Elizabeth Archer

From:	
Sent:	10 January 2022 15:47
To:	journalismcode
Subject:	Draft Journalism Code of Practice Response
Attachments:	2022.01 - ICO Journalism and Data Protection Draft Code Consultation Response.docx

External: This email originated outside the ICO.
Dear Sir/Madam,

Please find attached my response to the consultation on the draft journalism code of practice which closes today.

With all best wishes,

David

Dr David Erdos
Co-Director, Centre for Intellectual Property and Information Law (CIPIL)
Associate Professor in Law and the Open Society, Faculty of Law
WYNG Fellow in Law, Trinity Hall
University of Cambridge

ICO consultation:

Draft journalism code of practice

Start date: 13 October 2021
End date: 10 January 2022

ico.

Information Commissioner's Office

Introduction

We are seeking feedback on the draft code of practice about processing personal data for the purposes of journalism. This is a statutory code under section 124 of the Data Protection Act 2018 (DPA 2018).

The code provides practical guidance about processing personal data for the purposes of journalism in accordance with the requirements of data protection legislation and good practice.

The code updates our previous guidance, Data protection and journalism: a guide for the media, which was published in 2014.

It will also help us to assess compliance as part of the periodic review of processing for the purposes of journalism that the ICO must carry out under section 178 of the DPA 2018.

Before drafting the code, we launched a call for views in 2019. You can view a summary of the responses and individual responses on our website.

The draft is now out for public consultation. The public consultation will remain open for 12 weeks until 10 January 2022.

Download this document and email to: journalismcode@ico.org.uk

Print off this document and post to:

Journalism Code of Practice
Regulatory Assurance
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

If you have any general queries about the consultation, please email us at journalismcode@ico.org.uk.

Privacy statement

For this consultation, we will publish all responses except for those where the respondent indicates that they are an individual acting in a private capacity (eg a member of the public). All responses from organisations and individuals responding in a professional capacity will be published. We will remove email addresses and telephone numbers from these responses but apart from this, we will publish them in full.

For more information about what we do with personal data please see our privacy notice.

Questions

When commenting, please bear in mind that we aim to focus on key points and practical information relevant to journalism where possible. The code does not aim to cover all of the legislation and may assume knowledge of some general data protection terms and concepts. Where relevant, the code may link to further reading such as the Guide to the UK GDPR but this does not form part of the statutory code.

Please also bear in mind that we intend to provide a 'quick guide', and perhaps other resources, to support day-to-day journalism and smaller organisations, as we did with our previous media guidance. Please let us know if you have any ideas about resources to support this code in the general comment box at the end of this survey.

Q1 To what extent do you agree that the code is clear?

☐ Strongly agree
☒ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q1a If the code could be clearer, please tick which section(s) could be clearer.

☐ Summary
☐ Navigating the code
☒ About this code
☒ Balance journalism and privacy
☐ Be able to demonstrate your compliance
☐ Keep personal data secure
☐ Justify your use of personal data
☐ Make sure personal data is accurate
☐ Process personal data for specific purposes
☐ Use the right amount of personal data
☐ Decide how long to keep personal data
☐ Be clear about roles and responsibilities
☐ Help people to exercise their rights
☐ Disputes and enforcement
☐ Annex 1

Please explain your response to Q1a.

One of the most tricky but important issues relating to the Code concerns the delimitation of its scope. It would seem best to deal with the core issues which arise in detail at one place (with other coverage being limited to a summary with a cross-reference). However, at the moment there is substantive discussion of this in both about "About the Code" at pages 16-17 and "Balance journalism and privacy" at pages 23-24.

Q2 To what extent do you agree that it is easy to find information in the draft code?

☐ Strongly agree
☒ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q2a If it could be easier to find information in the code, please tell us how it could be easier.

It is good that compared to the *Data Protection and Journalism: A Guide for the Media* (2014) the ICO has moved away from separating out much of the content into a completely separate "Technical guidance" section and instead sought a more lawyered approach within each section. There is a tendency for the Code to appear a little disjointed but perhaps that is inevitable given the wide-ranging nature of the data protection framework.

Q3 To what extent do you agree that the code provides the right level of detail?

☐ Strongly agree
☒ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q3a If the code could provide a better level of detail, please tell us how it could be improved.

