

Johnston Press plc

Annual IPSO statement

Introduction

This is our second Annual statement for IPSO and this report covers the first full year of operation since IPSO's formation and is in relation to the period from **1 January 2015 to 31 December 2015**.

The regulated entity Johnston Press is one of the largest local and regional multimedia organisations in the UK.

We provide news and information services to local and regional communities through our portfolio of publications and websites - 13 paid-for daily newspapers, and approximately 250 other Publications including: paid-for weekly newspapers, free titles, lifestyle magazines together with local news and e-commerce websites. A list of all our publications is set out at Schedule B of this Statement.

Each month our news brands touch the lives of nearly 30m people across large parts of the UK including: Scotland, the North East, West Yorkshire, the North West & Isle of Man, South Yorkshire, the South, Midlands and Northern Ireland - delivering extensive coverage of local news, events and information.

We seek to set the highest editorial standards reinforced by excellent internal training services, and for six consecutive examinations our trainee reporters have secured a pass rate in the NQJ well above the national average as set by the NCTJ - the National Council for the Training of Journalist.

The Editors' Code of Practice is embedded in every part of our editorial operation and we give IPSO every possible support. Johnston Press continues to operate an internal Editorial Governance Committee with the key remit to consider, draft, implement and review the policies, procedures and training for the whole Group to ensure compliance with its obligations under IPSO. Copies of our relevant current policies are attached for your information. Gary Shipton is Deputy Chairman of our Editorial Board and chairman of our Editorial Governance Committee and Editor In Chief of our portfolio in Sussex; he is the Responsible Person (as defined in clause 3.3.9 of the Scheme Membership Agreement).

A list of the digital and print publications produced by Johnston Press is attached.

Registered Office: Johnston Press plc, Orchard Brae House
30 Queensferry Road, Edinburgh, EH4 2HS
Telephone: 0131 311 7500
Email: enquiries@johnstonpress.co.uk
www.johnstonpress.co.uk
Registered Number 15382 Scotland

Johnston Press plc

Our training process

The Editors Code is the standard used by all Johnston Press journalists.

All journalists in Johnston Press are required to undergo training to ensure they fully understand the Editors' Code of the Independent Press Standards Organisation and know how to apply that in real-life settings. The Editorial Learning and Development Department have put together an online training programme which ensures that journalists are tested in a range of scenarios which touch on various aspects of the Code. The module is compulsory.

The advice of the IPSO Operations Director has been sought in establishing this training.

The module is completed by an online test which requires that journalists reach a high ethical standard agreed by the Johnston Press Editorial Board.

The Editors' Code is made available to all new trainees joining the company and all trainees are put through the National Qualification in Journalism run by the National Council for the Training of Journalists. This includes training in ethical issues and the IPSO Code which is tested in the Media Law and Practice exam.

The code has been issued electronically to all staff and in addition following the launch of IPSO all staff are required to undertake detailed training and testing on the code.

This process is mandatory and a detailed log of all staff undergoing the training is recorded and retained.

It is a condition of employment of all editorial staff, contained within their contracts, that they fully observe the standards required by the regulator as explained within the code.

It is also a condition of commissioned freelance contributors that they fully comply with the code.

This is also made clear through the induction process for all new editorial employees.

Law and ethics refreshers are an integral part of the Johnston Press training programme and the Editorial Learning Development website includes material on ethical issues as well as the IPSO Code and Johnston Press complaints procedures.

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Registered Number 15382 Scotland

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Pre-publication guidance is provided in the first instances internally by the local content editor or editor and then, as required, by the group editor or editorial director.

Significant questions in advance of publication will also be raised with the appropriate external and internal legal advisers as well as the 'responsible person' for regulated matters within JP.

We have not generally sought pre-publication guidance from IPSO. However, we welcome the invitation to do so more frequently and will ensure that this forms part of our future policy. All editors have been informed of the IPSO contacts for which pre-publication advice should be sought.

Johnston Press has a robust editorial management structure which ensures that whenever a story might require verification it is assessed by the local content editor or editor and then, as required, by the group editor or editorial director.

External legal advice will be sought at the editorial director's discretion whenever it is required.

All newly-appointed journalists are required to be NCTJ trained to gold standard (in those jurisdictions where NCTJ training is recognised) and must undertake both in-house training and external NCTJ validation during a rigorous two year induction process to secure their NQJ.

