator as to the extent and gravity of Code breaches. The proposed PRP guidance removes a tier of intervention proportionate to the breach, collapsing the scale of breach and introducing disproportionate outcomes. Under this proposed model, the publication of an inaccurate figure naively sourced is weighted as significant as a publication which engages in wholesale inaccuracy and discrimination to advance a partisan agenda; these are not the same breaches and should not be flattened by the same remedial approach.

The PRP suggests Impress' ability to fine and exclude publications from its scheme means that it has sufficient remedies in its arsenal to address this perverse consequence. This makes every serious breach of the Code a high stakes outcome for publishers and the regulator.

While fines are a relevant remedy where a breach calls for compensation, such as harm to an individual or group, introducing fines to align with the severity of inaccuracy is fraught with challenge and uncertainty; note the [judicial review](#) of Ofcom following the issuing of fines for breach of impartiality and accuracy with the broadcaster RT.

Further, publishers should be able to engage in occasional serious breaches of the Code, address harm through proportionate remedy, and still enjoy membership of the regulator. Impress considers this power should only be exercised in the most extreme cases, where repeated failure to comply compels it. Having to deploy exclusion as a remedial action for serious breaches, to avoid weakening the effectiveness and perception of the regulator, runs contrary to the Charter Criterion 23 that an approved regulator be open, fair and non-discriminatory to all publishers.

Direction to amend or remove content which amounts to a serious breach of the Code, supports the redemptive nature of our existing Scheme, and more accurately reflects the tiers of severity characteristic of ethics breaches in news publication.

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?

For the same reasons given above, Impress has significant concerns about the draft guidance produced by the PRP in response to this question.

Impress therefore invites the PRP to reconsider or clarify this aspect of the guidance, for the reasons set out below.

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?

Yes, we agree in principle, that user-generated content (UGC) on a publication’s website is subject to a recognised regulator’s standards code.

However, for reasons given above, Impress considers that the guidance is inconsistent across its response to the various questions. At Question 1 and Question 2, the PRP has recommended that the criteria does not give a recognised regulator the power to order a publisher to remove or amend online material. This disregards the technical functionality of how user generated content appears on digital platforms.

Most commenting, sharing or uploading UGC tools do not enable notices to appear directly next to UGC; rather functionality is predominantly limited to sub-commenting (which are often hidden as replies) or moderation, removal or banning (as identified in the consultation document). In the instance that Impress cannot direct a publisher to remove UGC content which is in breach of the Standards Code, the power of the regulator would be limited to direct a publisher to sub-comment UGC in breach. We would reiterate the rationale above for why this would render regulation ineffective.



Alternatively, if Impress has misunderstood the PRP's intended interpretation here, clarification would be particularly helpful, given the technical constraints of UGC moderation systems.

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?

Yes. Impress has no further comment on the draft guidance issued in response to this question.

PRESS RECOGNITION PANEL

1. Decision following consultation on guidance on the Royal Charter and online and digital news related material.

February 2026

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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 to ensure that any organisation that regulates the press is independent, properly funded and able to protect the public, while recognising the important role carried out by the press.

Background

2. On 30 October 2013, the Royal Charter on Self-Regulation of the Press (the Charter) was granted and on 3 November 2014, the PRP came into formal existence.
 3. On 24 October 2016, the PRP recognised Impress as a regulator under the Charter. It remains the sole recognised regulator to date.
 4. The PRP [consulted](#) upon draft guidance on the Royal Charter and online and digital news related material between 10 November and 19 December 2025.
 5. We received one response to the consultation from Impress, attached as appendix A.
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Consultation summary and the PRP's responses and decision

Question (1) Do the criteria give a recognised regulator the power to order a publisher to remove online material?

Impress response

6. Impress disagreed with the draft guidance and considered that as a recognised regulator it does have the power to order a publisher to remove or amend published material. Impress grouped its arguments under several different themes.

Ordinary and natural meaning of the Charter recognition criteria.

7. Impress argued that criterion 17¹ does not prevent the regulator from ordering the removal or amendment of material, that it refers only to pre-publication matters and that the phrase “at any time” does not mean the criteria applies to post publication matters.
8. Impress said that the power to amend or remove content represents the deterrent effect or consequence of a standard code breach post-publication of the more robust regulatory framework described by Lord Leveson.
9. It disagreed with the PRP’s view that the importance of press freedom means that a power to order the removal or amendment of material would need to be explicitly contained in the criteria for it to be available to a recognised regulator. Impress said that if it was intended that a regulator would not have these powers this would have been explicitly stated in the Charter.
10. Impress said the Charter is not the ultimate source of its authority to act as a self-regulatory body for the press as it has contractual relationships with publishers. It added that there is legal precedent which sets out that the right to freedom of expression is not incompatible with a power to amend or remove content.