In most respects the Code is pitched at the right level of detail. However, there is a tendency sometimes to provide too much (contestable) detail on matters which are (as a result of the operation of journalism derogation/exemption) not central to the Code but in contrast sometimes not provide sufficient detail in relation to elements of the law which do remain central here.

An example of the first issue is the discussion of the interaction between purpose compatibility and legal bases where it is stated that "[i]f your purpose is compatible, you don't need a new lawful basis" (p. 65). Given that the journalism exemption is discussed on page 66, it seems clear that the Code is seeking to elucidate the general law. However, the binding provisions of the UK GDPR itself do not indicate that processing for a new purpose must necessarily fall within an existing legal bases simply because that purpose is a compatible one. It is true that in the preamble Recital 50 states that in cases of compatible repurposing "no legal basis separate from that which allowed the collection of the personal data is required". However, this provision is merely interpretation and as *Data: A New Direction* (2021) states it's not clear that if it is intended that understanding "applies in all circumstances" (p. 19). In any case it is important to distinguish between general legal bases which are dealt with in Recital 50 and special legal basis which are dealt within Recitals 51-3. These

recitals stress that derogations from the "prohibition on processing special categories of personal data" (Recital 52) should be "explicitly provided" (Recital 51). The often granular and highly safeguarded nature of these derogations would be completely undercut if it was possible to generally circumvent the need to point to something explicit simply by demonstrating that the purpose remains a compatible one. Another similar example is the reliance on the "general principle of open justice" in order to argue that "an offender may be deeded to have manifestly made information about his or her offending public", so allowing such processing to fall within the general derogation for in this case criminal-related data. It is true that in *Townsend v Google and Google UK* [2017] NIQB 81 the High Court of Northern Ireland invoked the open justice principle in order to argue that as a result of the individual carrying out the criminal activity it could be said that "information contained in the personal data has been made public as a result of steps deliberately taken by the data subject" (at [63]). Even here, difficulties remain including how to account for criminal activity which lacks an intentional (or deliberate) *mens rea*. In any case it is important to recognise the narrower statutory language in the new law which only covers "personal data which are manifestly made public by the data subject". Even putting aside the change of tense here, it more difficult to argue that (especially given that "[o]rdinarily an offender wishes to hide his criminal activity" (at [65])) an offender is in fact manifestly making such data public than it is to say that deliberate criminal activity coupled with the open justice principle satisfied the old legal gateway. Given both the tricky nature of these issues and that in context of the Code they can be resolved through the journalism exception, it would perhaps be better to provide a more limited or tentative analysis here.

In contrast, there are other aspects of the substantive law which do centrally concern journalism and which therefore warrant more searching consideration within the Code. One of these involves the legal treatment of personal data which, although not technically sensitive or criminal-related, nevertheless engages intimate and/or highly stigmatic matters. Examples include data relating to the detailed private living circumstances of an individual or an allegation of e.g. racist conduct. The widespread dissemination of such data can seriously interfere with an individual's fundamental rights to privacy and data protection. As stressed in C-131/12 *Google Spain* (at [81]), notwithstanding that it does not involve sensitive personal data as such this kind of processing therefore requires granular analysis and care under the ordinary legal bases for processing and by analogy even under the journalism exemption itself. Relatedly, in the discussion of the "reasonable belief" test within this exemption on page 28, it is helpful to bring out the potential interaction with defamation law. However, only a few of the non-exhaustive indicative criteria laid out Lord Nicholls in *Reynolds v Times Newspapers* [1999] 4 All ER 609 are listed here. Given that they are not as such highlighted elsewhere, it might also be helpful to reference a few of the other relatively discrete criteria, namely:
- the seriousness of the allegation (which dovetails with the discussion on stigma above), and
- the tone of the article/publication.
(One might also think a mention of "urgency" might also be apposite. However, this would need to grapple with and be integrated with the vital reach of the internet which has been given increasingly emphasis on subsequent case law, as well as the ongoing nature of processing in a data protection context and the

need in this context to consider news archives which are already dealt with in various parts of the Code).

