

ASSOCIATED NEWSPAPERS

**Annual statement to the Independent
Press Standards Organisation 2018**

1. Factual information

1.1 Overview

A division of Daily Mail and General Trust, Associated Newspapers is one of the largest publishers of national newspapers and news websites in the UK, its titles including the Daily Mail, Mail on Sunday, MailOnline, Metro and Metro.co.uk. The company also publishes the Irish Daily Mail, Irish Mail on Sunday and evoke.ie website in the Irish Republic. MailOnline is a global news website with independent editorial operations in the USA and Australia.

1.2 List of Titles

The Associated Newspapers titles regulated by IPSO are:

- Daily Mail (*Circulation area England, Wales and Northern Ireland. **Average circulation including Scotland and Ireland 2018: 1.27 million***)
- The Mail on Sunday (*Circulation area England, Wales and Northern Ireland. **Average circulation including Scotland and Ireland 2018: 1.06 million***)
- Scottish Daily Mail (*Circulation area Scotland. **Average circulation 2018: 73,754***)
- The Scottish Mail on Sunday (*Circulation area Scotland. **Average circulation 2018: 61,652***)
- Metro (*Distribution in major cities and suburban areas in England, Scotland and Wales. **Average circulation 2018: 1.47 million***)
- MailOnline (all content relating to news events in the UK) (*Global audience. **Global monthly unique visitors 2018: 177 million***)
- Metro.co.uk (all content relating to news events in the UK) (*Global audience. **Global monthly unique visitors 2018: 41 million***)

1.3 Responsible person

Associated Newspapers' responsible person is Peter Wright, Editor Emeritus.

2 Editorial standards

2.1 Overview.

Associated Newspapers has always been committed to upholding the editorial standards enshrined in the Editors' Code of Practice. The CEO is chair of the Regulatory Funding Company; the Editor Emeritus is a member of the IPSO Complaints Committee; and the Editor of Metro is a member of the Editors' Code of Practice Committee.

Compliance with Editors' Code, Data Protection Act and Bribery Act is a requirement written in to all journalists' contracts.

Whenever there are changes to the legal and regulatory framework within which our journalists work we ensure they are informed and, where necessary, undergo training to guarantee they understand and comply with new requirements.

The most significant change in regulatory requirements in 2018 was the publication by the Editors' Code Committee of a revised Editors' Code, which came into effect on January 1, 2018.

All journalists were sent a copy of the revised Code and during the course of 2018 the Editor Emeritus delivered a series of seminars explaining the changes to the Code, and educating them in how recent rulings by the Complaints Committee affect working practices. The seminars continue into 2019 and all journalists are required to attend (see section 4.1).

All our newspapers carry regular corrections and clarifications columns, normally on page two. Our websites carry regular corrections and clarifications panels on their news page.

All Associated titles employ managing editors with responsibility for ensuring compliance with the Editors' Code and resolving any alleged breaches. During this period there were three for the Daily Mail and Metro, one for The Mail on Sunday, and four for MailOnline and Metro.co.uk.

We operate an automated complaints management system to ensure all complainants have access to the Editors' Code and assistance in making a complaint, and complaints are logged, acknowledged and outcomes recorded.

We publish our Complaints Procedure (See Appendix 1).

All journalists are required to seek advice from managing editors and/or the editorial legal department in respect of any journalistic inquiries or proposed stories which may raise issues under the Editors' Code or the law.

In 2018 the editorial legal department currently employs five full-time lawyers and one part-time. An in-house lawyer is present until the daily newspapers go to press, and they remain on call 24/7 for the newspapers and for Mail Online. Additional cover is provided by rota lawyers during the evening for the Daily Mail and Metro, and two rota lawyers for The Mail on Sunday on a Saturday. All the editorial content of the newspapers is read before publication by either an in-house lawyer or a rota lawyer.

One in-house lawyer was embedded with MailOnline and Metro.co.uk with additional cover provided by rota lawyers. Online editors select content for legal advice pre-publication, there is constant dialogue between editors, journalists and lawyers, and lawyers monitor content as it is published. A rota provides legal assistance overnight.

2.1 Guidance from IPSO.

All desist notices received from IPSO are circulated to all relevant journalists, and placed on the legal warnings database. On receipt of desist notices managing editors will occasionally speak to IPSO's Director of Operations, either to seek clarification, or to check whether the notice relates to any activities of Associated journalists.

More rarely, from time to time managing editors speak to IPSO's Executive for guidance on Code issues. Practice varies a little from title to title, according to the nature of the material they publish. The Daily Mail would generally only seek guidance on the application of the Code, or helpful precedents, without reference to a specific story. The Mail on Sunday may give some detail of a particular story or picture. MailOnline and Metro do not normally seek pre-publication advice from IPSO

Similarly the IPSO Executive will occasionally contact a managing editor regarding a story they believe one of our titles might be about to publish, and draw his/her attention to potential Code issues.

In either case IPSO's Executive invariably make clear that any advice they give is only for guidance and not for official clearance. They always point out that the IPSO complaints committee would ultimately rule on any complaint and they may well take a different view to that offered by the executive. The decision to publish rests with the Editor alone.

2.2 Verification of stories

We are very aware that across the industry a large proportion of all complaints are about accuracy, and our titles are no exception. Associated Newspapers has a formal step-by-step Verification Policy which has been distributed to all journalists. (Appendix 2).

2.3 Financial Transparency

At Associated Newspapers we have always had a strong record of protecting our journalistic integrity from inappropriate commercial pressure. To help our journalists further we have during 2019 issued Financial Transparency guidelines, which codify and strengthen previous practice. They can be found at Appendix 4.

3 Complaints handling

3.1 Forms in which complaints are accepted.

All our titles have very large, broad-based readerships and, unsurprisingly, we receive complaints in many different forms, about a wide variety of issues. For this reason we offer a range of avenues for complainants: *(Please note this section gives Daily Mail web and email addresses; there are parallel web and email addresses for our other titles).*

(a) IPSO. The most frequently used avenue for complaints is IPSO. Complainants go directly to IPSO and are then referred to us.

(b) Readers' Editor. Readers who prefer to make a formal complaint under the Editors' Code directly to us are encouraged to do so via an automated complaints form which is hosted on a dedicated web page www.dailymail.co.uk/readerseditor. Here they are given full information about the Editors' Code, details of our Complaints Policy, and easy-to-follow instructions on how to formulate a complaint. This route is prominently displayed on page two of our newspapers and the UK news page of our websites.

