

# telegraphmediagroup

## IPSO Annual Report 2016

Reporting period: Jan 1 to Dec 31 2016

### Introduction

Telegraph Media Group Ltd (TMG) is a wholly owned subsidiary of Press Acquisitions Ltd. It has approximately 1,200 employees.

Our regulated titles are:

*The Daily Telegraph* (circulation 472,000 - Jan 2016)

*The Sunday Telegraph* (circulation 359,000 - Jan 2016)

[www.telegraph.co.uk](http://www.telegraph.co.uk)

The Telegraph remains 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.

Telegraph Media Group remains a strong supporter of self-regulation. We always do our best to assist IPSO and to co-operate with it by supplying information in a timely manner. We contributed to the independent Pilling Review of IPSO, and we are participating in IPSO's pilot arbitration scheme. Murdoch MacLennan is on the board of the Regulatory Funding Company that finances IPSO.

### **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).

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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**

*The Telegraph* has an integrated print/digital newsroom. Editorial staff work across all platforms.

Difficult or contentious stories are scrutinised 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 in all media.

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.

### **Editorial Code guidance**

The Head of Editorial Compliance works with the editorial Legal department 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 a 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 and/or the Editorial Legal Director. Details of all complaints are carefully recorded (see **Our complaints-handling process**, below) and outcomes are fed back to journalists and their managers. Significant cases and ones involving adverse adjudications by IPSO 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.

### **[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 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).

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

We publicise our membership of IPSO in all our newspapers, usually 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. 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 Contact Us page or the editorial complaints webform (or the postal address if complainants have no internet access).

At this stage we refer any complaints that are legal in nature - as opposed to Editors' Code matters - to the editorial Legal department. Similarly, letters of complaint from solicitors are always referred to the Legal team.

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 75% of editorial complaints within 3 working days. More than 90% 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**

### **General**

The Telegraph Media Group expects its journalists to adhere to the Editors' Code of Practice. Our Editorial Code of Conduct (part of every journalist's contract of employment) gives guidance on key Code issues. Contractual terms and conditions for contributors (ie non-staff journalists) also require that freelancers know and comply with the Code, as well as the Data Protection Act 1998 and Bribery Act 2010.

### **Editors' Code training**

Most journalists come to *The Telegraph* 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 run two training seminars, "IPSO Editors' Code Introduction" and "IPSO Editors' Code Refresher". The former is a detailed course explaining the Editors' Code and is mandatory for new editorial recruits. The latter is a shorter refresher session for existing staff, who must complete it every two years. The training is run by the Head of Editorial Compliance. Both courses include interactive discussion of both historical and hypothetical complaints under the Code, and seek to give journalists a solid grounding in its scope and application.

By the autumn of 2016, all TMG journalists had completed formal Editors' Code training.

We also create bespoke training modules when the need arises. In 2016 the company was convicted of an offence under s1 of the Sexual Offences (Amendment) Act for publishing a photograph which, though pixellated, was likely to identify the victim of a sex crime. In the six weeks following the conviction, 80 senior journalists were trained by the Head of Editorial Compliance and the Editorial Legal Director on a new policy in relation to victims of sex offences.

## **Compliance feedback and bulletins**

The Head of Editorial Compliance also 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, detail and explain recent complaints received by *The Telegraph* and by other publishers. Significant IPSO adjudications, involving our own and other publications, are discussed. Special attention is paid to adverse adjudications involving *Telegraph* publications.

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 (78%) complaints we received in the reporting period were solely or primarily concerned with Accuracy under clause 1 of the Editors' Code.

Of all complaints we received about editorial content during 2016, we rejected more than 75%. We resolved the others with amendments to online articles and/or corrections acknowledging errors online and/or in print.

During this reporting period, IPSO helped resolve six complaints by mediation (without a finding as to whether or not the Editors' Code had been breached):

- [02466-16 Lansman v Sunday Telegraph](#)
- [08975-16 A woman v telegraph.co.uk](#)
- [02746-16 Kozbar v The Sunday Telegraph](#)
- [02970-16 Gordon v The Daily Telegraph](#)
- [03086-16 Leaper v Daily Telegraph](#)
- [00183-16 Etherington v The Daily Telegraph](#)

IPSO adjudicated 10 complaints under Regulation 19. Eight were rejected, two upheld.

## Complaints not upheld by IPSO

- [10080-15 Cleghorn v Telegraph.co.uk](#)
- [07014-15 House v The Daily Telegraph](#)
- [03056-16 InFacts v Daily Telegraph](#)
- [00615-16 Prevent Watch v The Sunday Telegraph](#)
- [04533-16 Representatives of Sophia Murray v Telegraph.co.uk](#)
- [02436-16 Jukes v The Sunday Telegraph](#)
- [03058-16 InFacts v The Daily Telegraph](#)
- [12343-15 Perrett v Telegraph.co.uk](#)

## Adverse adjudications by IPSO during 2016 and steps taken to respond

### [12340-15 Nartey v telegraph.co.uk](#)

[An agency court report](#) about a man sentenced to prison for harassing female lovers contained the inaccurate claim that he had broken into one woman's house to steal her underwear. The inaccuracy in our article arose from a simple comprehension error by the reporter in court. We published a correction at the article's foot, which IPSO judged to be a sufficient remedial response.

### [00781-16 Khan v The Daily Telegraph](#)

Shoaib Khan complained that [this article](#) was misleading because of its references to the decision being made 'because of human rights laws'. The complainant said that the European Court of Justice Advocate-General's opinion, on which the piece reported, did not consider the case under the European Convention of Human Rights; the A-G was asked to give an opinion on whether Abu Hamza's daughter-in-law could be deported under article 20 of the Treaty on the Functioning of the European Union.

IPSO upheld the complaint on the basis that the print version of the article suggested that the A-G's opinion was definitive, and that deportation of the woman and her son was impossible because of his ruling. In fact, it was only an opinion and not a decision of the court. IPSO also ruled, however, that the A-G did set out the legal framework for the decision that would have to be made at law; this clearly included the child's ECHR 'right to family life' and his human rights under the Charter of Fundamental Rights, which would have to be weighed against any decision to deport his mother on public safety grounds. It was not therefore significantly inaccurate to

refer to the decision as being one involving human rights law. Our offer to publish a correction in our usual 'Corrections and Clarifications' spot was deemed to be an adequate remedy by IPSO in its adjudication.

Following this ruling, the case was incorporated into general Editors' Code training to ensure that journalists are aware of the difference between an opinion and a full ruling of the CJEU.