The Editors' Code and the importance of accuracy is fundamental both to this training process and to the internal verification of content.

Our record on compliance

Johnston Press publications have been the subject of 5 adverse IPSO adjudications in 2015, all as further specified in Schedule A below.

The primary issue raised in the relevant adjudications has been that of accuracy. Johnston Press do try to ensure, where appropriate, to take steps, to correct any inaccurate published materials before matters are escalated; however this is not always possible and we recognise that processes may need to be reviewed in light of any relevant adjudications.

In certain cases we noted that there had been specific concern about third party agency copy and we are currently reviewing ways in which to minimise such risks in the future.

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Whenever there is an adverse adjudication against a Johnston Press publication, it is normally referred to the company's editorial governance committee.

The committee examines the censure in the context of other adjudications and then refers it back to the senior editorial director for the region responsible to conduct a full investigation into it. The investigation identifies the failings and the steps needed to ensure no repetition locally or across the group.

These recommendations can include training requirements and potential changes to the company's editorial policies and procedures.

The report is then referred back to the governance committee for further consideration and then taken to the Editorial Board if substantive change needs to be approved.

We have regularly sought clarification from IPSO when adjudications have been upheld against us so that we can fully understand the broader implications and adjust our internal guidance accordingly. As a recent example, following guidance from IPSO in 2016, we have now amended our internal policies to ensure that we look to archive any digital content which we significantly changed in response to complaints about inaccuracy.

There has been an occasion where we have also sought further informal guidance from IPSO to help us more fully understand the ruling and to take the appropriate measures going forward.

Schedule A

IPSO rulings on JP cases (For the period 1 January 2015 to 31 December 2015)

04219-15 Archbold v Edinburgh Evening News

Kathryn Archbold complained to IPSO that the Edinburgh Evening News had breached Clause 1 (Accuracy), Clause 2 (Opportunity to reply) and Clause 5 (Intrusion into grief or shock) of the Editors' Code of Practice in an article headlined "Dead soldier faced court over assault", published on 28 May 2015.

The complaint was upheld under Clause 1 (Accuracy).

03856-15 Armstrong v Edinburgh Evening News

Paul Armstrong complained to IPSO on behalf of James Armstrong that The Edinburgh Evening News had breached Clause 1 (Accuracy), Clause 3 (Privacy) Clause 4 (Harassment) and Clause 5 (Intrusion into Grief or Shock) of the Editors' Code of Practice in an article headlined "Ellie Armstrong, 14, loses brain cancer fight", published online on 20 January 2015

The complaint was upheld under Clause 1 (Accuracy).

03644-15 Nesbitt v Portadown Times

Mike Nesbitt MLA complained to IPSO on behalf of the Ulster Unionist Party that the Portadown Times had breached Clause 1 (Accuracy) of the Editors' Code of Practice in an article headlined "Poll shows 'Sinn Fein are closing the gap'", published in print on 1 May 2015 and online on 4 May 2015.

The complaint was upheld.

00256-15 A woman v Lancashire Evening Post

A woman complained to the Independent Press Standards Organisation that the Lancashire Evening Post had breached Clause 3 (Privacy) and Clause 7 (Children in sex cases) of the Editors' Code of Practice in an article published in January 2015. The article reported that photographs of children from Lancashire had been found on a file sharing website which the newspaper described variously as a "Russian pervert website" and a "paedophile website"..

The complaint was upheld under Clause 3 (Privacy).

02184-14 Rooney v Wetherby News

Anna Rooney complained to the Independent Press Standards Organisation that the Wetherby News had breached Clause 1 (Accuracy) of the Editors' Code of Practice in an article headlined "New leaders set to stay at high school", published on 3 October 2014. The complainant further complained that the newspaper had breached Clause 3 (Privacy) in handling her complaint about the article.

The complaint was upheld in part under Clause 1.

