

## **IMPRESS STANDARDS CODE AND GUIDANCE CONSULTATION**

*Submitted by:*

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On behalf of the *Children's Media Foundation*

### **INTRODUCTION**

We very much welcome IMPRESS's efforts to ensure the representation of children and young people is at the heart of its proposed new Standards Code and Guidance regulating the news gathering activities of IMPRESS's members. All too often, especially in relation to distressing and traumatic news stories, both in the UK and overseas, children and young people's images and stories have been used, often without their informed consent, to elicit emotion and action with little appreciation of how this might impact on their lives. They rarely have the opportunity to have their own views and voices included in the news, which disenfranchises them as citizens.

### **RECOMMENDATION**

Along with the new Standards Code, IMPRESS should establish a permanent advisory/monitoring panel of children and young people, with evolving membership. This would enable IMPRESS to respond to issues and events concerning children and young people as they arise, as well as ensure the Standards Code and Guidance is responsive to changes in their views over time. This would ensure ongoing relevance of its guidance for journalists covering stories which include children or young people, supporting best, and up to date practice.

### **GENERAL QUESTIONS AND SUGGESTIONS FOR THE STANDARDS CODE**

*We also wish to raise the following questions/points:*

#### **Definitional clarity**

What is 'informed consent'? (Clause 3.1 / 3.12) How would this be practised and monitored, and by whom? To whom would it be accountable?

The proposed code (Clause 3.1 / 3.15) offers a welcome overview of what may constitute 'harm'. The term 'risk' is also used but not defined, nor 'safety' and 'well-being'. What do these terms mean, and who is defining them (were children and young people consulted?).

There is a tension between 'not causing harm to the child or placing the child at risk of harm', (Clause 3.1 / 3.15) and the 'best interests of the child' (*UN Convention on the Rights of the Child (UNCRC) General Comment 12*). This tension needs to be acknowledged and guidance offered to journalists how they might best navigate.

'Vulnerability' is assumed to be a general quality of all children and young people (Clause 3.3/ 3.21) with the code referring to children as 'inherently vulnerable'. Whilst it is important to acknowledge that children may be vulnerable, it is also likely there will be instances in which some journalists, automatically assuming a certain level of vulnerability, may inadvertently undermine children's right to have their voices heard on issues/events that affect them.

### **Supporting children's rights**

Various human rights acts are mentioned, but not the highly significant UNCRC (1989), *UN General Comment 12* (2009) on children's right to be heard or *UN General Comment 25* (2021) on children's digital rights. Notably the *UN General Comment 25, Section VI: Civil Rights and Freedoms - A: Access to Information, Sub-clause 57* addresses the need for professional codes of journalistic conduct for reporting on digital risks (e.g. misinformation/disinformation) and opportunities (e.g. inclusion of their voices) regarding children's digital rights, yet this is not referred to within the proposed Standards Code.

The only right mentioned regarding children in the proposed document is anonymity.

### **Mechanisms for handling complaints/redress**

How would a child or young person complain/seek redress/make requests (e.g. current and future requests for anonymity) about news stories involving them (i.e. where they have been sources, victims, etc)? What specific mechanism would IMPRESS put in place for this? What role might a permanent advisory/monitoring panel of children and young people play in such processes?

### **CONCLUSION**

Proposed changes to IMPRESS's Code and Guidance represent an exciting opportunity to talk about children's information, communication and media rights whilst also clarifying best journalistic practice in representing children and young people. To date, the voices of children and young people have been largely excluded from discussions about the ways in which their images and stories have been used in the news. It is our recommendation that IMPRESS establish a permanent advisory/monitoring panel of children and young people to ensure their voices are heard when reporting on issues and events that affect them, both directly and indirectly, and to contribute to adjudications of any complaints or requests that may arise.



*Convention on the Rights of the Child* (1989). [https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC\\_united\\_nations\\_convention\\_on\\_the\\_rights\\_of\\_the\\_child.pdf](https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf)

*General comment No.25* (2021) on children's rights in relation to the digital environment. <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G21/053/43/PDF/G2105343.pdf>

*General comment No. 12* (2009) on the right of the child to be heard. <https://www2.ohchr.org/english/bodies/crc/docs/advanceversions/crc-c-gc-12.pdf>

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