



# Register of Interests

March 2020

As a regulator, IMPRESS holds its members to high standards of transparency and accountability. As an organisation, IMPRESS holds itself to these same high standards.

IMPRESS Board Members and senior management publicly declare any interests that a member of the public, acting reasonably, would consider might influence their words, actions and decisions.

IMPRESS Board Members and senior staff have declared their interests in accordance with the stipulations set out in our Code of Conduct. The relevant section is listed below:

### **Conflicts of interest and perceptions of bias**

1. IMPRESS maintains a Register of Interests, which is a public document, published on IMPRESS's website. The purpose of the Register is to ensure transparency in relation to any interests of **Board members** and the **Chief Executive Officer (CEO)**, or of their spouses, partners and dependent children.
2. Board Members and the CEO are required to make a declaration of interests for the purposes of the Register immediately on taking up their appointment, and are required subsequently to declare any new matter that is required to be included on the Register as soon as possible after it arises.
3. **Committee members, employees (other than the CEO) and consultants** are not required to complete the Register of interests.
4. **Board Members** and the **CEO** are asked to review their personal and professional life and that of any spouse, partner or dependent children, in order to identify which current or former interests, if any, might reasonably be perceived by an independent bystander as directly or indirectly influencing their judgement. Such interests may include:
  - 4.1. Membership of any political party;
  - 4.2. Position of authority in a charity or voluntary body;
  - 4.3. Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers;
  - 4.4. Directorships in public and private companies including non-executive directorships;
  - 4.5. Majority or controlling shareholdings in any undertaking;
  - 4.6. Ownership of any company, business or consultancy;
  - 4.7. Remunerated employment, consultancy, trade, profession or vocation;

- 4.8. Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as compromising (i) that representative's ability to take fair and impartial decisions in accordance with IMPRESS's role as a regulator; or (ii) IMPRESS's openness to membership by all relevant news publishers on fair, reasonable and non-discriminatory terms; and
- 4.9. Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement in the exercise of their functions within IMPRESS.
5. It is the duty of each Board Member and the CEO to declare any matter that is required to be included in the Register when it may be relevant to an IMPRESS decision or process and to ensure that the Board follows the provisions set out in the IMPRESS Articles of Association 14.4-5 in relation to conflicts of interest including recusal where appropriate.
6. The primary consideration which will determine whether or not an interest should be declared is the reasonable perception of an independent bystander rather than whether the interest will have an actual influence. The latter is relevant only to the issue of resolving potential conflicts and not the decision to declare.
7. Board members, the CEO **and any IMPRESS representative who is responsible for advising the Board** (on issues including but not limited to complaints, arbitration claims and investigations) must declare at the earliest opportunity (a) any interest that is relevant to a particular issue under consideration; and (b) any issue that could give rise to a reasonable perception of bias on the part of an independent bystander.
8. IMPRESS representatives may be recused from the discussion of and decision on any matter in which they have disclosed an interest.
9. Regardless of whether an interest has been declared or not, **IMPRESS representatives** must be recused from the discussion of, and decision on, any matter on which an independent bystander would reasonably perceive that there is a real risk that they are biased. The Annex discusses factors that may be relevant to IMPRESS representatives' recusal decisions, depending on the circumstances.

The Code of Conduct clearly states that any declaration of an interest in the Register of Interests does not remove the obligation to declare in meetings all interests, whether registrable or not, which are relevant to the business being conducted.

