1) I am Anne Pickles, Associate Editor, Cumbrian Newspapers, Carlisle.

Career summary: I have been Associate Editor at CN since 2006, responsible principally for content management across our main titles and deputising for the editor. I am also leader writer, feature writer and columnist.

My responsibilities in the main are with the daily tabloid News & Star (two editions a day) and The Cumberland News (broadsheet weekly).

Prior to my appointment at Carlisle, I was Features Editor and Assistant Editor at the Yorkshire Evening Post, Leeds. Before then, a reporter with the Yorkshire Evening Post. My working life began at the Dewsbury Reporter.

My career in journalism spans 39 years.

2) I have not been personally involved in drawing up any part of Lord Black's proposals for a new system of self-regulation, based on contractual obligations.

3) The Editor - and members of his senior team - would expect to be consulted and closely involved in the final decision as to whether Cumbrian Newspapers' titles signed up to the contractual obligations envisaged by Lord Black's system of self-regulation.

Indeed, The Editor would expect to be involved fully in any decision to sign up to whatever process or system of self-regulation might be adopted, following the deliberations of this Inquiry.

However, given the specific contractual arrangements proposed by Lord Black, the final decision as to whether CN bought into it - so to speak - would be made by our Chief Executive.

4) In so far as I am able to do so, I'd suggest CN would not immediately be ready to commit to all the specifics of Lord Black's proposals for self-regulation.

That's not to say they are dismissed as wholly inappropriate or unworkable. But they do beg more time for careful consideration and perhaps some amendment.

Lord Black himself points out that the regional press has been "anxious about substantial change - especially when the current system works well for them."

I'd suggest that if the current system has worked relatively well for regional and local papers, it has done so more because of the way in which regionals work than how current systems of self-regulation are set up.

Without commitment to dealing with problems, complaints and readers' concerns directly, personally and swiftly in house - thus avoiding, wherever possible, recourse to formal systems - local press would soon lose the trust and faith of its readership... and subsequently, its business.

This is less true of most national newspapers. And as stressed in my oral evidence to the Inquiry in March, it remains important to recognise the distinction between national newspapers and local newspapers working within the communities they serve.

The Leveson Inquiry has been long, searching, illuminating and at times deeply shaming. Triggered by the misdemeanours of a national press, it would be a tragedy if, after all that, the regional industry were to be asked to rush voluntarily to pay a price it can ill afford for sins that were none of its making.

For those reasons these proposals and others submitted to The Inquiry deserve further study.

5) Membership of a system of the kind set out by Lord Black, underpinned by contractual obligations, would do little - if anything - to alter the culture, practices and ethics of Cumbrian Newspapers.

The culture here is a deep-seated, long-held, fiercely protected one of accuracy, fairness, treating people decently and publishing in the public interest.

Journalists are accountable, visible and available. We are not shy of holding public bodies to account. We are not afraid of lifting stones to expose wrong-doing. But we are accountable to all in our localities.

Ethics are ethics, whatever penalties loom in the background. For ethics to be improved by threat of stiffer penalty or closer scrutiny, they would have to have been compromised previously. They have not been. Such is CN's ethical culture and that won't be changing any time soon.

Editorial practices are in accordance with the Editors' Code. All CN journalists are aware of this, have a copy of The Code and are made aware of updates and changes to it.

Lord Justice Leveson said at The Inquiry hearing of March 26: "I absolutely understand that it is of critical importance to celebrate the enormous contribution that regional and local journalists make to their communities and not to forget that when one deals with the other side of the coin."

There is perhaps a sense that Lord Black's proposals might well, in parts, disadvantage the local side of the coin.

None could object to a review of the way the newspaper industry sees itself, conducts itself, regulates itself. That's healthy in a rapidly changing media. But there is a large part of that industry still wedded to the highest possible ethical standards, along with a culture of honesty and decency.

Assumptions that regional and local papers can be tarred with the same, necessary regulatory brush as nationals are a mistake.

6) There is merit is Lord Black's view that the PCC is ready for an overhaul. For regional and local newspapers it has worked relatively well because it has been generally respected - in spite of its flaws - because we have been willing partners together in a process of self-regulation.

To many national newspapers it is viewed as an irrelevance. Toothless, in a section of the industry which respects only teeth.

The PCC suffered heavy and justified criticism for its less than vociferous contribution to debate over recent criminal activity in the national press. It may well be true the PCC works only with the teeth it has been allowed. But if that be the case, there is possibly a case for rewriting its brief and building on a foundation which already exists.

There is merit also in the industry funding any new system of self-regulation. The last thing the press needs is state involvement in regulation or funding from the taxpayer. Independence is imperative, as is demonstration of a will to seriously address breaches of accepted standards, ethics and legality.

Lord Black's proposed new regulator does though have a heavily bureaucratic, clunky feel to it. Multi-layered and with an apparently extensive cast of a large number of mixed industry and non-industry participants - backed by a full-time secretariat - it might not easily be recognised as altogether approachable by those who need it.

The process for a complaints committee to investigate concerns, later reporting to the Trust Board, which will then meet to decide on sanctions, seems as though it could be overly lengthy.

There is room within a number of the submitted proposals for development of a convenient quango, offering part-time appointments for retired editors and senior journalists looking to keep their hands in with cushy little - well paid - hobby jobs. That would be a big mistake. In a rapidly changing industry, working journalists should serve as part of any regulating body.

There are worries about financial penalties. Even with a £1m cap - which won't touch the sides of wealthy national and bigger groups of regional newspapers - proportional fines, amounting to one per cent of turnover, could put smaller papers out of business.

A condition that Press Association copy should be supplied only to publications which have signed a contract of obligation with the new regulator is contentious. The condition is described in the proposal as an "incentive" to sign up to the new system. It has the whiff of something else. But if, agreed widely as a condition of compliance, there is added pressure on all - especially regional papers - to get the form of the new regulatory body right, so that it is fully supported across the industry.

There could be little argument with the issuing of a Press Card which promises agreement to act ethically.

I doubt any baby was ever thrown out with bathwater but there is a worry arising from so many of the submitted proposals for a new and/or improved system of selfregulation. They having, inevitably, been aimed at addressing indefensible wrong-doing within the national media, may - if we are not careful - diminish or even emasculate the role and reputation of the regional and local press.

Public perception of all media, since the Leveson Inquiry started, has been mistakenly to assume all print press is being viewed as untrustworthy, self-seeking and corrupt. That is plainly not the case. Let's not add fuel to the flames of that perception.

Anne Pickles *Associate Editor Cumbrian Newspapers Limited Carlisle* For Distribution to CPs