This case was not adjudicated until February 2015 although publication took place in 2014

**Four other cases involving Johnston Press titles were not upheld by IPSO.

Schedule B

Our Publications

Bury Free Press; Bourne Local; Boston Standard; Diss Express; Peterborough Telegraph; Fenland Citizen; Lincs Free Press:Grantham Journal; Haverhill Echo; Horncastle News; Lynn News; Louth Leader; Market Rasen Mail; Melton Times; Newmarket Journal; Rutland Times; Suffolk Free Press; Spalding Guardian; Spilsby Standard; Mablethorpe Leader; Mildenhall Journal; Soham and Ely Journal; Skegness Standard; Sleaford Standard; Rutland and Stamford Mercury;

The Scotsman; Arbroath Herald; Cumbernauld News; East Fife Mail; Falkirk Herald; Fife Herald; Glenrothes Gazette; Glasgow South & Eastwood Extra; Kirkintilloch Herald; Lanark Gazette; Linlithgowshire Journal; Milngavie Herald; Motherwell Times; Paisley & Renfrewshire Extra; Arbroath Herald; Brechin Advertiser; Buchan Observer; The Buteman; Carrick Gazette; Donside Piper & Herald; Ellon Times; Forfar Dispatch; Fraserburgh Herald; The Galloway Gazette; Kincardineshire Observer; Mearns Leader; Montrose Review; Stornoway Gazette; Berwick Advertiser; Berwick Gazette; Berwickshire News; East Lothian News; Edinburgh Evening News; Hawick News; Midlothian Advertiser; Southern Reporter; Pulse Magazine; Scotland On Sunday; Selkirk Weekly Advertiser; Lothian Times.

Beverly Guardian; Driffield Times and Post; Scarborough News; Scarborough News; Bridlington Free Press; Filey & Hunmanby Mercury; Pocklington Post; Malton & Pickering Mercury; Whitby Gazette; Harrogate Advertiser; Ripon Gazette; Wetherby News; Knaresborough Post; Pateley Bridge and Nidderdale Herald; North Yorkshire News; Brighouse Echo; Batley and Birstall News; Dewsbury and Mirfield Reporter; Halifax Courier; Hemsworth & South Elmsall Express; Morley Observer and Advertiser; Pontefract & Castleford Express; Spenborough Guardian; Wakefield Express; Todmorden News and Hebden Bridge Times; Absolute Leeds; Yorkshire Evening Post; Leeds Weekly News; Pudsey Times; Wharfe Valley Times; Yorkshire Post.

Buxton Advertiser; Belper News; Derbyshire Times; Doncaster Free Press; Doncaster Star; Epworth Bells; Eastwood & Kimberley Advertiser; Eckington Leader; Gainsborough Standard; Gainsborough News; Hucknall Dispatch; Ilkeston Advertiser; Ashfield Chad; Alfreton Chad; Mansfield Chad; Matlock Mercury; Ripley & Heanor News; Sheffield Weekly Gazette; The Star, Sheffield; Sheffield Telegraph; Sheffield Weekly Gazette; Worksop Guardian; South Yorkshire Time; Eckington Leader; Peak Courier; Retford Trader Guardian, Dinnington Guardian; The Business Sheffield.

Isle of Man Courier; Isle Of Man Examiner; Manx Independent.

Berwick Advertiser; Berwickshire News; Galloway Gazette; Hartlepool Mail; Morpeth Herald; News Guardian; News Post Leader; Northumberland Gazette; Shields Gazette; Sunderland Echo; Peterlee Star; Washington Star.

Chorley Guardian; Colne Times; Garstang Courier; Longridge News; Lancashire Evening Post; The Visitor (Morecambe); Wigan Evening Post; Wigan Observer; Leigh Reporter; Wigan Reporter; Blackpool Gazette; Fleetwood Weekly News; Lytham St Annes Express; Lancaster Guardian; Leyland Guardian; Trials & Motorcross News; Clitheroe Advertiser and Times; Burnley Express; Nelson Leader; Dirt Bike Rider.

Bucks and Winslow Advertiser; Brackley and Towcester Advertiser; Bicester Review; Bedfordshire Times & Citizen; Banbury Guardian; Northampton Chronicle and Echo; Daventry Express; Northants Telegraph; Hemel Hempstead Gazette; Berkhamsted and Tring Gazette; Herald Express; Image Magazine; Leighton Buzzard Observer; Luton & Dunstable Herald & Post; Luton News; Harborough Mail; Milton Keynes Citizen; Northampton Mercury; Rugby Advertiser; Rugby Review; Biggleswade Chronicle; Dunstable Gazette; Lutterworth Mail;

Corby Telegraph; Thame Gazette; Leamington Spa Courier; Warwick Courier; Kenilworth Weekly News.