A more specific issue which is nevertheless of direct relevance to journalistic processing concerns the relationship between the exercise of control rights such as erasure and onward notification of this (see pp. 84-85 of the draft Code). In certain contexts, such onward notification can help remedy legal failings. However, in other situations the threat of further unsafeguarded notification or dissemination of personal data can (perhaps even deliberately) inhibit the bona fide exercise of rights. This is particularly prominent issue in relation to search engine delisting but could also be relevant in a journalism context. It is, therefore, important to stress that onward notification is included as a (defeasible) right of the data subject and so should not be understood as applying as a UK GDPR duty even against their express wishes and interests. Such notification would undercut the purpose of these rights. It would therefore clearly be "disproportionate" under Article 19 of the UK GDPR and, as regards the "right to be forgotten" *stricto senso*, Article 17(2) clearly states that it applies (only) when "the data subject has requested" that these other controllers be asked to act on their erasure request. In order to ensure that such notification is not justified under this purported legal basis, these important caveats should be made clear in the Code. For a fuller analysis see David Erdos, "Disclosure, Exposure and the 'Right to be Forgotten' after Google Spain: Interrogating Google Search's webmaster, end user and Lumen notification practices", *Computer Law and Security Review*, Vol. 38 (2020), pp. 18-20 (or Section Four of the earlier Working Paper available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3505921).

Q4 To what extent do you agree that the code provides practical guidance to help individuals processing personal data for the purposes of journalism to understand and comply with data protection obligations?

☐ Strongly agree
☒ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q4a If the code could be more practical, please tick which section(s) could be more practical and tell us how it could be improved.

☐ Summary
☐ Navigating the code
☐ About this code
☐ Balance journalism and privacy
☒ Be able to demonstrate your compliance
☐ Keep personal data secure
☐ Justify your use of personal data
☐ Make sure personal data is accurate
☐ Process personal data for specific purposes
☐ Use the right amount of personal data
☐ Decide how long to keep personal data

☐ Be clear about roles and responsibilities
☐ Help people to exercise their rights
☐ Disputes and enforcement
☐ Annex 1

Please explain your response to Q4a.

The draft Code has generally been written with great care to ensure that it is practical at least for large media organisations. Some may criticise its length but that is perhaps inevitable given the wide scope of the data protection legislation and the many different rights and interests which require balancing here. It will however be important to complement the Code with tailored layered guidance for different audience.

There are particular problems relating to so-called "citizen" journalists. The Code rightly takes the principled position that those who are engaged in essentially the same activity must be subject to the same essential substantive provisions even if their activity is on a small scale and perhaps even entirely non-commercial and amateur. Nevertheless, the articulation of particular compliance processes and procedures needs to take contextual account of at least the scale of a controller's activities. Where the journalism exemption applies then what is reasonably considered "incompatible" with a journalistic purpose can and should take into account scale amongst other factors. This understanding can be applied some provisions which are principally supportive rather than intrinsic to data protection's core substance such as the international data transfer provisions. However, as regards most of the accountability provisions, a particular dilemma presents itself in that the formal journalistic exemption is inapplicable. The Code does appear to recognise that a degree of contextual interpretation may still be possible. Nevertheless, this could be strengthened. Moreover, a particular problem presents itself as regards Data Protection Impact Assessments (DPIAs). Here, the draft Code's contextualized acknowledge that one DPIA might cover an entire typo of processing such as "special investigations journalism" is likely to prove useful to large media organisations. However, it is unlikely prove particularly useful for your average citizen journalist. This issue is exacerbated by the fact that the ICO has itself chosen to establish a general list of the kind of processing subject to the DPIA under Article 35(4) which not only appears to encompass almost all journalism (e.g. "[c]ombining, comparing or matching personal data obtained from multiple sources") but does not include any express exemption for small-scale processing. This list forms the basis of the ICO's "screening checklist" referred to on page 39 which sends a confused message as a to when a DPIA is to be expected. The ICO should use the opportunity of the production of this Code to revisit its Article 35(4) list so as to clearly only capture processing "likely to result in a high risk to the rights and freedoms of natural persons". This should better take into account (i) that clearly legitimate exercises of freedom of expression (which a good portion although far from all journalism constitutes) are much less likely to result in a high risk to rights and freedoms as nobody has a right or freedom not to be impacted by manifestly lawful expression and (ii) in the assessment of likely high risk the scale and context of processing should be taken into consideration.

