



Speaker's House
House of Commons
London
SW1A0AA

30 July 2025

Reply to the Speakers Conference

Dear Sir Hoyle

Thank you for your letter dated 21 July 2025 requesting information on several questions raised to support the Conference's future programme of work.

We welcome the opportunity to provide clarification on the Impress Standards Code and the newsgathering and reporting requirements of the UK news publishers which have signed up to approved regulation.

Please find enclosed our answers to those questions directly.

Homes and Families

What are Impress' requirements around when and how journalists can speak to the family members of an MP or candidate who is the subject of a story (or any other public figure)?

While there are no specific requirements under the Impress Standards Code relating to when and how journalists can speak to family members of an MP or candidate, publishers must always bear in mind the requirements of [Harassment Clause 5](#).

While the Code clarifies that politicians must expect to be subject to greater levels of questioning by journalists due to the nature of their role journalists must not engage in intimidation or harassment in accordance with Clause 5.1. Under Clause 5.2, except where justified by the public interest, publishers must (a) not engage in deception, (b) identify themselves as journalists, and (c) comply immediately with any reasonable request to desist from contacting, following, communicating with or photographing a person. We provide [comprehensive guidance](#) to journalists on the issues.

Note, journalists must not intrude into shock and grief under Harassment Clause 5. Rather, publishers must take special care when engaging with the victims of traumatic events and their families.

Would a journalist telling an MP's young son that they were a friend of the MP to get the MP's personal number be acceptable under the Impress Standards Code, and if not, could there be a public interest defence?

A journalist telling an MP's young son that they were a friend of the MP in order to get the MP's personal number would prima facie amount to a breach of Clause 5.2 – Harassment, as publishers must ensure that journalists do not engage in deception and also identify themselves as journalists and provide the name of their publication when making contact.



The guidance on this clause clarifies that investigative journalism may involve working undercover to gather evidence to support serious allegations in the public interest. However, engaging in deceptive practices in the public interest requires journalists to demonstrate that they had a reasonable belief that they would discover significant information. Therefore, the sole act of a journalist approaching an MP's young son to obtain the MP's personal number would unlikely be justified in the public interest.

What do you believe is the public interest in the practice of press gathering at private residences. What do you believe is the public interest in this practice when it is possible to simply report that the subject declined to comment?

The guidance on Clause 5.1 – Harassment notes that failing to leave a private property when asked may constitute harassment, and that non-cooperation with a journalist cannot justify harassment. The Standards Code also acknowledges Article 8 ECHR (respect for private and family life), explaining under [the guidance on Clause 7 – Privacy](#) that journalists should take great care when conducting inquiries in institutions such as residential homes, where people may reasonably expect a high level of privacy, and it is made clear that this expectation may also apply to the residents' friends, family or colleagues.

Should a journalist decide to remain outside a private residence after the subject declined to comment and requested the journalist to desist, they would have to demonstrate that they had exceptional grounds to conclude that such a request by the subject was an attempt to evade legitimate journalistic enquiries on a matter of public interest (as defined under the [Public Interest](#) section of the Standards Code). The public interest here could relate to the uncovering of information which exposes unethical or illegal practices by a public official for example. Ultimately, Impress' assessment as to whether there was a public interest in making repeated demands for comment by gathering outside a private residence of a subject would involve balancing the article 8 rights of the subject (as well as other factors such as the profile of the individual, any characteristics that may make them particularly vulnerable, and the conduct of the journalist in their pursuit) against the public interest in the information sought.

Do you agree with the view that this practice is necessary to demonstrate that the press made every attempt to get a comment from a subject?

The guidance to our Code suggests when investigating a news story, journalists *should* approach the subject to verify the facts and seek comment. However, there is no requirement under the Code that a journalist or publisher *must* approach the subject and there is no requirement to make 'every' attempt to get a comment from a subject, particularly not by approaching them at their private residence. Rather, there may be instances where it is *not appropriate* to offer a 'right of reply' to the subject of a story.

Under the Accuracy clause of the Code, whether an opportunity to respond is provided to a story subject goes to a matrix of factors that determine whether reasonable steps were taken to ensure accuracy of a story. Impress has created a best practise note for publishers on providing opportunities to respond, for example, the reasonableness of deadline provided to subjects in advance of publication etc.

As is stated under Harassment clause 5.2, repeated and unwelcome demands for media participation without a public interest justification would be judged unnecessary and amount to harassment or intimidation under the Standards Code.



Headlines

Given that for many people the headline may be the only part of the story they read, what provisions do you have in place, or consider may be effective, in ensuring that headlines do not give a misleading or unbalanced impression of the content of the article?

