

Johnston Press - annual IPSO statement

Introduction

The regulated entity Johnston Press is one of the largest local and regional multimedia organisations in the UK.

We provide news and information services to local and regional communities through our portfolio of publications and websites - 13 paid-for daily newspapers, 195 paid-for weekly newspapers, 40 free titles, ten lifestyle magazines and 198 local news and e-commerce websites. A list of all our publications is set out at Schedule 2 of this Statement.

Each month our news brands touch the lives of nearly 30m people across our eight publishing regions: Scotland, the North East, West Yorkshire, the North West & Isle of Man, South Yorkshire, the South, Midlands and Northern Ireland - delivering extensive coverage of local news, events and information.

We seek to set the highest editorial standards reinforced by excellent internal training services, and for three consecutive examinations our trainee reporters have secured a 100% pass rate in the NQJ as set by the NCTJ - the National Council for the Training of Journalist.

The Editors' Code of Practice is embedded in every part of our editorial operation and we give IPSO every possible support. In preparation for the launch of IPSO, Johnston Press established an internal Editorial Governance Committee with the key remit to consider, draft, implement and review the policies, procedures and training for the whole Group to ensure compliance with its obligations under IPSO. A copy of our relevant current policies are attached for your information. Gary Shipton, is Deputy Chairman of our Editorial Board, and chairman of our Editorial Governance Committee and Editor In Chief of our portfolio in Sussex; he is responsible within Johnston Press for addressing issues with IPSO.

A list of the digital and print publications produced by Johnston Press are attached.

Our training process

The Editors Code is the standard used by all Johnston Press journalists.

All journalists in Johnston Press are required to undergo training to ensure they fully understand the Editors' Code of the Independent Press Standards Organisation and know how to apply that in real-life settings. The Editorial Learning and Development Department have put together an online training programme which ensures that journalists are tested in a range of scenarios which touch on various aspects of the Code. The module is compulsory.

The advice of the IPSO Operations Director has been sought in establishing this training.

The module is completed by an online test which requires that journalists reach a high ethical standard agreed by the Johnston Press Editorial Board.

The Editors' Code is made available to all new trainees joining the company and all trainees are put through the National Qualification in Journalism run by the National Council for the Training of Journalists. This includes training in ethical issues and the IPSO Code which is tested in the Media Law and Practice exam.

The code has been issued electronically to all staff and in addition following the launch of IPSO all staff are required to undertake detailed training and testing on the code.

This process is mandatory and a detailed log of all staff undergoing the training is recorded and retained.

It is a condition of employment of all editorial staff, contained within their contracts, that they fully observe the standards required by the regulator as explained within the code.

It is also a condition of commissioned freelance contributors that they fully comply with the code.

This is also made clear through the induction process for all new editorial employees.

Law and ethics refreshers are an integral part of the Johnston Press training programme and the Editorial Learning Development website includes material on ethical issues as well as the IPSO Code and Johnston Press complaints procedures.

Pre-publication guidance is provided in the first instances internally by the local content editor or editor and then, as required, by the group editor or editorial director.

Significant questions in advance of publication will also be raised with the appropriate external and internal legal advisers as well as the 'responsible person' for regulated matters within JP.

We have not generally sought pre publication guidance from IPSO however we welcome the invitation to do so more frequently and will ensure that this forms part of our future policy.

Johnston Press has a robust editorial management structure which ensures that whenever a story might require verification it is assessed by the local content editor or editor and then, as required, by the group editor or editorial director.

External legal advice will be sought at the editorial director's discretion whenever it is required.

All newly-appointed journalists are required to be NCTJ trained to gold standard and must undertake both in-house training and external NCTJ validation during a rigorous two year induction process to secure their NQJ.

The Editors' Code and the importance of accuracy is fundamental both to this training process and to the internal verification of content.

Our record on compliance

Johnston Press publications have been the subject of an adverse IPSO adjudication in the past year. This was:

00847-14 A man v Edinburgh Evening News: complaint upheld under Clause 1 (Accuracy)

Whenever there is an adverse adjudication against a Johnston Press publication, it is referred to the company's editorial governance committee.

The committee examines the censure in the context of other adjudications and then refers it back to the senior editorial director for the region responsible to conduct a full investigation into it.

The investigation identifies the failings and the steps needed to ensure no repetition locally or across the group.

These recommendations can include training requirements and potential changes to the company's editorial policies and procedures.

The report is then referred back to the governance committee for further consideration and then taken to the Editorial Board if substantive change needs to be approved.

We have regularly sought clarification from IPSO when adjudications have been upheld against us so that we can fully understand the broader implications and adjust our internal guidance accordingly.

There has been an occasion where we have also sought further informal guidance from IPSO to help us more fully understand the ruling and to take the appropriate measures going forward.

IPSO COMPLAINTS RECORD 8 September 2014 - 31 December 2014

Name of complainer	Date received	Brief description of complaint	PU/Editor involved	Internal policy complied with (Yes/No to confirm)	Outcome (describe what was agreed following the conclusion of the investigation)
[REDACTED]	[REDACTED]	Re headline: 'Taxigate: Rape scandal Mayor resigns' published in relation to story about resignation of MK Mayor who gave a personal reference to taxi driver who was a convicted rapist. [REDACTED] complained the headline implied the ex Mayor was involved in committing a rape	Midlands [REDACTED] MK Citizen	YES	IPSO concluded the headline, considered in the context of the article as a whole, and not as a standalone statement, was not misleading and therefore did not breach Clause 1 of the Editors' Code of Practice
[REDACTED]	[REDACTED]	News brief on latest political poll did not include all relevant details including the name of the polling agency	Scotland/ [REDACTED]	Yes	Complainant satisfied with publication of clarification adding extra details
[REDACTED]	[REDACTED]	Front page plug entitled Who Lives in a House Like This directed readers to p4/5 where there was a report about a sex offender instead of p6/7 where there was a story about the complainant who had erected a large Yes banner during the Scottish Independence Referendum	Scotland/ [REDACTED]	Yes	Complaint upheld that Clause 1 (i) was broken by failing to take care not to publish inaccurate information, but ruling that correction and apology published offered sufficient redress, so no further action necessary.
[REDACTED]	[REDACTED]	Complainant had	[REDACTED]	YES	Complied with