(c) Corrections. We are aware that some readers may want to take issue with a simple point of accuracy, which may not be a significant inaccuracy under the Code, or for a variety of reasons may not wish to engage in a formal process. We therefore offer in parallel with the Readers' Editor service an informal email route through corrections@dailymail.co.uk. It is publicised in the same way. If these complaints engage the Code in any way we record them with formal complaints.

(d) Contact Us. Some readers who use the Readers' Editor service realise, on reading the Editors' Code, that the matter which concerns them is not a Code issue, but a question of taste and decency, an opinion they wish to express, or something they simply wish to make known to us. Others may decide, having looked at the IPSO process, that they would rather not make a formal complaint. We therefore offer, on the landing page of the Readers' Editor web page, a second informal route called Contact Us. As with Corrections complaints that arrive by this route do nevertheless sometimes engage the Code, in which case they are recorded as formal complaints.

(e) Email/Letter. Some complainants prefer to complain in writing directly to the editor or journalist involved. Where these complaints might engage the Code they are recorded with other formal complaints.

3.2 Handling of editorial complaints.

Due to the very different nature of newsprint and digital publishing, there are some differences between the way our print and web titles handle complaints.

(a) Newspapers. Daily Mail and Metro complaints are assessed at the outset to determine whether there any issue under the Code. If there is no breach a member of the Managing Editor's team will write to the complainant explaining carefully how this decision has been reached. If the complaint is more serious and likely to go to IPSO for a ruling, it will be passed to the Managing Editor so it can be dealt with straight away. Mail on Sunday complaints follow a similar process, but are generally handled from the outset by the newspaper's managing editor.

(b) Websites. The much larger volume of content, and the speed with which it is published, makes websites more open to complaint than newspapers. At the same time continuous 24-hour publication means inaccuracies can be corrected immediately and permanently, sometimes within minutes of publication. Speed is of the essence, and for that reason online complaints go directly to managing editors, who try to resolve them as soon as possible. If that can't be done they will engage with the complainant and IPSO in the same way as the newspapers' managing editors.

3.3 Keeping of records.

All complaints that are entered via the complaints management system are recorded electronically. Complaints that are framed under the Code and are submitted by letter or email independently are also entered into the system, as are complaints referred by IPSO. When substantive complaints are resolved key information is transferred to a central register which records the name of the complainant, nature of the complaint, Code clause raised, outcome, remedial action (if any), and time taken to resolve

3.4 Resolution of complaints.

The average time taken to resolve complaints in 2018 was 17 working days. This represents the time taken from our receipt of a complaint to our last substantive exchange with the complainant or, in the case of complaints which proceed to IPSO for ruling, the last substantive exchange with IPSO. It does not include time spent waiting for IPSO to rule on a complaint or issue its ruling, as this is beyond our control.

3.5 Information provided to readers.

All readers using our automated complaints service are given full details of how to make a complaint and our Complaints Procedure. The Complaints Procedure gives an outline of how IPSO handles complaints, and encourages potential claimants to visit IPSO's website for further information. (Appendix 1) The automated complaints service is publicised on page two of our newspapers and the news page of our websites (Appendix 4).

4 Training Process

4.1`Details of training programmes

In 2018 we launched a major series of training seminars for all staff, given by the Editor Emeritus and entitled 'The Editors' Code: How to make sure YOU don't get an adverse adjudication from IPSO'.

The seminars explain the changes in the Code which were introduced on January 1, 2018, but their main purpose is to help journalists understand the lessons learned from recent rulings by IPSO. 12 seminars were held during the year, and the series continues into 2019. The subjects covered are summarised in Appendix 5. Each attendee was given a copy of the revised Editors' Code.

Many of our journalists have also received initial training through our Journalism Training Scheme. This took a new intake of 35 trainees in September 2017 and a further 12 in March 2018. Full details of the current course are given in Appendix 6.

In addition to this, MailOnline and Metro.co.uk hold internal induction sessions on key topics for new members of staff.

4.2 Numbers taking part.

809 journalists attended the 2018 series of Editors' Code seminars.

4.3 Plans for further training

The 2018 series of seminars will continue into 2019, and there will also be seminars for trainees and new joiners.

5 Compliance

5.1 Complaints ruled on by IPSO

During this period IPSO ruled on 31 complaints against Associated Newspapers titles. 13 were upheld. The rulings were:

05555-18 Ward v Daily Mail. Not upheld
03137-18 Ashton v Daily Mail. Not upheld
04418-18 Raphael v Daily Mail. Not upheld
04216-18 Chapman v Daily Mail. Not upheld
20912-17 Khan v Daily Mail. **Upheld**
02176-18 Chandler v Mail on Sunday. Not upheld
20864-17 Hindley v Mail on Sunday. **Upheld**
01582-18 Little v Mail on Sunday. **Upheld**
18693-17 Ward v Mail on Sunday. Not upheld
19645-17 Blair v Scottish Daily Mail. Not upheld
03999-18 Bromley v Metro. **Upheld**
04846-18 MacLeod v Mail Online. **Upheld**
04216-18 Chapman v Daily Mail. **Upheld**
06837-18 Chapman v Mail Online. **Upheld**
04626-18 Smith v Mail Online. Not upheld
05737-18 A Woman v Mail Online. Not upheld
05653-18 Crichton v Mail Online. **Upheld**
04100-18 The Transparency Project v Mail Online. Not upheld
04141-18 A Woman v Mail Online. Not upheld

03036-18 Khan v Mail Online. Not upheld
01033-18 Heimlich v Mail Online. Not upheld
02283-18 Premier Inn v Mail Online. **Upheld**
02821-18 Sivier v Mail Online. **Upheld**
19841-17 A Man v Mail Online. **Upheld**
01724-18 Nightingale v Mail Online. Not upheld
01063-18 Gabriel v Mail Online. Not upheld
00166-18 Dearlove v Mail Online. Not upheld
20887-17 A Man v Mail Online. **Upheld**
20380-17 Various v Mail Online. **Upheld**
20529-17 Strachan v Mail Online. Not upheld
18875-17 Dickinson v Mail Online. Not upheld

IPSO mediated 21 complaints without making a determination on whether or not there had been a breach of the Code:

03037-18 Khan v Daily Mail
03553-18 Appleby v Daily Mail
00920-18 Hallam-Baker v Daily Mail
04228-18 Chandler v Mail on Sunday
02502-18 Deevoy v Mail on Sunday
19431-17 Prakodwong v metro.co.uk
06021-18 Harvey v Mail Online
05740-18 A Man v Mail Online
04361-18 Osman and Kingstone v Mail Online
04110-18 Jefferd v Mail Online
04368-18 A Woman v Mail Online
03350-18 Jones v Mail Online
04203 Haggarty v Mail Online
20876-17 Johnson v Mail Online
02288-18 Jolley v Mail Online
00918-18 Dixon v Mail Online
00895-18 A Man v Mail Online
01019-18 Cantemir v Mail Online
01577-18 Chiariello v Mail Online
18477-17 A Man v Mail Online
19300-17 Prakodwong v Mail Online

5.2 Steps taken to respond to adverse adjudications:

20912-17 Khan v Daily Mail. This concerned a sub-deck to a headline which incorrectly summarised elements of a court case. Memos were sent to all journalists involved in the story, and all sub-editors, reminding them that facts in headlines and sub-decks must be carefully checked against the copy, and that reporters should be shown headlines and sub-decks on major stories to check for accuracy.

20864-17 Hindley v Mail on Sunday. This involved a panel identifying an individual beautician, which ran alongside a more general article criticising “cosmetic cowboys” and “rogue beauticians”. The panel only illustrated one point in the main article, and the complainant argued successfully that she was tarnished by being associated incorrectly with the other more general criticisms. A memo was sent to all staff instructing them to take great care when identifying an individual in connection with an article making wide-ranging criticisms.

01582-18 Little v Mail on Sunday. This also concerned an individual identified in a more general story making criticisms – in this case about doctors attending conference at a French ski resort at NHS expense. The article did not make it clear that the named doctor had attended the conference at her own expense. As the issue involved was similar to Hindley v Mail on Sunday it was remedied by specific reference in the same memo to all staff.

03999-18 Bromley v Metro. An article had described 50 Hamas members killed by Israeli forces as ‘fighters’ – the Complaints Committee ruled that insufficient care had been taken to confirm that all the dead were actually fighters. Those involved in preparing the story for publication were reminded that great care needs to be taken over the terminology used when writing about conflict in the Middle East.

04846-18 MacLeod v Mail Online. This reported on a judgment in the High Court relating to a divorce petition by a wife against her husband, whom she had married in an Islamic religious ceremony. The complaints committee ruled that it failed to distinguish clearly between a valid, void, and non-marriage. A memo was sent to all staff instructing them that when reporting court cases involving complex points of law they should check with the legal department prior to publication to ensure the right language is being used.

04216-18 Chapman v Daily Mail; 06837-18 Chapman v Mail Online. These rulings refer to the print and online versions of a report from a normally reliable agency on an inquest, in which the agency reporter identified the woman who had died as a different woman of the same name. There was nothing in the agency copy to indicate that an error had been made. The agency informed us that the reporter had been dismissed, and assured us that measures had been taken to ensure a similar error would not be made again.

05653-18 Crichton v Mail Online. This concerned a court report in which it was said the defendant had fully recovered after a serious bicycle accident. This information was based on pictures of the defendant walking in and out of court, in which he appeared healthy, but no further checks had been made. A memo was sent to all staff reminding them that any statement about an individual’s health needs to be properly checked, not just based on their appearance in a photograph.

02283-18 Premier Inn v Mail Online. This was a follow-up to a local newspaper story, in which it was claimed that a homeless couple who had tried to take advantage of a benefactor's offer of a free stay at Premier Inn had been turned away. Comment was sought from Premier Inn, but when no response was received after an hour and a half the story was published including a comment given earlier to the local newspaper. The Complaints Committee ruled this was not adequate. A memo was sent to all staff instructing them that when comment was sought by email a follow-up phone call should be made before publication to check that the email had been received and the subject of the story did not intend to make any comment.

02821-18 Sivier v Mail Online. This article repeated quotes published in another publication, which appeared to show the complainant had made anti-Semitic statements. In fact the supposed statements were not quotes, but the other publication's interpretation of what the complainant had said in his blog. A memo was sent to all staff reminding them that when repeating quotes from publically available sources they should be rechecked to ensure accuracy.

19841-17 A Man v Mail Online. This concerned an article about a well-known woman's new boyfriend, two of whose relatives had a criminal past. The references to the relatives were ruled in breach of Clause 9. A memo was sent to all staff reminding them that Clause 9 not only protects family and friends of criminals from being identified in an article about their criminal relatives, it also protects people in the public eye from being linked to less well-known criminal friends and relatives.

20887-17 A Man v Mail Online. The headline on this article, an interview with a woman who said a man she had met on a dating website had ruined her life, implied the man was bankrupt. In fact, although he had been bankrupt, he had subsequently been discharged, so was not bankrupt when the article was published. A memo was sent to all staff reminding the facts about individuals identified in confessional journalism must be checked.

20380-17 Various v Mail Online. This was a breaking news report about a panic in Oxford Street, caused when a pop singer tweeted that he had heard gunfire in Selfridges. The story included another tweet, claiming there was a lorry on the pavement, which was covered in blood, surrounded by police. In fact the tweet's date-stamp had been obscured, and it referred to another event a week earlier. A memo was sent to all staff instructing them to ensure when using tweet decks that retweets are switched off and date-stamps are carefully checked.

For the sake of completeness we also include one upheld adjudication which was issued in December 2017, but not covered in our 2017 Annual Statement:

16830-17 Warwickshire Police v Daily Mail. A freelance journalist, seeking interviews with victims in a widely-publicised criminal sex case, approached friends and relatives, and without directly identifying the victims, nevertheless named them and said he was seeking interviews with them in connection the case, which led friends and relatives to identify them as victims. The freelance was reprimanded and all staff sent a memo making clear that any

information disclosed to third parties, not just published information, could lead to a breach of the Editors' Code.

5.3 Details of other incidents

Any complaints which arrive outside the IPSO system are normally settled without admission of liability. Although they are investigated internally, they do not go through an independent process of investigation and adjudication, so it would be unfair to both the complainants and the journalists involved to offer a view on whether or not there was a breach of the Code in individual cases. In addition some complainants choose not to use the services of IPSO because they prefer to resolve their complaint with us privately, and we must respect that.