Bexhill Observer; Crawley Observer; West Sussex County Times; Eastbourne Herald. Eastbourne Gazette; Horsham Gazette; Hastings and St Leonards Observer; Mid Sussex Gazette; Mid Sussex Times; Sussex Express; Chichester Observer; West Sussex Gazette; Midhurst and Petworth Observer; Worthing Advertiser; Worthing Herald; Shoreham Herald; Hayling Islander; The News, Portsmouth; Brighton and Hove Independent; Bognor Regis Gazette

Banbridge Leader; Dromore Leader; Ballymena and Antrim Times; Larne Times; Carrick Times; Newtownabbey Times; Ulster Star; Lurgan Mail; Portadown Times; Coleraine Times; Ballymoney Times; Derry Journal (and its editions); Tyrone Times; Mid Ulster Mail; Mid Ulster Mail, South Derry edition; Londonderry Sentinel; Roe Valley Sentinel; News Letter; Farming Life; belfastvibe.

Etc Magazine (Northern Ireland); Etc Magazine Eastbourne; Etc Magazine Hampshire; Etc Magazine North East; Etc Magazine North West; Etc Magazine East Sussex; Etc Magazine West Sussex; Etc Magazine North Sussex; Etc Hampshire.

Website	URL	Mobile URL
Arbroath Herald	www.arbroathherald.co.uk	m.arbroathherald.co.uk
Ballymena Times	www.ballymenatimes.com	m.ballymenatimes.com/
Ballymoney Times	www.ballymoneytimes.co.uk	m.ballymoneytimes.co.uk/
Banbridge Leader	www.banbridgeleader.co.uk	m.banbridgeleader.co.uk/
Banbury Guardian	www.banburyguardian.co.uk	m.banburyguardian.co.uk
Batley News	www.batleynews.co.uk	m.batleynews.co.uk
Bedford Today	www.bedfordtoday.co.uk	m.bedfordtoday.co.uk
Belfast Newsletter	www.newsletter.co.uk	m.newsletter.co.uk
Belper News	www.belpernews.co.uk	m.belpernews.co.uk
Berkhamsted Today	www.berkhamstedtoday.co.uk	m.berkhamstedtoday.co.uk
Berwick Advertiser	www.berwick-advertiser.co.uk	m.berwick-advertiser.co.uk
Berwickshire News	www.berwickshirenews.co.uk	m.berwickshirenews.co.uk
Beverley Guardian	www.beverleyguardian.co.uk	m.beverleyguardian.co.uk
Bexhill Observer	www.bexhillobserver.net	m.bexhillobserver.net
Biggleswade Today	www.biggleswadetoday.co.uk	m.biggleswadetoday.co.uk
Blackpool Gazette	www.blackpoolgazette.co.uk	m.blackpoolgazette.co.uk
Bognor Regis Observer	www.bognor.co.uk	m.bognor.co.uk
Boston Standard	www.bostonstandard.co.uk	m.bostonstandard.co.uk
Bourne Local	www.bournelocal.co.uk	m.bournelocal.co.uk
Brechin Advertiser	www.brechinadvertiser.co.uk	m.brechinadvertiser.co.uk
Bridlington Free Press	www.bridlingtonfreepress.co.uk	m.bridlingtonfreepress.co.uk
Brighouse Echo	www.brighouseecho.co.uk	m.brighouseecho.co.uk
Brighton & Hove Independent	www.brightonandhoveindependent.co.uk	
Buchan Observer	www.buchanobserver.co.uk	m.buchanobserver.co.uk
Buckingham Advertiser	www.buckinghamtoday.co.uk	m.buckinghamtoday.co.uk
Bucks Herald	www.bucksherald.co.uk	m.bucksherald.co.uk
Burnley Express	www.burnleyexpress.net	m.burnleyexpress.net
Bury Free Press	www.buryfreepress.co.uk	m.buryfreepress.co.uk
Buxton Advertiser	www.buxtonadvertiser.co.uk	m.buxtonadvertiser.co.uk
Carlisle Gazette	www.carlukegazette.co.uk	m.carlukegazette.co.uk
Carrick Gazette	www.carricktoday.co.uk	m.carricktoday.co.uk
Carrickfergus Times	www.carrickfergustimes.co.uk	m.carrickfergustimes.co.uk
Chichester Observer	www.chichester.co.uk	m.chichester.co.uk
Chorley Guardian	www.chorley-guardian.co.uk	m.chorley-guardian.co.uk
Clitheroe Advertiser	www.clitheroeadvertiser.co.uk	m.clitheroeadvertiser.co.uk
Coleraine Times	www.colerainetimes.co.uk	m.colerainetimes.co.uk
Crawley Observer	www.crawleyobserver.co.uk	m.crawleyobserver.co.uk
Cumbernauld News	www.cumbernauld-news.co.uk	m.cumbernauld-news.co.uk
Daventry Express	www.daventryexpress.co.uk	m.daventryexpress.co.uk