[REDACTED]	[REDACTED]	<p>contacted Hartlepool Mail with a view to carrying out a story after being barred from school placement for having tattoos and piercings. Complainant then declared Editor's code breach for accuracy, harassment, privacy, discrimination, children and confidential sources.</p>	<p>[REDACTED] (managing editor NEPU (south))</p>		<p>correspondence deadlines, investigation complete within 28 days. Internal investigation concluded no case to answer. No further correspondence from complainant, referred back to IPSO. Nothing further</p>
[REDACTED]	[REDACTED]	<p>Complaint about article in the Berwick Advertiser, 'Town clerk storms out of meeting', which is the latest development in a long running story.</p>	<p>NEPA [REDACTED]</p>	<p>Yes</p>	<p>IPSO concluded that complaints concerning three separate points raised in the article were not misleading and that there was no breach of Clause 1.</p>
[REDACTED]	[REDACTED]	<p>Complaint related to an article about a video which appeared on Youtube of the [REDACTED] concerned swearing. Series of complaints raised, mainly relating to not telling [REDACTED] who the source was, subterfuge in trying to lure [REDACTED] into a quote that could be used in criminal proceedings against [REDACTED] and mistakes in the story.</p>	[REDACTED]	<p>Yes</p>	<p>Complaint dropped</p>
[REDACTED]	[REDACTED]	<p>Complaint related to headline in Linlithgowshire Journal & Gazette regarding the Foneshop which the complainant argued was not supported by the evidence in</p>	<p>[REDACTED] Linlithgowshire Journal & Gazette</p>	<p>Yes</p>	<p>Front page piece carried directing readers to clarification on letters page. Awaiting word if this has proved satisfactory. No further correspondence from IPSO despite chasing several times</p>

		your article and was therefore potentially libellous			
		The Louth Leader published a reader's letter which the complainant claimed was defamatory to [redacted] and [redacted] intruded on their privacy.	Midlands [redacted] Louth Leader	Yes	IPSO found the letter in question stated [redacted] was a supporter of the Labour party, which does not constitute defamation. It further found the letter was a response to one previously published in the [redacted] newspaper written by [redacted]. As such, [redacted] had put [redacted] into the public domain and there was no intrusion of privacy.
		Lancashire Evening Post reported on the death of dozens of birds killed at a bird sanctuary. Complainant [redacted] was unhappy at claim by the sanctuary's owner that the birds had been killed by human hand. Alleged breach under clause one of the code, accuracy.	NW [redacted] Lancs Evening Post	Yes	LEP has agreed to publish a follow up story when a police investigation into the deaths has been concluded.
		The Lancaster Guardian reported the inquest of [redacted] which [redacted] claim was insensitive. They claim this breached Editors Code of Practice.	NW [redacted] L&M newspapers	Yes	IPSO did not uphold this complaint, found the inquest report did not breach the Editors Code Clause 8 (1 &2) and that the report was balanced and not insensitive.
		[redacted] said an inquest into the death of [redacted] published in the Wigan Evening Post breached the Editor's code of conduct because we used pictures of members of the	NW [redacted] Editor	Yes	We pointed out that we did not use any pictures nor took any, not sold any to syndication. The complainant was mixing us up with Mail online who used pictures taken by Cavendish Press. The complainant indicated [redacted] no longer wished to

		family outside the coroner's court, and also sold them onto syndication			pursue the complaint and the matter was closed on [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] said a story about a planning application going before the high court was incorrect, therefore breached Clause 1 of the code (accuracy)	NW [REDACTED] Editor	Yes	We agreed to print a full statement from the housing company at the end of the high court case, which we did. [REDACTED] was satisfied with this outcome and the case was resolved and the matter closed on [REDACTED]
[REDACTED]	[REDACTED]	Complaint about accuracy of two Berwick Advertiser articles reporting the town clerk had "stormed out" of a Berwick Town Council committee meeting.	NE PU / [REDACTED]		Complaint dismissed by IPSO. [REDACTED] had already been walking out when [REDACTED] asked if [REDACTED] could leave the room, and hadn't waited for, or received, a response. "Stormed out" was not misleading and there was no breach of Clause 1. Newspaper provided IPSO with audio recording of the meeting.

Our editorial standards

Ethical integrity is the cornerstone of our editorial policy. It is the principle by which we run all our papers and websites, whether they be paid-for or free. Our content platforms must also be edited on the basis that they are intended to be read by whole families, and content must reflect this.

Within normal commercial constraints including planned editorial/advertising ratios and limitations on colour, the Group operates a policy under which the editor has freedom to edit without interference from general management, although this does not preclude management from making its views known. The editor is legally responsible for the entire content of the products he or she edits and has responsibility for reviewing advertising content too. He or she is similarly responsible for the fairness and accuracy of all content. If errors occur, they must be corrected promptly and with the appropriate remedies, subject to legal requirements

When deciding copy tasting priorities, editors should encourage audience interactivity, take into

account any research from focus groups, be aware of relevant social and cultural trends, pursue reader feedback in whatever form it is received and take full advantage of all the tools and platforms at their disposal to curate and create relevant content.

Editors are expected to publish content on all platforms which reflect the interests of the communities they serve. Editors should ensure that content is published in line with the correct publishing strategy of their communities paying due regard to the market research that informs that. They should avoid overt and sustained political bias. Those of our newspapers which have a long established tradition of reporting the outlook and perceptions of a particular section of the local community are expected to maintain their broad editorial stance.

Editors must ensure that they and their staff follow the guidelines and policies set out under the governing body which is IPSO. They should be mindful of the findings of the Leveson Commission and keep abreast of all legal changes and policy guidelines for in print, online and social media.

Editors should comply with guidance issued by the Editorial Board and refer to their Publishing Unit Editorial Directors when appropriate. Editors are expected to make managing directors and senior commercial managers aware, in advance of publication, of any articles they believe may have an adverse commercial impact on the business. This is in the interests of good internal communications only, and does not over-ride the preceding point on editorial independence. Our disciplinary policies in relation to editorial staff are reviewed from time to time and although the relevant policy is currently under review, a copy of the current policy is attached to this statement for information.