However we can supply the following details for complaints resolved under IPSO rules during 2018. This list does not include legal complaints, or those resolved informally:

Total number of complaints resolved: 273

This figure includes:

Number of complaints adjudicated or mediated by IPSO: 52

Complaints referred by IPSO and resolved by us within the 28-day period: 76

Clauses of the Code raised (some complainants raised more than one clause, none raised clauses 7 or 16):

1 Accuracy	236
2 Privacy	77
3 Harassment	21
4 Intrusion into grief	29
5 Reporting of suicide	5
6 Children	19
8 Hospitals	1
9 Reporting of Crime	17
10 Subterfuge	3
11 Victims of sexual assault	4
12 Discrimination	13
13 Financial journalism	1
14 Confidential sources	9
15 Payments to witnesses	1

Outcomes (internal determinations do not reflect an independent investigation and adjudication):

Code not engaged (internal determination)	121
Code potentially engaged (internal determination)	99
Outside remit (internal determination)	1
Upheld by IPSO	13
Not Upheld by IPSO	18
Outcome mediated by IPSO	21

Ways in which complaints were resolved (some complaints involved more than one action, an agreement to resolve a complaint does not necessarily mean there was a breach of the Code):

Online article amended	101
Online article or picture removed	34
Correction/clarification published	85
Footnote added to online article	32
Donation to charity	5
Apology published	8
Private letter of apology/clarification	2
Goodwill payment/compensation	4
Reader's Letter	2
No remedial action required	55

Complaints rejected by IPSO without referral to Associated Newspapers: 284

Appendix 1. Complaints Procedure

Daily Mail

Complaints Procedure

We take great pride in the quality of our journalism and do our utmost to ensure the accuracy of everything we publish. All our journalists are required to observe the rules of the Editors' Code of Practice and we are members of the Independent Press Standards Organisation (IPSO), the new regulatory body for the press set up in response to the Leveson Inquiry.

One of IPSO's key principles is that all its members should have effective mechanisms for dealing with complaints and correcting errors as promptly as possible. If you wish to complain about a story in one of our publications, or the behaviour of one of our journalists, we will do everything we can to put matters right.

But first, please take a few moments to read the advice below:

1. Is your complaint covered by the Editors' Code of Practice?

The Editors' Code sets standards for accuracy, respect for privacy, cases of intrusion into grief or shock, stories involving children, discrimination and the behaviour of journalists, including photographers. [Click here](#) to check whether your complaint is covered by the Code and make a note of the clause you believe has been breached.

If you wish to draw an issue to our attention but do not wish to make a formal complaint under IPSO rules, [click here](#) to send your concerns to our Managing Editor.

2. Important points to check before you submit your complaint

Under IPSO rules complaints will normally only be accepted within four months of the date of publication of the article, or the journalistic conduct in question. Outside that period, complaints

can be considered up to 12 months after the date of first publication only if the article remains on our website, and it can be investigated fairly given the passage of time.

Please note that we cannot begin considering a complaint until we have received all supporting documentation you wish to submit, including correspondence with the journalist concerned. Normally complaints can only be considered if they are made by a person who has been personally and directly affected by an alleged breach of the Editors' Code. If you are making a complaint on behalf of another individual you need to enclose with your complaint an email or letter from that individual, giving you permission to act on their behalf.

If you are taking legal action against any of our publications, you need to let us know, because we may then be unable to consider your complaint under IPSO rules.

Complaints from representative groups affected by an alleged breach of the Code can only be considered where the alleged breach is significant and where there is a substantial public interest in it being considered.

Third party complaints can only be considered where they seek to correct a significant inaccuracy of published information, in which case the position of the party most closely involved will be taken into account.

Complaints may be rejected if there is no apparent breach of the Editors' Code, or if they are without justification (such as an attempt to argue a point of opinion or to lobby), vexatious, or disproportionate.

Complaints about headlines will normally only be considered in the context of the article as a whole to which they relate.

3. What happens next?

As soon as we have checked that we have all the relevant information to consider your complaint it will be acknowledged and considered by our Readers' Editor.

The Readers' Editor, who is a qualified lawyer and not a member of any of our publications' editorial staff, will come to an independent decision on how to take your complaint forward. If the Readers' Editor cannot establish that there has been a potential breach of the Editors' Code, they will inform you of their decision.

If we receive a number of complaints about the same issue the Readers' Editor may identify one

complainant as the lead complainant, with whom we will attempt to resolve the case. If a resolution is agreed we will inform other complainants of the outcome.

If the Readers' Editor believes there has been a potential breach of the Code they will pass your complaint to the Managing Editor, who may offer you remedial action.

In cases of inaccuracy you may be offered a clarification or correction. If this is the case the Managing Editor will offer you a wording, which will usually be published in the Clarifications and Corrections column which appears on Page Two of the newspaper concerned, or in the case of our websites online.

Unless it involves a straightforward factual error, a clarification or correction will normally not be published until you have told the Managing Editor you are happy with the wording. Once you are satisfied and the clarification or correction has been published the complaint is closed. It may also be closed if you do not respond to our offer.

In cases where a clarification or correction is not an appropriate remedy, such as invasion of privacy, intrusion into grief, or behaviour by a journalist which is in breach of the Editors' Code, the Managing Editor may offer you an apology. This may be in the form of a published statement or a private letter. If a statement is to be published you may be asked to approve the wording. If your case has been referred to us by IPSO both parties must inform IPSO of the outcome.

4. What happens if I am not happy with the remedy offered to me?

Under IPSO rules we must attempt to resolve all complaints before they are considered by IPSO. If after 28 days your complaint has not been resolved you are then free to take it to IPSO. Visit the IPSO website to find out how to do that: www.ipso.co.uk

If IPSO's Complaints Committee finds that your complaint has disclosed a potential breach of the Editors' Code it will try to mediate an agreed resolution.

If the Complaints Committee cannot resolve your complaint by mediation it will determine whether or not there has been a breach of the Editors' Code. This may result in an adjudication with a requirement for us to take remedial action, which may consist of publication of a correction and/or the adjudication itself.

The nature, extent and placement of such an adjudication and/or correction will be determined by the Complaints Committee. Remedial action will not normally include an apology unless that has been agreed by you and the publication.

Please note IPSO has no authority to award financial compensation.

Appendix 2 - Verification of stories



Verification of stories

Accuracy is at the heart of everything we do as journalists. The following is a list of the various steps that should be taken to verify a story is accurate. It is not an exhaustive list - there may be occasions when a story can be verified by means not covered here, but if so great care should be taken, and the steps taken to secure verification should be made clear to the legal department and to your Editor or Acting Editor before publication.

