



# Register of Interests

April 2023

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	03/04/23	03/04/23
Debrah Harding	Non-Executive Director, Finance & Audit Committee member	July 2024	12/07/20	11/04/23	11/04/23
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	03/04/23	03/04/23
Richard Ayre	Chair, Non-Executive Director, Code Committee member, Communications Committee member, Finance & Audit Committee member	Mar 2026	01/04/22	03/04/23	03/04/23
David Robinson	Senior Non- Executive Director, Treasurer, Chair of Finance & Audit Committee, Communications Committee member	Sep 2024	02/08/15	11/04/23	11/04/23
Pam Vick	Non-Executive Director, Communications Committee Chair, Finance & Audit Committee member	Oct 2023	01/11/19	03/04/23	03/04/23
Andrea Wills	Non-Executive Director, Chair of Code Committee	Nov 2025	01/12/17	04/04/23	04/04/23
Staff name	Position		Date ROI created	Last updated	Last reviewed
Lexie Kirkconnell-Kawana	Chief Executive Officer	N/A	01/04/23	03/04/23	03/04/23