It is also Group policy that our newspapers or websites make no mention of any competitor except in the context of a genuine news story. In particular, it is strictly contrary to Group policy for any newspaper or website to indulge in "knocking copy" relating to competitors.

We will continue to strive to comply and maintain the quality and standards as required in accordance with IPSO requirements and are proud of our record this year of drafting and implementing our IPSO training programme as well as appropriate policies and procedures.

Schedule 1

Our complaints handling process

Internal Editorial Complaints Policy (FOR STAFF ONLY)

1. Internal Strategies for minimising complaints

In line with Johnston Press's commitment to upholding standards in editorial quality and content, all Publishing Units should ensure that they strive to employ the following internal strategies in order to minimise the likelihood of complaints:

- external pre-publication legal advice for editorial operations should be sought, where considered appropriate and authorised by the relevant Editor who has legal and ethical responsibility for the publication, but with reference to the Editor In Chief/Editorial Director so costs are effectively managed;
- importance should be placed on the local content checking process;
- on-going training should be invested in each PU through their Editor In Chief/Editorial Director; such training should be centrally recorded by the Head of Editorial Learning and Development.

2. Internal Process for resolving complaints

This process considers complaints alleging a breach of the Editor's Code of Practice ("the Code") and which potentially fall under the remit of our Regulator, IPSO. Other complaints not alleging a breach of the Code should be considered in a similar way but without reference to IPSO.

All alleged breach of Code complaints <http://www.ipso.co.uk> must be submitted in writing to the relevant Editor with legal and ethical responsibility and must comprise the following:

- a copy of the article in question, if there is one;
- a written outline of the concerns by reference to the Code;
- any other documents which will help IPSO to assess the complaint

***NOTE: Code complaints should only be accepted where the complaint is received within four months from the date of the conduct or first publication of the article complained of OR up to 12 months of the first publication if it remains accessible on the Company's website.**

The following internal process, including the Appeal, requires to be fully actioned and completed within a maximum of 28 days from receipt of the complaint:

➤ **On receipt of a complaint:**

- the relevant Editor In Chief/Editorial Director should **immediately** be informed and further action agreed in accordance with the external complaints policy.
- The Editor should **acknowledge receipt** of the complaint in writing within **five working days of receipt of the complaint** and confirm that the complaint will be

investigated in accordance with JP's external complaints policy. Consideration should also be given as to whether the story is safe to leave on-line.

➤ A letter confirming the outcome of the investigation should then be issued to the complainant ideally within **7 working days** from the acknowledgement letter and this should include the complainant's right to appeal the decision.

➤ **Appeal**

Any appeal received in writing should be promptly forwarded to the relevant Editor In Chief/Editorial Director and dealt with in accordance with the external complaints policy and legal advice should be sought, where appropriate. The outcome of any appeal should be confirmed to the complainant within 7 working days of receipt of the appeal letter.

Please note that IPSO can take over the handling of a complaint **either once the publisher's internal complaints procedures have been exhausted, or if the matter has not been resolved after 28 days. It is therefore important that we look to complete the process within the 28 day period.

IPSO

If the matter is unable to be resolved internally then it may be referred to the complaints committee of IPSO and the company must respond to any requests for further information. IPSO will seek to mediate a resolution between the company and the complainant.

If the complaint cannot be resolved by mediation, IPSO will determine whether there has been a breach of the Code and will notify the complainant and the company of its decision.

The company must implement the decision of IPSO within the timescales and conditions determined by IPSO.

All the following complaints alleging a breach of the Code should be promptly logged into the Internal IPSO Complaints folder and the outcome of the process should also be logged (as this will form part of an annual statement to IPSO):

1. Solicitor's letter seeking redress
2. Any complaint that has been referred to IPSO
3. Any complaint referred to JP from IPSO

When logging any such complaint, you should also notify:

1. The relevant PU MD;
2. The Legal Director [REDACTED] and
3. The Head of Editorial Learning and Development for future training purposes

Where a complaint may lead to legal action by the complainant or such action is threatened, the Editor with reference to the Editor In Chief/Editorial Director should authorise seeking legal advice on the matter, if they believe it is required, from Foot Anstey solicitors (for English and Northern Irish claims) and Campbell Deane of Bannatyne, Kirkwood France & Co Solicitors (for Scottish Claims) (full contact details are available from the JP internal website). The Legal Director should also be notified [REDACTED] of the complaint at the same time.

3. IPSO Complaints Record

The internal complaints recorded for each PU shall be reviewed and discussed on a quarterly basis by the JP IPSO editorial group in order to assess any identifiable training issues and/or requirement to tighten policies/procedures as well as for the purposes of preparing for the IPSO annual statement.

Editorial Complaints Policy (External)

Johnston Press is committed to upholding standards in editorial quality and content and acting in compliance with our regulatory guidelines and obligations.

We take all complaints about editorial content very seriously and seek to accordingly abide by the Independent Press Standards Organisation ("IPSO") requirements and its Editors' Code of Practice ("the Code").

When making a complaint, you must clearly state that your complaint is a formal complaint under this policy.

What does this policy cover?

This policy only applies to complaints about breaches of the Code in editorial content in our printed publications or on electronic services such as websites and apps, including text, pictures, video, audio/visual and interactive content, and which are either published or targeted at an audience in the UK, Channel Islands and Isle of Man. It does not cover:

- complaints about advertising (as that is regulated by the Advertising Standards Authority);
- concerns about matters of taste/decency and due impartiality;
- complaints about 'user generated content' (i.e. material on our websites that was not posted by us or on our behalf) which we have not reviewed or moderated;
- complaints about online material on sites which we do not own and which are not under our control;
- at our discretion, legal or contractual matters which are dealt with more appropriately in the courts or tribunals or elsewhere.