Journalists must also be aware that a story may be accurate, but still in breach of the Editors' Code, or the laws of libel or contempt. You also need to take into account the Data Protection Act and the Bribery Act.

1. **Is your story supported by an on-the-record quote or bone fide document?** If the quote or document is reported accurately and in context, describes the activities of the person or organisation who produced it, and is attributed to them, there should be no need for further verification.
2. **Does the quote or document you are relying upon describe the activities of another person or organisation?** Then its accuracy needs to be checked and the person or organisation given an opportunity to comment. You need to be sure that the questions you want to put have been received by the individual or organisation concerned, and quote their response fairly.
3. **What if the person or organisation refuses to comment?** If you are sure they have received your request for comment, you must make it clear the material you intend to publish is a claim or allegation and attribute it to its source. You must also accurately report the refusal to comment, which may in itself contain an element of comment.

4. **What if it is not possible to contact the person or organisation concerned?** You need to keep a note of all the steps you have taken to reach them. Do not say in your story that so-and-so 'did not comment' but make it clear that you were unable to reach them. If it is a substantial story and you suspect they are evading you, briefly spell out in the story the steps you took. Make it clear to your editor and legal department that you have been unable to contact the subject of the story.
5. **Are you relying on an off-the-record briefing?** If someone has briefed you about their own activities, or their own organisation (and they are qualified to do so) you can normally regard that as sufficient verification. However, if you think there is a danger that they will later complain, you may need to make it clear that in such circumstances you would regard the obligation of confidentiality as broken and may name them as your source. You may also be asked to give your source, confidentially, to your editor. If you are unable to do so your editor is unlikely to run the story. An off-the-record source who can't be named is unlikely to be strong enough evidence to defend an accuracy complaint to IPSO.
6. **Are you relying on an off-the-record briefing concerning the activities of a person or organisation other than the one giving you the briefing?** Then any claims need to be put to the person or organisation as in steps 2-4.
7. **What if I have two independent off-the-record sources?** It is helpful, but not sufficient to ensure verification. You still need to go through the processes in step 2-4.
8. **Check the legal warnings basket before you approach anyone for comment, and before you file your story.** If the facts in your story have been the subject of legal warnings or corrections in the past, make sure you take this into account and seek advice from the Legal Department. If the subject of your story has issued a desist notice, asking journalists not to contact them, you should not make an approach unless you have consulted the Legal Department and/or a senior editor and established there is a public interest in doing so.
Note – we are aware some journalists currently have difficulty accessing the legal warnings basket. An improved, easy-to-access basket is under construction and will be launched very shortly. It will be followed by a new clarifications and corrections basket.
9. **Public interest justification.** Before you engage in any activity which might give rise to a possible breach of the Editors' Code, you must be able to demonstrate that you have a reasonable belief that your actions, and the publication of any story involved, are justified by the public interest. In the case of misrepresentation or subterfuge, you must demonstrate that you have pre-existing evidence of the activities you plan to investigate, that your actions are in the public interest and that the material cannot be obtained by other means. To do this you must consult the Legal Department and/or a senior editor, and keep a record of how the decision was taken.

1.

Appendix 3 - Financial Transparency



Financial transparency for journalists

It has always been a central principle of our journalism that the editorial and commercial branches of our company work independently, without one exercising inappropriate influence on the other... church and state do not mix.

Of course there are times when it is perfectly legitimate, even desirable, for businesses which advertise with us to work with us on editorial projects: many supported the Mail's Turn the Tide on Plastic campaign, for instance.

But advertisers should never be in a position to use the fact they have a commercial relationship with us to apply pressure on journalists, whether it is to include certain content, exclude it, or to angle articles in a particular way.

If you feel an advertiser is putting you under this sort of pressure, inform your Managing Editor straight away so action can be taken.

Nor should you accept financial inducements, or gifts which may be offered or perceived as inducements, from businesses or individuals you may be writing about. Again if you are in any doubt, or feel you are being placed in an awkward situation, make sure you inform your Managing Editor, who will advise you on how to respond. You should also have had training on the Bribery Act. If you haven't, contact the Legal Department, who will arrange it.

If you are writing about a business with which you are aware we have a direct financial link, for instance another subsidiary of DMGT, then that relationship should be made clear in the copy.

There are also some areas where there are particular risks, and more specific rules apply:

- **Financial Journalism**

Financial journalists – including sub-editors and anyone else who has access to financial copy - should avoid doing anything that could be construed as unethical or trading on their privileged position. In particular:

- Never buy or sell shares in companies on which you have any inside or ahead-of-the-market information.
- Never buy or sell shares in companies on which you are in the process of writing or editing stories.
- Never buy or sell shares you know will soon be tipped in any of our publications

It would be unreasonable to forbid financial journalists to hold any investments, however you should list any directly-held shares in the Financial Journalists' Share Register, which is published on ThisisMoney.co.uk.

It is not always practical for a financial journalist to avoid writing articles about companies or funds in which they have an existing shareholding. However if you think a reader may perceive a potential conflict of interest then you should inform your head of department, and declare that you have a holding at the foot of the article.

- **Advertorials and sponsored content**

Some advertisers prefer to present their message in an editorial format. If an advertiser is paying for content and/or has editorial control over it, then it must be made clear to the reader by distinct labelling, such as 'Advertising Feature', 'Sponsored Content' or 'Sponsored by *Name of Company*'.

There are also some areas, commonly described as service journalism, where a closer relationship with businesses may be permissible, so long as sensible guidelines are followed:

- **Travel**

It would not be possible to provide a full range of travel features unless journalists are able to take advantage of offers from travel companies to sample destinations they serve. However no offer should be accepted unless:

- You have cleared it with your Travel Editor.
- It is made clear to the travel company that you are not under any obligation to write a favourable article, or indeed to write any article at all.
- If a travel company has covered the cost of flights or accommodation featured in a travel article this should be made clear on the page, preferably in a fact box, with wording such as: '*Name of Journalist* travelled to *name of destination* with *name of travel company*'.

- **Fashion and beauty**

It is not feasible to write about fashion and beauty without the use of clothing and beauty products loaned or supplied by manufacturers and/or retailers. However any arrangement which involves a significant financial input from a supplier, such as covering the cost of models, photographers, or travel to a location, and is not labelled as sponsored content, should be avoided. If you are in any doubt about a proposed project, you must clear it with your head of department. If for any reason a supplier has made a significant financial input into an article it should be made clear in a fact box.