Longstanding precedent

11. Impress said that it first made a decision to remove or amend content in May 2021², that this and subsequent decisions have been available publicly since then without the PRP having taken any action. The powers were therefore established by practice and usage and the PRP will have to justify its change in approach.

Editorial discretion on removal ineffective, unaccountable, and disproportionate

12. Impress pointed out that apologies corrections and clarifications are different remedies from amendment or removal. If a publisher does not remove, for example, discriminatory content or content that wrongly identifies a victim of crime, or a child then there has been no effective remedy. Impress stated that it needs the powers to order amendment or removal of such material in order to be an effective regulator, and that it is not aware of any evidence that publishers would carry out this action themselves when faced with an Impress complaint or decision.

¹ The Board should not have the power to prevent publication of any material, by anyone, at any time although (in its discretion) it should be able to offer a service of advice to editors of subscribing publications relating to code compliance.

² However its draft guidance refers to a decision in 2019 relating to Unity News Network.

Contrary to the accountability and transparency better regulation

13. Impress stated that relying on publishers to remove content in breach of the guide at their own discretion would mean that there was a lack of transparency as it would not be clear to the public whether the removal was as a result of the complaint or the regulatory decision. This might give an Impression of bias and undue influence and “behind closed doors” deals between regulator and publisher. Impress said that the alternative remedies of a fine or removal from the regulatory scheme are too extreme, and that issuing proportionate fines is fraught with challenge. Publishers should be able to engage in occasional serious breaches of the Code, address harm through proportionate remedy, and still enjoy membership of the regulator. Having to deploy exclusion as a remedial action for serious breaches, to avoid weakening the effectiveness and perception of the regulator, runs contrary to the Charter Criterion 23 that an approved regulator be open, fair and non-discriminatory to all publishers

The PRP’s decision

14. In relation to criterion 17, we note that Impress does not suggest any alternative meaning for the phrase “at any time”. Ordering the removal of all or part (through amendment) of material would be preventing further publication of that material.
15. We remain of the view that a power to order removal or amendment of material would need to be explicitly mentioned in the Charter for it to apply given the importance of press freedom. The Charter sets out other remedies available and discusses how they are to be operated. We note that Impress own regulatory scheme makes no mention of these additional powers. Nor had Impress ever issued any guidance on the issue until after it was raised with them by the PRP in 2025.
16. The Charter clearly is the ultimate source of authority for Impress as a recognised regulator. That is the only capacity with which the PRP is concerned with Impress.
17. Whilst it is the wording of the Charter that is determinative, the Leveson report can provide useful background.
18. Some guide as to what Lord Leveson intended the powers of a press regulator to include is contained in his discussion of what a statutory regulator could do if that was the route decided upon. “It is important to repeat that no backstop regulator should be given any powers over published content, except in relation to apologies and corrections. At no point should the regulator be able to prevent publication of content. The regulator would have no right to see content ahead of publication and no right to require the publication of any content other than in respect of apologies and corrections. This would not be statutory regulation of

what the press could publish; rather, it would represent an after the fact review of press behaviour.”³

19. Further, Lord Leveson noted the suggestion of Max Mosely when giving evidence that a regulator should have the power to order removal of an item from the internet:

“A substantially wider range of remedies and redress have been put to the Inquiry in the proposals for the future. The CPVs argue that the press adjudicator should have the power to make compensatory awards, to require the publication of corrections, and to determine the prominence given to such corrections. Most, but not all, of the CPVs also consider that an adjudicator should have the power to prevent publication similar to an injunction. Mr Mosley specifically advocates all of those powers as well as proposing that the Tribunal should have the power to order newspapers and photographers to leave a complainant alone, ban the use of photographs, and order an item to be removed from the internet.”⁴

20. Lord Leveson did not endorse Max Mosely’s proposal and included no reference to the power to do remove articles from the internet in his recommendations.

21. According to the published Impress decisions, this issue has come up in relation to three publications, in 2019 relation to Unity News network and in 2023 in relation to the Stray Ferret and 2024 in relation to 5pillars UK.

22. All of these decisions concerned videos/podcasts. In practice, these may be thought to represent special problems. For example, would a video or podcast have to be edited to include any correction ordered by the regulator and would this be possible in the circumstances? As Impress is aware, however, following referral to the PRP of a complaint about Impress in May 2025, it appeared to us that Impress was now extending its approach to written articles on the internet. We therefore raised our concerns with the Impress Chief Executive at that time and asked Impress to justify its position overall.