How to complain

Complaints should be made in writing, either by email to the Editor in question identified on the website of the publication to which the complaint relates to or by post to the address of the relevant publication and addressed in the first instance to the Editor. A copy of any complaint should also be copied to the Johnston Press head office email address at enquiries@johnstonpress.co.uk

Complaints will only be accepted within four months from the date of the behaviour complained of or first publication of the article that you are complaining about. If at the time you submit your complaint, the article remains accessible on a website or other electronic service operated by us however, complaints may be accepted up to 12 months from the date

of the behaviour or first publication of the article you are complaining about, provided it is still possible to investigate the complaint fairly given the period of time which has elapsed. Johnston Press shall have sole discretion in determining this.

Complaints must include:

- a copy of the article in question, or a link to the relevant webpage or a web address, if the complaint is about published material (or reference to the publication title, issue date, page and article title if a copy is unavailable);
- a written explanation of your concerns with reference to the Editors' Code;
- any other documents that will help us assess your complaint.

Complaints received without this essential information cannot be considered. We may however, at our discretion, seek further details from you after your initial contact. If you cannot provide any requested information we may be unable to consider your complaint.

We reserve the right to reject, without further investigation, complaints that show no breach of the Editors' Code, or those which are vexatious and/or disproportionate, or those which are without justification (such as an attempt to argue a point of view or to lobby).

We may also decline to consider complaints from third parties not directly affected by the alleged breach of the Editors' Code. When considering whether to accept such a complaint, the position of the party most closely involved in the matter will be taken into account.

What happens to your complaint?

The complaints process is free of charge irrespective of the outcome of your complaint

We aim to acknowledge receipt of your complaint within 5 working days of receipt. You in turn agree to respond promptly to any request for further information.

If we receive multiple complaints about the same issue we may choose to make one response to all such complaints.

We will aim to respond to complaints in writing within 7 working days of receiving everything we need from you to allow us to investigate your complaint.

We will always treat you courteously and with respect. We expect the same from you. We may decline to consider a complaint which is abusive or gratuitously offensive.

Appeals process

If you are dissatisfied with the outcome of your original complaint you have the right to appeal the decision by notifying the Editor, in writing, within 7 working days of receipt of the letter notifying you of the outcome.

Upon receipt of such appeal letter, the Editor, shall forward this for consideration to the Editor In Chief/Editorial Director of the relevant publishing unit, where appropriate, who will then aim to assess the appeal within 7 working days of receipt of such notification. After the Editor In Chief/Editorial Director has taken a decision in light of all the information made available at the time, you will be issued a letter confirming whether your appeal has been upheld or partially upheld and whether any actions will accordingly be taken.

For the avoidance of doubt, you will have no further right of appeal with the company following the determination of this appeals process. However, you may look to exercise your right to take the matter to IPSO.

6. Complaint to IPSO on exhaustion of our complaints procedure

If you are unhappy with our final response to your complaint you may complain to IPSO for consideration. Further details can be found at <http://www.ipso.co.uk>.

7. Policy Changes

We reserve the right to amend this policy as and when required. Members of the public can request a copy of this policy via the relevant editor or by emailing enquiries@johnstonpress.co.uk Your complaint will be considered against the published policy on the date of receipt of your complaint.

Schedule 2

Our publications

Bury Free Press; Bourne Local; Boston Standard; Diss Express; Peterborough Telegraph; Fenland Citizen; Lincs Free Press; Grantham Journal; Haverhill Echo; Horncastle News; Lynn News; Louth Leader; Market Rasen Mail; Melton Times; Norfolk Citizen; Newmarket

Journal; Peterborough Citizen; Rutland Times; Suffolk Free Press; Spalding Guardian; Spilsby Standard; Mablethorpe Leader; Mildenhall Journal; Soham and Ely Journal; Skegness Standard; Sleaford Standard; Rutland and Stamford Mercury;

The Scotsman; Arbroath Herald; Cumbernauld News; East Fife Mail; Falkirk Herald; Fife Herald; Glenrothes Gazette; Glasgow South & Eastwood Extra; Kirkintilloch Herald; Lanark Gazette; Linlithgowshire Journal; Milngavie Herald; Motherwell Times; Paisley & Renfrewshire Extra; Arbroath Herald; Brechin Advertiser; Buchan Observer; The Buteman; Carrick Gazette; Donside Piper & Herald; Ellon Times; Forfar Dispatch; Fraserburgh Herald; The Galloway Gazette; Kincardineshire Observer; Mearns Leader; Montrose Review; Stornoway Gazette; Berwick Advertiser; Berwick Gazette; Berwickshire News; East Lothian News; Edinburgh Evening News; Hawick News; Midlothian Advertiser; Southern Reporter; Pulse Magazine; Scotland On Sunday; Selkirk Weekly Advertiser; Lothian Times.

Beverley Guardian; Driffield Times and Post; Scarborough News; Scarborough News; Bridlington Free Press; Pocklington Post; Malton & Pickering Mercury; Whitby Gazette; Harrogate Advertiser; Ripon Gazette; Wetherby News; Knaresborough Post; Pateley Bridge and Nidderdale Herald; North Yorkshire News; Brighouse Echo; Batley and Birstall News; Dewsbury Reporter; Mirfield Reporter; Halifax Courier; Hemsworth & South Elmsall Express; Morley Observer and Advertiser; Pontefract & Castleford Express; Spenborough Guardian; Wakefield Express; Todmorden News; Absolute Leeds; Yorkshire Evening Post; Leeds Weekly News; Pudsey Times; Wharfe Valley Times; Yorkshire Post.

Buxton Advertiser; Belper News; Derbyshire Times; Doncaster Free Press; Doncaster Star; Epworth Bells; Eastwood & Kimberley Advertiser; Eckington Leader; Gainsborough Standard; Gainsborough News; Hucknall Dispatch; Ilkeston Advertiser; Ashfield Chad; Alfretton Chad; Mansfield Chad; Matlock Mercury; Ripley & Heanor News; Sheffield Weekly Gazette; The Star, Sheffield; Sheffield Telegraph; Sheffield Weekly Gazette; Worksop Guardian; South Yorkshire Time; Eckington Leader; Peak Courier; Retford Trader Guardian, Dinnington Guardian; The Business Sheffield.

Isle Of Man Courier; Isle Of Man Examiner; Manx Independent.

Berwick Advertiser; Berwickshire News; Galloway Gazette; Hartlepool Mail; Morpeth Herald; News Guardian; News Post Leader; Northumberland Gazette; Shields Gazette; Sunderland Echo; Peterlee Star; Washington Star.

