

## **Submission from Jim Gibb**

Dear sir,

As a supporter of 'Hacked Off', I am responding to your invitation to comment on the IMPRESS draft Standards Code.

The issues which most concern me are:

1. In Section 3 (Children), the present wording suggests that sufficient 'consent' for publication may be given by any child under 16, including legal minors. The wording should be altered to ensure that any such consent is obtained from appropriately informed and responsible sources.
2. The clause in Section 4 (Discrimination) on inciting hatred (para. 4.3) is insufficiently inclusive: many previous or potential vulnerabilities are not listed (e.g., social, professional or economic status and associated group affiliations). The code should be reworded to ensure all vulnerable groups are protected unless any such attribute is demonstrably relevant to the story.
3. As currently drafted, the proposed code appears over-dependant on accepted but undefined standards of best practice to determine 'due prominence', 'reasonable consideration', 'significant inaccuracy', etc., etc. How are these standards to be established in the broader public context which includes, but is not limited to, that in which the press itself operates?

If you have any queries on the above, please don't hesitate to contact me.

Best wishes,  
Jim Gibb