

IPSO Annual Statement

Period 01/01/2021 – 31/12/2021

1. Factual Information of Regulated Entity – D.C. Thomson Group

Company Number SC005830

Established 1905

Average monthly number of employees - c1,600

Turnover year to March 31 2021 - £160m

1.1 List of titles/products

Newspaper Titles	Consumer Magazine Titles	Children's Magazines & Comic Titles
Dundee Courier & Advertiser	Peoples Friend	Beano
Evening Telegraph	Peoples Friend Special	Commando Gold
The Sunday Post	Peoples Friend Pocket Novel	Commando Home of Heroes
Press & Journal	My Weekly	Commando Action & Adventure
Evening Express	My Weekly Special	Commando Silver
www.energyvoice.com	My Weekly Pocket Novel	Animals & You
www.thecourier.co.uk	Animals & You	Shout
www.pressandjournal.co.uk	The Scots Magazine	110% Gaming
www.eveningtelegraph.co.uk	This England/Annual	Jacqueline Wilson
www.eveningexpress.co.uk	Evergreen	
www.sundaypost.com	Platinum	www.beano.com
	Bunkered	www.commandocomics.com
	UK Club Golfer	www.animalsandyou.co.uk
	www.peoplesfriend.co.uk	
	www.myweekly.co.uk	
	www.scotsmagazine.com	www.shoutmag.co.uk
	www.thisengland.co.uk	www.110gaming.com

	www.platinum-mag.co.uk	www.jw-mag.com
	www.bunkered.co.uk	Unicorn Universe
	www.ukclubgolfer.co.uk	Animal Planet
	UK Club Golfer	Animalplanetmagazine.com
	ukclubgolfer.co.uk	Beano and Dandy Gift Book
	Stylist magazine	Dandy Annual
	www.stylist.co.uk	Broons Annual
	Great British Food	Oor Wullie Annual
	Speciality Food*	
	What Franchise	
	Global Franchise	
	Teach Primary	
	Teach Early Years	
	Teach Secondary	
	Teach Specials	
	Head Teacher	
	Sew	
	Sew & Make Toys	
	Let's Knit	
	Let's Get Crafting	
	Knitting Crochet	
	Top Crochet Patterns	
	Crafts Beautiful	
	Papercrafter	
	100 Days of Christmas	
	Craft Club	
	Crafts Bookazines	
	Grow Your Own	
	Natural Health	
	Health & Wellbeing	
	Soul & Spirit	
	Your Easy Veg Garden	
	Live Green & Good	
	Living	
	Veggie*	
	Fireside Annual (PF)	
	Friendship Book (PF)	

1.2 Regulated Entity's responsible person

Graham Huband – Managing Editor

Email: ghuband@dcthomson.co.uk

Phone: 01382 575318 / 07585969942

1.3 A brief overview of the nature of the Regulated Entity

The group's trading activities consist of the printing and publishing of newspapers, the publishing of magazines and books, gifting, events, local radio broadcasting, the online publishing of content including genealogy and newspaper archive records and the provision of data hosting and associated technological services.

2. Copies of internal manuals, codes or guidance used by journalists

Copies of the DCT/AJL Code of Conduct & Press Trip Guidelines which are issued to all staff are attached. The terms and conditions for freelance contributors are also attached.

3. Brief details of the compliance process, including how the Regulated Entity deals with:

3.1 Compliance with the Editors' Code of Practice

All Editorial staff comply with both the Editors' Code of Practice, administered by IPSO, and the D.C. Thomson Code of Conduct. The Code of Conduct is part of the terms and conditions of employment and breaches are dealt with under the company's disciplinary procedure.

In 2021, we began to digitally overhaul our complaints handling systems. The majority of complaints, and the correspondence that arises from them, are now held securely online on dedicated boards on the Trello platform and categorised under newspaper or magazine. Access to the platform is available through DC Thomson's protected internal computer network and the complaints can be held indefinitely in a secure manner. The new system allows all aspects of a complaint to be held in a single, searchable place and gives better oversight of the current status of individual cases.

For each complaint, the following information is captured as a routine.

- *Complainant name
- *Contact details
- *Date received
- *Date Closed (as and when applicable)
- *Online / Print or Both (publication)

- *Article URL
- *Reporter name
- *Action taken

The platform also allows for a narrative of a case to be held and updated and attachments (such as email correspondence and images etc) to be added.

There are four sub-headings under which a complaint may sit.

These are:

- * Under investigation
- * Escalated
- * Resolved - without action
- * Resolved - with action

For newspapers, newsroom mini publishing team leaders are expected to handle complaints in the first instance, with editors providing assistance where a regulatory or legal issue arises or if a complaint becomes more complex and cannot immediately be resolved.