Chorley Guardian; Colne Times; Garstang Courier; Longridge News; Lancashire Evening Post; The Visitor (Morecambe); Wigan Evening Post; Wigan Observer; Leigh Reporter; St Helens Reporter; Wigan Reporter; Blackpool Gazette; Fleetwood Weekly News; Lytham St Annes Express; Lancaster Guardian; Leyland Guardian; Trials & Motorcross News; Clitheroe Advertiser and Times; Burnley Express; Nelson Leader; Dirt Bike Rider.

Bucks and Winslow Advertiser; Brackley and Towcester Advertiser; Bicester Review; Bedfordshire Times & Citizen; Banbury Guardian; Northampton Chronicle and Echo; Daventry Express; Northants Telegraph; Hemel Hempstead Gazette; Berkhamsted and Tring Gazette; Herald Express; Image Magazine; Leighton Buzzard Observer; Luton & Dunstable Herald & Post; Luton News; Harborough Mail; Milton Keynes Citizen; Northampton Mercury; Rugby Advertiser; Rugby Review; Biggleswade Chronicle; Dunstable Gazette; Lutterworth Mail; Corby Telegraph; Thame Gazette; Leamington Spa Courier; Warwick Courier; Kenilworth Weekly News. Mid-Bedfordshire

Bexhill Observer; Crawley Observer; West Sussex County Times; Eastbourne Herald. Eastbourne Gazette; Horsham Gazette; Hastings and St Leonards Observer; Mid Sussex Weekend Herald; Mid Sussex Times; Sussex Express; Chichester Observer; West Sussex Gazette; Midhurst and Petworth Observer; Worthing Advertiser; Worthing Herald; Shoreham Herald; Hayling Islander; The News, Portsmouth; Brighton and Hove Independent.

Banbridge Leader; Dromore Leader; Ballymena and Antrim Times; Larne Times; Carrick Times; Newtownabbey Times; Ulster Star; Lurgan Mail; Portadown Times; Coleraine Times;

Ballymoney Times; Derry Journal (and its editions); Sunday Journal; Tyrone Times; Mid Ulster Mail; Mid Ulster Mail, South Derry edition; Londonderry Sentinel; Roe Valley Sentinel; News Letter; Farming Life; belfastvibe.

Etc Magazine (Northern Ireland); Etc Magazine Eastbourne; Etc Magazine Hampshire; Etc Magazine North East; Etc Magazine North West; Etc Magazine East Sussex; Etc Magazine West Sussex; Etc Magazine North Sussex; Etc Hampshire;.

Website	URL	Mobile URL
Arbroath Herald	www.arbroathherald.co.uk	m.arbroathherald.co.uk
Ballymena Times	www.ballymenatimes.com	m.ballymenatimes.com/
Ballymoney Times	www.ballymoneytimes.co.uk	m.ballymoneytimes.co.uk/
Banbridge Leader	www.banbridgeleader.co.uk	m.banbridgeleader.co.uk/
Banbury Guardian	www.banburyguardian.co.uk	m.banburyguardian.co.uk
Batley News	www.batleynews.co.uk	m.batleynews.co.uk
Bedford Today	www.bedfordtoday.co.uk	m.bedfordtoday.co.uk
Belfast Newsletter	www.newsletter.co.uk	m.newsletter.co.uk
Belper News	www.belpernews.co.uk	m.belpernews.co.uk
Berkhamsted Today	www.berkhamstedtoday.co.uk	m.berkhamstedtoday.co.uk
Berwick Advertiser	www.berwick-advertiser.co.uk	m.berwick-advertiser.co.uk
Berwickshire News	www.berwickshirenews.co.uk	m.berwickshirenews.co.uk
Beverley Guardian	www.beverleyguardian.co.uk	m.beverleyguardian.co.uk
Bexhill Observer	www.bexhillobserver.net	m.bexhillobserver.net
Biggleswade Today	www.biggleswadetoday.co.uk	m.biggleswadetoday.co.uk
Blackpool Gazette	www.blackpoolgazette.co.uk	m.blackpoolgazette.co.uk
Bognor Regis Observer	www.bognor.co.uk	m.bognor.co.uk
Boston Standard	www.bostonstandard.co.uk	m.bostonstandard.co.uk
Bourne Local	www.bournelocal.co.uk	m.bournelocal.co.uk
Brechin Advertiser	www.brechinadvertiser.co.uk	m.brechinadvertiser.co.uk
Bridlington Free Press	www.bridlingtonfreepress.co.uk	m.bridlingtonfreepress.co.uk
Brighouse Echo	www.brighouseecho.co.uk	m.brighouseecho.co.uk
Brighton & Hove Independent	brightonandhoveindependent.co.uk	
Buchan Observer	www.buchanobserver.co.uk	m.buchanobserver.co.uk
Buckingham Advertiser	www.buckinghamtoday.co.uk	m.buckinghamtoday.co.uk
Bucks Herald	www.bucksherald.co.uk	m.bucksherald.co.uk
Burnley Express	www.burnleyexpress.net	m.burnleyexpress.net
Bury Free Press	www.buryfreepress.co.uk	m.buryfreepress.co.uk
Buxton Advertiser	www.buxtonadvertiser.co.uk	m.buxtonadvertiser.co.uk
Carluke Gazette	www.carlukegazette.co.uk	m.carlukegazette.co.uk
Carrick Gazette	www.carricktoday.co.uk	m.carricktoday.co.uk
Carrickfergus Times	www.carrickfergustimes.co.uk	m.carrickfergustimes.co.uk
Chichester Observer	www.chichester.co.uk	m.chichester.co.uk