Deeside Piper	www.deesidepiper.co.uk	m.deesidepiper.co.uk
Derbyshire Times	www.derbyshiretimes.co.uk	m.derbyshiretimes.co.uk
Derry Journal	www.derryjournal.com	m.derryjournal.com
Dewsbury Reporter	www.dewsburyreporter.co.uk	m.dewsburyreporter.co.uk
Diss Express	www.dissexpress.co.uk	m.dissexpress.co.uk
Doncaster Free Press	www.doncasterfreepress.co.uk	m.doncasterfreepress.co.uk
Donegal Democrat	www.donegaldemocrat.ie	m.donegaldemocrat.ie
Donside Piper	www.donsidepiper.co.uk	m.donsidepiper.co.uk
Driffield Post	www.driffieldtoday.co.uk	m.driffieldtoday.co.uk
Dromore Leader	www.dromoreleader.co.uk	m.dromoreleader.co.uk
Dunstable Today	www.dunstabletoday.co.uk	m.dunstabletoday.co.uk
East Lothian News	www.eastlothiannews.co.uk	m.eastlothiannews.co.uk
Eastbourne Herald	www.eastbourneherald.co.uk	m.eastbourneherald.co.uk
Eastwood Advertiser	www.eastwoodadvertiser.co.uk	m.eastwoodadvertiser.co.uk
Edinburgh News	www.edinburghnews.scotsman.com	m.edinburghnews.scotsman.com
Ellon Times	www.ellontimes.co.uk	m.ellontimes.co.uk
Epworth Bells	www.epworthbells.co.uk	m.epworthbells.co.uk
Falkirk Herald	www.falkirkherald.co.uk	m.falkirkherald.co.uk
Farming Life	www.farminglife.com	m.farminglife.com
Fenland Citizen	www.fenlandcitizen.co.uk	m.fenlandcitizen.co.uk
Fife Today	www.fifetoday.co.uk	m.fifetoday.co.uk
Filey Mercury	www.fileymercury.co.uk	m.fileymercury.co.uk
Fleetwood Weekly News	www.fleetwoodtoday.co.uk	m.fleetwoodtoday.co.uk
Forfar Dispatch	www.forfardispatch.co.uk	m.forfardispatch.co.uk
Fraserburgh Herald	www.fraserburghherald.co.uk	m.fraserburghherald.co.uk
Gainsborough Standard	www.gainsboroughstandard.co.uk	m.gainsboroughstandard.co.uk
Galloway Gazette	www.gallowaygazette.co.uk	m.gallowaygazette.co.uk
Garstang Courier	www.garstangcourier.co.uk	m.garstangcourier.co.uk
Glasgow South and Eastwood Extra	www.glasgowsouthandeastwoodextra.co.uk	m.glasgowsouthandeastwoodextra.co.uk
Grantham Journal	www.granthamjournal.co.uk	m.granthamjournal.co.uk
Guide and Gazette	www.guideandgazette.co.uk	m.guideandgazette.co.uk
Halifax Courier	www.halifaxcourier.co.uk	m.halifaxcourier.co.uk
Harborough Mail	www.harboroughmail.co.uk	m.harboroughmail.co.uk
Harrogate Advertiser	www.harrogateadvertiser.co.uk	m.harrogateadvertiser.co.uk
Hartlepool Mail	www.hartlepoolmail.co.uk	m.hartlepoolmail.co.uk
Hastings Observer	www.hastingsobserver.co.uk	m.hastingsobserver.co.uk
Haverhill Echo	www.haverhillecho.co.uk	m.haverhillecho.co.uk
Hawick News	www.hawick-news.co.uk	m.hawick-news.co.uk
Hayling Islander	www.haylingtoday.co.uk	m.haylingtoday.co.uk
Hebden Bridge Times	www.hebdenbridgetimes.co.uk	m.hebdenbridgetimes.co.uk
Hemel Today	www.hemeltoday.co.uk	m.hemeltoday.co.uk
Hemsworth and South Elmsall Express	www.hemsworthandsouthelmsallexpress.co.uk	m.hemsworthandsouthelmsallexpress.co.uk
Horncastle News	www.horncastlenews.co.uk	m.horncastlenews.co.uk
Houghton Star	www.houghtonstar.co.uk	m.houghtonstar.co.uk
Hucknall Dispatch	www.hucknalldispatch.co.uk	m.hucknalldispatch.co.uk
Ilkeston Advertiser	www.ilkestonadvertiser.co.uk	m.ilkestonadvertiser.co.uk
Inverurie Herald	www.inverurieherald.co.uk	m.inverurieherald.co.uk
Isle of Man Today	www.iomtoday.co.im	m.iomtoday.co.im
Kenilworth Weekly News	www.kenilworthweeklynews.co.uk	m.kenilworthweeklynews.co.uk
Kincardineshire Observer	www.kincardineshireobserver.co.uk	m.kincardineshireobserver.co.uk
Kirkintilloch Herald	www.kirkintilloch-herald.co.uk	m.kirkintilloch-herald.co.uk
Kirriemuir Herald	www.kirriemuirherald.co.uk	m.kirriemuirherald.co.uk
Lancashire Evening Post	www.lep.co.uk	m.lep.co.uk
Lancaster Guardian	www.lancasterguardian.co.uk	m.lancasterguardian.co.uk
Larne Times	www.larnetimes.co.uk	m.larnetimes.co.uk
Leamington Courier	www.leamingtoncourier.co.uk	m.leamingtoncourier.co.uk
Leigh Reporter	www.leighreporter.co.uk	m.leighreporter.co.uk
Leighton Buzzard Observer	www.leightonbuzzardonline.co.uk	m.leightonbuzzardonline.co.uk
Leyland Guardian	www.leylandguardian.co.uk	m.leylandguardian.co.uk

