

Press Recognition Panel

Cyclical review of the recognition of IMPRESS under the
Royal Charter — PRP Board Decision

22 April 2025

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Part 1: Introduction

This report sets out the process and the basis for the decision made by the Board of the Press Recognition Panel ('the Board') on the third cyclical review of the recognition of IMPRESS under the terms of the Royal Charter on Self-Regulation of the Press ([The Charter](#)).

The Board reviews the recognition of a Regulator as soon as practicable after the end of the two years beginning with the day of the recognition (25 October 2018 in the case of IMPRESS) and every subsequent three-year period thereafter as set out in Schedule 2 of the Charter. This involves deciding whether the applicant meets the 29 criteria set out in paragraphs 1 to 23 of Schedule 3 of the Charter ('the criteria'). If the Board is satisfied that all the criteria continue to be met, then the Regulator shall continue to be recognised under the Charter.

The Board met on 22 April 2025 to consider evidence and decide whether IMPRESS continues to meet the requirements set out in the criteria.

In Part 4 below, the Board's discussion on each of the criteria is set out, along with relevant extracts from the Executive's Assessment.

A list of all the documents considered by the Board (with hyperlinks) is included in Part 6.

Part 2: Summary of the PRP Board’s decision-making process on 22 April 2025

At the meeting on 22 April 2025, the Board met to consider the report of the PRP Executive’s Assessment¹ of the third cyclical review of IMPRESS under the Royal Charter (‘the Executive’s Assessment’).

At the meeting, PRP Chair Kathryn Cearnys (‘the Chair’) outlined the process for the Board’s decision-making. The Chair reminded the Board that the decision on whether IMPRESS continues to meet the criteria in Schedule 3 of the Charter was for the Board alone to make based on the papers presented to them, with the Executive’s Assessment for consideration along with any further information provided at this meeting.

The Chair confirmed with Board members that they:

- had received and taken the opportunity to consider the Executive’s Assessment and supporting documentation; and
- had not had any pre-discussion outside of this Board meeting regarding its contents.

The Chair confirmed that she had been given an advance copy of the Executive’s Assessment to consider whether any further information needed to be included prior to the Board’s decision, but had taken the view that nothing further was required. The Chair confirmed that she had not had any pre-discussion outside of this Board meeting regarding the contents.

In terms of the decision-making process, the Chair set out that, due to the interaction between the Charter criteria and the overlap of information applicable to some of them, the Board would follow these steps:

- consider each of the criteria and the supporting documentation as presented in the Executive’s Assessment without expressing any view on compliance with the Charter criteria at this stage;
- during this process, the Board would have the opportunity to ask questions of the PRP Executive and seek any clarifications from the IMPRESS representatives who were also present; and
- having considered all the information related to each criterion, the Board would return to consider and reach a view on compliance with the criteria one by one and ultimately make a decision on the cyclical review as a whole.

¹ Annex B to PRP Board Paper PRP09(25) — Cyclical review of the recognition of IMPRESS under the Royal Charter: PRP Executive Assessment and recommendations to the PRP Board.

To support the Board's consideration, the Executive's Assessment was structured criterion-by-criterion as follows:

- the criterion and indicators of compliance
- a historic summary of the Board's consideration at the previous Cyclical Review
- any information submitted by IMPRESS and supporting evidence
- the Executive's Assessment of the IMPRESS submission, supporting evidence, and any evidence sourced from elsewhere
- the Executive's recommendation as to whether they considered that IMPRESS continues to demonstrate ongoing compliance with the requirements of the Charter.

The Chair noted the Executive's confirmation that there had been no relevant changes since the Executive's Assessment had been sent out. The PRP had received an email about IMPRESS from a member of the public who had been the subject of an article about which IMPRESS handled a complaint. This email alleged breaches of the criteria by IMPRESS in their handling of the matter, but no evidence had been examined as yet. The Board agreed that if, after investigation, any breaches of the criteria were found, then an ad hoc review process could be initiated. Therefore, the cyclical review process could proceed without the need to adjourn and make IMPRESS wait an indefinite period for a decision.

The Executive's Assessment confirmed that the third cyclical review of IMPRESS to determine whether it continues to meet the requirements in the Charter followed the same process as was used in both previous cyclical reviews.