Chorley Guardian	www.chorley-guardian.co.uk	m.chorley-guardian.co.uk
Clitheroe Advertiser	www.clitheroeadvertiser.co.uk	m.clitheroeadvertiser.co.uk
Coleraine Times	www.colerainetimes.co.uk	m.colerainetimes.co.uk
Crawley Observer	www.crawleyobserver.co.uk	m.crawleyobserver.co.uk
Cumbernauld News	www.cumbernauld-news.co.uk	m.cumbernauld-news.co.uk
Daventry Express	www.daventryexpress.co.uk	m.daventryexpress.co.uk
Deeside Piper	www.deesidepiper.co.uk	m.deesidepiper.co.uk
Derbyshire Times	www.derbyshiretimes.co.uk	m.derbyshiretimes.co.uk
Derry Journal	www.derryjournal.com	m.derryjournal.com
Dewsbury Reporter	www.dewsburyreporter.co.uk	m.dewsburyreporter.co.uk
Diss Express	www.dissexpress.co.uk	m.dissexpress.co.uk
Doncaster Free Press	www.doncasterfreepress.co.uk	m.doncasterfreepress.co.uk
Donegal Democrat	www.donegaldemocrat.ie	m.donegaldemocrat.ie
Donside Piper	www.donsidepiper.co.uk	m.donsidepiper.co.uk
Driffield Post	www.driffieldtoday.co.uk	m.driffieldtoday.co.uk
Dromore Leader	www.dromoreleader.co.uk	m.dromoreleader.co.uk
Dunstable Today	www.dunstabletoday.co.uk	m.dunstabletoday.co.uk
East Lothian News	www.eastlothiannews.co.uk	m.eastlothiannews.co.uk
Eastbourne Herald	www.eastbourneherald.co.uk	m.eastbourneherald.co.uk
Eastwood Advertiser	www.eastwoodadvertiser.co.uk www.edinburghnews.scotsman.com	m.eastwoodadvertiser.co.uk
Edinburgh News	om	m.edinburghnews.scotsman.com
Ellon Times	www.ellontimes.co.uk	m.ellontimes.co.uk
Epworth Bells	www.epworthbells.co.uk	m.epworthbells.co.uk
Falkirk Herald	www.falkirkherald.co.uk	m.falkirkherald.co.uk
Farming Life	www.farminglife.com	m.farminglife.com
Fenland Citizen	www.fenlandcitizen.co.uk	m.fenlandcitizen.co.uk
Fife Today	www.fifetoday.co.uk	m.fifetoday.co.uk
Filey Mercury	www.fileymercury.co.uk	m.fileymercury.co.uk
Fleetwood Weekly News	www.fleetwoodtoday.co.uk	m.fleetwoodtoday.co.uk
Forfar Dispatch	www.forfardispatch.co.uk	m.forfardispatch.co.uk
Fraserburgh Herald	www.fraserburghherald.co.uk	m.fraserburghherald.co.uk
Gainsborough Standard	www.gainsboroughstandard.co.uk	m.gainsboroughstandard.co.uk
Galloway Gazette	www.gallowaygazette.co.uk	m.gallowaygazette.co.uk
Garstang Courier	www.garstangcourier.co.uk	m.garstangcourier.co.uk
Glasgow South and Eastwood Extra	www.glasgowsouthandeastwoodextra.co.uk	m.glasgowsouthandeastwoodextra.co.uk
Grantham Journal	www.granthamjournal.co.uk	m.granthamjournal.co.uk
Guide and Gazette	www.guideandgazette.co.uk	m.guideandgazette.co.uk
Halifax Courier	www.halifaxcourier.co.uk	m.halifaxcourier.co.uk
Harborough Mail	www.harboroughmail.co.uk	m.harboroughmail.co.uk
Harrogate Advertiser	www.harrogateadvertiser.co.uk	m.harrogateadvertiser.co.uk

Hartlepool Mail	www.hartlepoolmail.co.uk	m.hartlepoolmail.co.uk
Hastings Observer	www.hastingsobserver.co.uk	m.hastingsobserver.co.uk
Haverhill Echo	www.haverhillecho.co.uk	m.haverhillecho.co.uk
Hawick News	www.hawick-news.co.uk	m.hawick-news.co.uk
Hayling Islander	www.haylingtoday.co.uk	m.haylingtoday.co.uk
Hebden Bridge Times	www.hebdenbridgetimes.co.uk	m.hebdenbridgetimes.co.uk
Hemel Today	www.hemeltoday.co.uk	m.hemeltoday.co.uk
Hemsworth and South Elmsall Express	www.hemsworthandsouthelmsallexpress.co.uk	m.hemsworthandsouthelmsallexpress.co.uk
Horncastle News	www.horncastlenews.co.uk	m.horncastlenews.co.uk
Houghton Star	www.houghtonstar.co.uk	m.houghtonstar.co.uk
Hucknall Dispatch	www.hucknalldispatch.co.uk	m.hucknalldispatch.co.uk
Ilkeston Advertiser	www.ilkestonadvertiser.co.uk	m.ilkestonadvertiser.co.uk
Inverurie Herald	www.inverurieherald.co.uk	m.inverurieherald.co.uk
Isle of Man Today	www.iomtoday.co.im	m.iomtoday.co.im
Kenilworth Weekly News	www.kenilworthweeklynews.co.uk	m.kenilworthweeklynews.co.uk
Kincardineshire Observer	www.kincardineshireobserver.co.uk	m.kincardineshireobserver.co.uk
Kirkintilloch Herald	www.kirkintilloch-herald.co.uk	m.kirkintilloch-herald.co.uk
Kirriemuir Herald	www.kirriemuirherald.co.uk	m.kirriemuirherald.co.uk
Lancashire Evening Post	www.lep.co.uk	m.lep.co.uk
Lancaster Guardian	www.lancasterguardian.co.uk	m.lancasterguardian.co.uk
Larne Times	www.larnetimes.co.uk	m.larnetimes.co.uk
Leamington Courier	www.leamingtoncourier.co.uk	m.leamingtoncourier.co.uk
Leigh Reporter	www.leighreporter.co.uk	m.leighreporter.co.uk
Leighton Buzzard Observer	www.leightonbuzzardonline.co.uk	m.leightonbuzzardonline.co.uk
Leyland Guardian	www.leylandguardian.co.uk	m.leylandguardian.co.uk
Linlithgow Journal and Gazette	www.linlithgowgazette.co.uk	m.linlithgowgazette.co.uk
Littlehampton Gazette	www.littlehamptongazette.co.uk	m.littlehamptongazette.co.uk
Londonderry Sentinel	www.londonderrysentinel.co.uk	m.londonderrysentinel.co.uk
Longridge News	www.longridgenews.co.uk	m.longridgenews.co.uk
Louth Leader	www.louthleader.co.uk	m.louthleader.co.uk
Lurgan Mail	www.lurganmail.co.uk	m.lurganmail.co.uk
Luton Today	www.lutontoday.co.uk	m.lutontoday.co.uk
Lutterworth Mail	www.lutterworthmail.co.uk	m.lutterworthmail.co.uk
Lynn News	www.lynnnews.co.uk	m.lynnnews.co.uk
Lytham St Annes Express	www.lythamstannesexpress.co.uk	m.lythamstannesexpress.co.uk