The [guidance on Clause 1.4 – Accuracy](#) clarifies that a headline which does not accurately represent the story it accompanies could constitute a significant inaccuracy if it were judged likely to create a false impression for the reader. Publishers should be prepared to correct an inaccurate headline at the earliest opportunity in a way that is proportionate to the prominence and importance given to the original story, as well as the seriousness of the inaccuracy.

What position does Impress take on ‘clickbait’ titles, or headline writing practices such as presenting a claim from a partisan organisation as a fact, phrasing headlines as questions when the evidence cannot justify a claim, or other misleading practices?

Impress requires publishers to clearly distinguish between statements of fact and opinion (Clause 1.2 – Accuracy) and this extends to ‘clickbait’ titles and the headline writing practices described. The reader must be able to tell from the tone, context, and language whether the information in a story represents a journalist’s personal judgement, is a statement of fact, or a mix of facts and judgement.

Therefore, if a claim/allegation in a headline in isolation is presented to the reader as a factual statement, this could result in a breach of Clause 1.2. In a [recent case](#) for example, Impress found one of its publishers in breach of Clause 1.2 for using a headline which appeared to adopt an allegation as fact from the outset, thereby framing the reader’s impression without allowing for any measure of doubt and uncertainty.

Regarding the example of a claim in a headline which is phrased as a question but accompanying story does not present evidence to justify the claim, this could potentially create a false or misleading representation of the facts to the reader, resulting in a breach of Clause 1.3 – Accuracy.

In scenarios such as these, the question for an Impress Regulatory is how the objective ordinary, reasonable reader would interpret headlines in consideration of the stories they accompany.

Independent journalists

What penalty would Impress apply if an editor engaged in an independent journalist who then breached the rules on harassment, or used material submitted by an independent journalist who had breached those rules (either with or without the editor’s knowledge)?

The newsgathering, editorial decision-making and publishing of regulated publishers are subject to the Impress Standards Code. Therefore, if a publisher commissions an independent journalist to make inquiries on their behalf, the publisher will be responsible for any breaches of the Harassment clause committed by the journalist.



Where material is submitted to a publisher by an independent journalist, but there is no existing contractual/employment arrangement between the two parties, then it is possible that a publisher may not be found in breach of the Harassment clause, where they can demonstrate no actual or constructive knowledge of this practise, for example, whether the editor had discussions with the independent journalist about their conduct in obtaining the information. If the editor were made aware of or should have known of harassing or deceptive practices by the journalist, but still proceeded to publish the material, they would likely be found in breach of the Harassment clause.

Should Impress find that a publisher has breached the Harassment Clause, the sanction imposed would depend on the seriousness or systematic nature of the breach (see Clause 7.4 of the [Impress Regulatory Scheme](#)). A breach of the harassment clause may result in the publication of an apology, with Impress directing the nature, extent, and placement of this. In the case of more serious or systematic breaches of the Harassment clause, this could result in the imposition of a financial sanction of up to 1% turnover attributable to the publication concerned.

How has the increase in citizen journalists affected the Impress Standards Code impact and its ability to ensure journalistic standards?

The increase in citizen journalists has not affected the impact of the Standards Code and its ability to ensure journalistic standards. However, it has highlighted the need for publishers to take particular care when accepting content from freelance or citizen journalists.

There have been two notable cases investigated by Impress where publishers were found in breach of the Code following the publication of content submitted by an independent journalist or member of the public.

In case [467/2021](#) (Michelle Edwards and Waltham Forest Echo), the publisher was found to have materially altered the original copy submitted to them by a freelance journalist and did not take further steps to verify the accuracy of what was published despite this material alteration. Therefore, the publisher was found in breach of Clause 1.1 – Accuracy (taking reasonable steps to ensure accuracy).

In case [608/2023](#) (Laura Hitchcock and Dorset Eye), the publisher chose to publish material sent to them via a member of their Facebook group (who was not the author of the material). Impress found that the publisher failed to contact, seek permission from, or appropriately credit the originator of the content, thereby breaching Clause 2.1 – Attribution & Plagiarism of the Standards Code.

Press regulation in the UK

Impress is the UK's only press regulator recognised as independent and effective under the terms of Royal Charter on self-regulation of the press.

We are a champion for news that can be trusted. We are here to make sure news providers can publish with integrity; and the public can engage in an ever-changing media landscape with confidence.

