

PA MEDIA ANNUAL STATEMENT TO IPSO FOR 1 JAN-31 DEC 2022

Overview

PA Media is the national news agency of the United Kingdom and Ireland.

It was founded in 1868 and sits at the heart of the UK media industry. Now based at The Point in Paddington, the agency also has a significant presence in Howden, East Yorkshire, as well as reporters, photographers and video journalists across the UK and Ireland.

PA provides a wide range of content for use in print, online and for broadcast. Our extensive output includes words, pictures, video, graphics, data and social media.

This can be delivered to customers who then build their own output with the help of PA material, and there are other customers who will use PA content without any further editing. This applies to some print customers, and we can also provide multi-media digital feeds of content direct to websites (known as PA Ready).

Content includes a commitment to extensive coverage of the House of Commons and the Lords, as well as Scottish Parliament, Wales and Northern Ireland assemblies, the High Court, Old Bailey and courts across the UK and Ireland, as well as day-to-day reporting on all the major news and sports stories. The agency also includes Finance and Entertainment teams, and Features department, providing a wide range of content including Travel, Fashion, Lifestyle and Real Life.

In 2022 the editorial agenda was dominated by the continuing impact of Covid-19, the war in Ukraine, the cost-of-living crisis, and, of course, the death of the Queen.

Long planned for, the death of the Queen highlighted once again the central part the PA plays in the media landscape. The first media organisation to announce her death, we then provided hundreds of pre-prepared words, video and picture packages, as well as deploying scores of our journalists to cover the aftermath and the build-up to the funeral.

PA's content appeared across the world, with many of our reporters, photographers and videographers having some of the best positions to record this moment in history – including in Westminster Hall, Westminster Abbey and St George's Chapel.

In the days between the Queen's death and the funeral, we detected PA content in some 350,000 online and print articles, our images were used more than 200,000 times and our videos clocked up tens of millions of views for our customers.

PA started to provide customers with live video in the days following the Queen's death. Using portable LiveU packs, our journalists can send video live to our main newsrooms, and this can also be made available as live streams to customers.

Our Live Video service officially launched in November 2022, and we now have 19 LiveU packs across the UK and Ireland, delivering up to 10 live streams a day to customers including several broadcasters and major websites. We expect this to be an increasingly important part of the service we provide to customers in 2023 and beyond.

All our journalists are equipped to work from home, which was obviously a significant benefit during the various Covid lockdowns. Our newsrooms are now strongly staffed every day, though we retain the flexibility for journalists to work from home or on the road if that is most effective.

Our PA Explore platform, which showcases all our content, continues to go from strength to strength, with hundreds of journalists from across our customer base accessing it every day.

This increasing use, along with all the data we gather from the online use of our content, gives PA a level of understanding about our customers and how they use our words, pictures, video and graphics that is genuinely world-leading.

PA is largely owned by national and regional media organisations and its services are purchased by almost every media outlet in the UK, including all the national newspapers, regional media groups, national and regional broadcasters and digital only publishers. PA also has a variety of international customers. Most customers have subscriptions with PA, though some content is purchased on an ad hoc basis.

The person responsible for Ipsos matters is the Editor-in-Chief Peter Clifton. The lead person day-to-day on the news desk is Chief News Editor Richard Woodward, along with his deputy Scott D'Arcy.

Our editorial standards

PA strives to maintain high editorial standards. We declare that our service is "Fast, Fair and Accurate". Our customers expect to be able to use a PA story without making further checks, so we are always aware of the burden of responsibility that we carry when we report stories.

We believe in robust and vigorous pursuit of stories but we are also risk averse on behalf of our customers, particularly if legal risks or issues relating to the Editors' Code of Practice are involved.

The surest safeguard for PA and our customers is that our stories are sourced. PA does not declare that breaking news is a fact: it attributes it to a named source or - very rarely - an unnamed but wholly reliable source.

So, a story on the wire about a major breaking story will be attributed to a source and our customers will be able to rely on it as an accurate report of what has been announced.

The process is, of course, slightly more complex, because even if a story can be attributed we may still carry out further checks, as not all sources issuing statements are reliable.

PA uses social media to assist its newsgathering in the field. We adhere to very strict guidelines on verifying content we find on social media, and we do not use content without permission.

News is often referred to as the first draft of history and reporting it is certainly not an exact science. Sometimes, in the heat of covering breaking news, the story will change and some details may simply prove to be wrong. For example, names may be spelled incorrectly for some reason.

