

telegraphmediagroup

IPSO Annual Report 2015

Reporting period: Jan 1 to Dec 31 2015

Introduction

Telegraph Media Group Ltd (TMG) is a wholly owned subsidiary of Press Acquisitions Ltd. It has approximately 1,200 employees.

Our regulated titles are:

The Daily Telegraph (circulation 472,033 - Jan 2016)

The Sunday Telegraph (circulation 355,044 - Jan 2016)

The Weekly Telegraph (not audited)

www.telegraph.co.uk

The Telegraph remains one of the few commercially successful newspaper publishers; we are a highly profitable business that understands the needs of our customers. We invest significantly in quality journalism and technology and are proud of our high professional and ethical standards.

Murdoch MacLennan 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.

Editorial Structure

Chris Evans is Editor and Director of Content. Ian MacGregor is Weekend Editor and Director of Leisure. 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 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 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

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 and discussed 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, and we seek to apply those standards in the new digital world.

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.

For example, in February, the investigations team revealed how Jack Straw and Sir Malcolm Rifkind offered to use their positions as politicians on behalf of a fictitious Chinese company in return for payments of at least £5,000 per day.

Similarly, in April, the Telegraph published several articles about political donations, including how the Liberal Democrats were embroiled in a new fundraising scandal after accepting a second potentially illegal donation that allegedly “bought” a donor access to Nick Clegg. The reporters spoke to numerous sources and managed to piece together the politicians involved. Once satisfied that the information was reliable, they contacted the relevant people and asked for comment. Receiving both on and off the record information, the reporters fairly and accurately reflected the allegations.

Editorial Code guidance

The Head of Editorial Compliance works with the Head of Legal 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 only a residual 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. Details of all complaints are carefully recorded (see **Our complaints-handling process**, below) and outcomes are fed back directly to journalists and their managers. Significant cases and ones involving adverse adjudications by IPSO are also incorporated into compulsory regular training and 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 key 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 arising from contemporary news events, or from legal or regulatory complaints.

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 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 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

We publicise our membership of IPSO in all our newspapers at the foot of a right-hand column that usually appears 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).

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 75% 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 produce quarterly reports for the editorial management team. 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). The reports aim to identify issues or trends that might be of concern so that any potential underlying problems can be quickly addressed. The commentary in these reports is for private internal use only, and therefore not for publication, but details are available to IPSO on a confidential basis. 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 1998 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.

We therefore run a two-hour training seminar, "IPSO Editors' Code Refresher", which offers a more detailed examination of the Editors' Code, with real examples of up-to-date cases involving *The Telegraph* and other publishers. The training, run by the Head of Editorial Compliance, includes interactive discussion of both historical and hypothetical complaints brought under the Code, and seeks to give journalists a solid grounding in its scope and application. The presentation that illustrates these sessions evolves continuously, and contains details of real cases that cannot be published for reasons of data protection. The slides can, however, be made available to IPSO in confidence.

In April 2015 it became mandatory for all new editorial staff to attend within three months of arrival at TMG, and for all editorial staff to attend at least once every two years. Between April and December 2015, the seminar ran 19 times and was attended by 155 journalists.

Compliance feedback and bulletins

The Head of Editorial Compliance 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 20-30 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 (approximately 70%) complaints we receive are solely or primarily concerned with Accuracy under clause 1 of the Editors' Code.

Of all complaints we received about editorial content during 2015, we rejected more than 60%. We resolved the others with amendments to online articles and/or corrections acknowledging errors online and/or in print.

During this reporting period, IPSO adjudicated 28 complaints under Regulation 19.

Complaints not upheld by IPSO:

- 05946-15 Kudmany v The Daily Telegraph
- 04170-15 Smurthwaite v The Daily Telegraph
- 00660-15 Muller v The Daily Telegraph
- 03109-15 Emmott v The Daily Telegraph
- 01030-15 Westley v The Daily Telegraph
- 00810-15 Scudamore v The Daily Telegraph
- 00165-15 Smeeton v The Daily Telegraph
- 03157-14 Ivleva v The Daily Telegraph

- 01659-14 de Pulford v Daily Telegraph
- 02096-14 Webber v The Daily Telegraph
- 01754-14 Thomason v The Daily Telegraph
- 03653-15 Belaon v The Sunday Telegraph
- 03804-15 Lese v The Sunday Telegraph
- 00766-14 Sloan v The Sunday Telegraph
- 01902-15 Afzal v The Sunday Telegraph
- 00870-15 Hussain v The Sunday Telegraph
- 02462-14 Salter v The Sunday Telegraph
- 00184-14 Tameez v The Sunday Telegraph
- 01840-14 Sattar v The Sunday Telegraph
- 01733-14 Sattar v The Sunday Telegraph

Complaints mediated by IPSO (without a finding as to whether or not the Editors' Code had been breached):

- 01898-14 A man v The Daily Telegraph
- 00682-15 Burbage Parish Council v The Daily Telegraph
- 02838-15 Lavington v The Daily Telegraph
- 04898-15 Avery v The Daily Telegraph
- 07520-15 ME Association v The Daily Telegraph
- 02742-14 Khan v The Sunday Telegraph

Adverse adjudications by IPSO during 2015 and steps taken to respond:

[02402-15 Rodu v The Daily Telegraph](#)

A report of a scientific study about teenage e-cigarette usage inaccurately speculated about teenagers “who would never have taken up smoking”, whereas the study examined only the proportion of users who had never smoked, or had smoked but did not like it.