This included:

- a request for IMPRESS to submit evidence regarding its ongoing compliance with the criteria, with a particular focus on what has changed since the last cyclical review
- a public call for information seeking views on the evidence submitted by IMPRESS
- two verification visits to review case files relating to IMPRESS' Regulatory Scheme Procedures and review other documents
- communication with publishers subscribing to the IMPRESS Regulatory Scheme, inviting views on IMPRESS directly
- preparation of the Executive's Assessment for the Board's consideration

The Chair also reminded the Board that the PRP Executive's recommendations regarding whether IMPRESS demonstrated ongoing compliance against each of the criteria were in no way binding on the Board. The Board must reach its own view. If the Board felt that further information was required, a decision did not have to be made at this meeting.

The Chair noted that IMPRESS had appointed a new Chair and planned to set up two new subsidiaries. These would be discussed under the relevant criteria.

Part 3: Framework for the Cyclical Review of an independent Self-Regulatory Body of the Press recognised under the Charter

Article 4.1(b) of the Charter provides for the Board to review whether a Regulator which has been granted recognition shall continue to be recognised. The Board applies the Scheme of Recognition as stated in Article 4.2(a) and reviews against the recognition criteria.

Schedule 2, paragraph 5(a), provides that the Board must review the Recognition of a Regulator as soon as practicable after the end of the period of two years beginning with the day of the Recognition and every subsequent three-year period thereafter.

In considering the evidence regarding whether a regulator continues to meet the requirements of the criteria, the Board also applied [The PRP Board's Indicative View on Some Elements of the Charter](#), formulated and consulted upon by the PRP, as stated in Schedule 2, paragraph 13.

Schedule 3 sets out the 29 recognition criteria that must be met, and it is the Board's role to assess whether the Regulator continues to meet those criteria.

If a Regulator meets the criteria, then the Board decision will be that the Regulator continues to be Recognised. The Board cannot apply any additional considerations or fail to consider any Charter requirements.

Under Schedule 2, paragraph 11, the Board may withdraw Recognition following a cyclical review if it is satisfied that the Regulator is not meeting the recognition criteria or where it deems that it has insufficient information to determine whether or to what extent the Regulator is meeting those criteria.

Schedule 2, paragraph 12 states that the Board may not withdraw Recognition from a Regulator unless the Board has given the Regulator at least three months' notice in writing of its proposal to do so.

Part 4: Assessment against the Recognition Criteria

Criterion 1

An independent self-regulatory body should be governed by an independent Board. In order to ensure the independence of the body, the Chair and members of the Board must be appointed in a genuinely open, transparent and independent way, without any influence from industry or Government. For the avoidance of doubt, the industry's activities in establishing a self-regulatory body, and its participation in making appointments to the Board in accordance with criteria 2 to 5; or its financing of the self-regulatory body, shall not constitute influence by the industry in breach of this criterion.

Discussion

The PRP Board considered the analysis on pages 8 to 12 of the Executive's Assessment.

The Board acknowledged that criteria 1 to 5 are interlinked and needed to be considered together. Regarding the details contained in the Executive's Assessment relating to criterion 1, the Board noted the process of appointing the new IMPRESS Chair, the appointment of new IMPRESS Board members, and the reappointment of existing members. The Board noted the views in the Executive's Assessment on independence. The Board also noted the view that the creation of the new subsidiaries would not adversely impact IMPRESS' financial independence. The Board was satisfied that IMPRESS continued to meet the requirements of criterion 1.

Criterion 2

The Chair of the Board (who is subject to the restrictions of criterion 5(d), (e) and (f)) can only be appointed if nominated by an appointment panel. The selection of that panel must itself be conducted in an appropriately independent way and must, itself, be independent of the industry and of Government.

Discussion

The PRP Board considered the analysis on page 14 of the Executive's Assessment and noted the link to criterion 3.

IMPRESS confirmed that it was going through the process of handover to its new Chair. The Board was satisfied that IMPRESS continued to meet the requirements of criterion 2.

Criterion 3

The appointment panel:

- a) should be appointed in an independent, fair and open way;
- b) should contain a substantial majority of members who are demonstrably independent of the press;
- c) should include at least one person with a current understanding and experience of the press;
- d) should include no more than one current editor of a publication that could be a member of the body.

Discussion

The PRP Board considered the analysis on pages 15 to 17 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 3.

Criterion 4

The nomination process for the appointment of the Board should also be an independent process, and the composition of the Board should include people with relevant expertise. The appointment panel may only nominate as many people as there are vacancies on the Board (including the Chair), and the Board shall accept all nominations. The requirement for independence means that there should be no serving editors on the Board.