# Register of Interests



Director name	Position(s)	End of tenure	Date ROI created	Last updated	Last reviewed
Deborah Arnott	Non-Executive Director, Chair of Business Development & Communications Committee	Sep 2021	27/07/15	23/08/17	01/04/19
Shelina Janmohamed	Non-Executive Director	Oct 2023	01/11/19	-	-
David Leigh	Non-Executive Director	Nov 2021	01/12/17	02/04/18	01/04/19
Walter Merricks	Chair, Non-Executive Director, Code Committee member, Business Development & Communications Committee member, Finance & Audit Committee member	Sep 2020	17/08/15	01/04/19	01/04/19
David Robinson	Senior Non- Executive Director, Treasurer, Chair of Finance & Audit Committee, Business Development & Communications Committee member	Sep 2022	02/08/15	01/04/19	01/04/19
Pam Vick	Non-Executive Director	Oct 2023	01/11/19	-	-
Andrea Wills	Non-Executive Director, Chair of Code Committee	Nov 2021	01/12/17	01/04/19	01/04/19
Staff name	Position		Date ROI created	Last updated	Last reviewed
Ed Procter	Chief Executive Officer	N/A	14/07/17	02/03/20	01/04/19



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In completing this Register of Interests, Board Members and senior management are asked to comply with the letter and the spirit of the Code of Conduct, which incorporates the Nolan Principles.

**Name:** Deborah Arnott

**Position:** Non-Executive Director, Chair of the Business Development & Communications Committee

**Date of appointment:** 01/10/15

**Form last updated:** 23/08/17

Interest	Current	Former (give dates)
Membership of any political party.	Labour Party	None
Position of authority in a charity or voluntary body.	Chief Executive, Action on Smoking and Health (registered charity) since 2003  Member of the Royal College of Physicians Tobacco Advisory Group since 2003	Trustee No Smoking Day 2006-2009  Governor Pimlico School 2002–06  Chair, Management Committee, and Special Advisor to Board, Personal Finance Education Group (pfeg), 1998–2002

		<p>Member, Government Task Force on Tackling Over-indebtedness, 2000–02</p> <p>Governor Walnut Tree Walk Primary School 1995–2001</p> <p>Member Management Committee, Kingsway workplace nursery, 1983–94</p> <p>Equality Officer and Shop Steward, ACTT, later BECTU, at LWT, 1983–93</p>
<p>Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.</p>	None	<p>Staff Writer, Management Today, Haymarket Publishing 1982-3</p>
<p>Directorships in public and private companies including non-executive directorships (apart from IMPRESS).</p>	None	None
<p>Majority or controlling shareholdings in any undertaking.</p>	None	None
<p>Ownership of any company, business or consultancy.</p>	None	None
<p>Remunerated employment, consultancy, trade, profession or vocation.</p>	<p>Chief Executive, Action on Smoking and Health since 2003</p>	<p>Head of Consumer Education, Financial Services Authority 1998-2002</p> <p>Researcher, Producer Director and Programme Editor, Factual</p>

		<p>Programmes, London Weekend Television 1983-1998</p> <p>Staff Writer, Management Today, Haymarket Publishing 1982-3</p>
<p>Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.</p>	None	None that I am aware of
<p>Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.</p>	None	None that I am aware of

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**Name:** Shelina Janmohamed

**Position:** Non-Executive Director

**Date of appointment:** 01/11/2019

<b>Interest</b>	<b>Current</b>	<b>Former (give dates)</b>
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	None	Trustee, Windsor Fellowship (voluntary, unpaid)
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	Employment with Ogilvy Freelance contributor to: The National UAE Irregular freelance contributor to The Guardian, The Telegraph, Campaign magazine	
Directorships in public and private companies	Director 68 KGS Ltd (private property)	None



including non-executive directorships.		
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	<p>Employment with Ogilvy</p> <p>Freelance contributor to: The National UAE</p> <p>Irregular freelance contributor to The Guardian, The Telegraph, Campaign magazine</p>	
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	content has been published	
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	



