

# telegraphmediagroup

## IPSO Annual Report 2014

Reporting period: Sept 8 to Dec 31 2014

### Introduction

Telegraph Media Group Ltd (TMG) is a wholly owned subsidiary of Press Acquisitions Ltd. It has approximately 1,150 employees.

Our regulated titles are:

*The Daily Telegraph* (circulation 489,459)

*The Sunday Telegraph* (circulation 372,346)

*The Weekly Telegraph* (not audited)

This year (2015) *The Telegraph* celebrates its 160<sup>th</sup> anniversary since its first publication. *The Telegraph* has played an important part in British national life and will continue to do so, even as our customers become increasingly international.

We remain one of the few commercially successful newspaper publishers; we are a highly profitable business that understands the needs of our customers. We invest significantly in quality journalism and technology and are proud of our high professional and ethical standards.

Murdoch MacLennan is the Chief Executive and Aidan Barclay is Chairman of TMG. They are supported by an executive team. They are both members of the TMG Board, which is responsible for strategic planning, corporate governance, annual budgeting, financing, investment appraisal and executive remuneration.

### **Editorial Structure**

Chris Evans is Editor and Director of Content. Ian MacGregor is Weekend Editor and Director of Leisure. They are supported by an editorial executive team responsible for producing a 24/7 product online and in print.

Compliance with the Editors' Code is a contractual requirement of all editorial employees and contributors. The company has an Editorial Code of Conduct incorporating this and other conditions of working for TMG relating to the Bribery Act and Data Protection (see **Our training process**, below).

The Group's 'responsible person' (under section 1.2 of IPSO Regulations Annex A) is Jess McAree, Head of Editorial Compliance.

## The Daily Telegraph

is a member of the Independent Press Standards Organisation (IPSO) and we subscribe to its Editors' Code of Practice. If you have a complaint about editorial content, please visit [www.telegraph.co.uk/editorialcomplaints](http://www.telegraph.co.uk/editorialcomplaints) or write to 'Editorial Complaints' at our postal address (see below). If you are not satisfied with our response, you may appeal to IPSO at [www.ipso.co.uk](http://www.ipso.co.uk).

The Daily Telegraph, 111 Buckingham Palace Road, London, SW1W 0DT

### Our editorial standards

The Telegraph Media Group is a robust supporter of voluntary press self-regulation, and played a leading role in the creation of IPSO. It takes seriously its responsibility to uphold the highest editorial standards.

We have a dedicated Compliance team whose job is to manage and record complaints brought under the Editors' Code.

The Head of Editorial Compliance works closely with the in-house Legal department to offer Code

advice, to handle complaints, to train journalists in the Code and to give regular feedback to editorial staff about Code complaints and other legal/regulatory issues (see **Our training process**, below).

### **How we work**

In recent years, *The Telegraph* has integrated its print and digital newsrooms. Editorial staff work across platforms, meaning that decisions about the publication of stories now have to be made from early in the morning to late in the evening.

Difficult or contentious stories are scrutinised and discussed by senior editorial staff, who sit in the centre of the newsroom to facilitate quick editorial decisions and rapid digital publication where necessary. *The Telegraph* prides itself on its high standards of journalism, and we seek to apply those standards in the new digital world.

Nowhere is rigour more important than in our investigative journalism. We have an award-winning Investigations team dedicated to producing exclusive stories that expose issues of significant public interest. Most are contentious and legally sensitive. They demand painstaking, detailed work to comply with the Editors' Code, particularly clause 1.

By way of example, during this reporting period the Investigations team received specific information that rail passengers were paying more than they should for certain train fares. To test this, reporters spent two weeks travelling around the country by rail, examining the various fares offered on different routes. They established that tickets sold at ticket machines are often significantly more expensive than those bought elsewhere. All relevant train companies had to be contacted for comment before publication, and all published details carefully checked against reporters' notes and actions.

Similarly, in preparation for the Alexander Litvinenko Inquiry, the team spent the autumn of 2014 meticulously interviewing those who knew about his death to investigate a tip-off that American spies had intercepted communications between those involved in his murder. The investigation was delicate and complex. All information collected, which derived from both on- and off-the-record commentary, had to be scrupulously analysed and cross-checked until reporters were satisfied about its accuracy and authenticity. After discussing the information with the Editor, the reporters contacted the relevant parties for comment pre-publication. The resulting article was published in January.

Separately, from time to time, the Investigations team uses subterfuge. To comply with Code clause 10, reporters meet with senior editorial staff to agree that the matter is in the public interest and the information cannot be obtained by any other means. A formal proposal is submitted to the Head of Legal and/or Head of Editorial Compliance before any operations are undertaken. Before employing subterfuge, reporters must have gathered prima facie evidence that a specific individual, company or organisation warrants investigation.