Discussion

The PRP Board considered the analysis on pages 18 to 19 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 4.

Criterion 5

The members of the Board should be appointed only following nomination by the same appointment panel that nominates the Chair, together with the Chair (once appointed), and should

- a) be nominated by a process which is fair and open;
- b) comprise a majority of people who are independent of the press;
- c) include a sufficient number of people with experience of the industry (throughout the United Kingdom) who may include former editors and senior or academic journalists;
- d) not include any serving editor;
- e) not include any serving member of the House of Commons, the Scottish Parliament, the Northern Ireland Assembly, the National Assembly for Wales, the European Parliament or the House of Lords (but only if, in the case of the House of Lords, the member holds or has held within the previous 5 years an official affiliation with a political party) or a Minister of the Crown, a member of the Scottish Government, a Northern Ireland Minister or a Welsh Minister; and
- f) in the view of the appointment panel, be a person who can act fairly and impartially in the decision-making of the Board.

Discussion

The PRP Board considered the analysis on pages 20 to 23 of the Executive's Assessment. The Board agreed that the criteria allowed the reappointment of IMPRESS Board members. The Board also agreed with the interpretation of the term "independent of the press". The Board was satisfied that IMPRESS met criterion 5 and therefore criteria 1–5 collectively.

Criterion 6

Funding for the system should be settled in agreement between the industry and the Board, taking into account the cost of fulfilling the obligations of the Regulator and the commercial pressures on the industry. There should be an indicative budget which the Board certifies is adequate for the purpose. Funding settlements should cover a four- or five-year period and should be negotiated well in advance.

Indicators

- The Regulator is funded adequately to fulfil its Charter obligations.
- The Regulator adopts policies and mechanisms to ensure that funding arrangements cover the prescribed period and undertakes reviews in an appropriate time.
- The timing for negotiating funding settlements is not such as to create a concern that the negotiation would impact on the independence or perceived independence of the Board.

Discussion

The PRP Board considered the analysis on pages 24 to 29 of the Executive's Assessment. The Board noted that there had been no new funding settlement in the cyclical review period, but agreed that it needed to consider whether IMPRESS remained adequately funded to meet its obligations.

IMPRESS confirmed that the indicative budget for the four-year period from 31/03/25 to 31/03/29, supplied to the PRP, had been approved unamended by the IMPRESS Board at its March 2025 meeting.

The PRP Board noted that two new subsidiaries were being set up and commented that IMPRESS' budget would need to include details of the funding. IMPRESS confirmed that funding for the subsidiaries was being arranged externally and would not come from the existing grant.

The PRP Board was satisfied that IMPRESS continued to meet criterion 6.

Criterion 7

The standards code must ultimately be the responsibility of, and adopted by, the Board, advised by a Code Committee which may comprise both independent members of the Board and serving editors. Serving editors have an important part to play although not one that is decisive.

Discussion

The PRP Board considered the analysis on pages 30 to 31 of the Executive's Assessment and was satisfied that IMPRESS continued to meet criterion 7.

Criterion 8

The code must take into account the importance of freedom of speech, the interests of the public (including but not limited to the public interest in detecting or exposing crime or serious impropriety, protecting public health and safety and preventing the public from being seriously misled), the need for journalists to protect confidential sources of information, and the rights of individuals. Specifically, it must cover standards of:

- a) conduct, especially in relation to the treatment of other people in the process of obtaining material;
- b) appropriate respect for privacy where there is no sufficient public interest justification for breach; and
- c) accuracy, and the need to avoid misrepresentation.

Indicators

- The Regulator has demonstrably considered relevant legislation, codes, rules and/or guidance in developing the code.
- The Regulator meets the requirements set out in the criterion, including in 8 (a), (b) and (c).
- The code is framed in a manner consistent with the potential for complaints to be heard and decided upon by the Regulator under criterion 11 (a) to (c).

Discussion

The PRP Board considered the analysis on pages 32 to 35 of the Executive's Assessment.

The PRP Board noted the changes to the Code and was encouraged to see the amendments given the importance of the document. The PRP Board asked IMPRESS how it managed to keep the Code up to date with AI changes, and whether the Code was able to take a forward-looking view of such matters. IMPRESS confirmed that the Code Committee meets quarterly and that the Code is kept under review. New guidance on AI was due to be issued the following week, and no doubt this would evolve over time.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 8.