If we make an error in a story we take immediate steps to correct it and to draw it to our customers' attention. Whenever corrections or amendments are made to our reports, we keep the original versions in the archive of our content production system.

Like all media organisations we are subject to pressure from the people and organisations that we report on, some of whom claim we have got the story wrong. We always investigate these claims in real time as soon as they are made. If we believe that the complaint is only being made because we have exercised our right to highlight a legitimate angle on a story that does not please them we will resist their claims, even if this may involve the threat of a complaint to Ipso.

PA is proud of its reputation for speed, impartiality and accuracy. With mounting concern around the increase in fake news online, the role of a news agency with our clear principles is more important than ever.

We also continue to campaign for media freedom. This may be on public platforms, and our views are regularly provided in submissions to government and other inquiries.

Our commitment to having journalists in the field is unchanged, and increasingly important when other organisations may be reducing their teams. This includes extensive coverage on the courts and inquests, and regular interventions by our reporters to challenge orders that may have been wrongly implemented.

The nature of our journalism means we do not have to routinely seek guidance from Ipso, but there will be occasions when we do so.

We have a good relationship with Ipso, and continue to share all desist notices with our customers on the main newswire and as advisories on PA Now.

We meet up with Ipso representatives on occasion, we take careful note of all Ipso rulings, and highlight many of them on our Media Lawyer service. We look forward to maintaining this close relationship.

Our complaints handling process

PA has always prided itself on its willingness to deal with complaints quickly and reasonably, whether received directly or via the regulator.

If we believe that we have broken the Editors' Code we will always seek to resolve the complaint to the satisfaction of the complainant. If we do not believe that the Code has been broken we will present reasoned arguments to that effect to the complainant or to Ipso.

The Editor-in-Chief or a senior colleague – for example Chief News Editor Richard Woodward - are responsible for handling complaints.

We have a permanent central register held on our editorial system of serious complaints and their outcomes.

If a customer receives a complaint about a story that contains PA content we will always assist them as they deal with it.

Our training process

We have always insisted that our editorial staff are aware of the many responsibilities that they have with regard to media law and the Editors' Code.

The launch of Ipsos prompted our associated company PA Training to develop an online training course on the Editors' Code. Head of Production Wesley Johnson is responsible for training.

This online training course is regularly refreshed, and all our journalists are required to take it on a rolling basis. In addition, the hard copies of the Code of Practice, provided by the Society of Editors, have been made available to all our editorial staff.

We offer legal refreshers for staff, and updated training in other important areas like monitoring social media and handling user generated content.

Ipsos advisories are available on our editorial system and the Editor-in-Chief uses staff notices to highlight issues of concern as they arise.

Our record on compliance

I am pleased to report that there were no direct complaints against PA which were upheld by Ipsos's Complaints Committee during 2022.

Ipsos did receive a complaint from [redacted] about the behaviour of one of PA's photographers.

[redacted] had complained that she felt our photographer was rude to her and that he was not sympathetic towards her mental health. [redacted] had made a covert recording of some of the conversation, which was forwarded. [redacted] had not recorded the entire conversation. [redacted] was assured at the time by our photographer that the pictures which he had taken would be deleted at the end of the day and that they would not be sent out.

[redacted] explained in written correspondence she had spoken with two police officers who were nearby at the time. They confirmed they could not force the photographer to delete his pictures.

Having listened to the covert recording and having had a call directly with [redacted], we felt that while the photographer could perhaps have been friendlier, we did not feel that he had spoken out of turn.

We confirmed to [redacted] that we would undertake a review of our guidelines for how our team interacts with members of the public. This has been done, and photographers will have a refresher session to ensure we maintain our standards at all times.

[redacted] acknowledged the steps and said in an email: "Many thanks for speaking to me on the phone earlier this week; I do appreciate it. Thank you for clarifying what further steps you will take. I am very glad to hear that you will be providing further training, as discussed, in addition to reviewing your guidelines."

We believe that to be the end of the matter.

Why people trust PA Media

The core editorial values of PA can be summed up in three words: fast, fair and accurate. All are equally important: the PA does not sacrifice accuracy or balance for the sake of speed. As we sometimes say: "We must be first - but first we must be right."