Complaints handling within magazines is being brought into line with newspapers and oversight and responsibility sits with Head of Magazines (Dundee) Maria Welch.

In line with IPSO guidelines, attempts are made to resolve issues directly with complainers. If no resolution can be found, then editors provide contact details for IPSO and detail the service offered by the regulator.

All IPSO regulated newspaper titles carry information about IPSO, including contact details, and the IPSO mark in every printed edition.

The same text and mark are carried online on each title's contacts page.

The IPSO mark is also hosted on the group's main corporate website at

www.dcthomson.co.uk

All our journalists are trained to industry standards and conduct fact-checking and source management as advocated in their professional training.

All staff raise legal concerns with senior editorial figures who have access to lawyers 24 hours a day.

Pre-publication advice has been sought from IPSO on a regular basis concerning most aspects of the Editors' Code of Conduct.

Copies of the Editors' Code of Practice are given to all editorial staff and IPSO updates are made available to senior managers who brief their teams as necessary.

Senior editorial executives are also responsible for potential Public Interest Defences and decisions where there may be challenges or give rise to potential complaints. A whistleblowing procedure is in place and is detailed in our internal Editorial Code of Conduct.

3.2 Upheld adjudications during the period:

The Courier newspaper was required to publish a correction following an upheld complaint brought by Moira Brown.

The adjudication followed the publication of an article headed “Pensioner accused of Covid breach at City Square protest”, on January 19, 2021.

IPSO found there to have been a breach of Article 1 (Accuracy) of the Editors’ Code.

03211-21 Brown v The Courier

<https://www.ipso.co.uk/rulings-and-resolution-statements/ruling/?id=03211-21>

3.3 Training of Staff

The majority of our staff have undergone e-learning – provided by PA - re the Editors’ Code in previous years.

New starts still undergo the eLearning training at the beginning of their employment.

The nature of the eLearning modules is about awareness of the Code requirements and how and what to do.

Individual title editors also regularly remind senior staff of relevant IPSO case studies, prompting discussion and debate over the complaints and resolutions involved.

IPSO staff have also been invited to provide briefings on the regulator’s role, with sessions held virtually during 2021 for large newspaper staff cohorts.

As well as in-house sessions, external experts are also brought in to ensure journalists are fully cognisant of media law.

4. Details of steps taken by the Regulated Entity in response to any adverse Adjudication by the Regulator during the previous year.

The adverse judgement (03211-21 Brown v The Courier) was discussed by senior editors in Dundee including Courier Editor David Clegg, Managing Editor Graham Huband and then Head of Newspapers, Richard Neville.

Editors reviewed the judgement against the Code of Practice, specifically in relation to Clause 1 (Accuracy) and the first two sub clauses therein (1i) and (1ii), where The Courier was found to have erred in its reporting.

The findings of the committee were noted and the journalist involved in producing the original article was spoken with directly in order to ensure he was fully aware of, and understood, the terms of the ruling.

A clarification was inserted into the Courier newspaper and attached to the relevant article on the newspaper's website as agreed with IPSO / the complainer.

<https://www.thecourier.co.uk/fp/news/dundee/1895311/woman-74-charged-with-breach-of-coronavirus-restrictions-after-dundee-city-square-incident/>

Advice on Clause 1 (Accuracy) is provided to the wider staff base as part of regular IPSO internal training sessions led by senior editors and it is expected that learnings from the adverse adjudication will form part of that discussion in future.

Graham Huband

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Graham Huband
Managing Editor
DC Thomson

CODE OF CONDUCT

Company Values and Editors' Code of Practice

All DC Thomson newspapers are committed to journalism of the highest standards. We aim to produce our newspapers and digital products with accuracy, honesty and fairness. As a result we have earned and secured the trust of our readers.

We expect and require all of our journalists to adhere to the DC Thomson company values and to abide by the Editors' Code of Practice which is enforced by the Independent Press Standards Organisation.

All editorial staff are expected to have a working knowledge and understanding of the content of the Editors' Code of Practice and a commitment to the highest ethical standards. It is required that the Code is kept to hand at all working times. (Copies are available from your line manager)

It is our policy to handle complaints courteously, professionally and timeously. We will publish clarifications and corrections when necessary, as quickly as possible and with due prominence. Appropriate space will be set aside early in the paper to do so unless the complainant requests otherwise (eg. sport corrections in sport).

Staff Training

Mandatory e-learning will be provided on IPSO guidelines and ethics for all editorial staff who will be required to complete this on a regular basis.

Contractual Requirements

All editorial staff will be contractually required to abide by:

- DC Thomson's company values and this editorial Code of Conduct
- the Editors' Code of Practice
- the editorial complaints / clarifications and corrections procedure.

