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# Complaints Committee Handbook

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# 1. Background

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The Independent Press Standards Organisation's role is to monitor, maintain and where necessary improve the standards of the press, following the principles set out in the Editors' Code of Practice. The complaints function plays an essential part in IPSO's role in monitoring and maintaining standards by identifying and requiring remedial action for breaches of the Code.

The Complaints Committee determines whether the Code has been breached in individual cases that have been investigated by IPSO's Executive and imposes sanctions in appropriate cases. The Committee applies the standards set out in the Editors' Code in individual cases, and in turn – and with the involvement of IPSO's Board – helps set the standards IPSO expects of the industry it regulates.

## 2. Founding documents and relationships to publishers

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IPSO operates an independent system of regulation underpinned by legally-binding commercial contracts with member publishers. A series of documents provide a framework for its powers and procedures: the Scheme Membership Agreement (SMA), which constitutes IPSO's contract with each publisher; its Regulations; its Articles of Association; and its Financial Sanctions Guidance, for use in cases in which the Board imposes a fine on a member publisher for a major standards failure.

Under the terms of the SMA, publishers are obliged to comply with the Editors' Code and IPSO's Regulations and to implement and maintain appropriate procedures to ensure the compliance of their employees and agents; to implement and maintain effective and clear procedures for the reasonable and prompt handling of complaints; and to act in an open and co-operative way towards IPSO. Publishers agree not to take any disciplinary action against any employee for appropriate use of IPSO's whistleblowing hotline or for refusing, in good faith, to act in a manner which the employee believes is contrary to the Editors' Code. Publishers agree to provide annual statements explaining their compliance practices and, if required by IPSO's Board, to provide quarterly statements setting out the outcome of complaints framed under the Editors' Code that it handles internally.

In turn, IPSO agrees to carry out the functions described in its Regulations and to do so fairly and proportionately, having regard to the nature of its members and their publications. IPSO's Regulations are published on its website. The most relevant sections are Regulations 7-42 and Appendix C. Committee members are expected to be generally familiar with the content of these Regulations and to consult them as necessary.

The Scheme Membership Agreement prescribes a specific, and limited, set of circumstances in which member publishers may withdraw from the

scheme within the five-year term of the agreement. They do not include disagreement with a ruling by the Committee. Every five years, publishers have an opportunity to withdraw from the scheme, with a year's notice, otherwise the contract rolls over to another five-year period. The current term expires in September 2025.

There are two other organisations that perform important and separate roles within the system of regulation overseen by IPSO. The Regulatory Funding Company (RFC), made up of industry representatives, collects subscriptions from IPSO member publishers and uses them to fund IPSO's work according to a budget settlement reached between IPSO and the RFC which extends to the end of the current contract period. The RFC also represents the industry in negotiations with IPSO in relation to the certain issues defined in IPSO's foundation documents, including any changes proposed by IPSO to its Regulations.

The Editors' Code of Practice Committee, convened by the RFC, consults on and proposes changes to the Code. Previously an all-industry Committee, it now includes five lay representatives, including the Chair and Chief Executive.

### 3. The Editors' Code of Practice

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The Editors' Code contains 16 Clauses that govern the nature of material that may be published and the conduct of journalists.

The first version of the Editors' Code was published in January 1991, setting the standards to be enforced by the newly-created Press Complaints Commission. Over the years, it has been regularly revised.

Most significantly, following the death of Diana, Princess of Wales, in September 1997, the Code was extensively rewritten to incorporate new provisions relating to privacy, harassment, intrusion into grief and shock, and children. The wording for the new privacy clause was drawn largely from the European Convention on Human Rights.

The Editors' Code of Practice conducts public consultations on the Code every three years.

The Code is structured in three parts: the preamble sets the framework within which the Code should be interpreted; the numbered Clauses stipulate in practical terms the standards against which publications' conduct will be judged by IPSO; and the public interest section provides a non-exhaustive list of the circumstances in which IPSO may recognise an exception to the Code because the publication has established a sufficient public interest.