### **Editorial Code guidance**

The Head of Editorial Compliance works with the Head of Legal to offer pre-publication Code advice (in practice, such advice is usually offered by editorial lawyers, who are most likely to encounter issues in routine pre-publication reading). The Legal and Compliance teams are usually sufficiently knowledgeable to advise journalists without recourse to IPSO. Exceptionally, where the issues are marginal, abstruse or potentially serious, we seek advice from IPSO directly and relay this to staff.

This service is advisory only; once journalists are informed of potential Code issues and their possible consequences, it is for senior editorial staff to decide how to proceed. The Legal and Compliance teams retain only a residual responsibility to escalate matters in circumstances where issues are being deliberated by insufficiently senior members of the editorial team.

Post-publication, complaints are dealt with by editorial lawyers and the Head of Editorial Compliance. Relevant journalists are normally involved, but management of complaints is the responsibility of the Legal and Compliance teams, with final sign-off by the Head of Editorial Compliance. Details of all complaints are carefully recorded (see **Our complaints-handling process**, below) and outcomes are fed back directly to journalists and their managers. They are also incorporated into compulsory regular training and briefings (see **Our training process**).

### **IPSO Code warnings**

IPSO warnings and advisory notices are distributed to editorial staff by email shortly after they arrive. They are also collated on a shared spreadsheet to which key editorial staff have access. This is kept up to date with all such communications, together with legal and reporting restriction notices. They are searchable on demand.

The Compliance and Legal teams from time to time also issue their own advisories to journalists when it is felt necessary or appropriate to bring to their attention any specific risks or problems arising from contemporary news events, or from legal or regulatory complaints.

### **Our complaints-handling process**

We accept complaints via our webform at [www.telegraph.co.uk/editorialcomplaints](http://www.telegraph.co.uk/editorialcomplaints), which explains that we are regulated by IPSO and links to its website. The link to the webform appears in a Q&A page about Editorial that can be reached via [Contact us](#) → [Editorial](#). The complaints webform links to our own published [complaints policy](#), which was adopted in preparation for IPSO's launch, and explains how complainants can appeal to IPSO if they are unsatisfied by our response.

## **The Sunday Telegraph**

is a member of the Independent Press Standards Organisation (IPSO) and we subscribe to its Editors' Code of Practice. If you have a complaint about editorial content, please visit [www.telegraph.co.uk/editorialcomplaints](http://www.telegraph.co.uk/editorialcomplaints) or write to 'Editorial Complaints' at our postal address (see below). If you are not satisfied with our response, you may appeal to IPSO at [www.ipso.co.uk](http://www.ipso.co.uk).

The Daily Telegraph, 111 Buckingham Palace Road, London, SW1W 0DT

We publicise our membership of IPSO in all our newspapers at the foot of a right-hand column that usually appears on page 2 (see left).

Readers may also submit complaints about editorial content by post, to "Editorial Complaints" at *The Telegraph's* usual postal address. We of course also accept complaints referred to us by IPSO under Regulation 13. Submissions via

the webform and standard mail are monitored by a dedicated team reporting to the Head of Editorial Compliance. All editorial complaints are centrally handled by Compliance and Legal, working together. Where complainants get in touch via other channels raising concerns that appear to raise a potential breach of the Editors' Code, they are referred to the editorial complaints webform (or the postal address if complainants are unable to access the online form).

Whether they come to us direct, or are referred by IPSO under Regulation 13, most complaints receive a response within two working days (within a week if sent by standard post). We aim to conclude complaints speedily, whether by rejecting them or by upholding them and taking some form of remedial action. Our records show that in this reporting period we resolved 84% of editorial complaints within 3 working days. 97% were resolved within two weeks.

We keep detailed records of all complaints, which are coded and categorised to allow us to produce quarterly reports for the editorial management team. The reports track key metrics such as total complaint numbers, the clauses of the Editors' Code under which they are brought, sections and journalists responsible for the material under complaint and breakdowns of outcomes (resolution remedies, complaints upheld, rejected, mediated etc). The reports aim to identify issues or trends that might be of concern so that any potential underlying problems can be quickly addressed. The commentary in these reports is for private internal use only, and therefore not for publication, but details are available to IPSO on a confidential basis. Details for the present reporting period are included below (see **Our record on compliance**).

### Our training process

#### **IPSO Launch preparation**

In the run-up to IPSO's launch on Sept 8 2014, and thereafter until the end of 2014, we ran a series of 10 workshops to ensure editorial staff were aware of the background to IPSO's creation.