- **Motoring**

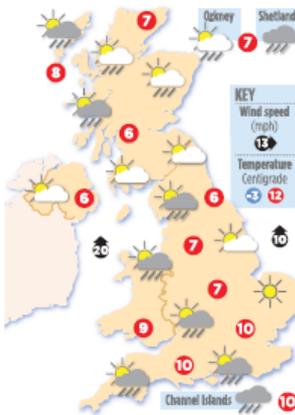
As with travel and fashion, it would not be possible to write about new cars without taking them on loan for test drives. However if this takes place in a location which involves significant financial input from a manufacturer – such as flights or hotels – this should be made clear in a footnote (*'name of journalist travelled to name of location with name of company'*).

Finally it is a good general rule for all journalists, if you think you may be putting yourself in a position where you could be accused of a conflict of interest, to ask yourself: 'Would I be embarrassed if this were to appear as a story elsewhere?' If the answer is yes, don't do it.

Appendix 4 – Complaints Service

The following pages give examples of the way our complaints service was publicised in our various titles during this period. Please note that the Metro.co.uk content management system automatically gives the page the date on which it was first created. It has been updated since then, and the version below was current during 2018

Weather



UK FORECAST

GENERAL FORECAST

Bright and dry start across the East and central parts. Cloud with scattered heavy showers and the risk of thunder in the West. These showers will spread east through the afternoon, affecting much of England and South Scotland. Northern Ireland and North West Scotland staying dry.

REGIONAL FORECASTS

South East, London, South Midlands, East Anglia: Clear start, turning increasingly unsettled and cloudy with showers, some heavy. Wind SW gentle. Max 10C, 52F.

South West, Wales, Channel Islands: Cloudy with scattered heavy showers, most frequent in the afternoon. Wind S moderate. Max 10C, 50F.

North West, North East: Dry with sunny spells for a while, thick cloud and showers by evening. Wind SW moderate. Max 8C, 46F.

Northern Ireland, Eire: Scattered heavy showers in the West. Wind W moderate. Max 9C, 48F.

Scotland: Scattered showers in the West, light showers in the South later. Dry with sunny spells in the East. Wind W brisk. Max 8C, 46F.

WEEK AHEAD

Bright and dry start tomorrow, turning windy and unsettled. Persistent rain in the North West, scattered showers elsewhere. Windy on Tuesday, widespread heavy rain. Windy and unsettled by midweek. Sunny spells and scattered heavy showers in the North and West. Rain by Friday.

WEATHER WATCH

John Kettleby
The past week has seen strong Atlantic winds affecting the West and colder air across England, bringing a raw feel and frosty nights but some wintry sunshine, with the more eastern counties well favoured. Our sunniest December on record was in 2001, with England claiming an average of 75 hours, Wales 73 hours, 60 hours in Northern Ireland and just 44 hours in Scotland. There were severe frosts and dense fog for some areas with snow from Christmas through to New Year. This weekend has seen the heaviest and most disruptive snowfall of the season in the North and local flooding further south. The coming week also looks unsettled, with further showery bands to all areas. So the December 2001 sunshine record looks safe at this stage, but will history repeat itself with the prospect of snow at the end of the month?

SIX-DAY FORECAST

	MON	TUE	WED	THU	FRI	SAT
LONDON	11	11	10	10	12	12
AUGSWELL	7	11	11	8	8	8
BELFAST	11	11	11	8	8	8
BIRMINGHAM	9	11	11	9	10	10
CARLISBURG	10	10	11	11	11	11
CARDIFF	11	11	11	9	11	11
GLASGOW	9	11	11	8	9	8
LEEDS	8	10	10	8	9	9
MANCHESTER	9	12	11	8	9	10
NEWCASTLE	7	10	10	8	8	8
NOTTINGHAM	8	10	10	9	10	10
PLYMOUTH	12	12	11	11	12	11

EUROPE WEEK AHEAD



Brighter start, especially across Iberia and South France, which will stay largely dry until Wednesday. Heavy rain from the east will affect Greece and the Turkish resorts on Tuesday and Wednesday.

Labour plotting extra £12,000 stealth tax on every lorry in Britain

By Harry Cole

DEPUTY POLITICAL EDITOR

LABOUR will cripple Britain's supermarkets and drive up the cost of food with a £6billion stealth tax on hauliers, campaigners have warned.

Clive Lewis, a key lieutenant in the Shadow Treasury team, is pushing to dramatically put up lorry taxes by up to £12,096 a year per truck.

But last night he was warned this would spark chaos for shoppers as it risks bankrupting the country's 496,000-strong haulage industry, which moves 98 per cent of all goods consumed in the UK.

Left-winger Mr Lewis has declared a Labour administration with John McDonnell in No11 would review the 'entire spread of environmental taxes and tax reliefs'.

And he told the Commons Finance Bill Committee that Ministers should 'apply "polluter pays" disincentives in the form of increased taxes', demanding powers to amend Vehicle Excise Duty (VED) and other taxes. He said: 'No one

No 10 WAR OVER A SECOND VOTE AS HOPEFULS WRESTLE FOR MAY'S JOB

Pages 10-15

wants to see HGV businesses go out of business, but everyone in Committee would agree that it is right for people to pay the appropriate level of tax.'

He added: 'Research suggests that HGVs are paying for only 11 per cent of their UK road infrastructure costs, predict-

ing a shortfall of about £6billion.' And he cited a report by the Campaign For Better Transport charity that argues HGVs should pay £6 billion more in taxes which would work out at £12,096.77 more tax for each truck operated domestically.

His incendiary comments

prompted the Road Haulage Association to brand them 'naive' and 'beyond belief'.

RHA chief executive Richard Burnett said: 'It is clear from his comments that Clive Lewis, sees our industry as the bad guys - the emission bandits. Nothing could be further from the truth.'

'What is even more shocking is the cavalier approach of Mr Lewis, who is content to "see HGV businesses go out of business" as a direct consequence of this tax hike.'

And Tory MP Simon Hoare blasted: 'John McDonnell's sickle has revealed the latest of Labour's stealth tax policies that would not only put Britain's crucial haulage industry on its knees but also lead to a massive rise in the costs of basic goods at the supermarket for hardworking families.'

'It just goes to show that Labour don't care about people's jobs and are too incompetent to run Britain's economy.' Labour hit back: 'The real threat to hauliers is this Tory Government and their failure to secure a Brexit deal which is in the industry's interests.'

