

Submission to the PCC Governance Review by Trinity Mirror Plc

This paper is submitted on behalf of Trinity Mirror Plc.

Introduction

Trinity Mirror welcomes this opportunity to submit its views to the PCC Governance Review.

Trinity Mirror is a passionate supporter of a self-regulatory system for the press, and as such we are firm supporters of the Press Complaints Commission (“the Commission”) as a key part of that system. We believe that it is vital that this remains a self-regulatory system and that there is no imposition of any form of “regulator”. We believe that it is to the credit of the press that they have introduced and run a self-regulatory system with a code of practice – the Editor’s Code of Practice (“the Code of Practice”) which they subscribe to.

However, to ensure that the press abides by its own rules they created the Commission to consider and adjudicate on claims that the Code of Practice had been breached. Quite correctly, and in order to give the Commission credibility, the Commission has a majority of non-press members (referred to in the Articles of Association of the Commission (“the Articles”) as the “Public Members”).

In order to preserve and maintain separation from the Commission and the Editors a third body, the Press Standards Board of Finance (“PressBoF”), provides the funding for the Commission and also approves the remit of the Commission.

We now turn to the areas specified under the Review.

1. The PCC Board

We believe that it is important to remember that the Commission has one simple primary role and that is to adjudicate on potential breaches of the Code of Practice in accordance with Article 53.1 of the Articles.

Trinity Mirror believes that attempts to extend the role of the Commission beyond this role have been a mistake. In particular Article 53.1A is too vague and loosely worded as is Article 53.4.

Allied to this are two related problems. They are,

- i. The extent to which the Commission considers complaints from people or bodies who are not “the person affected”, as that term is defined in Article 53.9(b). (There is a conflict, it seems to us, between Article 53.3 and Article 53.4.)
- ii. The extent to which the Commission considers a complaint where there is a legal remedy. In this connection we believe that the wording of Article 53.3(c) should be analysed and re-addressed.

Sub-committees

We have no submission to make on sub-committees save that clearly if the work of the Commission is to be delegated to them it is important that those sub-committees are provided for in the Articles of Association and that the composition of them complies with the Articles which apply to the Commission.

2. The Appointments Commission

We believe that the Articles should be amended so that Press Members (as that term is defined in the Articles) shall be appointed by PressBoF.

3. Transparency

We do not support the introduction of public hearings but believe that consideration could be given to the Commission publishing the minutes which, pursuant to Article 30(c) of the Articles, are kept of the proceedings of the Commission.

4. **Accountability**

Trinity Mirror believes that consideration should be given to a proper appeal process although clearly consideration must be given to this leading to legitimate appeals as opposed to simply requests for re-hearings.

5. **Articles of Association**

Trinity Mirror believes that the Articles should be amended so that 'no amendment shall be made to the Articles without the prior approval in writing of PressBoF'.

Conclusion

We are happy to expand upon any of the above areas if that would be helpful and would be willing to participate in an evidence session if that is deemed appropriate and helpful by those conducting the Governance Review.