

The Telegraph

IPSO Annual Report 2022

Reporting period: Jan 1 to Dec 31 2022

Introduction

Telegraph Media Group Ltd (TMG) is a wholly owned subsidiary of Press Acquisitions Ltd. Our portfolio includes The Telegraph website and app, The Daily Telegraph and The Sunday Telegraph print titles.

Our regulated titles are:

The Daily Telegraph

The Sunday Telegraph

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. As of December 2022, we had:

- 733,731 subscriptions across print and digital
- Digital = 586,867 Print = 146,864

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. Lord Black is on the Board of the Regulatory Funding Company 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. Ben Clissitt is Managing Editor. They are supported by an editorial executive team.

The Group's 'responsible person' (under section 1.2 of IPSO Regulations Annex A) is Ben Clissitt, Managing Editor.



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 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.

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

Our editorial standards

Telegraph Media Group is a 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 Editorial Legal & Compliance team works closely with editorial departments to offer Code advice and to handle complaints. Via the

Managing Editor, journalists are given regular feedback about Code issues and complaints. (see **Our training process**, below).

How we work

The Telegraph has an integrated digital/print 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 on all platforms.

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.

Editorial Code guidance

The Editorial Legal & Compliance team offers pre-publication Code advice.

The team is sufficiently knowledgeable to advise journalists without recourse to IPSO. Exceptionally, where the issues are marginal or abstruse, advice might be sought from IPSO directly and relayed 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 team retains a responsibility to escalate matters directly to the Editor and/or Deputy Editor where it is deemed appropriate.

Post-publication, complaints are dealt with by staff in the Editorial Legal & Compliance department. Relevant journalists are normally involved, but management of complaints is the responsibility of that department, with final sign-off by the Head of Editorial Legal & Compliance in collaboration with the relevant editorial executive.

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 circulated to editorial staff. (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 and lawyers 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 Editorial Legal & Compliance team from time to time also issues its 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, which explains that we are regulated by IPSO and links to its website. The link to the webform appears in the footer of the telegraph.co.uk homepage where we state that we are a member of IPSO. The complaints webform links to our own published [complaints policy](#), which explains how complainants can appeal to IPSO if they are dissatisfied by our response.



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

We publicise our membership of IPSO in our newspapers (see left) and online.

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 Legal & Compliance. Editorial complaints are centrally handled by the Editorial Legal & Compliance team. 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 and allows for recording and monitoring of complaints.

At this stage any complaints that are legal in nature - as opposed to Editors' Code matters - are dealt with by the lawyers within the Editorial Legal & Compliance department. Similarly, letters of complaint from solicitors are always dealt with by lawyers.

Whether they come to us directly, or are referred by IPSO under Regulation 13, most complaints receive a response/acknowledgement 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 85% of editorial complaints within three working days. 97% 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 relevant reporting period are included below (see **Our record on compliance**).

Our training process

General

Telegraph Media Group expects its journalists to adhere to the IPSO Editors' Code and as such it forms part of every journalist's contract of employment. It is also part of the contractual terms and conditions for editorial contributors/freelancers. In addition, staff are provided with training and information from Group Legal in relation to the Data Protection Act 2018 and Bribery Act 2010. The Editorial Legal and Compliance department maintains a google site, accessible company-wide, which contains guidance and advice on the IPSO Editors' Code and media law topics.

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 Refresher course every two years.

Targeted Training

When there is a significant change in the law or there is a topic worthy of intense focus then seminars may be arranged in order to explain and discuss the topic or alternatively a note about the change in law with practical guidance is circulated.

Compliance feedback

Lawyers from the Editorial Legal & Compliance department regularly meet face to face with journalists; desk editors; publishers and commissioners as and when complaints arise in order to discuss errors and the lessons that can be learned. In addition, the department circulates IPSO advisories in a timely manner and where appropriate will send emails which highlight specific issues that have arisen or noteworthy decisions.

Our record on compliance

Most (77%) complaints we received in the reporting period were solely or primarily concerned with Accuracy under clause 1 of the Editors' Code.

Of all the complaints we received about editorial content during 2022, we rejected more than 76%. We resolved the others with amendments to online articles and/or corrections acknowledging errors online and/or in print.

During this reporting period one complaint was resolved by mediation (without a finding as to whether or not the Editors' Code had been breached):

- [13064-21 Miller v telegraph.co.uk](#)

In 2022, over 130 complaints made to IPSO about Telegraph articles were rejected. 125 of the rejections were under clause 1 (accuracy) of the Editors' Code.

IPSO adjudicated eleven complaints under Regulation 19. Eight were rejected, one upheld, two partially upheld.

Complaints not upheld by IPSO during 2022

- [11103-22 A woman v The Daily Telegraph](#)
- [12130-21 Reeve v The Daily Telegraph](#)
- [09984-22 Percy v The Daily Telegraph](#)
- [00517-22 Various v The Daily Telegraph](#)
- [10324-21 Morgan v The Daily Telegraph](#)
- [00368-22 Thompson v The Daily Telegraph](#)
- [10439-21 The family of John Patrick Cunningham v The Daily Telegraph](#)
- [01789-21 Brewerton v telegraph.co.uk](#)

Partly upheld adjudications by IPSO during 2021 and Corrections published

- [08884-21 Trans Legal Project v The Daily Telegraph](#)

Print: *"Patient safety fears after NHS trusts allow trans sex offenders in female only wards"* (Aug,3) reported that hospitals were exempt from the Equalities Act and did not have to admit patients to single sex wards that did not match their legal gender. In fact, hospitals are only exempt from some provisions and under the Act have to admit people to single sex spaces based on the gender they present as, except in exceptional circumstances. We are happy to correct the record.

Online: *An earlier version of this article reported that hospitals were exempt from the Equalities Act and did not have to admit patients to single sex wards that did not match their legal gender. Hospitals are only exempt from some provisions and under the Act have to admit people to single sex spaces based on the gender they present as, except in exceptional circumstances. The article has been amended.*

- [10784-22 Various v telegraph.co.uk](#)

Correction: The headline of this article previously reported that Allison Bailey had won her case against Stonewall. That was not correct. As the article makes clear, her case against Stonewall was dismissed.

Upheld adjudications by IPSO during 2022 and Corrections published

- [10895-22 Various v The Daily Telegraph](#)

An article "Doctors and nurses may join wave of strikes" (July 20) reported that doctors and nurses were considering strike action after a proposed pay rise of up to 9.3 per cent. This was inaccurate as doctors and nurses were not offered a 9.3 per cent pay rise. The 9.3 per cent was offered only to the lowest paid NHS staff such as porters and to newly qualified teachers. This has been published following an upheld ruling by Ipsos