The Committee formally considers complaints framed under the numbered Clauses of the Code, but it does so against the background set out in the preamble and the public interest section.

## 4. Structure and membership

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The Committee consists of 12 members: 7 lay and 5 editorial. Its Chair is also Chair of IPSO's Board, but under IPSO's Articles, no other member of the Board or Appointments Panel may be a member of the Committee.

Also barred from serving on the Committee are serving editors of bodies that are or could be Regulated Entities; MPs, MSPs, AMs, or MLAs; or members of the UK, Scottish or Welsh Government, or the Northern Ireland Executive. Committee members must inform the Chair before standing for any such office and if appointed, must inform the Chair and resign.

Apart from the Chair, who is appointed by the Appointments Panel, Committee members are appointed by the Board. The Chair has appointed a Deputy Chair to chair meetings in his absence.

Lay members must, at the time of their appointment, have no connection with any organisation that is currently, or in application to be, an IPSO member. Neither may lay members have connection with the RFC; although they are not barred from continuing to serve if they are appointed to the RFC subsequently.

In appointing editorial members, the Board must take account of the views of the Regulatory Funding Company and aim to ensure that there are at all times at least five members with recent senior editorial experience, with at least one having such experience at a publisher in each of the following sectors: national mass market newspapers; national 'broadsheet' newspapers; Scottish newspapers; regional newspapers; and magazines.

The quorum for Committee meetings is 7, of whom at least 4 must be lay members and at least 3 editorial members, of whom one must have "mass market" or "broadsheet" experience, and one must have Scottish or regional experience.

IPSO's foundation documents refer to lay and editorial members as, respectively, "independent" and "industry" members. IPSO does not use this terminology as it expects all Committee members to act and form judgments independently, regardless of whether or not they have experience working in the newspaper or magazine industry.



## 5. General duties and expectations

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### *Adjudication of complaints, and procedural matters related to individual complaints*

Committee members' primary roles are to consider and issue rulings on complaints that have been investigated by the Executive staff, and to make procedural decisions about the handling of complaints where necessary.

All members of the Committee are expected to participate actively in the consideration of complaints, including those circulated weekly on the papers, and to attend Committee meetings, unless prevented by unavoidable circumstances.

### *Consideration of standards issues and procedural matters*

As well as issuing judgements on how the Code applies in individual cases, the Committee feeds into the process by which IPSO produces and disseminates guidance on standards issues more broadly. This includes making formal recommendations to the Board regarding potential changes to the Editors' Code and participating in the process of formulating guidance on the application of the Code.

The Committee also makes recommendations to the Board regarding the procedures that IPSO should adopt to ensure that it handles complaints effectively and in a manner that serves IPSO's broader aim to raise standards.

### *External affairs*

Although Committee members do not have a formal role in IPSO's External Affairs function and are not obligated to participate in any external events, IPSO believes that Committee members constitute a valuable resource for the organisation that extends beyond their roles as adjudicators. IPSO welcomes any ideas from Committee members as to

ways in which they could represent IPSO publicly, and in particular raise awareness of IPSO in areas or among communities where our work is less well known. These should be coordinated with the Head of Communications and Chief Executive.

### *Time commitment*

The time commitment necessary to fulfil Committee members' obligations varies week to week, depending on the volume and nature of the cases being considered and other procedural matters requiring review. The nature of the role makes it impossible to be specific about the maximum time commitment, and during busy periods it can expand significantly. Overall, it is expected that Committee members should spend around 4 days per month on work for IPSO, but many Committee members report devoting more hours to the work than this, particularly after accounting for attendance at Committee meetings.