23. This concern led to discussions between the respective Chief Executives and Impress indicated that it would welcome guidance from the PRP. We therefore put the matter to our Board, along with other issues arising from online services, which led to the current consultation.

24. The issue, as considered for the first time by our Board in September 2025, is whether the Charter gives powers to order the removal or amendment of material. Once the PRP has come to a view on that matter and issued guidance,

³ The Leveson Report Volume IV Part K Chapter 8 para 4.15 page 1788

⁴ The Leveson Report Volume IV part K chapter 4 para 10.3 page 1692

then previous practice by Impress could not in our view justify new decisions that go against the terms of the Charter.

25. Impress might have had an argument against the PRP seeking to take a punitive approach to its previous decisions (for example by way of an ad hoc review) given the passage of time. However, we have made it plain that we do not intend to take such an approach. We accept that these are difficult matters of interpretation, arising out of the changing industry, and that Impress has been doing its best to interpret its powers in that situation. This only reinforces the need for the PRP to issue guidance.
26. In light of our review of the issues arising out of online publications, we have considered whether there is a justification for treating video and podcast material differently under the Charter. However, whilst acknowledging the practical difficulties, which we will be happy to discuss with Impress, we have come to the view that the same arguments in relation to the regulator's powers in the Charter apply in relation to these media as in relation to any other "material".
27. In terms of the effectiveness or otherwise of regulation – if the powers to order the amendment or removal of material are not in the Charter, then the issue becomes whether the PRP should seek an alteration to the Charter. We do not consider that this is necessary. We note from Impress published decisions that the Impress Complaints Committee has only made such orders against three publishers in the seven years of its existence, all of them relating to videos/podcasts and that one of these publishers simply left Impress regulation as a result.
28. The Charter aims at achieving speedy resolution of complaints. If a publisher decides to remove or amend material following receipt of a complaint, during the process of the complaint with Impress, or after a decision, it does not follow that there must be a lack of transparency. Negotiated settlements are envisaged by criteria 10 and 15. Once Impress has agreed to deal with a complaint, it could choose to publish any negotiated outcome or amend its scheme to do so if it does not consider that it has the power.
29. Fines and removal of the publisher from the scheme are not the only severe remedies available to a regulator. In a serious case it could for example order the adjudication, an apology or a correction to appear in prominent place on the home page of the publisher's website for such period as it thinks fit.
30. In any event if, using the examples given by Impress in its consultation response, if the Impress Complaints Committee finds that a publication has published discriminatory material, breached the anonymity of a sexual violence victim, or identifies a child endangering their wellbeing and the publication ignores this

finding, then we would imagine that it would be appropriate for regulator to the further action in any event. If a publication is going to ignore a ruling, it would be just as likely to ignore an order to remove the material and/or, as in the case of 5Pillars, decide to take no further part in the scheme.

Question (2) Do the criteria give a recognised regulator the power to order a publisher to amend online material?

Impress response

31. Impress disagreed with the draft guidance on this issue for reasons given in relation to question (1)

PRP response

32. We refer to the points made concerning question (1).

Question (3) Is user-generated content (UGC) on a publication's website subject to a recognised regulator's standards code?

Impress response

33. Impress agreed in principle that UGC on a publisher's website is subject to the standards code. However, it questioned the practicality of regulating this material if it cannot be ordered to be removed, stating that most commenting sharing or uploading UGC tools run by publishers do not enable notices to appear directly next to the breach. Therefore, the regulator would be limited to ordering the publisher to sub comment next to the breach.

The PRP's response

34. Impress recognises that its code is more likely to apply to UGC if the publisher endorses or relies in some way in the content. The PRP agrees with this approach. So, for example, we would have thought it unnecessary (and indeed counter to the whole way UGC operates) for a publisher to be held generally responsible for the accuracy of comments made by readers, if not endorsed or relied on by the publisher.

35. Therefore, there is likely to be more limited regulatory intervention in relation to UGC. There will still be cases of a severe breach of the standard code – discriminatory remarks, identification of a victim of crime etc where the regulator will need to act. In such a case, assuming the publisher does not simply remove the comment itself brought to its attention, then Impress ability to act is not limited to requiring the publisher to sub comment. It can, for example, require adjudications, corrections and apologies to be placed on the main article itself, as well as take more serious action.

36. Under criterion 9, the regulator should require publishers to have processes in place to ensure code compliance. These should include processes for publishers to deal with non-compliant material in UGC.

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?

Impress response

37. Impress agreed with the proposition and the draft guidance

PRP Response

38. We have noted Impress decision.

PRP decision and next steps

39. For the reasons set out above, the PRP will publish the guidance as consulted upon.

End of document

Attachments

Annex A: Impress response to the consultation