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**Name:** David Leigh

**Position:** Non-Executive Director

**Date of appointment:** 01/12/17

**Form last updated:** 01/04/19

Interest	Current	Former (give dates)
Membership of any political party.	None	Labour party (Inactive member Jan-Nov 2017)
Position of authority in a charity or voluntary body.	None	Trustee, Centre for Investigative Journalism Ltd (2008-14)
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies	Charlotte Properties (Doughty St) Ltd	None

including non-executive directorships.	(freehold share of own flat)	
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	Professor of Journalism, City, University of London	Investigations Editor, The Guardian 2000-2013, Consultant 2013-15
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None that I am aware of	None that I am aware of
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	<ul style="list-style-type: none"> <li>• Advisory board, Gothenburg University</li> <li>• Founder-member, International Consortium of Investigative Journalists, Washington DC</li> <li>• Member of "Liberty" (civil liberties organisation)</li> </ul>	Former staff member of The Scotsman, The Times, Thames TV, Granada TV, Observer (all prior to 2000)



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**Name:** Walter Merricks

**Position:** Chair, Non-Executive Director, member of the Code Committee, member of the Business Development & Communications Committee, member of the Finance & Audit Committee

**Date of appointment:** 01/10/15

**Form last updated:** 01/04/19

Interest	Current	Former (give dates)
Membership of any political party.	None	Labour approx 1985-99
Position of authority in a charity or voluntary body.	Justice, board member 2009, Chair 2016	Camden Community Law Centre, Director, 1972-76 Donor Conception Network, Chair 1993-2017 Ombudsman Services Ltd Board member, 2010-15

		Trustee board, Academy of Medical Royal Colleges Chair, 2011-15
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies including non-executive directorships (apart from IMPRESS).	None	None
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	<p>Class representative in collective consumer claim against MasterCard Inc</p> <p>Independent Complaint Reviewer: Royal Institution of Chartered Surveyors</p> <p>Verita, Senior Associate</p> <p>Civil Aviation Authority</p> <p>Consumer Panel Member</p> <p>Independent Complaint Reviewer, Financial Conduct Authority</p>	<p>Gambling Commission Board member</p> <p>Brunel University, Lecturer in Law 1976-81</p> <p>New Law Journal, Legal affairs journalist 1982-85</p> <p>The Law Society, Assistant Secretary-General 1986-96</p> <p>Insurance Ombudsman 1996-99</p> <p>Human Fertilisation and Embryology Authority 2002-08, Board member</p> <p>Financial Ombudsman Service, Chief Ombudsman 1999-2009</p>

		Office of the Health Professions Adjudicator, Chair 2009-12 Legal Ombudsman, Service Complaint Reviewer 2011-15
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None

<p>Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.</p>	<p>Member MeCCSA</p> <p>Member University and College Union (UCU)</p> <p>Member British Psychological Society</p> <p>Member Voice of the Listener and Viewer</p> <p>Member mailing list, Hacked Off</p> <p>Husband currently member of NUJ (as retired journalist).</p> <p>Member of Hacked Off mailing list.</p>	<p>Informed by Metropolitan Police in 2011 that my phone messages had been hacked in 2006 by Glen Mulcaire on behalf of the News of the World, due to my acquaintance with Prof John Tulloch, a former colleague at Cardiff University, who was hacked as a widely-publicised victim of the 7/7 tube bombings.</p> <p>Former member National Union of Journalists (NUJ) 1975 – 1990</p>
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**Name:** David Robinson

**Position:** Non-Executive Director, Senior Independent Director, Treasurer, Chair of the Finance and Audit Committee, member of the Business Development & Communications Committee

**Date of appointment:** 01/10/15

**Form last updated:** 01/04/19

Interest	Current	Former (give dates)
Membership of any political party.	Liberal Democrats	None
Position of authority in a charity or voluntary body.	Trustee of Scottish-registered charity, Changing The Chemistry (2017 - )	Chair of Trustees of charity, Smalls for All – 2009 to 2015; Governor of Heriot-Watt University, Edinburgh – 2009 to 2015