These explained the history of press regulation in the context of the Leveson Inquiry and set out the differences between PCC and IPSO rules. The sessions highlighted the significant new powers of IPSO - ie Standards Investigations and possible fines - and gave a brief reminder of the Editors' Code, emphasising that journalists were expected to observe it.

The sessions were mandatory for at least two editorial representatives from every major section (ie Features, News, Business etc). All delegates were instructed to

feed back to their teams. 136 editorial staff (out of approximately 400 in total) attended.

We also amended our Editorial Code of Conduct (part of every journalist's contract of employment) to require that journalists know the Editors' Code and comply with it. Contractual terms and conditions for contributors (ie non-staff journalists) were similarly updated. Compliance with the Data Protection Act 1998 and Bribery Act 2010 is also a contractual requirement.

### **Editors' Code training**

Most journalists come to TMG either as beginners with a recognised postgraduate journalism qualification, or as established journalists with experience and knowledge of media law and regulation. Although very few recruits are unaware of the Editors' Code, we are conscious that the small handful that do fall into this category need mandatory training. It is also felt to be important that experienced staff be given a regular reminder as the Code evolves, and new cases set precedents.

We therefore established a two-hour training seminar, "IPSO Editors' Code Refresher", which offers a more detailed examination of the Editors' Code, with real examples of up-to-date cases involving *The Telegraph* and other publishers. The training, run by the Head of Editorial Compliance, includes interactive discussion of both actual and hypothetical complaints brought under the Code, and seeks to give journalists a solid grounding in its scope and application. The presentation that illustrates these sessions evolves continuously, and contains details of real cases that cannot be published for reasons of data protection. The slides can, however, be made available to IPSO in confidence.

In April 2015 it became mandatory for all new editorial staff to attend within three months of arrival at TMG, and for all editorial staff to attend at least once every two years. In the period covered by this report, attendance was voluntary. Nevertheless the seminar ran nine times and attracted 54 delegates.

### **Compliance feedback and bulletins**

The Head of Editorial Compliance holds individual monthly briefings with all the main editorial sections. Attendance is mandatory, although Desks may send different staff members to sessions; not all are required to attend every month. The briefings, which last 20-30 mins, set out recent complaints received by the Group and by other publishers. Significant IPSO adjudications are discussed.

The briefings identify errors and lessons that can help inform editorial practice in similar cases. They are accompanied by a summary that is distributed as a 'compliance bulletin' to all Desks. Although these documents contain third party

details that are potentially data sensitive, and are therefore not for publication, example bulletins can be made available to IPSO on a confidential basis.

### Our record on compliance

Most (approximately 80%) complaints we receive are solely or primarily concerned with Accuracy under clause 1 of the Editors' Code.

Of all complaints we receive about editorial content, we reject more than 80%. We resolve the others with amendments to online articles and/or corrections acknowledging errors online and/or in print.

During this reporting period, IPSO issued decisions on three complaints adjudicated under Regulation 19. None were upheld:

- 0109-14 Scott v The Daily Telegraph (Decision issued 20/10/14)
- 0274-14 Miah v The Daily Telegraph (Decision issued 15/12/14)
- 0334-14 HRH Sara bint Talal bin Abdulaziz v The Sunday Telegraph (Decision issued 02/12/14)





## PRIVATE & CONFIDENTIAL

### Additional compliance information, Sept 8 to Dec 31 2014

During this reporting period 121 editorial complaints brought directly to TMG were summarily dismissed, not upheld, or were not pursued by the complainant(s).

The table below itemises the 19 complaints that were upheld and remedied by formal published corrections (ie wording that acknowledged a Code breach), or which were resolved by other means (for example, text/picture amendments online). Two were mediated by IPSO without being adjudicated under Regulation 19.

19 of these complaints were brought under Code clause 1 (Accuracy). One involved clause 2 (Opportunity to reply) and two engaged clause 3 (Privacy).

Nine were upheld in the 'Minor' category. This is reserved for complaints that are relatively trivial in nature or which (if brought under clause 1) arguably did not reach the threshold of significance necessary to engage the Code.

Action taken	Upheld/resolved	Upheld/resolved (minor)	Mediated by IPSO	Total
Correction in paper and online	2	1	1	4
Correction in paper	1			1
Correction online	2			2
Article amended online	2	8	1	11
Correction published on stand-alone web page linked from main hub page (for 24 hours)	1			1
Total	8	9	2	19



# Editorial Code of Conduct

## EDITORIAL CODE OF CONDUCT

Telegraph Media Group (TMG or Company) is a trusted and respected media publisher, committed to providing journalism of the highest quality.