CORRECTIONS & CLARIFICATIONS

Last week we reported that the football agent Paul Stretford had settled claims from a group of footballers who complained that his firm had received a fee for introducing them to investment advisers. Mr Stretford said he had not been aware of any such fee.

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CORRECTIONS & CLARIFICATIONS

Further to an article of November 8 quoting Mr Lee Denis, we would like to point out that the quotes attributed to him came from his Twitter account and that the photograph of him came from the St Matthew's Project website. We are happy to clarify that Mr Denis neither provided the photo nor gave an interview. We apologise for any contrary impression given.

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Capita deal leads to Army recruits crisis

by SAM RUSSELL

THE Army has not been able to recruit the troops it needs in any year since signing a controversial £495million contract with outsourcing giant Capita in 2012.

It currently has 77,000 fully trained soldiers compared with a target of 82,500, the Commons Defence Committee was told in October.

A report by the National Audit Office (NAO) today found both Capita and the Army underestimated the complexity of the British Army Recruiting Partnering Project, leading to significant problems.

These included an online recruitment system planned for July 2013 but launched 52 months late at a cost of £113m - triple the original budget. Applicants experienced technical problems when the system eventually launched.

The NAO report found it took up to 520 days for new recruits to go from start-

ing an application to beginning basic training. A total of 47 per cent of applicants dropped out of the process voluntarily in 2017-18 and both the Army and Capita believe the delay was a significant factor.

Capita, which has a ten-year contract ending in 2022, has consistently missed recruitment targets, with the total shortfall ranging from 21 per cent to 45 per cent, the report added.

The Army estimates there were 13,000 fewer applications between November 2017 and March 2018 than the previous year. This could lead to up to 1,500 fewer enlistments.

The NAO found that neither the Army nor Capita tested changes to the recruitment process before it was introduced

and the number of local recruitment centres was cut from 131 to 66 to save costs. It said the project will not achieve its planned savings of £267m for the Ministry of Defence.

However, both parties believe recent changes will improve the recruitment of regulars and officers, the report added.

A Capita spokesperson said: 'Our focus is now on working with the Army to deliver a recruitment process fit for the 21st century. We are absolutely committed to getting this partnership right.'

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IN BRIEF

I'm Princess Diana's aunt, claims US teacher

AN AMERICAN teacher wants to exhume the body of one of Princess Diana's relatives in a bid to prove she is a relative.

Ann Ukrainetz, 75, says she discovered the connection after her mother died, leaving her a letter. It claimed Ms Ukrainetz was the illegitimate child of Maurice Burke Roche, 4th Baron Fermoy and Diana's grandfather, making her the princess's aunt.

The Californian hopes to compare her DNA to that of Lord Fermoy's twin brother, who is buried in New York. She said she just wants to know her 'real' family.

98-year-old called to court over council tax

A 98-year-old woman was summoned to court over an unpaid council tax bill.

Minnie Pryor was living in a care home when a payment letter was sent to her property in Redbridge, east London. A summons was sent after the deadline expired. Her daughter Christine, 65, called the council's actions 'outrageous'. Redbridge council said it had to contact Mrs Pryor directly because her daughter had not given evidence of power of attorney. It said 'appropriate documentation' had been received and the matter would be resolved immediately.

New Year's Eve strike over rail guards

WORKERS on South Western Railway are to stage two extra strikes, including one on New Year's Eve, in the bitter dispute over guards on trains.

Members of the Rail, Maritime and Transport union will walk out for 24 hours on December 27 and 28, in addition to a previously announced strike on December 22.

RMT general secretary Mick Cash

said: 'South Western stubbornly refuses to make any progress at all in resolving this dispute, which is about safety, security and access. The company is hell bent on opening up a loophole that would allow them to run services driver-only at their discretion.'

The union wants to agree a settlement with the company that would guarantee guards will stay in place, as it has done

with other firms bringing in trains with doors operated by the driver.

But South Western, which runs services between London and destinations including Reading, Exeter, Bristol, Portsmouth and Weymouth, said it had already promised to put a guard on every train.

'This strike action is totally unnecessary,' it said.

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ON SUNDAY

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IPSO, Gate House, 1 Farringdon Street, London, EC4M 7LG

Website: <https://www.ipso.co.uk>

Email: advice@ipso.co.uk

Telephone: 0300 123 2220

You can also write to Readers' Editor, Daily Mail, Northcliffe House, 2 Derry Street, London W8 5TT

Contact us: How to get in touch with us at Metro newspaper and Metro.co.uk

 Metro News Reporter Friday 24 Mar 2017 12:16 pm

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To book advertising in a regional edition of Metro please call Zach Drake on 020 3615 0539 or email zach.drake@metro.co.uk

Appendix 5 - 2018 seminar programme

The Editors' Code: How it's changed – and how IPSO interprets it.

The precise content of seminars varied according to the audience and topical issues in the news, but the outline remained broadly constant:

1. Introduction
 - Despite the misgivings of some, IPSO is working – even the Leader of the Opposition used its services during 2018.
 - A revised Editors' Code came into force in January 2018. The most important change is that a headline must be supported by the text beneath.
 - Now that IPSO has been in operation for nearly five years it is possible to see how it deals with problems as they emerge, and valuable lessons can be learned from studying its rulings.
2. Taking care with headlines and sub-decks
 - Great care must be taken with sub-decks, which often contain detail not given in the main headline. That detail must be supported by the text of the copy, which must be read carefully to ensure headlines and sub-decks are accurate.
 - This is particularly true if they appear on the front page – IPSO have shown themselves increasingly ready to rule that due prominence means errors on the front page must be remedied by corrections flagged on the front page.
 - Case histories – *Khan v Daily Mail*; *DHSS v Daily Mirror*
 - Pictures and online video can present similar problems if they are not carefully checked against headlines. Case history – *Dartington v Daily Mail*
3. The importance of rechecking stories followed from other publications
 - Even the most reputable publications make errors, so it is important when following stories first published elsewhere to go back and check any original sources that are quoted.
 - Case histories – *Versi v MailOnline*; *Sivier v MailOnline*
4. The dangers of rushing to publication
 - Complex stories about controversial subjects require careful checking and expert input, and extra care must be taken that all legal and scientific arguments are correctly understood.
 - Case histories – *Wass v The Mail on Sunday*; *Ward v The Mail on Sunday*; *Hill v The Mail on Sunday*.
 - Extra care must be taken when covering breaking stories from tweets and social media, particularly if using technology such as tweet decks, which may obscure time-stamps. Case history – *Various v MailOnline*.
 - Subjects of stories must be given adequate time to respond to a request for comment – and if a request has been made by email it should be followed up by

a telephone call to check it has been received. *Case history - Premier Inns v MailOnline.*