The Executive strives to ensure that Committee members are able to work as efficiently as possible and remain open to suggestions from Committee members for possible improvements. Any concerns that the workload is becoming excessive may be raised with the Chair, Chief Executive or Head of Complaints. The Deputy Chair also plays an important role in serving as an informal channel of communication between the Executive staff and the Committee; Committee members are free to raise concerns relating to the working of the Committee or its relationship with the Executive staff with him or her at any time.

Although the Complaints Committee and Board fulfil different and complementary functions, it is essential that they maintain regular and full communication, not least because all of the Committee's powers are, formally, delegated from the Board (although the Board is legally required, by its Regulations, to make this delegation). It is helpful to this end that the Board and Committee share a Chair, but IPSO has put in place other channels to ensure that members of each remain informed about the work of IPSO as a whole:

- Board and Committee members receive weekly updates with information about complaints and corporate matters, including

adjudications scheduled for publication and upcoming external events;

- Committee and Board members receive electronic access to all papers prepared for the consideration of both committees (except where there is a relevant conflict of interest that makes this inappropriate); and
- Committee members are encouraged to observe a Board meeting at least once each year (as Board members are encouraged to observe Committee meetings on the same basis).

The Committee also interacts with the Board in more formal ways:

- A Liaison Committee includes Complaints Committee members, Board members and staff. It ensures that there is appropriate communication and consensus on the standards that IPSO is setting for member publishers;
- The Deputy Chair of the Committee reports to the Board on the work of the Committee on an annual basis.

## 6. Relationship to the Board

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- The Committee regularly makes recommendations for the Board's approval on complaints-related procedural issues;
- The Committee will be asked to make formal recommendations to the Board regarding potential changes to the Editors' Code on the next occasion that the Code is subject to formal review.

## 7. Relationship to the Executive staff

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In order for IPSO to operate properly, it is essential to maintain relationships of mutual respect and trust between the Executive and the Complaints Committee.

Although most in-person contact between the staff and Committee members occurs during and around Committee meetings, members are encouraged to engage with the staff in less formal settings. Members are welcome to call staff to discuss issues raised by complaints or raise queries. They are also regularly invited to attend the staff's weekly complaints meeting, at which all on-going complaints under investigation are reviewed, and to attend training sessions co-ordinated by the Complaints Team.

## 8. Overview of the complaints function

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This section summarises the basic elements of IPSO's complaints procedure.

IPSO's complaints function is overseen by the Head of Complaints. The complaints process can be considered as comprising four distinct stages: the initial assessment process; referral to the publication's internal complaints procedures; the investigation and mediation process; and consideration by the Committee. This varies, however, and not all complaints will progress through all four stages.

### *Initial assessment*

The purpose of the initial assessment process is to determine whether a complaint or contact raises an issue that falls within IPSO's remit and should be considered further. This includes checking on whether the publication that is the subject of the complaint is an IPSO member; whether the complainant has identified a potential breach of the Editors' Code; whether the complaint has been made in time; and whether the complainant has standing to complain (whether the complainant is a "third party" and if so whether the complaint should be considered further). Usually, the Executive determines whether a complaint falls within IPSO's remit, but in some circumstances these determinations are referred immediately to the Committee. These include:

- Cases in which the Executive recommends that a complaint should not be considered because of potential difficulties arising from related legal proceedings;
- Decisions as to whether a complaint meets the bar set by the Regulations for formal consideration as a complaint from a representative group;

- Complaints which the Executive believes that are without justification, vexatious and/or disproportionate, and therefore should not be considered further.

The Executive may also elect to refer to the Committee in the first instance other complex or novel procedural points relating the nature of IPSO's remit.

Regardless of whether the initial determination has been made by the Executive or the Committee, any decision that a complaint will not be considered further is subject to review by the Committee, should the complainant request a review within 7 days. In general, reviews of such decisions by the Executive are requested by complainants only in cases where the Executive has determined that the complaint has been made by a third party or that it does not raise a possible breach of the Editors' Code.

