



# Register of Interests

April 2022

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
Cordella Bart-Stewart	Non-Executive Director, Code Committee member	July 2024	12/07/20	-	12/04/22
Debrah Harding	Non-Executive Director, Finance & Audit Committee member	July 2024	12/07/20	09/04/22	09/04/22
Shelina Janmohamed	Non-Executive Director, Code Committee member	Oct 2023	01/11/19	-	06/04/22
David Leigh	Non-Executive Director	Nov 2024	01/12/17	06/04/22	06/04/22
Richard Ayre	Chair, Non-Executive Director, Code Committee member, Communications Committee member, Finance & Audit Committee member	Mar 2026	01/04/22	01/04/22	01/04/22
David Robinson	Senior Non- Executive Director, Treasurer, Chair of Finance & Audit Committee, Communications Committee member	Sep 2022	02/08/15	15/04/22	15/04/22
Pam Vick	Non-Executive Director, Communications Committee Chair, Finance & Audit Committee member	Oct 2023	01/11/19	18/02/22	18/02/22
Andrea Wills	Non-Executive Director, Chair of Code Committee	Nov 2025	01/12/17	06/04/22	06/04/22
Staff name	Position		Date ROI created	Last updated	Last reviewed
Ed Procter	Chief Executive Officer	N/A	14/07/17	07/04/22	07/04/22

# IMPRESS

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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:** Cordella Bart-Stewart

**Position:** Non-Executive Director

**Date of appointment:** 13/07/20

Interest	Current	Former (give dates)
Membership of any political party.	Labour Party on and off last joined December 2019	
Position of authority in a charity or voluntary body.	Church Parochial Council St Andrews Church Southgate registered charity	
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	
Directorships in public bodies, public or private	Director Black Solicitors Network private limited non profit company	

companies including non-executive directorships.		
Majority or controlling shareholdings in any undertaking.	None	
Ownership of any company, business or consultancy.	None	
Remunerated employment, consultancy, trade, profession or vocation.	Fee paid Consultant Stewart & Co Solicitors  Fee paid First tier Tribunal Judge	
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.	No.	
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	Statements on the case for diversity and inclusion	

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**Name:** Debrah Harding [including details for my partner, Aled Evans]

**Position:** Non-Executive Director, Finance & Audit Committee member

**Date of appointment:** 21<sup>st</sup> July 2020

**Form last updated:** 9<sup>th</sup> April 2022

Interest	Current	Former (give dates)
Membership of any political party.	DH: None AE: None	DH: None AE: Member of the Liberal Democrats circa 1988-1993
Position of authority in a charity or voluntary body.	DH: Chair and Founding Member of the Global Research Business Network (GRBN)  DH: Vice President of the European Federation of Associations of Market Research Organisations (EFAMRO)	DH: Trustee of McDougall Trust (Jan 2014 to December 2018) incl. Treasurer  AE: None

	AE: None	
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	<p>DH: Audit Bureau of Circulation (ABC) provides audit services to support my employer, The Market Research Society (MRS), for its Fair Data trust mark.</p> <p>AE: current employer (MarketCast) has clients which include a range of international media, entertainment and technology companies. Some of these clients will have news publishing divisions.</p>	<p>DH: Audit Bureau of Circulation (ABC) as a member of audit and marketing staff 1994 – 1999</p> <p>AE: Occasional analyst articles published in international media business press (e.g. Television Business International). Related to employment as a media analyst for Omdia/ IHS Markit Technology 2017-2020.</p> <p>AE: BBC Radio Producer and Developer 1993-2000 (including role as producer of ‘The News Quiz’ (1994-1997) and ‘The Now Show’ (1998-1999));</p>
Directorships in public bodies, public or private companies including non-executive directorships	DH: Director (representing my employer, MRS) of JICPOPS (the Joint Industry Committee for Population Standards)	DH: Director (representing my employer, MRS) of the Market Research Quality Standards Association circa 1999-2012 (when the association ceased)
Majority or controlling shareholdings in any undertaking.	<p>DH: None</p> <p>AE: None</p>	DH: Minority shareholder of partner’s business, Quickfire Entertainment Limited - December 2005 to June 2014

		AE: None
Ownership of any company, business or consultancy.	DH: None AE: None	DH: None AE: Owner of own company, Quickfire Entertainment Limited, as a freelance media consultant/ producer - December 2005 to June 2014
Remunerated employment, consultancy, trade, profession or vocation.	DH: Managing Director, the Market Reserch Society DH: Committee Member, British Standards Institution (BSI), Standards, Policy & Strategy Committee (remunerated position)  AE: Project Manager, MarketCast, Dec 2020 – current.	DH: ABC (1994-1999) DH: Casson Beckman (1991-1994)  AE: Senior Analyst, Omdia (previously part of IHS Markit Technology before it was acquired in 2019) (2017–2020) AE: Freelance media consultant/ producer (2002-2017) AE: Development Producer, Tiger Aspect (2000-2002) AE: BBC Radio Producer & Developer (1993-2000)
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	DH: None that I am aware of  AE: None that I am aware of	DH: None that I am aware of  AE: An annual guest lecture & seminar (2015 onwards) for the LLM Entertainment Law

