

# The Telegraph

## IPSO Annual Report 2019

Reporting period: Jan 1 to Dec 31 2019

### 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.

Our regulated titles are:

The Daily Telegraph

The Sunday Telegraph

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

TMG is focused on a subscriber-first strategy underpinned by long term investment in The Telegraph's digital transformation: the numbers that reflect the success of our business are our subscriber numbers. We aim to reach 10 million registrants and 1 million subscribers by 2023.

As of January 2020, we had:

- 426,468 subscriptions across print and digital
- 5.9m registrants

The Telegraph 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. Guy Black is on the RFC Board and Chris Evans is a member of the Editors' Code Committee. We always do our best to assist IPSO and to co-operate with it by supplying information in a timely manner.

## 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).

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 Head of Editorial Legal.

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 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  
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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 77% of editorial complaints within 3 working days. 94% were resolved within two weeks.

We keep detailed records of all complaints, which are coded and categorised to allow us to track issues of potential concern. 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). 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 2018 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.

All new editorial staff must complete an introductory Editors' Code e-learning course provided by the Press Association. Thereafter all journalists must complete the Advanced course every two years.

## **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 15-20 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 (73%) 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 2018, we rejected more than 63%. 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 four complaints by mediation (without a finding as to whether or not the Editors' Code had been breached):

- [06188-19 Allbury v The Daily Telegraph](#)
- [00420-19 Lewisham Islamic Centre v The Daily Telegraph](#)
- [02388-19 Osman v The Sunday Telegraph](#)
- [04521-19 Jewitt v telegraph.co.uk](#)

IPSO adjudicated 11 complaints under Regulation 19. Nine were rejected, two upheld.

### **Complaints not upheld by IPSO during 2019**

- [06020-19 Wilkins v The Daily Telegraph](#)
- [00170-19 Salih v The Daily Telegraph](#)
- [01612-19 Bentham v The Daily Telegraph](#)
- [07411-18 Arcadia Group v The Daily Telegraph](#)
- [06758-19 Jefferd v The Daily Telegraph](#)
- [04836-19 Ridley v The Daily Telegraph](#)
- [06786-19 Crick v The Sunday Telegraph](#)
- [01311-19 Gharu v telegraph.co.uk](#)
- [03526-19 Marks v telegraph.co.uk](#)

### **Adverse adjudications by IPSO during 2019 and steps taken to respond**

- [04527-19 Portes v The Daily Telegraph](#)  
An article of 3 June incorrectly reported that the UK was forecast to become the largest and most prosperous economy "in this hemisphere". The forecast was in fact based on an extrapolation from OECD figures suggesting that the UK's GDP would surpass Germany's. The error was highlighted to journalists in routine monthly briefings by the Head of Editorial Compliance.
- [00154-19 Stirling v The Daily Telegraph](#)  
A 7 Jan article reported the following: "Of all the options suggested by pollsters – staying in the EU, coming out on Theresa May's terms, or coming out on World Trade terms – it is the last, the so-called no-deal option, that is

gaining in popularity. In spite of – or perhaps because of – everything they have been told, it is this future that is by some margin preferred by the British public.” This statement was not based on any specific poll findings, but was the writer’s interpretation of data from several polls that were not directly comparable. The case featured in the monthly round-up of Code issues circulated to TMG journalists.



# The Telegraph

## **Editorial Code of Conduct**

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

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

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

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

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

Note that the Editors' Code was recently revised. The updated version came into force on January 1st 2018. It is published on IPSO's website: [www.ipso.co.uk](http://www.ipso.co.uk).

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

- Detecting or exposing crime, or the threat of crime, or serious impropriety
- Protecting public health or safety
- Protecting the public from being misled by an action or statement of an individual or organisation
- Disclosing a person or organisation's failure or likely failure to comply with any obligation to which they are subject
- Disclosing a miscarriage of justice
- Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public
- Disclosing concealment, or likely concealment, of any of the above

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

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

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

## **Privacy**

The Editors' Code states:

- i) Everyone is entitled to respect for his or her private and family life, home, health and correspondence, including digital communications
- ii) Editors will be expected to justify intrusions into any individual's private life without consent. Account will be taken of the complainant's own public disclosures of information
- iii) It is unacceptable to photograph individuals, without their consent, in public or private places where there is a reasonable expectation of privacy

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

sufficiently senior level (see Obeying the Law, above), and the reasons and justification fully and contemporaneously documented.

## **Responding to complaints**

Complaints about editorial content should normally be referred to Compliance and/or to our webform at [www.telegraph.co.uk/editorialcomplaints](http://www.telegraph.co.uk/editorialcomplaints). The Compliance department will generally manage the handling of complaints.

Exceptionally, where you are able to resolve minor complaints by amending online articles yourself, you must print out or make a digital copy of the article before any changes are made to it (this does not include trivial changes, such as changes to spelling or grammar). Under IPSO's rules, this copy must be retained for a minimum of four months from the date of the amendment.

You are strongly advised to give a copy to Compliance and explain what you changed in the article, and why.

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

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

## **Confidential Information**

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

## **Social Media**

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

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

**If in doubt**

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

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

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

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