Following this adjudication, staff were reminded in monthly briefings of the importance of clearly distinguishing between the findings of a scientific study, and their own conjectures arising from these.

[02368-15 A woman v The Daily Telegraph](#)

This complaint arose from an honest error by the writer, and IPSO accepted that *The Telegraph* had already taken appropriate action to remedy it.

[05903-15 Shadforth v The Daily Telegraph](#)

An article reported that thousands of students were expected to receive incorrect A-level results after the “government’s regulator” had said that an exam board “lacked understanding” of marking. The report to which the article referred was published in 2014, and did not concern 2015 marks; the article was therefore misleading. IPSO required publication of the correction offered by the newspaper during its investigation.

The article’s writer was warned to take care about confusing a sequence of events such as to create an inaccurate impression.

[02572-15 Office of the First Minister v The Daily Telegraph](#)

Nicola Sturgeon complained about a front page article reporting a civil servant’s memorandum suggesting that she had said that she would rather see David Cameron win the general election than Ed Miliband. She denied she had said this and IPSO upheld her complaint: *The Telegraph* had not sought to verify the accuracy of the claim, but had published it as fact. The content of the civil servant’s note was however reported accurately. IPSO required publication of its adjudication on page 2, with a link from the front page of the paper.

The details of this complaint were shared with staff in the monthly briefings held by the Head of Compliance, and also incorporated into the regular IPSO Refresher training mandated for all *Telegraph* journalists.

[05143-15 Lewis v The Daily Telegraph](#)

A front page story reported that Ivan Lewis, in an article for Labour List, had accused Jeremy Corbyn of being an anti-Semite. Since he had not made this criticism in terms (he wrote that Corbyn “has shown poor judgment in expressing support for and failing to speak out against people who have engaged in...anti-Semitic rhetoric”), the article was deemed significantly misleading. IPSO required *The Telegraph* to publish a p2 correction with a link from the front page.

The article’s writer was advised to take care over accuracy in reporting such comments. The issues raised by the adjudication were also explained to staff in the Head of Compliance’s monthly briefings, and included in the IPSO training that is mandatory for all journalists.

[05807-15 Carey v The Daily Telegraph](#)

An opinion article about a woman who had provided one of the questions asked by Jeremy Corbyn at Prime Minister’s Questions included an inaccurate claim that the maximum a family would lose as a result of the government’s proposed changes to tax credit thresholds was £1,000. In fact, this was an average loss. IPSO required the newspaper to publish the correction that it had already offered in correspondence with the complainant.

[04986-15 Large v The Daily Telegraph](#)

An article reported on Michael Gove's treatment for a broken foot over a weekend. By omitting the detail that he had visited a minor injuries unit, the item gave the misleading impression that NHS radiology departments are closed on Sundays. IPSO agreed that the correction promptly offered and published by the newspaper was sufficient to correct the inaccuracy.

[04968-15 Doherty v The Daily Telegraph](#)

An inquest report on the death of John Knott and his wife bore the headline: Gypsy camp stress 'drove couple to suicide pact'. Contacted by a representative of the traveller movement, IPSO upheld his accuracy complaint only in relation to the headline, and only in print. It accepted that both the print and online articles made clear overall that Mr Knott was concerned not only about the planning application for a traveller site on nearby land, but also about his wife's health; nevertheless, no witness at the inquest had reported the proposed traveller site as the sole or principal cause of Mr Knott's distress, nor had this been part of the coroner's findings. The print headline was therefore inaccurate, IPSO ruled.

The Telegraph expressed concern about this adjudication. Headlines are often required to address complex issues. In print they must sometimes fit small spaces, as here. In circumstances where IPSO accepted in its adjudication that the meaning of quotation marks can vary according to context, and is therefore open to interpretation, it was troubling that this headline - given all the clarifying detail in the text - was adjudged to be a significant inaccuracy that engaged the Code. It was difficult to explain the decision to journalists such that they might draw meaningful lessons from it.

telegraphmediagroup

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 decide how to behave. 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 2016. It is published on IPSO's website: 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 a decision is ever taken by senior TMG journalists 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. A template for these formal proposals is available from the Head of Editorial Compliance.

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. 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