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Preamble

Q5: What, if any, changes would you recommend IMPRESS make to this clause?

How will it be determined whether someone was "acting in journalistic capacity"?
Could there not be some kind of self-identification as well or instead. Perhaps "anyone identifying as a journalist or engaging in the practice of journalism" ?

Public interest

Q6: What, if any, changes would you recommend IMPRESS make to this clause?

None

Q7: What recommendations would you make for guidance to this clause?

It might be useful for the guidance on this clause to refer also to the guidance from the ICO for journalists in terms of data protection exceptions as a specific area in which this clause could come into play.

Attribution

Q10: What, if any, changes would you recommend IMPRESS make to this clause?

For publishers that produce video content for online versions it might be relevant to the rights to use content for short news (e.g. Sports). These rights are granted audiovisual media services under the AVMS Directive and since the CJEU ruled that the video on publishers online offering could fall under the scope of the Directive, this might also apply.

Children

Q12: What, if any, changes would you recommend IMPRESS make to this clause?

None

Discrimination

Q14: What, if any, changes would you recommend IMPRESS make to this clause?

None – good

Harassment

Q16: What, if any, changes would you recommend IMPRESS make to this clause?

None

Q17: What recommendations would you make for guidance to this clause?

Perhaps guidance should mention equal application for celebrity and "civilian"

Privacy

Q20: What, if any, changes would you recommend IMPRESS make to this clause?

None

Sources

Q22: What, if any, changes would you recommend IMPRESS make to this clause?

None

Q23: What recommendations would you make for guidance to this clause?

Publishers should consider the use of encryption and safe storage on a regular basis so as to normalise the practice, making it stand out less when sources need to be carefully protected.

Suicide

Q24: What, if any, changes would you recommend IMPRESS make to this clause?

None

Transparency

Q26: What, if any, changes would you recommend IMPRESS make to this clause?

None

Q29: Do you agree the IMPRESS draft Standards Code is a practical working tool which enables journalists, editors and publishers to do their jobs?

strongly agree

Q30: Do you agree that the IMPRESS draft Standards Code is easily understood by the public?

strongly agree

Q31: Do you agree that the IMPRESS draft Standards Code is enforceable through regulation? disagree