Criterion 8A

A self-regulatory body should provide advice to the public in relation to issues concerning the press and the standards code, along with a service to warn the press, and other relevant parties such as broadcasters and press photographers, when an individual has made it clear that they do not welcome press intrusion.

Indicators

- General and specific advice to the public is provided in a way which makes it easily accessible.
- The service to warn the press is easily accessible and available.
- The Regulator identifies appropriate tools and mechanisms to notify relevant parties on timescales which ensure that the recipients of it can respond promptly.

Discussion

The PRP Board considered the analysis on pages 36 to 37 of the Executive's Assessment.

IMPRESS confirmed in response to a question from the PRP Board that requests from the public for advisory notices are rare.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 8A.

Criterion 8B

A self-regulatory body should make it clear that subscribers will be held strictly accountable under the standards code for any material that they publish, including photographs, however sourced. This criterion does not include advertising content.

Indicator

- Approach taken to defining advertising content takes account of the Advertising Standards Authority's definition to ensure that regulatory gaps do not emerge.

Discussion

The PRP Board considered the analysis on pages 38 to 40 of the Executive's Assessment. The Board was satisfied that IMPRESS continues to meet the requirements of criterion 8B.

Criterion 8C

A self-regulatory body should provide non-binding guidance on the interpretation of the public interest that justifies what would otherwise constitute a breach of the standards code. This must be framed in the context of the different provisions of the code relating to the public interest.

Indicator

- Guidance is provided in a way which makes it easily accessible.

Discussion

The PRP Board considered the analysis on pages 41 to 42 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 8C.

Criterion 8D

A self-regulatory body should establish a whistleblowing hotline for those who feel that they are being asked to do things which are contrary to the standards code.

Indicator

- Concerns are welcomed, valued and treated seriously.
- Individuals are not victimised for contacting the hotline.
- Safeguards are in place to prevent victimisation.
- The Regulator ensures that the hotline is easily accessible and available to anyone who might reasonably want to access it.
- Concerns identified through the hotline are dealt with appropriately and effectively through mechanisms available to the regulator.
- Confidentiality and anonymity are assured at all times, where requested.
- The Regulator demonstrates clear leadership and commitment to whistleblowing.
- The Regulator monitors and records data arising from any use of the hotline and learns from and acts appropriately on concerns raised, action taken, and outcomes.
- The Regulator has appropriate tools to support individuals who raise concerns.

Discussion

The PRP Board considered the analysis on pages 43 to 45 of the Executive's Assessment. The Board was satisfied that IMPRESS continued to meet the requirements of criterion 8D.

Criterion 9

The Board should require, of those who subscribe, appropriate internal governance processes (for dealing with complaints and compliance with the standards code), transparency on what governance processes they have in place, and notice of any failures in compliance, together with details of steps taken to deal with failures in compliance.

Indicators

- The Regulator requires subscribers to have procedures in place for dealing with complaints and standards compliance, recording and reviewing of compliance failures (whether escalated or not) and remedial actions taken/ reports made.
- The Regulator requires the subscriber to nominate a senior individual to take responsibility for dealing and complying with the standards code.
- The Regulator requires subscribers to be transparent in their processes.
- The Regulator ensures that the subscriber's complaints mechanism manages conflicts of interest.

Discussion

The PRP Board considered the analysis on pages 46 to 48 of the Executive's Assessment. The Board noted the increase in new subscribers to IMPRESS. The Board was satisfied that IMPRESS continues to meet the requirements of criterion 9.

Criterion 10

The Board should require all those who subscribe to have an adequate and speedy complaint handling mechanism; it should encourage those who wish to complain to do so through that mechanism and should not receive complaints directly unless or until the internal complaints system has been engaged without the complaint being resolved in an appropriate time.

Indicators

- The complaints procedure is easily accessible.
- The Regulator requires subscribers to have a mechanism for dealing with complaints which is adequate and speedy, including that it should:
 - be publicised in a way which ensures that people who might wish to take advantage of it would know of its existence and how to use it;
 - identify when a complaint is being made;
 - facilitate the complainant's understanding of how the complaint relates to the code;
 - acknowledge receipt of the complaint and notify the complainant how the complaint will be handled in an appropriate timeframe;
 - share findings of investigations and conclusions with the complainant; and
 - if the complaint is not resolved, provide details on how the complaint can be referred to the regulator.
- The Regulator has in place mechanisms which ensure that subscribers deal with complaints in a timeframe that is effective and proportionate for the subscriber and type of complaint, in accordance with performance indicators.
- The Regulator requires subscribers to have an accessible complaints mechanism that considers vulnerable individuals and those who need additional support.