Failure to abide by any of the above may lead to disciplinary proceedings, which, in the event of consistent, serious, or deliberate breaches could result in dismissal. Investigations will be handled in the first instance by a senior editorial executive with any disciplinary proceedings handled at editor level. Rights of appeal will be heard by the Head of Newspapers.

No member of staff should feel under pressure to breach the Editors' Code of Practice or DC Thomson company values. In the event that any staff member feels that they – or their colleagues – have been put in this position, they should raise their concerns with their line manager or confidentially with a member of the HR team. The matter will be investigated at senior level and action taken as appropriate.

Public Interest Defence

Following changes to the Editors' Code of Practice, the Public Interest rules require editors who claim a breach of the Code was "in the public interest" to show that they had good reason to believe that the public interest would be served, and to demonstrate *how and with whom that was established at the time*.

Any decision to use the Public Interest defence must be done with the knowledge of the editor or designated deputy in their absence following discussion at senior editorial level.

A brief note must be taken of the steps taken prior to publication, including details on who was involved in the discussion / debate and at what time in the publication process, as well as the clear grounds on which they believed the public interest would be served. The note should be filed electronically in the Public Interest folder managed by each title's editor. A copy must also be filed with the Editor-in-Chief.

Potential Clash of Interest

It is incumbent on all writers to declare any potential conflict of interest in stories they are covering to their line manager. Business reporters should provide a list of all companies that they hold shares in directly to their

Date: Updated 12/6/15

editor. They do not need to declare the number they possess nor do they need to include details of investment trusts or financial products in which the shares of many companies are held together with bonds and cash.

Hospitality and Entertainment

Newspapers run more of a risk of being party to bribery and corruption than most businesses and, therefore, must adopt robust procedures for protecting staff and the brand from falling foul of attempts to undermine credibility and confidence.

There are several areas of normal business that are open to abuse and there are clear positions to be taken by staff in particular circumstances.

In general, however, transparency is the key to ensuring the brands and individual members of staff are not left open to accusations of corruption.

It is an accepted practice that entertainment and hospitality will be offered to editors and senior and specialist editorial staff. It is acceptable to take part in these activities provided the overall value is reasonable and that there is not a disproportionate expectation of response.

Staff must evaluate an offer to ensure the process is open and transparent and there is no risk of bribery or corruption.

Key questions to ask are:

- What is the purpose of the activity and is it proportionate?
- Is it legitimate to build a relationship? What is the host's intention?
- Does the newspaper benefit?
- If other parties were to take part in the same activity on the same basis, would we write about it?

Examples where it is acceptable are:

- Building a positive relationship
- Promoting or highlighting interests
- Sharing joint interests
- General fact finding

There is no definitive way to assess each offer of hospitality or entertainment but there are clearly situations that editorial staff should avoid, including:

- Where there is an expectation of a "quid pro quo" in that those extending the offer are expecting something specific in return.
- Where a gift of cash is part of the experience.
- Where the activity is inappropriate, i.e it is sexual or illegal

In general terms invitations to meals, sporting or cultural events with modest travel or accommodation included would be acceptable from a provider who could be expected to have a business relationship with our newspapers.

Small, modest gifts like branded merchandise proportionate to the relationship would also be acceptable but never cash.

While it is difficult to put a maximum value on entertainment and hospitality offered, common sense and transparency is the key when deciding what is and is not acceptable.

When in doubt please take advice from your line manager.

All gifts and entertainment should be recorded on the online register which you can find on the company intranet.

Review materials

Where items such as books, CDs, videos, computer games and other consumer goods are offered for review, they should only be accepted on the understanding that there is no guarantee that the items will feature in the publication.

Anything offered on the condition that it is featured, favourably or otherwise, should be refused. Items that are received but not reviewed should be disposed of by means of charity sale to staff.

Holiday and travel experiences

It is forbidden for staff to try to elicit travel or accommodation directly from private companies.

Offers of holidays and travel experiences for review should be passed to a designated senior executive. They can only be accepted on the understanding that there is no guarantee of a favourable report in any publication.

A register of all staff who have been offered a facility trip should be kept and monitored by the editors.

There must be a fair and transparent system for deciding which staff members are to receive holiday or travel offers. Again this will be handled by a senior executive on the title. All staff taking a trip should be familiar with the company Press Trip Guidelines.

Procedure to follow if cash or cheques are sent into title

1. Members of staff are NOT permitted to keep any monies sent in by readers for their own personal use, or for any other purpose.
2. All offices must keep a log book in which any cheques or cash sent in are recorded and it is the responsibility of a title Editor to ensure that this is done.
3. If any money or cash is sent in, the employee who receives it must immediately bring it to the attention of their line manager, who will ensure that it is officially logged.
4. The reader should then be sent a letter, enclosing an SAE, thanking them, but telling them that what we do is all part of the service, it would also explain that we do have a fund for charity (DCT chosen charity or the title's chosen charity, i.e. the Francis Gay fund) and that we can either return the cash/cheque to them or pass it to the charitable fund.
5. We would then follow their preferred course of action. In the meantime, the money should remain with the line manager. If the reader opts for it to be given to charity, the money should be sent to the PA to Editor-In-Chief in your office.