Q5 To what extent do you agree that the draft code covers the right issues about journalism in the context of data protection?

☐ Strongly agree
☐ Agree
☒ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q5a If we have not covered the right issues in the code, please tell us how it could be improved.

In general the draft Code has performed an admirable job in addressing key issues regarding the interface between journalism and data protection, moving well beyond the often much more generalised coverage of the topic in *Data Protection and Journalism: A Guide for the Media* (2014). However, as noted above, I do think the issue of highly stigmatic and/or intimate data that is not formally sensitive could be more clearly dealt with. It is also notable that the Code unlike the previous guidance includes no specific guidance regarding international data transfers. It seems important to reiterate that this special regime must not be bar to publication to the world at large of special expressive material where publication is other legally permissible. On the other hand, a transfer to an overseas controller which is deliberately designed to circumvent legal protections including on publication which apply within the UK would rightly raise issues under the international data transfer regime. Perhaps this is tangentially addressed with at page 76 with the sentence "When sharing personal data between controllers, you are required to comply with the data protection principles" but should be made more explicit (moreover this sentence should mention as in other parts of the Code that this is generally subject to the journalism exemption).

A rather bigger issue concerns the interface with services which host and manipulate user-generated content. This would include media organisations which host and organise such comments associated with or "under-the-line" of their articles. The Code is absolutely right to recognise the need, confirmed by recent case law, to ensure that those performing essentially the same activity involving personal data are subject to essentially the same substantive provisions. Nevertheless, this only touches the surface of relevant issues which include potential wider responsibility of the service or platform especially for any severable onward processing of this data and determination of what sort of processing falls within or outside of journalism and the other special academic, artistic and literary purposes. This is an enormous topic which is touched upon in the draft Code at pages 16-17 and pages 23-24. It is perhaps not realistic to expect much more given the weight and importance of the other issues in play within the Code. Nevertheless, this lacunae does highlight the need to urgently revisit other guidance, notably *Social Networking and Online Forums – when does the DPA apply?* (n.d./2013; https://ico.org.uk/media/for-organisations/documents/1600/social-networking-and-online-forums-dpa-guidance.pdf) which does not accurately represent the current legal position especially as regards individual responsibility for publication which poses serious

risks of infringing the rights of others. In undertaking such revisions, the ICO may find useful the analysis presented in the following two publications:

- David Erdos, "Intermediary Publishers and European data protection: Delimiting the ambit of responsibility for third-party rights through a synthetic interpretation of the EU acquis", *International Journal of Law and Information Technology*, Vol. 26(3), pp. 189-225 (2018) – Open Access version available here: https://academic.oup.com/ijlit/article/26/3/189/5033541 - see especially section entitled "Towards a New Synthetic Approach")

- David Erdos, "Beyond 'Having a Domestic'? Regulatory Interpretation of European Data Protection Law and Individual Publication", *Computer Law and Security Review*, Vol. 33(3), pp. 275-297 (2017) – (Accepted version freely available here: https://www.repository.cam.ac.uk/bitstream/handle/1810/263883/Erdos.pdf - see especially section five)

Once this guidance is updated then it should be integrated into ICO's resources concerning journalism and data protection (although I appreciate that by this stage the Code itself may have already been finalised).

Q6 Please provide details of any cases, examples, scenarios or online resources that it would be useful for us to include in the code.

Please see above. At some stage much further work needs to be done in the area of user-generated content but I appreciate that this may be not be possible prior to the finalisation of the Code and in any case engages with issues fall outside of the journalism-data protection interface.

Q7 To what extent do you agree that the draft code effectively protects the public interest in freedom of expression and information?

☐ Strongly agree
☐ Agree
☒ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q7a If the draft code could protect the public interest in freedom of expression and information more effectively, please tell us how it could be improved (bearing in mind the need to balance competing rights in the code).