The Executive staff will also review at the initial assessment stage whether there are any circumstances requiring adjustments to be made to IPSO's standard procedures, for example because the complainant has made a request regarding the manner in which IPSO should handle their personal information, is currently serving a custodial sentences, or has other special needs or requirements relating to the way in which IPSO communicates with them.

## *Referral to the publication's internal complaints procedures*

If the complaint falls within IPSO's remit, is properly made, and raises a potential breach of the Editors' Code, it is generally then forwarded to the relevant publication's internal complaints process; this is known as the "referral process", and the period during which it is being handled by the publication (which can extend for up to 28 days) as the "referral period".

The exceptions will be cases in which the complaint has already been through the publication's complaints process and has not been resolved to the complainant's satisfaction, or where the Executive considers that IPSO's earlier involvement is essential; these complaints will not be referred.

During the referral process the complaint is assigned to a named Complaints Officer and both parties (complainant and publication) are free to seek IPSO's advice and guidance.

A complaint is considered closed by IPSO if it is resolved to the complainant's satisfaction at the referral stage. Alternatively, if the complainant is not resolved by the publication's internal procedures (or if the complaint is not referred for one of the reasons outlined above), IPSO will commence its active investigation/mediation phase.

## *Investigation and mediation*

Before beginning the investigation/mediation stage, the Complaints Officer assigned to investigate the complaint will conduct a review of the complaint to assess the state of the complaint, considering what its prospects are for mediation and what further information the Committee may require from either party in order to reach a determination on the complaint, should mediation be unsuccessful. The Complaints Officer will then conduct a tightly-focussed correspondence with both parties and aim to bring the complaint to a satisfactory and efficient outcome, whether a mediated settlement or a ruling.

Should the complaint be resolved through mediation to the parties' satisfaction, a statement recording the nature of the complaint and the



outcome is published on IPSO's website; the Committee is not asked to issue a ruling.

### *Consideration by the Committee*

Where a ruling by the Committee is required because the matter has not been resolved through mediation, the material is prepared for its consideration using the process outlined in the next section.

Before a complaint is adjudicated, complainants are informed that the decision will be published and offered an opportunity to object to the publication of information about themselves or the subject matter of the complaint. The Committee considers any such requests before it considers the substance of the complaint, in a separate process.

## 9. Consideration and adjudication process

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Complaints that the Executive believes are ready for a determination by the Committee are presented to the Committee, either via correspondence, through a set of weekly papers that are submitted to Committee members for comments, or at a meeting, of which there are generally 10 per year. See below for more information on the adjudication process.

Regardless of the process, decisions on complaints are generally made by a consensus of the Committee, as required under Clause 27.8 of IPSO's Articles of Association. In practical terms, this means that while an individual member or small minority of the Committee may disagree, they are content to accept the decision as the fair and reasoned outcome of the deliberation of the Committee as a whole.

In considering complaints under the Editors' Code, the Committee is required to exercise a balancing act between the various rights of individuals, including the right to freedom of expression and the right to privacy. It acknowledges the public interest in the free flow of information, which enables individuals to inform and be informed, while recognising that its role in considering complaints is to enforce the limitations on this freedom that member publishers have agreed to impose on themselves, in the public interest, by virtue of participating in the system of independent regulation overseen by IPSO.

IPSO does not operate formal rules of evidence, but the Committee is required to, as best as it can, identify areas in which there is a factual dispute between the complainant and publication that has a bearing on the judgment it is required to make as to whether the Code has been breached; assess the evidence that has been provided to it by the parties or (less commonly) otherwise obtained by the Executive through the investigation process; and reach a judgment as to how that dispute should be resolved.

The Committee must then apply, using members' individual and collective judgment, the principles of the Code to this set of circumstances, bearing in mind the principle that the burden is on publications to demonstrate that they have taken care to comply with the Code.