OTHER MEDIA AND/OR PUBLISHING WORK

In addition to your contractual obligations with the Company, all other media and/or publishing work should first be cleared at senior editorial/executive level.

Where an individual is undertaking media work as a result of their position within the company, they must ensure their position and publication must be credited prominently.

Date: Updated 12/6/15

You shall use also your best endeavours to promote and protect the interests of the Company or any associated company and shall not do anything which is harmful to those interests.

COMPLAINTS, CLARIFICATIONS & CORRECTIONS

Policy Statement (*Published under the Opinion column of each title*)

The <NEWSPAPER TITLE> is committed to journalism of the highest standards and we aim to produce our newspaper with accuracy, honesty and fairness.

Our journalists adhere to these principles and the DC Thomson company values of integrity and respect. We abide by the Editors' Code of Practice which is enforced by the Independent Press Standards Organisation. It is our policy to publish clarifications and corrections when necessary as quickly as possible and with due prominence.

You can contact us by e-mail at <insertreaderseditor@emailaddress>, by writing to The Editor, *The <TITLE>*, 2 Albert Square, Dundee DD1 1DD or by calling us on 01382 575 541.

Information about the Code of Practice can be obtained from Independent Press Standards Organisation, Gate House, 1 Farringdon Street, London EC4M 7LG. Telephone: 0300 123 2220. Email: inquiries@ipso.co.uk.

Process and Procedure

Each title will appoint a senior executive to handle and investigate **ALL** complaints, clarifications and corrections in the first instance. Complaints, clarifications and corrections will not be dealt with by staff directly.

An acknowledgement will be sent within 24 hours of receipt of the initial complaint and we will aim to resolve all complaints, wherever possible, within seven working days.

All complaints, clarifications and corrections will be recorded in line with the agreed procedure and subject to an annual audit. Where clarifications and / or corrections are necessary we will publish these with due prominence on an appropriate early page as quickly as possible.

Each title reports IPSO and legal complaints to the newspaper board on a monthly basis.

A further collated report is submitted by the Editor in Chief to the main board's Audit/Risk Compliance committee every six months

COMPLAINTS will be:

- Filed centrally under three headings: Legal, IPSO and General
- Filed using the electronic version of the attached form with a copy of the original article and any subsequent corrections / clarifications will be held on file by admin/PA
- Logged with the title editor and then the Editor-in-Chief who has responsibility for compliance

NEWSPAPER COMPLAINT FORM

Name of person taking call: Date: Time:

Name of complainant:

Address:

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Contact numbers: E-mail:

Nature (and date) of complaint:

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Has an acknowledgement been sent? [] Has a copy of original article been attached? []

Cause and nature of error and staff members involved:

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Resolution / action taken to resolve complaint:

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Resolution date and by whom:

Date: Updated 12/6/15

Has copy of any correction / clarification been attached? []

I have read and understood the Code of Conduct	
Signature	{{Signature_es_:signer2:signature}}
Date	{{Date_es_:signer2:date:format(date, "dd mmmm yyyy")}}

Press Trip Guidelines

In the interests of fairness, clarity and our editorial integrity, and in accordance with our Code of Conduct and Anti-bribery and Corruption policy, the following rules apply for all press trips:

- Staff must not elicit or attempt to elicit travel or accommodation or extras or enhancements to offer packages directly from travel companies.
- Where travel companies contact staff directly, even where staff have been on previous trips with the company, details must be passed to the person responsible for travel features, who schedules all press trips and travel coverage.
- Staff must not contact the person responsible for travel features to request trips without prior written approval from the Editor or Deputy Editor. Approval for trips is generally based on merit and will only be granted in exceptional circumstances.
- Notification of available trips, co-ordinated by the person responsible for travel features, will be put out to all staff. Following notification, any requests to go on trips must be sent to the relevant person who ultimately decides who will go on the trip.
- All trips must be taken in the staff member's own time, and material must be written for the Travel Supplement as required and to deadline.
- A log is kept of all trips that staff have been offered and attended on and we aim to ensure the allocation of trips is based on merit.

Any breach of this policy may result in disciplinary action in accordance with our disciplinary policy up to and including dismissal.

I have read and understood the Press Trip Guidelines	
Signature	{{Signature_es_:signer2:signature}}
Date	{{Date_es_:signer2:date:format(date, "dd mmmm yyyy")}}