In general I believe that the Code does effectively balance substantive rights. However, at least as regards its elucidation of the accountability obligations, a problem presents itself as regards small-scale and in particular "citizen" journalism. The duties articulated there could inhibit the exercise of clearly legitimate freedom of expression. This is particularly the case as regards DPIAs (discussed above) but also engages other areas such as records of processing activities. In this context, it is important to stress that:

- As with other legislation, data protection law must be interpreted "so far it is possible" (Human Rights Act 1998, s 3(1)) with the Convention right to freedom of expression. This far-reaching obligation can apply to provisions which are not a central aspect of the legislative scheme. In light of their supportive rather than intrinsic nature, many of the accountability provisions have this nature and so should be limited when their application would clearly be disproportionate.
- It is open to the ICO itself to revisit its Article 35(4) DPIA list and in light of the discussion above it should take the opportunity to do so.
Finally, although the issues which arise regarding the extent to which the journalistic exemption remains applicable when other (non-special expressions) purposes are present largely presents risks for data protection and privacy (see below), it would be helpful for freedom of expression if the Code's coverage on page 28 could highlight purposes other than campaigning which overlap here including at least research and archiving.

Q8 To what extent do you agree that the draft code effectively protects the public interest in data protection and privacy?

☐ Strongly agree
☐ Agree
☒ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Q8a If the draft code could protect the public interest in data protection and privacy more effectively, please tell us how it could be improved (bearing in mind the need to balance competing rights in the code).

As previously stated, in general the draft Code does effectively balance substantive rights. However, as noted in the previous sections above, there are some areas where the Code could better elucidate the duties imposed by the core tests attached to the journalistic exemption. Thus:
- As regards the reasonable belief in the public interest limb of the test discussed on page 28 the Code could helpfully refer in its discussion of defamation law to other parts of Lords Nicholls' indicative list including at least the seriousness of any allegations and the tone of the article/publication,
- Relatedly, the Code could better address the need for careful consideration before disseminating highly stigmatic and/or intimate personal data even if this I not formally deemed sensitive.
Moreover, although the coverage of the interface with the misuse of private information tort is generally helpful, the Code could better elucidate the broad scope of personal data in order to ensure that the individual's rights in this regard are not ignored. Although welcome, the statement that "not all personal data is necessarily private" (p. 19) seems unduly circumscribed and contrasts with the more extensive analysis in the former Data Protection and Journalism guidance (see there at page 22). At the least the delimitation of "necessarily" should be removed as it runs the risk of being misinterpreted.
Another final substantive issue which the final Code might take more care over concerns the treatment of personal data which is being processed not just for journalism or even for several of the special expressive purposes but also for other purposes. In an important change from the old law, the legislation no

longer states that the exemption can only be claimed only when processing is "solely" or "only" for one or more of the special expressive purposes (although it should be noted that the reference to "solely" has been retained in the interpretative preamble found in Recital 153 of the UK GDPR). This change importantly recognises the need for the continued benefit of the exemption where these purposes overlap with others not themselves deemed special including campaigning, research, archiving and trading and sharing in personal information. I analysed the practical difficulties this ambiguity prior to the finalisation of the GDPR in "From the Scylla of Restriction to the Charybdis of Licence? Exploring the scope of the 'special purposes' freedom of expression shield in European data protection", *Common Market Law Review*, Vol. 52 (1), pp. 119-153 (2015) (https://resources.law.cam.ac.uk/cipil/documents/2015%20-%20Erdos%20CMLR%20Special%20Purposes%20in%20DP%20Article%20(2).pdf, see pages 138-141). However, the mere omission of an express reference to "solely" in the exemption itself cannot mean that processing entirely unrelated to expression (e.g. wealth screening for a fundraising campaign) benefits from the exemption simply because due to the fact that the same personal data is also being processed for special expressive purposes. If it were otherwise then the entire data protection regime would be open to circumvention. To avoid this, the difference between overlapping and non-overlapping purposes should therefore be better elucidated at page 26.

