


THE SCOTSMAN
SCOTLAND'S NATIONAL NEWSPAPER

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13 July 2012

Ms Kim Brudenell
Solicitor to the Inquiry
The Leveson Inquiry
Royal Courts of Justice
Strand
LONDON
WC2A 2LL

Dear Ms Brudenell

Thank you for your letter of 29 June 2012, received by email at lunchtime on Friday 29 June. I went on holiday the following day but I understand that an extension to the deadline was granted and am grateful for that.

I note that you are seeking my comments on the proposals for self regulation contained in the witness statement made by Lord Black of Brentwood, dated 7 June 2012.

I have read Lord Black's papers, though I have not had sufficient time to consider in detail the implications of his proposed scheme. I should also say that I am not authorised to comment on Lord Black's scheme on behalf of Johnston Press plc ("JP"), the parent company of The Scotsman. Similarly, I am unable to give any assurances, promises, or commitments on JP's behalf. Obviously, these are matters to be decided by the Board of Directors once a final proposal is produced.

I agree with the general thrust of Lord Black's proposal, though I have reservations with regard to its likely cost and the bureaucratic burden it could impose. Nevertheless, bearing in mind JP's commitment to the PCC and its Code, I am confident that the company will continue to support the principle of self regulation, though whether it will support all aspects of Lord Black's proposals I do not know.

With regard to your specific questions:

- 1 My name is Ian Stewart and I am the Editor of The Scotsman and Scotland on Sunday
- 2 I had a meeting with Lord Hunt to talk about a new framework for press regulation, and I understand Lord Hunt's proposals make up a substantial part of Lord Black's submission.

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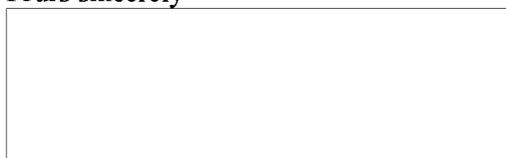
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- 3 As stated above, the decision to enter into a contract with any new regulator would be a decision for JP's Board of Directors. However, I am sure that the Board would seek the views of JP's Editorial Review Group, which advises JP on editorial policy. The views of other senior JP editors might also be sought.
- 4 For the reasons stated above, I am not able to give the Inquiry any kind of commitment with regard to Lord Black's proposals at this time.
- 5 If JP were to agree to Lord Black's proposals, I am confident that compliance with them would make little practical difference to the way my staff and I operate. In light of the current culture, practices and ethics of the newspaper, we would have no difficulty at all in meeting the standards envisaged by Lord Black's scheme.
- 6 My principal concerns about Lord Black's proposals relate to the additional bureaucratic burden that could fall on relatively small newspapers that have extremely efficient management structures and the cost that regional publishers will be compelled to incur if his scheme is implemented. There is also much to be worked out in the detail of how the plans would be implemented, in particular how newspapers would be held contractually responsible for the compliance of agents and subcontractors. I find it difficult to see the necessity of adding another layer of governance to our infrastructures. I am concerned that Lord Black's proposals do not adequately address the regulation of online-only publishers.

If the press as a whole had engaged in the kind of unethical or allegedly criminal conduct apparently carried out by some elements of the national press, I accept that it would be hard to object to the cost consequences of Lord Black's proposal. However, no such allegations have been made to the Inquiry against anything other than a small number of London-based nationals. Accordingly, though I remain absolutely committed to the concept of self regulation, I think it is important that the Inquiry appreciates that any new regime must be proportionately targeted at where the faults lay and the financial consequences of the new scheme.

Please do not hesitate to contact me if you need further information.

Yours sincerely



IAN STEWART
Editor

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