Malton and Pickering Mercury	www.maltonmercury.co.uk	m.maltonmercury.co.uk
Mansfield and Ashfield Chad	www.chad.co.uk	m.chad.co.uk
Market Rasen Mail	www.marketrasenmail.co.uk	m.marketrasenmail.co.uk
Matlock Mercury	www.matlockmercury.co.uk	m.matlockmercury.co.uk
Mearns Leader	www.mearnsleader.co.uk	m.mearnsleader.co.uk
Melton Times	www.meltontimes.co.uk	m.meltontimes.co.uk
Mid Sussex Times	www.midsussextimes.co.uk	m.midsussextimes.co.uk
Mid Ulster Mail	www.midulstermail.co.uk	m.midulstermail.co.uk
Midhurst and Petworth Observer	www.midhurstandpetworth.co.uk	m.midhurstandpetworth.co.uk
Midlothian Advertiser	www.midlothianadvertiser.co.uk	m.midlothianadvertiser.co.uk
Milngavie Herald	www.milngavieherald.co.uk	m.milngavieherald.co.uk
Milton Keynes Citizen	www.miltonkeynes.co.uk	m.miltonkeynes.co.uk
Mirfield Reporter	www.mirfieldreporter.co.uk	m.mirfieldreporter.co.uk
Montrose Review	www.montrosereview.co.uk	m.montrosereview.co.uk
Morley Observer and Advertiser	www.morleyobserver.co.uk	m.morleyobserver.co.uk
Morpeth Herald	www.morpethherald.co.uk	m.morpethherald.co.uk
Motherwell Times	www.motherwelltimes.co.uk	m.motherwelltimes.co.uk
Newmarket Journal	www.newmarketjournal.co.uk	m.newmarketjournal.co.uk
News Guardian	www.newsguardian.co.uk	m.newsguardian.co.uk
News Post Leader	www.newspostleader.co.uk	m.newspostleader.co.uk
Newtownabbey Times	www.newtownabbeytoday.co.uk	m.newtownabbeytoday.co.uk
Northampton Chronicle and Echo	www.northamptonchron.co.uk	m.northamptonchron.co.uk
Northamptonshire Telegraph	www.northantstelegraph.co.uk	m.northantstelegraph.co.uk
Northumberland Gazette	www.northumberlandgazette.co.uk	m.northumberlandgazette.co.uk
Pendle Today	www.pendletoday.co.uk	m.pendletoday.co.uk
Peterborough Telegraph	www.peterboroughtoday.co.uk	m.peterboroughtoday.co.uk
Peterlee Star	www.peterleestar.co.uk	m.peterleestar.co.uk
Pocklington Post	www.pocklingtonpost.co.uk	m.pocklingtonpost.co.uk
Pontefract and Castleford Express	www.pontefractandcastlefordexpress.co.uk	m.pontefractandcastlefordexpress.co.uk
Portadown Times	www.portadowntimes.co.uk	m.portadowntimes.co.uk
Portsmouth News	www.portsmouth.co.uk	m.portsmouth.co.uk
Retford Trader and Guardian	www.retfordtoday.co.uk	m.retfordtoday.co.uk
Ripley and Heanor	www.ripleyandheanornews.co.uk	m.ripleyandheanornews.co.uk

News

Ripon Gazette	www.ripongazette.co.uk	m.ripongazette.co.uk
Rugby Advertiser	www.rugbyadvertiser.co.uk	m.rugbyadvertiser.co.uk
Rutland Times	www.rutland-times.co.uk	m.rutland-times.co.uk
Rye and Battle Observer	www.ryeandbattleobserver.co.uk	m.ryeandbattleobserver.co.uk
Seaham Star	www.seahamstar.co.uk	m.seahamstar.co.uk
Selkirk Weekend Advertiser	www.selkirkweekendadvertiser.co.uk	m.selkirkweekendadvertiser.co.uk
Sheffield Telegraph	www.sheffieldtelegraph.co.uk	m.sheffieldtelegraph.co.uk
Shields Gazette	www.shieldsgazette.com	m.shieldsgazette.com
Shoreham Herald	www.shorehamherald.co.uk	m.shorehamherald.co.uk
Skegness Standard	www.skegnessstandard.co.uk	m.skegnessstandard.co.uk
Sleaford Standard	www.sleafordstandard.co.uk	m.sleafordstandard.co.uk
South Yorkshire Times	www.southyorkshiretimes.co.uk	m.southyorkshiretimes.co.uk
Spalding Guardian	www.spaldingtoday.co.uk	m.spaldingtoday.co.uk
Spenborough Guardian	www.spenboroughguardian.co.uk	m.spenboroughguardian.co.uk
St Helens Reporter	www.sthelensreporter.co.uk	m.sthelensreporter.co.uk
Stamford Mercury	www.stamfordmercury.co.uk	m.stamfordmercury.co.uk
Stornoway Gazette	www.stornowaygazette.co.uk	m.stornowaygazette.co.uk
Suffolk Free Press	www.suffolkfreepress.co.uk	m.suffolkfreepress.co.uk
Sunderland Echo	www.sunderlandecho.com	m.sunderlandecho.com
Sussex Express	www.sussexexpress.co.uk	m.sussexexpress.co.uk
Thame Gazette	www.thametoday.co.uk	m.thametoday.co.uk
The Buteman	www.buteman.co.uk	m.buteman.co.uk
The North Yorkshire News	www.northyorkshirenews.com	m.northyorkshirenews.com
The Scarborough News	www.thescarboroughnews.co.uk	m.thescarboroughnews.co.uk
The Scotsman	www.scotsman.com	m.scotsman.com
The Southern Reporter	www.thesouthernreporter.co.uk	m.thesouthernreporter.co.uk
The Star	www.thestar.co.uk	m.thestar.co.uk
The Visitor	www.thevisitor.co.uk	m.thevisitor.co.uk
Thorne Gazette	www.thornegazette.co.uk	m.thornegazette.co.uk
Todmorden News	www.todmordennews.co.uk	m.todmordennews.co.uk
Tring Today	www.tringtoday.co.uk	m.tringtoday.co.uk
Tyrone Times	www.tyronetimes.co.uk	m.tyronetimes.co.uk
Ulster Star	www.lisburntoday.co.uk	m.lisburntoday.co.uk
Wakefield Express	www.wakefieldexpress.co.uk	m.wakefieldexpress.co.uk
Warwick Courier	www.warwickcourier.co.uk	m.warwickcourier.co.uk
Washington Star	www.washingtonstar.co.uk	m.washingtonstar.co.uk
West Sussex County Times	www.wscountytimes.co.uk	m.wscountytimes.co.uk
West Sussex	www.westsussextoday.co.uk	m.westsussextoday.co.uk