The Committee's decisions should reflect, in the summary of the parties' positions, the key evidence and arguments that have been submitted to it. In the findings, they must identify clearly whether a breach has been established in relation to each Clause under complaint; set out comprehensively the reasons for the Committee's judgment as to whether a breach has been established; and explain what evidence it has relied on to reach that judgment and, where appropriate, the reasons why evidence submitted by either party has not been accepted.

### *Complaints considered on the papers*

The Executive circulates to the Committee dossiers of complaints for consideration in correspondence on a weekly basis through the Board Intelligence app, which can be accessed through a computer or via an iPad. Committee members have 7 days in which to review the dossiers and submit any written comments. These comments, along with any relevant comments by IPSO's solicitor, are compiled by the Executive into a grid, along with comments by the Executive setting out how it proposes to proceed with each complaint in light of the comments. The grid is circulated electronically. Committee members are given a deadline for comments in response, typically 48 hours after the time of circulation.

After the deadline has passed, and subject to any further comments by Committee members, the Executive proceeds as set out in the grid. Any substantive changes proposed by the Executive in response to Committee members' comments is re-circulated to the Committee electronically for its approval. If the Committee does not reach consensus on a complaint in correspondence, for example because one or more Committee members strongly dissent, it is held for discussion at a meeting.

Committee members are free to raise questions with members of the complaints staff about the substance of a complaint, the procedures

followed, or relevant previous cases, in order to assist their understanding of the complaint.

### *Complaints considered at meetings*

Meetings of the Committee take place around 10 times per year. The Head of Complaints will suggest an agenda to be approved by the Chair of the Committee in discussion with the Chief Executive, or in the Chair's absence, the Deputy Chair. The Executive generally circulates to the Committee dossiers on any complaints to be discussed at a meeting no less than five days before the date of the meeting, although exceptions may be made in the case of complaints that have previously been considered by the Committee in correspondence.

Members of the Executive attend as observers and may be asked to clarify points of fact relating to the complaint or the Code. Should the Committee require significant changes to the draft recommendation, a revised draft is circulated to Committee members subsequent to the meeting to confirm Committee members' approval

# 10. Conflicts of interest

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## *Register of interests*

IPSO maintains and publishes on its website a register of the professional and public interests held by Committee and Board members. Committee members are responsible for informing Michelle Kuhler, PA to the Chairman and Chief Executive and Office Manager,, of any changes to the register, if possible in advance. In case of doubt about whether a new commitment or business interest may give rise to a conflict of interest or a conflict with any duties to IPSO, Committee members should seek advice from the Chair.

## *Conflicts of interest*

Committee members may encounter from time to time cases to which they bring a particular view because of their personal experiences. This is natural and beneficial, and indeed IPSO is seeking to diversify its appointees because it believes that the organisation benefits when its decisions are informed by a variety of perspectives. Such experiences and perspectives do not constitute a conflict of interest.

A conflict of interest is identifiable because it creates a risk that a member's judgment or actions are, or could be, impaired or influenced by an interest that competes with Committee members' paramount obligation to act and judge cases independently and impartially – or because the circumstances could give rise to the perception of such a risk. A conflict might arise if a Committee member has, for example: a direct or indirect financial interest in the outcome of a complaint, or related to one of the parties to a complaint; a personal (non-financial) interest in the outcome of a complaint, or related to one of the parties to a complaint; or a conflict of loyalty between IPSO and a party to the complaint.

It is essential for IPSO to manage conflicts of interest appropriately to ensure that it is able to retain confidence in its integrity and independence,

among the public and among the industry it regulates. A failure to recognise or manage a conflict of interest could give the impression that IPSO, or the Committee member, is not acting in the public interest or lead to legal challenge.

IPSO expects members of the Committee to exercise appropriate judgment in identifying and declaring matters relating to conflicts of interest.

Where a conflict of interest is identified, the Committee member must play no part in the consideration of the complaint. Dossiers on complaints, and other complaints-related material, are not circulated to members of the Committee who have a known conflict of interest in the complaint.