Our reputation is our most vital asset. It depends, for its protection, upon you. We expect all staff to be honest, to obey the law, and to be committed to our core journalistic values of fairness, thoroughness, accuracy and integrity.

This editorial code is intended to help TMG journalists decide how to behave. It should be read in conjunction with your employment contract, the Staff Handbook, the 1998 Data Protection Act, the 2010 Bribery Act and the 1998 Human Rights Act. The Company provides regular IPSO Editors' Code Refresher courses and you are expected to attend one of these at least once every two years. If you avoid this responsibility, you may face disciplinary action. You must also read and abide by the IPSO Editors' Code of Practice, which TMG journalists are required to follow.

### Following the Editors' Code and obeying the law

TMG journalists and non-established staff working for us must obey the law. You may not illegally or inappropriately purloin data, documents or other property. You may not tap telephones or intercept email or voicemail messages, engage in telephone 'hacking' or knowingly or recklessly obtain or disclose personal data or information without the consent of the subject\*. Nor may you commission or encourage others to do it on your behalf.

As stated in the Editors' Code, there may be extraordinary circumstances where exceptions to some of these rules, and others, can be justified in the public interest. The Code defines this as including, but not being confined to:

- i) Detecting or exposing crime or serious impropriety
- ii) Protecting public health and safety
- iii) Preventing the public from being misled by an action or statement of an individual or organisation

If a decision is ever taken by senior TMG journalists that the public interest does justify some of the above actions, it is a requirement by the Company that the decision is taken by senior editorial executives. The group making the decision must include, as a minimum, the Editor or Deputy Editor, and at least one other of the following: an Associate Editor, Assistant Editor or Departmental Head (Desk/Section Head). It must also include the Editorial Legal Director and/or the Head of Editorial Compliance.

Any such decision, pertaining to 'public interest' exceptions outlined in the Editors' Code must be fully and contemporaneously documented. Minutes of these meetings must address all the circumstances involved, and the reasons why it is believed the action or publication would be in the public interest.

Journalists are strongly encouraged, before taking such decisions, to seek the advice of in-house lawyers and/or the Head of Editorial Compliance. Where you seek a public interest exemption for activities proscribed by the Editors' Code, you must first submit to Legal and/or Compliance a formal proposal outlining your proposed actions, with full discussion of the public interest involved and the

reasons why they are necessary. A template for these formal proposals is available from the Head of Editorial Compliance.

## **Privacy**

The Editors' Code states:

- i) Everyone is entitled to respect for his or her private and family life, home, health and correspondence, including digital communications
- ii) Editors will be expected to justify intrusions into any individual's private life without consent

We offer the additional caveat that there should be a reasonable prospect of success, i.e. journalists should not engage in 'fishing' expeditions\*; that there should be sufficient cause to justify any intrusion, in terms of the public good which would follow from publication and any damage caused by the intrusion; that the methods used should cause the least possible intrusion; and, as with any breach of the Editors' Code, the intrusion must be authorised at a sufficiently senior level (see Obeying the Law, above), and the reasons and justification fully and contemporaneously documented.

## **Financial Matters and the Editors' Code**

The Editors' Code is clear about how journalists must behave when covering financial matters, particularly those who make recommendations to buy, sell or hold shares.

## **Confidential Information**

All employees have a responsibility to safeguard the confidentiality of information acquired during the course of their work and a duty never to use it for personal advantage or gain.

## **Social Media**

There is a distinction between accounts that are managed by editorial teams and the personal Twitter or Facebook accounts of journalists. Any accounts managed by editorial teams are subject to this editorial code and other guidance such as the Editors' Code.

TMG journalists who have personal social media accounts should also follow the rules set out in this editorial code and in the Editors' Code. Even if this is your personal account, note that things you write on personal social media accounts can, in some circumstances, give rise to complaints under the Editors' Code.

## **If in doubt**

If you are ever in doubt about any matter concerning business conduct, please seek advice from the Company Secretary or any member of the Executive Management Team.

If you ever feel under pressure from a senior colleague to carry out action that you feel breaks this editorial code (or the IPSO Editors' Code), you should contact the Head of Editorial Compliance. Any contact of this nature will be treated in the strictest confidence.

No disciplinary action shall be taken against any journalist who refuses to act in a manner which he or she reasonably and in good faith believes is contrary to the Editors' Code. Any journalist who uses IPSO's 'whistleblowing hotline', once it comes into force (and provided such use is appropriate and proportionate), is similarly protected from disciplinary procedures.

\* Talk to Legal Dept or Head of Editorial Compliance if you're unsure what this means