Gazette

Wetherby News	www.wetherbynews.co.uk	m.wetherbynews.co.uk
Whitby Gazette	www.whitbygazette.co.uk	m.whitbygazette.co.uk
Wigan Today	www.wigantoday.net	m.wigantoday.net
Worksop Guardian	www.worksopguardian.co.uk	m.worksopguardian.co.uk
Worthing Herald	www.worthingherald.co.uk	m.worthingherald.co.uk
Yorkshire Evening Post	www.yorkshireeveningpost.co.uk	m.yorkshireeveningpost.co.uk
Yorkshire Post	www.yorkshirepost.co.uk	m.yorkshirepost.co.uk

PERSONNEL POLICY AND PROCEDURE NO: 1.18

CODE OF ETHICS

1 OVERVIEW

Johnston Press plc and its associated and subsidiary companies (the “Group”) publish quality local and regional newspapers and operate local internet sites. Its publishing philosophy is based on serving local communities.

2 VALUES

We aim to conduct our business with integrity, honesty and in accordance with ethical standards.

We seek to maintain the highest standards of quality whilst operating as efficiently as possible.

3 EMPLOYEES

We respect the rights and interests of our employees and value diversity in our workforce.

We encourage mutual trust and respect between all employees and strive to promote and protect a culture where each employee knows the value of their contribution to the Group as a whole.

We are committed to helping employees maximise their potential through the development of skills and knowledge and we seek to implement policies that encourage and reward productivity, creativity and loyalty.

We recruit, employ and promote employees solely on the basis of qualifications, performance and abilities and without discrimination.

We are committed to providing our employees with a safe and healthy working environment. We do not tolerate any form of discrimination, harassment, victimisation or bullying and there are clear procedures in place to deal with such behaviour. (see Personnel Policies & Procedures Manual – 1.01 Recruitment & Selection, 2.01 Equal Opportunities, 2.02 Bullying & Harassment, 2.03 Disability, 2.04 Age Discrimination, 2.05 Diversity etc).

4 CUSTOMER RELATIONS

Our newspapers and internet sites are produced by local teams of people, dedicated to delivering local news and information. We are committed to providing our customers with accurate, honest and informative products that reflect the important issues in the communities that our newspapers serve, thus encouraging a loyal and valuable readership and regular use of our internet sites. The company is wholly committed to the Independent Press Standards Organisation (IPSO) and the Editorial Code of Conduct.

5 SHAREHOLDERS

We seek to provide our shareholders with an attractive long term return on their investment in the Company.

We recognise the value of an honest and open relationship with our shareholders and our dealings with them are conducted in accordance with recognised standards of responsible corporate governance.

6 SUPPLIERS

Our suppliers are essential to our business and we are committed to maintaining good working relationships with them whilst maintaining the value of these relationships for the benefit of the Company. We will always operate with honesty and integrity.

7 COMPETITION

We will conduct our business in full compliance with competition law. No employee should ever assume that the Group's interests ever require anything other than strict compliance. Moreover, no one in the Group has the authority to give any order or direction that will result in the violation of this policy. Local managers are responsible for ensuring that their employees comply with competition law through training, briefing and communication (see Group Guideline 3.6).

8 INTEGRITY & CONFLICTS OF INTEREST

We do not countenance the acceptance or solicitation of hospitality or gifts as these may be mistaken for an inducement or bribe or other improper enticement for business, financial or personal gain. No employees may offer, give or receive any gift or payment which is, or may be construed as being, an inducement or bribe. Any such demand or offer must be rejected and reported to management (see Group Guideline 1.10 and Personnel Policy & Procedure 1.09).

All employees are to avoid activities and financial interests which conflict or may conflict with their responsibilities and obligations to the Group. Employees must not misuse their position with the Company in order to acquire any benefit either for themselves or for others. If in doubt, please seek prior approval from immediate line manager (see Personnel Policy & Procedure 1.08).

9 CHARITABLE AND COMMUNITY SUPPORT

We take our corporate social responsibility seriously and respect the legitimate interests of those with whom we have relationships and of the communities within which we work. We actively encourage our Editors to support local good causes and we will make charitable donations (see Group Guideline 3.11).

10 RESPONSIBILITIES AND ACCOUNTABILITIES

The Board is responsible for the Group's ethical standards and ensuring compliance with and implementation of these principles. Day to day responsibility for communication of and adherence to these principles is however delegated to managers around the Group.

The Code is reviewed annually and compliance with the Code is monitored. The Group takes breaches of the Code seriously and any breach or suspected breach must be reported to the appropriate senior manager. Disciplinary action will be applied in respect of any breach of this code, including, where appropriate, dismissal. Certain disclosures may fall under the Company's Personnel Policy & Procedure - 1.12 Whistle Blowing.

Copies of Personnel Policies and Procedures and Group Policy Guidelines referred to are available from your manager or from the Johnston Press Intranet.

