

# The Telegraph

## IPSO Annual Report 2017

Reporting period: Jan 1 to Dec 31 2017

### Introduction

Telegraph Media Group Ltd (TMG) is a wholly owned subsidiary of Press Acquisitions Ltd. It has approximately 1,200 employees. Our portfolio includes The Telegraph website and app, The Daily Telegraph and The Sunday Telegraph print titles and The Telegraph Edition app. Recently named as the UK's leading quality news brand, our digital content reaches more than 25 million users across the UK (UKOM MMX MP).

Our regulated titles are:

The Daily Telegraph (circulation 393,310 - Nov 2017)

The Sunday Telegraph (circulation 303,307 - Nov 2017)

[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.

Nick Hugh 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. Deputy Chairman Murdoch MacLennan is on the board of the Regulatory Funding Company that finances IPSO.

## Editorial Structure

Chris Evans is Editor and Director of Content. Allister Heath is Sunday Telegraph Editor & Head of Business. Jo Morrell is Managing Editor. 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, amongst other things, 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 and clause 10.

## 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 all 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).

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

We publicise our membership of IPSO in 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). We encourage users to fill in the

webform because it guarantees that their complaint will be picked up quickly by the relevant staff.

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 74% of editorial complaints within 3 working days. More than 95% 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 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. We also create bespoke training modules when the need arises.

### **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 (68%) 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 2017, we rejected more than 70%. 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 nine complaints by mediation (without a finding as to whether or not the Editors' Code had been breached):

- [01440-17 Taylor v The Daily Telegraph](#)
- [01137-17 Royal Albert Hall v The Sunday Telegraph](#)
- [06777-17 The Transparency Project v The Sunday Telegraph](#)
- [12765-17 Peter Ford v telegraph.co.uk](#)
- [16566-17 KFC v The Daily Telegraph](#)
- [16904-17 Molloy v The Daily Telegraph](#)
- [19479-17 Lendy Ltd v The Daily Telegraph](#)
- [19341-17 Olufemi v The Daily Telegraph](#)
- [20835-17 Silk v Telegraph.co.uk](#)

IPSO adjudicated seven complaints under Regulation 19. Five were rejected, two upheld.

### **Complaints not upheld by IPSO**

- [07794-16 Jasper v The Daily Telegraph](#)
- [13677-16 Foreman v The Daily Telegraph](#)
- [16335-17 Houghton v The Daily Telegraph](#)
- [18382-17 Consultus Care & Nursing Limited v The Daily Telegraph](#)
- [18520-17 Rowlands v The Daily Telegraph](#)

### **Adverse adjudications by IPSO during 2017 and steps taken to respond**

#### [00294-17 Brown v The Daily Telegraph](#)

An article about the introduction of section 40 to the Crime and Courts Act was illustrated with the Daily Telegraph “MP’s Expenses” splash of 2009. Gordon Brown complained that the context gave the impression that he had been found to have acted wrongly, whereas he had been acting within the rules of the time. IPSO ruled that the article was a breach of clause 1 and required the publication of an adjudication. The case was included in routine compliance bulletins.

#### [17510-17 Evans v The Daily Telegraph](#)

The article reported on a survey examining public opinion and attitudes towards the possible outcomes of Brexit negotiations. It said that more than 20,000 respondents had been surveyed, whereas in fact there had been only 3,293. IPSO upheld this point as a breach of clause 1, but ruled that The Telegraph had not misinterpreted the survey results in other ways, as the complainant claimed. In light of this case, staff were reminded about the importance of checking and fairly representing statistics.