Discussion

The PRP Board considered the analysis on pages 49 to 51 of the Executive's Assessment.

The Board asked whether IMPRESS considered that a reason why some individuals do not complain directly to publishers was that they were concerned about potential retribution. IMPRESS stated that there was the opportunity to provide confidential feedback which mitigated this risk, but overall, it does not have the data to identify the full reasons why people do not go directly to publishers. IMPRESS confirmed that the number of occasions where complainants came directly to them because publishers had not dealt with the complaint was small and resulted in feedback to the publisher.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 10.

Criterion 11

The Board should have the power to hear and decide on complaints about breach of the standards code by those who subscribe. The Board will need to have the discretion not to look into complaints if they feel that the complaint is without justification, is an attempt to argue a point of opinion rather than a standards code breach, or is simply an attempt to lobby. The Board should have the power (but not necessarily the duty) to hear complaints:

- a) from anyone personally and directly affected by the alleged breach of the standards code, or
- b) where there is an alleged breach of the code and there is public interest in the Board giving consideration to the complaint from a representative group affected by the alleged breach, or
- c) from a third party seeking to ensure accuracy of published information.

In the case of third-party complaints the views of the party most closely involved should be taken into account.

Indicators

- The complaints and escalation procedure:
 - is publicised and explained in a way which makes it easily accessible.
 - operates in a manner and on a timescale which ensures complaint adjudications are effective.
- The Board ensures that both parties understand how the complaint relates to the code.

Discussion

The PRP Board considered the analysis on pages 52 to 57 of the Executive's Assessment. The Board commented that there had been a reasonable and acceptable response to the PRP Executive's question as to what steps had been taken by IMPRESS following the service failure in relation to the Derby News complaint.

The Board was satisfied that IMPRESS continues to meet the requirements of criterion 11.

Criterion 12

Decisions on complaints should be the ultimate responsibility of the Board, advised by complaints handling officials to whom appropriate delegations may be made.

Discussion

The PRP Board considered the analysis on pages 58 to 59 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 12.

Criterion 12A

The Board should be prepared to allow a complaint to be brought prior to legal proceedings being commenced. Challenges to that approach (and applications to stay or sist) can be decided on the merits.

Discussion

The PRP Board considered the analysis on page 60 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 12A.

Criterion 13

Serving editors should not be members of any Committee advising the Board on complaints and should not play any role in determining the outcome of an individual complaint. Any such Committee should have a composition broadly reflecting that of the main Board, with a majority of people who are independent of the press.

Indicator

- The Regulator takes appropriate governance steps to ensure that serving editors do not advise on complaints, or determine their outcome.

Discussion

The PRP Board considered the analysis on pages 61 to 62 of the Executive's Assessment.

The Board noted IMPRESS' description in the meeting of the process it follows to ensure that any Regulatory Committee meets this criterion. The Board was satisfied that IMPRESS continued to meet the requirements of criterion 13.

Criterion 14

It should continue to be the case that complainants are able to bring complaints free of charge.

Discussion

The PRP Board considered the analysis on page 63 of the Executive's Assessment:

The Board noted that IMPRESS continue to enable complainants to bring complaints free of charge and was satisfied that IMPRESS continues to meet the requirements of criterion 14.

Criterion 15

In relation to complaints, where a negotiated outcome between a complainant and a subscriber (pursuant to Criterion 10) has failed, the Board should have the power to direct appropriate remedial action for breach of standards and the publication of corrections and apologies. Although remedies are essentially about correcting the record for individuals, the power to direct a correction and an apology must apply equally in relation to:

- a) individual standards breaches; and
- b) groups of people as defined in criterion 11 where there is no single identifiable individual who has been affected; and
- c) matters of fact where there is no single identifiable individual who has been affected.

Indicator

- The mechanisms for achieving appropriate remedial action are designed to be credible and effective (including sufficiently fast) and operate in that way.

Discussion

The PRP Board considered the analysis on pages 64 to 65 of the Executive's Assessment.

The Board was satisfied that IMPRESS continues to meet the requirements of criterion 15.