Our Standards Code is required to define the public interest and the uphold the right to freedom of expression and the rights of individuals as part of our Charter recognition. Our Code is co-created with the public, publishers, and civil society, reflecting the views of

hundreds of organisations, academics and experts, and thousands of surveyed members of the public.



We currently regulate over 200 publications, including The Bureau of Investigative Journalism, Byline Times, Prospect Magazine, and Novara Media.

It is voluntary for UK news publishers to sign up to approved press regulation. This means that many news publishers operating in the UK elect not to abide by editorial standards or be accountable to the public through an independent oversight mechanism. Several news publishers adopt their own codes of practice which they determine and oversee. Many of the national newspapers choose to adopt the Editor's Code of Practice, which is written by newspaper editors and is far below the standards set out in the Impress Standards Code; this is administered by complaints handling bodies such as the Independent Press Standards Organisation.

Therefore, in determining the role played by the press in driving public attitudes towards abuse in politics, the Conference should give due consideration to the sheer number of publishers who do not adopt independent and effective regulation and therefore do not ensure high ethical standards are essential requirements of the day-to-day work of the journalists and contributors they employ.

We have encouraged this and previous Governments to consider in what ways it could incentivise UK new publishers and journalists to adopt high ethical standards. We have yet to see policies or legislative changes proposed to this end.

We would encourage this Conference to consider what practical recommendations it can put forward to make progress on this important issue.

Thank you once again for the opportunity to respond to your letter. We hope these responses are helpful to you. If you have any further questions or would like Impress to provide oral evidence, please do not hesitate to reach out to us.

Kind Regards

Lexie Kirkconnell-Kawana
Chief Executive, Impress



The Speaker

Speaker's House House of Commons London SW1A 0AA

Monday, 21st July 2025

Dear Ms Kirkconnell-Kawana,

I am writing to you on behalf of the Speaker's Conference, a committee set up by the House of Commons to consider threats against MPs, candidates and elections.

One of the questions the Conference is working to answer is what is driving public attitudes towards abuse in politics, and as part of this we are considering the role played by the press. We recently took evidence from the chair of the Parliamentary Press Gallery, Anushka Asthana, and the chair of the Parliamentary Lobby, David Hughes. During this session, the Conference discussed with witnesses how journalists engage with subjects' homes and families, the accuracy of headlines, and the role of independent journalists. The session raised several questions relating to Impress's role, set out below.

Homes and families

What are Impress's requirements around when and how journalists can speak to the family members of an MP or candidate who is the subject of a story (or any other public figure)? We have heard a story about a journalist telling an MP's young son that they were a friend of the MP in order to get the MP's personal number:⁷ would this be acceptable under the Impress Standards Code, and if not, could there be a public interest defence?

Groups of journalists waiting outside an MP or candidate's home are often threatening and reduce their sense of safety. The Impress Standards Code includes a public interest defence for harassment that is used to justify press gathering at private residences. What do you believe is the public interest in this practice, when it is possible to simply report that the subject declined to comment? Do you agree with the view that this practice is necessary to demonstrate that the press made every attempt to get a comment from a subject?⁸

⁷ Q188

⁸ Q197

Headlines

We have been told that headlines must be accurate but must also be read in the context of the story. Given that for many people the headline may be the only part of the story they read, what provisions do you have in place, or consider may be effective, in ensuring that headlines do not give a misleading or unbalanced impression of the content of the article? What position does Impress take on “click bait” titles, or headline writing practices such as presenting a claim from a partisan organisation as a fact,⁹ phrasing headlines as questions when the evidence cannot justify a claim,¹⁰ or other misleading practices?¹¹

Independent journalists

We understand that the Impress Standards Code’s requirement that publishers ensure journalists do not engage in harassment also covers citizen journalists and freelancers.¹² What penalty would Impress apply if an editor engaged an independent journalist who then breached the rules on harassment, or used material submitted by an independent journalist who had breached those rules (either with or without the editor’s knowledge)? How has the increase in citizen journalists affected the Impress’s Standards Code impact and its ability to ensure journalistic standards?

We would appreciate you providing this information by 1 August so that we can properly consider it as part of the Conference’s future programme of work. I plan to publish this letter and any reply.

Best regards,



Rt Hon. Sir Lindsay Hoyle MP

Speaker

Lexie Kirkconnell-Kawana
Chief Executive, Impress

⁹ Q179

¹⁰ “[Betteridge's law of headlines](#)”, Wikipedia, accessed 16 July 2025

¹¹ “[The media must stop using misleading headlines](#)”, Full Fact, 28 May 2021

¹² [Guidance on the Impress Standards Code](#) p4