

The Telegraph

IPSO Annual Report 2023

Reporting period: Jan 1 to Dec 31 2023

Introduction

The Regulated Entity (as defined in, and for the purposes of, the Independent Press Standards Organisation CIC Regulations 2013) is Telegraph Media Group ('TMG').

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 sustained investment in digital: the numbers that best reflect the success of our business are our subscriber numbers. As of December 2023, there were:

- 1,035,710 subscriptions
- Print = 117,586 Digital = 688,012 Other = 230,112

The Telegraph understands the needs of its customers. We invest significantly in quality journalism and technology and are proud of our high professional and ethical standards.

Anna Jones is the Chief Executive of TMG. Mike McTighe is Chairman of the TMG Board. They are supported by an executive team 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. Chris Evans is Chairman 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.



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

How we work

The Telegraph has an integrated newsroom. Editorial staff work across all platforms, digital and print.

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 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 with our response.



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 69% 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 should 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. In 2023 we held a series of media law refresher seminars covering all the major areas including defamation; privacy/public interest amongst other topic areas. This was particularly targeted at those who may have entered the newsroom without a classic journalistic training.

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 (73%) 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 2023, we rejected more than 63%. We resolved the others with amendments to online articles and/or corrections acknowledging errors online and/or in print.

In 2023, over 250 complaints made to IPSO about Telegraph articles were rejected. 85 of the rejections were under clause 1 (accuracy) and 96 under clause 12 (discrimination) of the Editors' Code.

IPSO adjudicated 18 complaints under Regulation 19. Twelve were rejected, three partly upheld and three upheld.

Complaints not upheld by IPSO during 2023

- [20544-23 Shaw v telegraph.co.uk](#)
- [20606-23 White v The Sunday Telegraph](#)
- [20400-23 Extinction Rebellion v The Daily Telegraph](#)
- [19677-23 A complainant v The Daily Telegraph](#)
- [19498-23 Newman v The Sunday Telegraph](#)
- [17700-23 Calvert v The Daily Telegraph](#)
- [17652-23 Potucek v The Daily Telegraph](#)
- [15070-23 Djanogly and Silk v The Daily Telegraph](#)
- [12490-22 Portes v The Daily Telegraph](#)

- [16843-23 Meacham v The Sunday Telegraph](#)
- [13065-22 A man v The Daily Telegraph](#)
- [13109-22 National LGBT+ Police Network v The Sunday Telegraph](#)

Partly upheld adjudications by IPSO during 2023 and Corrections published ●

[20255-23 White v The Daily Telegraph](#)

Print: *An article “The culture war will be an election issue, and the Tories can’t allow the woke to win” (July 29) incorrectly reported that a court had confirmed that the Scottish Government had exceeded its powers in relation to the Gender Recognition Reform Bill. The application was only heard by the Court of Session in September 2023. We are happy to correct the record*

Online: *CORRECTION: An earlier version of this article stated that a court had confirmed that the Scottish Government had exceeded its powers in relation to the Gender Recognition Reform Bill. This was incorrect. The application has yet to be heard and is due to come before the Court of Session in September 2023. We are happy to correct the record.*

- [22168-22 Walawalker v telegraph.co.uk](#)

CORRECTION: A previous version of this article reported that the drop in deportations of Category A foreign criminals was at a record low ‘thanks to’ and ‘after’ human rights challenges. This was inaccurate. Available data does not show that a rise in human rights challenges are why the number of such deportations have dropped. This correction has been published following a partially upheld ruling by the Independent Press Standards Organisation

- [12259-22 Esslemont v The Daily Telegraph](#)

Print: *In an article headlined “Modern slavery law is ‘biggest loophole’ for migrants” published on 17 August 2022, we reported that “the numbers [of people who had made Modern Slavery claims] allowed to stay have risen from just 3,000 in 2015 to 16,000 this year”. This was inaccurate. The figures related to the total number of the potential number of victims referred to the National Referral Mechanism – 26% of whom were UK nationals – rather than those who had used these claims as part of their deportation proceedings. In addition, the figure of 16,000 was a prediction at the time of publication, based on previous Home Office figures. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.*

Online: *CORRECTION: A previous version of this article reported that the “numbers allowed to stay [following Modern Slavery claims] had risen from 3,000 in 2015 to 16,000 this year”. This was inaccurate. The figures related to the total number of the potential number of victims referred to the National Referral Mechanism – 26% of whom were UK nationals – rather than those who had used these claims as part of their deportation proceedings. In addition, the figure of 16,000 was a prediction*

at the time of publication, based on previous Home Office figures. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.

Upheld adjudications by IPSO during 2023 and Corrections published • [00721-](#)

[23 Hammond v The Daily Telegraph](#)

Print: An article “We are all paying the terrible price for lockdown” (Nov, 19) reported that pandemic-related measures in Sweden cost 60 billion kroner in 2020 and 2021, a tenth of the UK figure for Covid-related spending. This was misleading. The 60 billion kroner related only to business support. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.

Online: CORRECTION: An earlier version of this article reported that pandemic related measures in Sweden cost 60 billion kroner a year in 2020 and 2021, a tenth of the UK figure for Covid spending. This was misleading. The 60 billion kroner related only to business support. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.

• [11120-22 Cozens-Hardy v The Daily Telegraph](#)

Print: An article headlined “Self-hating Remainers are blind to the EU’s flaws” (July 23) stated that “the basic facts will not go away: gas-turbine generator small enough to go on the back of a lorry will produce the same electricity, faster and more reliably, than 10 of shore wind turbines the size of the Eiffel Tower”. This was inaccurate; a generator capable of generating that much electricity would not fit on the back of a lorry. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.

Online: CORRECTION: A previous version of this article stated that “the basic facts will not go away: a gas-turbine generator small enough to go on the back of a lorry will produce the same electricity, faster and more reliably, than 10 of shore wind turbines the size of the Eiffel Tower”. This correction has been published following an upheld ruling by the Independent Press Standards Organisation

• [17743-23 Yallop v The Daily Telegraph](#)

Print: An article “Covid’s ghost children cannot be forgotten” (March, 27) reported that evidence showed the majority of children educated at home did not receive a good education. This was inaccurate as there was no available evidence to support the claim. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.

Online: CORRECTION: This article previously reported that evidence showed the majority of children schooled at home did not receive a good education. This was inaccurate as there was no available evidence to support the claim. This correction has been published following an upheld ruling by the Independent Press Standards Organisation.

In all the above cases discussions were held with relevant writers and editors, explaining the ruling and the reasons for it. In some instances, where appropriate, there is a broader communication on the matter to the wider editorial group.