These are the guiding principles for everything the PA reports, photographs, writes or broadcasts and they underpin our reputation for journalistic integrity. They explain why PA is trusted both by those we report on and the customers who use the service. They believe we offer them a fair deal.

The responsibility on the PA and its journalists is immense. PA helps set the news agenda. It influences both the decision-making and what eventually appears each day in newspapers, websites and broadcast media across the country and around the world. When a story breaks, the cry across the newsroom that "it's on PA" is the catalyst for action.

The PA's official history says: "Throughout the media industry, the PA has a reputation for speed, accuracy, fairness and flexibility. It does not have any political views. It writes no opinionated editorials - or editorials of any kind whatsoever. It does not campaign or crusade. It simply gathers the news and the pictures and distributes them as fast as modern communications systems will allow."

The following notes outline how our guiding principles apply. It is essential that these rules are honoured not only to the letter but in the full spirit. That is what PA's sense of fair play is about.

- Every reasonable endeavour will be made to ensure all material transmitted in the name of PA is factual, fair and is sent to customers without unnecessary delay.
- All our stories carry attribution and wherever possible the source is identified and on the record.
- All PA reporters, writers, photographers and video journalists will follow rigorously the Editors' Code of Conduct in its true spirit.
- Any serious error of fact will be corrected at the earliest opportunity and, where applicable, a suitable apology or clarification will be transmitted to customers.
- To be trusted the PA must be editorially independent. It is the duty of the PA Editor-in-Chief to resist attempts by any individual or organisation to unduly influence the content of the PA wire.
- Organisations cannot buy their way onto the PA wire - a business relationship with PA's commercial division will not influence the editorial judgment of journalists providing the main wire. The usual news values will apply. Likewise, individual journalists will not file copy or pictures as the result of receiving an inducement and in disregard of editorial judgment.

- All PA customers will be treated equally, regardless of size, influence or power and with courtesy and consideration. We go the extra mile to help all our customers.
- Our responsibility to our customers means that we must combine vigour in pursuing stories with caution. For example, when following up exclusives, we must balance the demand to get a story on the wire with the requirement to behave responsibly.
- When the PA provides pooled coverage on behalf of all the media, we will supply the material to all the organisations who usually participate in pooled coverage and at our discretion to other media organisations.
- The PA's central role in the media allows us privileged access to information but we will never exploit this position and will ensure that such material is provided to all our customers. Embargoed information must never leak from PA: it would be a betrayal of the trust placed in us.
- In general, the PA will not make payments to individuals for stories, features or pictures. Any exception must be agreed at department head level and such transactions must adhere strictly to the Code of Conduct.

DEALING WITH COMPLAINTS

PA sets high editorial standards, follows the Editors' Code of Practice - in its spirit and not just to the letter - and readily corrects mistakes.

We deal with complaints effectively but as we are a member of the Independent Press Standards Organisation (Ipsos) we are required to have a documented internal complaints procedure.

Complaints may be made in good faith because there is a genuine belief we have got something wrong. They may also be made in an attempt to intimidate us.

By following this robust complaints procedure we can speedily resolve genuine complaints and we can stand up to the bullies.

Dealing with a complaint may take only a few minutes. For example, we may have spelled somebody's name incorrectly and we run an immediate correction. But some complaints will need more consideration and the exercise of judgment. For example, we may receive a complaint that our story unfairly represents what someone has said. In these cases investigations may take longer before we can reach a conclusion. In both cases the principles underlying our actions remain the same.

We must always take a complaint about PA content seriously. This is because it is only fair to do so. It is also because if we do not deal effectively and fairly with a complaint we may find ourselves embroiled in a lengthy process involving Ipsos.

The Ipsos complaints system requires members to attempt to resolve complaints using their internal complaints procedures. If that process fails, or if there is no resolution after 28 days, Ipsos will launch its own investigation.

So, whether we receive a complaint directly from the complainant or via Ipsos, we have an opportunity to resolve it using our own internal complaints procedure.

It is of course essential that all PA journalists should have a good working knowledge of the industry's Code of Practice and must pass whatever tests are required to prove that. Ipso will require us to demonstrate the steps we take to ensure compliance by our staff. A copy of the Code is attached to this document.

Complaints sent directly to PA and not arising from an approach to Ipso

Complainants may approach us directly without first contacting Ipso.

If individual PA journalists try to resolve complaints on their own they could make the matter worse - for example, it is not acceptable to bury a correction in a new lead.