Criterion 16

In the event of no agreement between a complainant and a subscriber (pursuant to criterion 10), the power to direct the nature, extent and placement of corrections and apologies should lie with the Board.

Discussion

The PRP Board considered the analysis on page 66 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 16.

Criterion 17

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

Discussion

The PRP Board considered the analysis on pages 67 to 68 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 17.

Criterion 18

The Board, being an independent self-regulatory body, should have authority to examine issues on its own initiative and have sufficient powers to carry out investigations both into suspected serious or systemic breaches of the code and failures to comply with directions of the Board. The investigations process must be simple and credible and those who subscribe must be required to cooperate with any such investigation.

Discussion

The PRP Board considered the analysis on pages 69 to 72 of the Executive's Assessment.

IMPRESS confirmed in response to a question from the PRP Board that certain publishers remain under active monitoring and could be followed up by an investigation if required.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 18.

Criterion 19

The Board should have the power to impose appropriate and proportionate sanctions (including but not limited to financial sanctions up to 1% of turnover attributable to the publication concerned with a maximum of £1,000,000) on any subscriber found to be responsible for serious or systemic breaches of the standards code or governance requirements of the body. The Board should have sufficient powers to require appropriate information from subscribers in order to ascertain the turnover that is attributable to a publication irrespective of any particular accounting arrangements of the publication or subscriber. The sanctions that should be available should include power to require publication of corrections, if the breaches relate to accuracy, or apologies if the breaches relate to other provisions of the code.

Discussion

The PRP Board considered the analysis on pages 73 to 75 of the Executive's Assessment.

IMPRESS confirmed that although it had not yet issued a fine, it would do so in an appropriate case. The Board noted that IMPRESS had the power to do so (as well as to require corrections and apologies) and was satisfied that IMPRESS continued to meet the requirements of criterion 19.

Criterion 19A

The Board should establish a ring-fenced enforcement fund, into which receipts from financial sanctions could be paid, for the purpose of funding investigations.

Discussion

The PRP Board considered the analysis on page 76 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 19A.

Criterion 20

The Board should have both the power and a duty to ensure that all breaches of the standards code that it considers are recorded as such and that proper data is kept that records the extent to which complaints have been made and their outcome; this information should be made available to the public in a way that allows understanding of the compliance record of each title.

Discussion

The PRP Board considered the analysis on pages 76 to 77 of the Executive's Assessment.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 20.

Criterion 21

The Board should publish an Annual Report identifying:

- a) the body's subscribers, identifying any significant changes in subscriber numbers;
- b) the number of:
 - (i) complaints it has handled, making clear how many of them are multiple complaints,
 - (ii) articles in respect of which it has considered complaints to be without merit, and
 - (iii) articles in respect of which it has considered complaints to be with merit, and the outcomes reached,in aggregate for all subscribers and individually in relation to each subscriber;
- c) a summary of any investigations carried out and the result of them;
- d) a report on the adequacy and effectiveness of compliance processes and procedures adopted by subscribers; and
- e) information about the extent to which the arbitration service has been used.

Indicators

- Annual Report is easily accessible.
- Annual Report is published annually.

Discussion

The PRP Board considered the analysis on page 78 of the Executive's Assessment:

The Board was satisfied that IMPRESS continued to meet criterion 21.

Criterion 22

The Board should provide an arbitral process for civil legal claims against subscribers which:

- a) complies with the Arbitration Act 1996 or the Arbitration (Scotland) Act 2010 (as appropriate);
- b) provides suitable powers for the arbitrator to ensure the process operates fairly and quickly, and on an inquisitorial basis (so far as possible);
- c) contains transparent arrangements for claims to be struck out, for legitimate reasons (including on frivolous or vexatious grounds);
- d) directs appropriate pre-publication matters to the courts;
- e) operates under the principle that arbitration should be free for complainants to use (note 1);
- f) ensures that the parties should each bear their own costs or expenses, subject to a successful complainant's costs or expenses being recoverable (having regard to section 60 (note 2) of the 1996 Act or Rule 63 of the Scottish Arbitration Rules (note 3) and any applicable caps on recoverable costs or expenses); and
- g) overall, is inexpensive for all parties.