<p>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>master's students at Westminster Law School based on my LLM dissertation: 'Social television and the law'. This includes a brief overview of current TV &amp; internet regulation landscape from a legal perspective. The lecture/seminar also examines the current and future challenges for TV and video content regulation.</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>DH: Monthly financial donation to UNICEF;  DH: Fellow of the Academy of Social Sciences and Fellow of the RSA (the Royal Society for the encouragement of Arts, Manufactures and Commerce);  DH: subscriber to Vanity Fair;</p> <p>AE: Member of Royal Television Society (RTS);  AE: Monthly financial donation to The Conversation, plus monthly financial donations to the charities Shelter, Crisis and Friends of the Earth.  AE: Fellow of the RSA (the Royal Society for the encouragement of Arts,</p>	<p>DH: financial donations to Save the Children and NSPCC (circa 2001-2012);</p> <p>AE: One off financial donation to Liberal Democrats (circa Nov 2019);</p> <p>AE: One off financial donation to More United (circa Nov 2019);</p> <p>AE: One off financial donation to People's Vote/Open Britain (circa Oct 2019);</p>

	<p>Manufactures and Commerce).</p> <p>AE: Member of Humanists UK plus monthly financial donation.</p> <p>AE: Subscriber to: Financial Times (FT.com digital subscription), The Guardian (membership tier: 'Supporter'), The Week, Scientific American and the Radio Times.</p>	<p>AE: More United (monthly financial donation – circa June 2020 to October 2021);</p>
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# IMPRESS

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**Name:** Shelina Janmohamed

**Position:** Non-Executive Director, Code Committee member

**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.	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 bodies, public or private	Director 68 KGS Ltd (private property)	None

companies 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>	
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>I write a weekly op-ed column for The National UAE on a wide range of social and cultural issues including racism and Islamophobia</p> <p>I always aim to be fair and factual.</p> <p>I have a twitter feed in which I cover similar issues</p> <p>I have been critical of the government policy on Prevent</p> <p>My twitter feed is @loveinheadscarf</p> <p>I have a blog where I used to publish original material. It then became a place to repost my newspaper pieces. As of writing this no new</p>	

	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:** 06/04/22

<b>Interest</b>	<b>Current</b>	<b>Former (give dates)</b>
Membership of any political party.	Labour party (Sleeping member)	None
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 bodies, public or private companies including non-executive directorships	Charlotte Properties (Doughty St) Ltd (freehold share of own flat)	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.	Honorary Research Fellow, City, University of London	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:** Richard Ayre

**Position:** Non-Executive Director

**Date of appointment:** 01/04/2022

**Form last updated:** 01/04/22

Interest	Current	Former (give dates)
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	Vice-Chair, Egypt Exploration Society	Trustee & Chair, <i>Asian &amp; African-Caribbean Reporters Trust</i> (1996-2000) Trustee & Chairman, <i>Article 19</i> (1999-2004) Member, Advisory Council, <i>Sense About Science</i> (2002-2011) Magistrate, <i>Kings Lynn</i> (2003-07)
Connection with any body which contracts with or is likely to contract with IMPRESS, including but		None

not limited to news publishers.		
Directorships in public and private companies including non-executive directorships.	None	Board member, <i>BBC Trust</i> (2010-2016) Content Board member, <i>Ofcom</i> (2006-2010) Board member, <i>Teachers' TV</i> (2007-08) Board member, <i>Food Standards Agency</i> (2000-07)
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.		Journalist (various roles), <i>BBC</i> (1972-2000) Civil Service Commissioner (2005-06) FoI Adjudicator, <i>The Law Society</i> (2001-15) Occasional fees as contributor on broadcast media ethics (2016-2020)
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	None	None I can recall

fair, reasonable and non-discriminatory terms.		
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None I can recall

# IMPRESS

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**Name:** David Robinson

**Position:** Non-Executive Director; Senior Independent Director; Treasurer, Chair of Finance and Audit Committee; Communications Committee member

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

**Form last updated:** 15/4/22

Interest	Current	Former (give dates)
Membership of any political party.	Liberal Democrats	None
Position of authority in a charity or voluntary body.	Trustee of The Royal Scottish National Orchestra (2020 - ), Chair of the Remuneration Committee.	Trustee of Scottish-registered charity, Changing The Chemistry (2017 to 2020) 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 bodies, public or 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 to 2014; Fidem Life (Ukraine); member of the Supervisory Board 2010 – 2013; Money Dashboard Ltd. , NED 2008 to 2012 (Acting Chair, 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;</p>	<p>100% owner of MyLife Financial Ltd. – the business never traded</p>

<p>Remunerated employment, consultancy, trade, profession or vocation.</p>	<p>Retained consultant; Community Life GmbH, Liederbach am Taunus, Germany (2015 - )</p>	<p>Public-interest member of the Investigation Committee of the Institute of Chartered Accountants of Scotland (2015 to 2021)</p> <p>Bright Grey, Founder and CEO (2001 to 2006)</p> <p>Scottish Provident, UK 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>

# IMPRESS

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**Name:** Pam Vick

**Position:** Non-Executive Director, Communications Committee Chair, Finance & Audit Committee member

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

**Form last updated:** 18/02/2022

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  Trustee of the British Ecological Society	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	Women on Boards partnership with CityAM  Judge on Evening Standard creative competition July 2019

	and PR features paid and unpaid.	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 bodies, public or 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.  Boardroom Advisors Ltd board advisor	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	None that I am aware of	None that I am aware of

publishers on fair, reasonable and non-discriminatory terms.		
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:** 06/04/22

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 member of its Strategy and Growth 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 bodies, public or 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	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.  Sole trader – independent media consultant and trainer April 2007 to April 2019
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
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**Name:** Edward Procter

**Position:** Chief Executive Officer

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

**Form last updated:** 07/04/22

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	The Racing Post Newspaper Temporary Administrator (July to October 1988)
Directorships in public bodies, public or private	None	Executive Director of Sport Resolutions (UK)

companies 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.	CEO, IMPRESS	Oversight Board UK Limited: Recruitment consultant April to June 2020  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	None	None

directly or indirectly influencing or affecting their judgement.		
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