So in all these cases the journalist who receives a complaint must raise it with the duty editor, who will decide what to do, take prompt action and if necessary escalate the complaint to the Editor-in-Chief.

The duty editor should treat all complaints seriously and attempt to find a fair resolution. We should not adopt a defensive position and should maintain an open mind.

The objective should always be to seek a fair, speedy resolution if we accept that we have made a mistake.

For example, if it is clear that an error has been made we should promptly take action to make amends.

Remedial action may include:

:: Writing to the complainant

:: Amending our internal files

:: A correction on the wire

:: A clarifying advisory

:: Killing the story, picture, video or other content and taking follow-up action to remove it from online sites

:: An apology and correction or clarification on the wire

We may seek the agreement of the complainant before taking some of these measures on the understanding that they will draw a line under the matter.

If after a thorough investigation we do not think that we have done anything wrong we should inform the complainant that we reject their complaint.

We should also inform them that we are regulated by Ipso and follow the Code of Practice. This information means they will know that they can take their complaint further by going to Ipso if they still believe they have a grievance against us.

It is rare that we will find ourselves in this position but if we do we have to be prepared for a complaint to be made to Ipso and we must be very confident that we will defend it successfully.

This decision to finally reject a complaint should therefore be taken by the Editor-in-Chief, or the duty editor.

In this case we should ensure that we have a document trail of how we handled the complaint in case it goes forward to Ipso. We should keep letters and emails and make a note of phone calls relating to a complaint, particularly if you think it will not be resolved swiftly to everyone's satisfaction.

See below for how Ipso will deal with complaints. We must offer full cooperation with an Ipso inquiry about a complaint.

Complaints arising from an approach direct to Ipso

The first we may learn about a complaint against us could be a referral from Ipso – the complainant has gone directly to the regulator without contacting us. In this case we will be required to try to resolve it using our internal complaints procedure.

Responding to a complaint from Ipso will be the responsibility of the Editor-in-Chief, although he may delegate investigation of it to a senior editor.

The procedure will be similar to handling complaints which come directly to us.

The investigating editor should treat all complaints seriously and attempt to find a fair resolution. We should not adopt a defensive position and should maintain an open mind.

The objective should always be to seek a fair, speedy resolution if we believe that we have made a mistake.

For example, if it is clear that an error has been made we should promptly take action to make amends.

Remedial action may include:

:: Writing to the complainant

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:: An apology and correction or clarification on the wire

We should seek the agreement of the complainant before taking some of these measures on the understanding that they will draw a line under the matter.

If we fail to reach a satisfactory resolution with the complainant, or if a resolution is not reached within 28 days Ipsos may take over the investigation.

We should offer full cooperation and behave in a fair and transparent manner.

PA is also signed up to the Ipsos low cost arbitration scheme. We can agree with a complainant to have a dispute ruled upon quickly and cheaply without going to court.

In this instance, the claim is passed by Ipsos to the Centre for Effective Dispute Resolution (CEDR) who will administer the process and appoint an independent specialist barrister to rule on the dispute.

Maintaining records of complaints

Ipsos will require us to file an annual return on our complaints procedure, what we have done to ensure compliance and the complaints that we have received that were referred to Ipsos.

If we have a complaint that involves Ipsos we must keep a record of all correspondence and the relevant content so that we will be able to present the case effectively and summarise it when we make our report to Ipsos.

Senior editorial staff have access to a shared folder named Ipsos (link: <https://pressassociation.sharepoint.com/sites/Editorial>). Inside there will be a file for the year in question and files for individual cases dealt with during that year. Copies of relevant documents including correspondence should be copied into the file.

Access has been granted to: Peter Clifton, Richard Woodward, Scott D'Arcy, Joe Sené, Wesley Johnson and Ashley Broadley. More names can be added as necessary.

This is the industry's Code of Practice:

Editors' Code of Practice

- The Editors' Code of Practice sets out the rules that newspapers and magazines regulated by IPSO have agreed to follow.
- The Code is written and administered by the [Editors' Code Committee](#) and enforced by IPSO.
- The latest version of the Editors' Code of Practice came into effect on 1 January 2021. Find a full PDF of the 2021 Code [here](#).

The Code

The Code – including this preamble and the public interest exceptions below – sets the framework for the highest professional standards that members of the press subscribing to the Independent Press Standards Organisation have undertaken to maintain. It is the cornerstone of the system of voluntary self-regulation to which they have made a binding contractual commitment. It balances both the rights of the individual and the public's right to know.