Notes:

1. *The principle that arbitration should be free does not preclude the charging of a small administration fee, provided that: (a) the fee is determined by the Regulator and approved by the Board of the Recognition Panel; and (b) the fee is used for the purpose of defraying the cost of the initial assessment of an application and not for meeting the costs of determining an application (including the costs of the arbitration).*
2. *Section 60 (Agreement to pay costs in any event): An agreement which has the effect that a party is to pay the whole or part of the costs of the arbitration in any event is only valid if made after the dispute in question has arisen.*
3. *The Rules are set out in Schedule 1 to the Arbitration (Scotland) Act 2010. Rule 63 (Ban on predispute agreements about liability for arbitration expenses) M: Any agreement allocating the parties' liability between themselves for any or all of the arbitration expenses has no effect if entered into before the dispute being arbitrated has arisen.*

Indicator

- The Regulator either itself provides, or has in place arrangements to ensure that someone else will on its behalf provide, the arbitral process.

Paragraphs 6 and 7 of Schedule 2 of the Charter state:

6. As part of its Cyclical Review of a Regulator the Board of the Recognition Panel may:

- a) call for (or receive voluntarily from a Regulator) evidence from that Regulator about the fairness, effectiveness and sustainability of its arbitral process (including any small administration fee) and its complaints handling (to the extent that this interacts with the arbitral process), including from any assessment of these arrangements that the Regulator has undertaken, and
- b) seek evidence on the matter from third parties.

7. Where the Board has received such evidence as part of a Cyclical Review, it shall consider that evidence, and publish its conclusions on the fairness, effectiveness and sustainability of the Regulator's arbitral process. Such conclusions may include:

- a) recommendations about or revisions to the Recognition Panel's policies and guidance on the operation of Criterion 22 (published in accordance with paragraph 13 (policies and guidance) of this Schedule);
- b) directions to the Regulator to amend any small administration fee; or
- c) that where it determines the requirement to provide an arbitral process causes serious financial harm to subscribers who publish only on a local or regional basis, the Recognition Panel may allow recognition to continue on the basis that such subscribers may, but need not, participate in the Regulator's arbitral process. Criterion 22 shall be interpreted accordingly.

Discussion

The PRP Board considered the analysis on pages 79 to 84 of the Executive's Assessment.

IMPRESS confirmed that a Regulatory Committee had agreed that the current application for arbitration should be referred to the arbitrator.

The Board was satisfied that IMPRESS continued to meet criterion 23.

The Board confirmed that it was making no recommendations in relation to arbitration under Schedule 2 paragraphs 6 and 7 of the Charter but would keep matters under review. IMPRESS confirmed that it would keep the PRP Executive updated on the process of the current arbitration application.

Criterion 23

The membership of a regulatory body should be open to all publishers on fair, reasonable and non-discriminatory terms, including making membership potentially available on different terms for different types of publisher.

Indicators

- Any variation in terms for different types of publisher needs to be such as to facilitate membership on fair, reasonable and non-discriminatory terms.
- Those terms need properly to take into account matters such as the financial position of a publisher.

Discussion

The PRP Board considered the analysis on pages 85 to 91 of the Executive's Assessment.

The Board noted that IMPRESS confirmed in the meeting that it had provided training to its Board and committee members on the appropriate use of social media given their role and that it does react to deal with situations of inappropriate comments if they arise. The PRP Board also noted that IMPRESS confirmed it is rigorous about Board members recusing themselves from decisions in the event of a potential conflict of interest.

The Board was satisfied that IMPRESS continued to meet the requirements of criterion 23.

Part 5: Decision

As the Board had agreed that IMPRESS had satisfied the requirements of all the criteria individually, IMPRESS continues to satisfy the Charter's requirement for recognition. The Board, therefore, concluded that IMPRESS will continue to be recognised as an approved regulator within the meaning of the Charter.

Part 6: Documents considered by the PRP Board

The PRP Executive's Assessment has been published on the PRP's website and includes links to the associated documentation, including all components of IMPRESS' self-assessment and evidence.

Cover paper PRP09(25) [PRP0925-Cyclical-Review-of-IMPRESS.pdf](#) for PRP Board determination on the cyclical review, including the following annexes:

- Annex A: Schedule 3 of the Charter - [Annex-A-to-PRP0925-Schedule-3-of-the-Charter.pdf](#)
Annex B: Cyclical review of the recognition of IMPRESS under the Royal Charter — PRP Executive Assessment with links to supporting documentation - [Annex-B-to-PRP0925-Cyclical-Review-of-IMPRESS-Executive-Assessment-and-Recommendations-to-the-PRP-Board-April-2025.pdf](#)