A rather larger issue concerns the way in which the Code conceptualises the ICO's own role. The ICO has a new formal role in periodically auditing or reviewing journalism for compliance with data protection and ongoing supervisory and enforcement functions. Clearly both involve fundamental rights conflicts and are extremely sensitive. Nevertheless, as regards the former, it is very important that this is carried out and seen to be carried out in a robust and comprehensive fashion. Nothing in the Code should be pre-empt that. The statement that "[m]ost, if not all, journalistic organisations already have suitable broader policies and procedures which can easily be adapted if necessary to include data protection considerations" (p. 33) should therefore be revised as the ICO has not itself clearly determined this and it would presumably be strongly disputed by groups critical of significant parts of the media such as Hacked Off. In relation to the latter, parts of the "Disputes and enforcement" section present an unduly circumscribed understanding of the ICO's position here. Most problematically, the draft states that the ICO cannot issues an enforcement notice (p. 87) or obtain a court warrant (p. 90) "if the processing is only for the special purposes" (p. 87). In reality, the determination required under Section 174 is significantly more limited it that requires a finding *either* that a separate processing purpose is in play *or* that the material at issue has already been published by the controller (DPA 2018, s. 174). Thus, albeit rightly subject to other safeguards, post-publication action to investigate a possible criminal offence or to limit the ready availability of manifestly illegally published personal data remains possible even if this has arisen from purely journalistic processing. This section also could be read as indicating that (outside of criminal offences) the ICO would never have an obligation to consider taking action against an individual. This must be wrong and therefore some amendment to make this clear is in order.

Q9 Could the draft code have any unwarranted or unintended consequences?

☒ Yes
☐ No

Q9a If yes, please explain your answer to Q9.

As previously mentioned, there is a danger that insofar as the Code seeks to determine the meaning of contested provisions in the general law then this could have serious consequences for the governance of unrelated processing. A clear example would be delimitation of the meaning of "manifestly made public by the data subject" which could radically affect the legality of mass mining of sensitive and/or criminal-related data for purely private commercial purposes. Therefore, insofar as the issues in question are in any case likely to be addressed in a journalism context through the special purposes exemption, this should either be avoided or addressed in a more tentative fashion.

Q10 Do you think this code requires a transition period before it comes into force?

☒ Yes
☐ No

Q10a If yes, please tick the most appropriate option.

☒ 3 months
☐ 6 months
☐ 12 months

Q11 Is there anything else you want to tell us about the draft code?

There are a few places where meaning of the draft Code appears to be obscured by infelicities of expression which could helpfully be addressed before the final version is produced. In addition to a number of examples noted above:
- The statement on the public interest that "there are always arguments to be made on both sides" (p. 29) would best be caveated (with the addition of e.g. "generally" or "almost" before "always") given the broad meaning of personal data processing within journalism as in other areas.
- The discussion on personal data breaches (p. 42) needs to mention the potential need to notify data breaches to the ICO under article 33 of the UK GDPR.
- The statement that it is "best not to assume that reasonable checks have already been done by third parties, even by news organisations that you judge to be reputable" (p. 62) would best be caveated. If this is referring to material directly supplied by third parties then this makes considerable sense. However, clearly there is a range of published material e.g. court records where it is perfectly correct to assume that reasonable checks have been carried out.

Section 2 About you
Please see privacy information above.

Q12 What is your name?

David Erdos

Q13 If applicable, what is the name of your organisation and your role?

Associate Professor in Law and the Open Society and Co-Director of the Centre for Intellectual Property and Information Law (CIPIL), Faculty of Law, University of Cambridge

Q14 Are you acting: Please select the capacity in which you are acting.

☐ in a private capacity (eg someone providing their views as a member of the public)?
☒ in a professional capacity?
☐ on behalf of an organisation?
☐ other

If other, please specify.

Q14a Are you: Please select most appropriate.

☐ A member of the public
☐ A citizen journalist
☐ A public figure (eg individuals who have a degree of media exposure due to their functions or commitments) or individual with a public role (eg politician, public official, business people and members of regulated professions)
☐ A representative of a newspaper or magazine
☐ A representative of a broadcaster
☐ A representative of an online service other than those above
☐ A representative of the views and interests of data subjects
☐ A representative of a trade association
☐ A representative of a regulator
☐ A representative of a 'third sector'/'civil society' body (eg charity, voluntary and community organisation, social enterprise or think tank)
☐ A freelance journalist
☐ A private investigator
☐ A photographer
☒ An academic
☐ A lawyer
☐ Other

If other, please specify.

Further consultation

Q15 Would you be happy for us to contact you regarding our consultation on the journalism code?

☒ Yes
☐ No

If so, please provide the best contact details.

Q16 Would you be happy for us to contact you regarding our work to develop a process to review processing for journalism in accordance with the statutory requirement under section 178 of the DPA 2018?

☒ Yes
☐ No

If so, please provide the best contact details.

Thank you for taking the time to share your views and experience.