5. You cannot assume that because information has been published elsewhere the individual concerned does not retain a reasonable expectation of privacy.
 - As with accuracy, fresh checks must be made when following up an article or republishing a picture which may breach an individual's privacy.
 - If you believe an individual in a story needs to be anonymised care must be taken to ensure they are not still recognisable. *Case history – Ahmed v Daily Mail.*
 - However if the complainant has put similar material into the public domain themselves a complaint is unlikely to succeed. *Case history – Rooney v Daily Mail*
 - Nor is a complaint likely to succeed if the complainant is photographed in a place where photographers are known to be present. *Case history - Murray v Daily Mail*
 - But IPSO are likely to rule there is a reasonable expectation of privacy where a photographer takes pictures of someone in a private location, without their knowledge. *Case histories – Princess Beatrice of York v MailOnline; Prince Henry of Wales v MailOnline.*

6. It is possible to identify a victim of a sex offence even if no story is ever published.
 - Care must be taken when seeking interviews not to identify to third parties individuals as having been involved in a case involving sexual offences, because it may then be obvious they were victims. *Case history – Warwickshire Police v Daily Mail.*

7. Reporters must always identify themselves to a responsible executive when entering a hospital or similar institution, and subterfuge must never be employed unless the conditions of clause 10 (ii) have been fully met. *Case history – Jeary v Daily Mail.*

8. Clause 9 – Reporting of Crime – is normally engaged when an innocent person is identified in story about a criminal relative. But it can also apply when a story about an innocent person names a relative who has been convicted of crime. *Case history – A Man v MailOnline.*

Appendix 6 – Training of Journalists

The Associated Newspapers editorial training scheme

The Associated Newspapers training scheme is the largest run by any national newspaper and has a formidable reputation throughout the industry for producing excellent, well-trained journalists.

In 2018 we took on 35 trainees - six reporters, four sub-editors, three sports journalists, 15 online reporters for MailOnline in the UK and seven for DailyMail Australia. In addition we have two Stephen Lawrence scholarship students.

This year we have already trained an additional 12 people for MailOnline and have interviewed more than 70 candidates for the September 2019 intake. 27 offers will be going out in May.

The selection process focusses on ensuring as much diversity as possible both in terms of ethnicity and social background. In some cases we have arranged bespoke training before trainees join the main scheme. The Daily Mail is currently paying fees for one student to attend City University's prestigious journalism MA course. His parents were immigrants to the UK and he is the first in his family to attend university. A second student, whose parents fled the civil war in Somalia, started under our auspices at News Associates in February and is heading for a gold standard NCTJ. Both receive salary and join the main course in September this year.

The training is run by respected journalists led by Sue Ryan, a former managing editor of The Daily Telegraph, and Peter Sands, a former editor of The Northern Echo and editorial director of Northcliffe Newspapers.

The selection process is very robust. Most trainees have done a journalism master's degree, NCTJ or Press Association course so have basic skills in news writing, sub-editing, law, government, court reporting, shorthand and the Editors' Code.

The reporters are taught for two weeks under Peter Sands, and the sub-editors and online trainees for four weeks. It is an intensive course with a lot of red-penning of exercises and zero tolerance of mistakes. These are the topics covered in this year's basic training:

Reporting course

The course presumes attendees have already taken a qualification in journalism and had newsroom experience. It deals mainly with the tasks which will be required while working for our titles:

- a skills checklist (grammar, spelling, accuracy, attitude, structure, media law)
- intro writing and story structure
- the art of storytelling for the web
- tight writing and attention to detail
- professional standards (all UK trainees study the Editors' Code in detail and are given an electronic copy)
- media law (libel, privacy, copyright, bribery)
- covering a breaking story
- sources of stories
- story development
- the senior reporter's survival guide
- stories from the written word (agendas, reports, financial information)
- writing lighter stories/picture stories
- developing contacts
- writing a profile
- forward planning and working to the diary
- copy tasting, conference and putting together a newslit
- professional behaviour
- current affairs knowledge
- Mail style
- understanding the Mail audience

The focus of the course is on developing and writing stories. Trainees take live stories from the wire services and put them into Mail style, and have to source and write an exclusive for publication during the course. There are speakers from the newsroom - news, city, sport and production department heads, plus senior reporters and columnists.

Sub-editing course

- a skills checklist (grammar, spelling, accuracy, attitude, structure, media law)
- the art of the sub-editor
- a glossary of subbing terms
- the 70 most common errors in newspapers
- intro writing and story structure
- the art of storytelling
- tight writing and attention to detail
- professional standards (all UK trainees study the Editors' Code in detail and are given an electronic copy, trainees from the USA and Australia study the codes of practice that apply in their home countries)
- media law (libel, privacy, copyright, bribery)
- proofreading

- the subbing perils
- Mail style
- understanding the Mail audience
- Mail headline writing and practical headline exercises
- captions, subdecks, standfirsts, factfiles
- analysis of different newspaper styles
- Photoshop
- Adobe InDesign
- an introduction to typography
- handling pictures and graphics
- layout and design
- putting together a picture spread
- editing stories from different sources
- editing a live breaking story
- current affairs knowledge

After basic training all trainees undergo placements for between four and five months.

We used to send trainees to regional papers but the nature of their production means they no longer have proper sub-editing teams. So we send the subs to The Scottish Daily Mail, The Irish Daily Mail and Metro, where they will learn from professionals.

Reporters and online journalists go either to these papers or to big regionals such as The Manchester Evening News, Birmingham Mail and Liverpool Echo. Here they learn the skills of going on the road. They also spend around two months with a news agency.

Courses are tailored for the individual, but generally every trainee will have six months paid training before filing or subbing their first story to the Daily Mail, Mail on Sunday or MailOnline. And once they have joined their chosen paper or website they continue to be treated as trainee and are given mentors. Department heads take time to teach and encourage them.

More than 400 trainees have graduated from the scheme and many are now senior executives on our newspapers and websites – so trainees may well find themselves working for someone who not very long ago was a trainee themselves.

Sue Ryan

Peter Sands