<p>Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.</p>	<p>None</p>	<p>None</p>
<p>Directorships in public and private companies including non-executive directorships (apart from IMPRESS).</p>	<p>Independent Non-Executive Director, Chair of the Audit and Compliance Committee, Forester Life (UK) Ltd. (2017- )</p>	<p>Engage Mutual Assurance; Chairman of the Board 2010 – 2014; Fidem Life (Ukraine); member of the Supervisory Board 2010 – 2013; The One Place Capital Ltd. , NED 2008 to 2012 (Acting Chairman, 2010 to 2012) Royal London Marketing, Executive Director, 2002 to 2006 IFA Promotion Ltd. NED 1995 to 2006</p>
<p>Majority or controlling shareholdings in any undertaking.</p>	<p>None</p>	<p>None</p>
<p>Ownership of any company, business or consultancy.</p>	<p>Majority owner and sole consultant of consultancy, Noteperfect Limited; 100% owner of MyLife Financial Ltd. – the business has never traded</p>	<p>None</p>

<p>Remunerated employment, consultancy, trade, profession or vocation.</p>	<p>Membership of the Investigation Committee of the Chartered Accountants of Scotland (2015 - )</p>	<p>Retained consultant; Community Life GmbH, Kelkheim, Germany (2015 - 2018) Bright Grey, CEO (2001 to 2006) Scottish Provident, Marketing Director, 1997 to 2001; various other roles 1971 to 1997</p>
<p>Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.</p>	<p>None</p>	<p>None that I can recall</p>
<p>Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.</p>	<p>None</p>	<p>None that I can recall</p>

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**Name:** Pam Vick

**Position:** Non-Executive Director

**Date of appointment:** 01/11/2019

Interest	Current	Former (give dates)
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	Member of Events Committee and Steering Group DEBRA charity	Member of Advisory Board Juvenile Diabetes Foundation International charity 1993-1996
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	PR advisor to many small businesses, working with media owners to negotiate partnerships and PR features paid and unpaid, including current Women on Boards partnership with CityAM.	Judge on Evening Standard creative competition July 2019 Advertising Director at Leo Burnett London working with Express Newspapers editorial and marketing teams on advertising campaigns for Sunday Express and Daily Star in 1980s and 1990s

Directorships in public and private companies including non-executive directorships.	Founder and Director of Caspia Consultancy Ltd	Director of StepStone ASA 1999-2002 Director, Leo Burnett Ltd from late 1980s to 1996
Majority or controlling shareholdings in any undertaking.	100% shareholder Caspia Consultancy Ltd	None
Ownership of any company, business or consultancy.	Founder and owner Caspia Consultancy Ltd	None
Remunerated employment, consultancy, trade, profession or vocation.	Paid marketing and business development consultant to various small businesses, portfolio of clients, Caspia Consultancy Ltd 2002 to date.	Leo Burnett London Ltd, 1977 to 1996 Hertz Europe 1996 to 1999 StepStone ASA 1999 to 2002
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None that I am aware of	None that I am aware of
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None that I am aware of	None that I am aware of



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**Name:** Andrea Wills

**Position:** Non-Executive Director, Chair of the Code Committee

**Date of appointment:** 01/12/17

**Form last updated:** 01/04/19

Interest	Current	Former (give dates)
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	A director and charity trustee of the Bristol based Learn@Multi-Academy Trust and chair of its Quality and Standards Committee.	None
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None

Directorships in public and private companies including non-executive directorships.	None	None
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	Video Standards Council Rating Board - Member of Appeals Panel. April 2017 to date  Sole trader – independent media consultant and trainer April 2007 to date	BBC radio & TV content producer and Chief Adviser, Editorial Policy – Jun 1981 to Mar 2006  ABC Manager Editorial Quality Training, Sydney, July 2012 to August 2013.
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None

# IMPRESS

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**Name:** Edward Procter

**Position:** Chief Executive Officer

**Date of appointment:** 09/05/16

**Form last updated:** 02/03/20

Interest	Current	Former (give dates)
Membership of any political party.	None	Labour Party (1992 to 1994)
Position of authority in a charity or voluntary body.	None	None
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies	None	Executive Director of Sport Resolutions (UK)



including non-executive directorships.		Sept 2006 to May 2016
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	COO, IMPRESS	Legal Services Commission, Regional Director South East April 2005 to April 2006
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None