If a conflict has not been previously identified and declared, it should be declared to the Chief Executive and Head of Complaints with responsibility for overseeing investigations, as soon as possible. In the case of complaints that are circulated via correspondence, the conflict of interest – and the fact that the member has not participated in the consideration of the complaint – should be noted on the complaints grid. In the case of complaints considered at a meeting, the Committee member should declare the conflict of interest at the appropriate agenda item and leave the room when the complaint is discussed. The Committee member's departure from, and return to, the room should be minuted.

In some instances Committee members may be aware of a personal link to a complaint that they do not regard as a conflict of interest, but may choose to declare to other members of the Committee for information. The declaration should be minuted or recorded in the comments grid, as appropriate, along with the fact that the Committee member participated in the consideration of the complaint.

Any concerns that a conflict of interest affecting the Committee's consideration of a complaint has not been appropriately recognised or managed should be raised with the Chair or, in his absence, the Deputy Chair.

## *Gifts and hospitality register*

Committee members are not barred from accepting reasonable and proportionate hospitality from individuals or organisations with connections to IPSO. However, accepting significant gifts or hospitality has the potential to create a perception of bias even if the gift has no bearing on judgement, because it may be perceived that the giver's purpose is to exercise influence, or that the circumstances in which it has been offered and accepted are inappropriate for individuals acting on behalf of an organisation that must retain its independence from the press, Parliament, and others who might seek to influence its work.

IPSO maintains a Gifts and Hospitality Register, in which Board members, Committee members, and members of the Executive may declare the nature, date, and (if known) value of any gift or hospitality received from a party in circumstances that they believe may be relevant to their IPSO role. This is not published but kept as an internal record. Updates to the register should be sent to Michelle Kuhler. Any related concerns from Committee members should be raised with the Chair.

# 11. Reporting allegations of criminal activity

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From time to time IPSO receives allegations of criminal activity, or identifies of its own accord that material passed to it may indicate that a crime has been committed. Even where no legal obligation exists to report a crime, IPSO should act positively to ensure that any credible allegation of criminal activity is brought to the attention of the authorities who are competent to assess such an allegation.

Complaints Committee members who believe that there are grounds to make a report to police should raise this with the Executive at the earliest opportunity. This should be done in writing to the Chief Executive to enable further consideration by IPSO's Board.

In general, a decision about whether the Board should make a report to the police will be taken by the Board as a whole, taking into account the full circumstances, including:

- Whether the allegation (if any) is credible;
- Whether the alleged activity might amount to a criminal offence; and
- Whether such a report might breach IPSO's legal obligations, in particular its obligations of confidentiality.

In urgent cases, the decision will be taken by the Chairman alone, having considered the above factors. The Chairman will notify the Board of this at the earliest convenient opportunity.

It may be appropriate to take legal advice before making such a report. IPSO recognises that, should the decision be that a report should not be made by IPSO, a Board member may nonetheless feel a personal moral obligation to make a report. IPSO does not seek to prevent this, so long as such a report is expressly made in a personal capacity and does not



breach IPSO's confidentiality policy or the Board member's duties and obligations to IPSO. However, any Board member intending to make such a report should notify the Chairman in advance, copying in the Chief Executive.

## 12. Expenses and remuneration

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Committee members are considered independent contractors and are currently paid £13,680 per year for their services; the Board may increase this in future years, but any such increases will be capped with reference to the Retail Prices Index.

Committee members are required to submit invoices for payment to IPSO on a monthly basis, which are generally paid within 30 days of receipt. Some Committee members who consider themselves unable to fulfil their obligations for some period (for example, because they are on holiday and unable to review the weekly papers) have elected to reduce their invoiced fee proportionately, but this is entirely at the member's discretion, and is neither required nor expected by IPSO.

IPSO will reimburse reasonable expenses incurred by Committee members in connection with their attendance at Committee meetings or their participation in other commitments undertaken on behalf of IPSO. Requests for reimbursement should be directed to Michelle Kuhler, including a copy of any relevant receipts. Queries about expenses should be directed to the Chief Executive.