To achieve that balance, it is essential that an agreed Code be honoured not only to the letter, but in the full spirit. It should be interpreted neither so narrowly as to compromise its commitment to respect the rights of the individual, nor so broadly that it infringes the fundamental right to freedom of expression – such as to inform, to be partisan, to challenge, shock, be satirical and to entertain – or prevents publication in the public interest.

It is the responsibility of editors and publishers to apply the Code to editorial material in both printed and online versions of their publications. They should take care to ensure it is observed rigorously by all editorial staff and external contributors, including non-journalists.

Editors must maintain in-house procedures to resolve complaints swiftly and, where required to do so, co-operate with IPSO. A publication subject to an adverse adjudication must publish it in full and with due prominence, as required by IPSO.

Clause 1 (Accuracy)

- i) The Press must take care not to publish inaccurate, misleading or distorted information or images, including headlines not supported by the text.
- ii) A significant inaccuracy, misleading statement or distortion must be corrected, promptly and with due prominence, and — where appropriate — an apology published. In cases involving IPSO, due prominence should be as required by the regulator.
- iii) A fair opportunity to reply to significant inaccuracies should be given, when reasonably called for.
- iv) The Press, while free to editorialise and campaign, must distinguish clearly between comment, conjecture and fact.

v) A publication must report fairly and accurately the outcome of an action for defamation to which it has been a party, unless an agreed settlement states otherwise, or an agreed statement is published.

Clause 2 (Privacy) *

i) Everyone is entitled to respect for their private and family life, home, physical and mental health, and correspondence, including digital communications.

ii) Editors will be expected to justify intrusions into any individual's private life without consent. In considering an individual's reasonable expectation of privacy, account will be taken of the complainant's own public disclosures of information and the extent to which the material complained about is already in the public domain or will become so.

iii) It is unacceptable to photograph individuals, without their consent, in public or private places where there is a reasonable expectation of privacy.

Clause 3 (Harassment) *

i) Journalists must not engage in intimidation, harassment or persistent pursuit.

ii) They must not persist in questioning, telephoning, pursuing or photographing individuals once asked to desist; nor remain on property when asked to leave and must not follow them. If requested, they must identify themselves and whom they represent.

iii) Editors must ensure these principles are observed by those working for them and take care not to use non-compliant material from other sources.

Clause 4 (Intrusion into grief or shock)

In cases involving personal grief or shock, enquiries and approaches must be made with sympathy and discretion and publication handled sensitively. These provisions should not restrict the right to report legal proceedings.

Clause 5 (Reporting suicide) *

When reporting suicide, to prevent simulative acts care should be taken to avoid excessive detail of the method used, while taking into account the media's right to report legal proceedings.

Clause 6 (Children) *

i) All pupils should be free to complete their time at school without unnecessary intrusion.

ii) They must not be approached or photographed at school without permission of the school authorities.

iii) Children under 16 must not be interviewed or photographed on issues involving their own or another child's welfare unless a custodial parent or similarly responsible adult consents.

iv) Children under 16 must not be paid for material involving their welfare, nor parents or guardians for material about their children or wards, unless it is clearly in the child's interest.

v) Editors must not use the fame, notoriety or position of a parent or guardian as sole justification for publishing details of a child's private life.

Clause 7 (Children in sex cases)*

The press must not, even if legally free to do so, identify children under 16 who are victims or witnesses in cases involving sex offences.

In any press report of a case involving a sexual offence against a child -

- i) The child must not be identified.
- ii) The adult may be identified.
- iii) The word "incest" must not be used where a child victim might be identified.
- iv) Care must be taken that nothing in the report implies the relationship between the accused and the child.

Clause 8 (Hospitals)*

- i) Journalists must identify themselves and obtain permission from a responsible executive before entering non-public areas of hospitals or similar institutions to pursue enquiries.
- ii) The restrictions on intruding into privacy are particularly relevant to enquiries about individuals in hospitals or similar institutions.