If needed, Committee members will be supplied by IPSO with mobile devices to ensure that they are able to review IPSO documents electronically

## 13. Terms of appointment and termination

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Committee members are appointed for three-year terms, renewable at the discretion of the Board. In general the Board will renew terms for only one further three-year term.

Committee members may terminate their appointments by giving at least 30 days' notice.

# 14. Training and development

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Committee members are invited on periodic visits to publications in various sectors of in the industry.

In addition, IPSO aims to incorporate into Committee meetings presentations from relevant groups to enrich the Committee's understanding of important ethical issues facing the press. Committee members are invited to make suggestions as to potential groups that might be suitable, or subject areas about which they would like to have more information.

## 15. Confidentiality and data protection

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Any confidential information to which Committee members gain access as a result of their appointments must not be released, communicated or disclosed to third parties or used for any reason other than in the interests of IPSO without prior agreement by the Chair, unless it has become available to the public generally (by reason other than a breach of confidentiality by the Committee member concerned). This does not prevent Committee members from disclosing information under the Public Interest Disclosure Act 1998, provided that the disclosure is made in accordance with the provisions of that Act, or as otherwise required or permitted by law.

Committee members must hold and retain IPSO data in appropriately secure conditions and will be reimbursed for any reasonable expenses incurred in order to meet this requirement.

# Appendix A: Code of Conduct

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High standards of conduct and personal integrity are essential to maintaining public confidence in IPSO. This Code defines the standards IPSO expects of you as an office holder. You are responsible for ensuring that you are aware of the terms of the Code of Conduct and comply with it not only to the letter, but in the full spirit.

While many Board and Committee members have a variety of public roles which may require you to balance competing interests, you should be mindful that your actions in one sphere will reflect on your role at IPSO. Any conflict of loyalties between your roles should be declared and resolved in a manner that accords with IPSO's values. IPSO expects that as a Board Member or Complaints Committee member, you will:

1. Uphold and promote IPSO's values: independence; boldness; fairness; accessibility; transparency.
2. Uphold and promote the standards set out in the Editors' Code of Practice, and the value it places on freedom of expression.
3. Maintain respectful working relationships with other office holders and staff. IPSO does not tolerate bullying, harassment or intimidation.
4. Uphold IPSO's commitment to promoting equal opportunities for everyone, including in the provision of its services and the employment of staff. You are personally responsible for ensuring that no one – including staff, office holders, complainants and others – is unjustifiably disadvantaged in their interactions with IPSO, including by virtue of their age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, colour, nationality, national or ethnic origin, religion or belief, sex, or sexual orientation.

5. Use confidential information you receive in the course of your work for IPSO only for the purposes for which it was provided to you, and ensure that it is stored and processed securely.
6. Accept responsibility for decisions made collectively; this means not speaking against decisions outside the meeting in which they were taken.
7. Exercise appropriate judgement in identifying, declaring and managing conflicts of interest, and interests that might reasonably give rise to the perception of a conflict. This includes ensuring that your entry in IPSO's Register of Interests is complete and current.
8. Consider before accepting any gift or hospitality whether it could diminish your ability to act independently in your IPSO role, or could be seen to do so. Ensure that any significant items are recorded in the Register of Gifts and Hospitality.
9. Use any expenses, facilities or services provided by IPSO only for their intended purposes.
10. Avoid any actions or comments that could bring IPSO into disrepute or detract from its mission: to support those who feel wronged by the press; to uphold the highest professional standards in the press; and to determine whether standards have been breached and provide redress if so.
11. This Code of Conduct is in addition to, and does not replace, the terms of any contract between you and IPSO. Concerns about a possible breach of this Code should be reported to IPSO's Chairman. Failure to observe the Code may be regarded by IPSO as a disciplinary matter.