Clause 9 (Reporting of Crime)*

- i) Relatives or friends of persons convicted or accused of crime should not generally be identified without their consent, unless they are genuinely relevant to the story.
- ii) Particular regard should be paid to the potentially vulnerable position of children under the age of 18 who witness, or are victims of, crime. This should not restrict the right to report legal proceedings.
- iii) Editors should generally avoid naming children under the age of 18 after arrest for a criminal offence but before they appear in a youth court unless they can show that the individual's name is already in the public domain, or that the individual (or, if they are under 16, a custodial parent or similarly responsible adult) has given their consent. This does not restrict the right to name juveniles who appear in a crown court, or whose anonymity is lifted.

Clause 10 (Clandestine devices and subterfuge)*

- i) The press must not seek to obtain or publish material acquired by using hidden cameras or clandestine listening devices; or by intercepting private or mobile telephone calls, messages or emails; or by the unauthorised removal of documents or photographs; or by accessing digitally-held information without consent.

ii) Engaging in misrepresentation or subterfuge, including by agents or intermediaries, can generally be justified only in the public interest and then only when the material cannot be obtained by other means.

Clause 11 (Victims of sexual assault)

The press must not identify or publish material likely to lead to the identification of a victim of sexual assault unless there is adequate justification and they are legally free to do so. Journalists are entitled to make enquiries but must take care and exercise discretion to avoid the unjustified disclosure of the identity of a victim of sexual assault.

Clause 12 (Discrimination)

i) The press must avoid prejudicial or pejorative reference to an individual's race, colour, religion, sex, gender identity, sexual orientation or to any physical or mental illness or disability.

ii) Details of an individual's race, colour, religion, gender identity, sexual orientation, physical or mental illness or disability must be avoided unless genuinely relevant to the story.

Clause 13 (Financial journalism)

i) Even where the law does not prohibit it, journalists must not use for their own profit financial information they receive in advance of its general publication, nor should they pass such information to others.

ii) They must not write about shares or securities in whose performance they know that they or their close families have a significant financial interest without disclosing the interest to the editor or financial editor.

iii) They must not buy or sell, either directly or through nominees or agents, shares or securities about which they have written recently or about which they intend to write in the near future.

Clause 14 (Confidential sources)

Journalists have a moral obligation to protect confidential sources of information.

Clause 15 (Witness payments to criminal trials)

i) No payment or offer of payment to a witness – or any person who may reasonably be expected to be called as a witness – should be made in any case once proceedings are active as defined by the Contempt of Court Act 1981. This prohibition lasts until the suspect has been freed unconditionally by police without charge or bail or the proceedings are otherwise discontinued; or has entered a guilty plea to the court; or, in the event of a not guilty plea, the court has announced its verdict.

*ii) Where proceedings are not yet active but are likely and foreseeable, editors must not make or offer payment to any person who may reasonably be expected to be called as a witness, unless the information concerned ought demonstrably to be published in the public interest and there is an over-riding need to make or promise payment for this to be done; and all reasonable steps have been taken to ensure no financial dealings influence the evidence those witnesses give. In no circumstances should such payment be conditional on the outcome of a trial.

*iii) Any payment or offer of payment made to a person later cited to give evidence in proceedings must be disclosed to the prosecution and defence. The witness must be advised of this requirement.

Clause 16 (Payment to criminals)*

i) Payment or offers of payment for stories, pictures or information, which seek to exploit a particular crime or to glorify or glamorise crime in general, must not be made directly or via agents to convicted or confessed criminals or to their associates – who may include family, friends and colleagues.

ii) Editors invoking the public interest to justify payment or offers would need to demonstrate that there was good reason to believe the public interest would be served. If, despite payment, no public interest emerged, then the material should not be published.

The Public Interest (*)

There may be exceptions to the clauses marked * where they can be demonstrated to be in the public interest.

1. The public interest includes, but is not confined to:

- Detecting or exposing crime, or the threat of crime, or serious impropriety.
- Protecting public health or safety.
- Protecting the public from being misled by an action or statement of an individual or organisation.
- Disclosing a person or organisation's failure or likely failure to comply with any obligation to which they are subject.
- Disclosing a miscarriage of justice.
- Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public.
- Disclosing concealment, or likely concealment, of any of the above.

2. There is a public interest in freedom of expression itself.

3. The regulator will consider the extent to which material is already in the public domain or will become so.

4. Editors invoking the public interest will need to demonstrate that they reasonably believed publication - or journalistic activity taken with a view to publication – would both serve, and be proportionate to, the public interest and explain how they reached that decision at the time.

5. An exceptional public interest would need to be demonstrated to over-ride the normally paramount interests of children under 16.