Linlithgow Journal and Gazette	www.linlithgowgazette.co.uk	m.linlithgowgazette.co.uk
Littlehampton Gazette	www.littlehamptongazette.co.uk	m.littlehamptongazette.co.uk
Londonderry Sentinel	www.londonderrysentinel.co.uk	m.londonderrysentinel.co.uk
Longridge News	www.longridgenews.co.uk	m.longridgenews.co.uk
Louth Leader	www.louthleader.co.uk	m.louthleader.co.uk
Lurgan Mail	www.lurganmail.co.uk	m.lurganmail.co.uk
Luton Today	www.lutontoday.co.uk	m.lutontoday.co.uk
Lutterworth Mail	www.lutterworthmail.co.uk	m.lutterworthmail.co.uk
Lynn News	www.lynnnews.co.uk	m.lynnnews.co.uk
Lytham St Annes Express	www.lythamstannesexpress.co.uk	m.lythamstannesexpress.co.uk
Malton and Pickering Mercury	www.maltonmercury.co.uk	m.maltonmercury.co.uk
Mansfield and Ashfield Chad	www.chad.co.uk	m.chad.co.uk
Market Rasen Mail	www.marketrasenmail.co.uk	m.marketrasenmail.co.uk
Matlock Mercury	www.matlockmercury.co.uk	m.matlockmercury.co.uk
Mearns Leader	www.mearnsleader.co.uk	m.mearnsleader.co.uk
Melton Times	www.meltontimes.co.uk	m.meltontimes.co.uk
Mid Sussex Times	www.midsussextimes.co.uk	m.midsussextimes.co.uk
Mid Ulster Mail	www.midulstermail.co.uk	m.midulstermail.co.uk
Midhurst and Petworth Observer	www.midhurstandpetworth.co.uk	m.midhurstandpetworth.co.uk
Midlothian Advertiser	www.midlothianadvertiser.co.uk	m.midlothianadvertiser.co.uk
Milngavie Herald	www.milngavieherald.co.uk	m.milngavieherald.co.uk
Milton Keynes Citizen	www.miltonkeynes.co.uk	m.miltonkeynes.co.uk
Mirfield Reporter	www.mirfieldreporter.co.uk	m.mirfieldreporter.co.uk
Montrose Review	www.montrosereview.co.uk	m.montrosereview.co.uk
Morley Observer and Advertiser	www.morleyobserver.co.uk	m.morleyobserver.co.uk
Morpeth Herald	www.morpethherald.co.uk	m.morpethherald.co.uk
Motherwell Times	www.motherwelltimes.co.uk	m.motherwelltimes.co.uk
Newmarket Journal	www.newmarketjournal.co.uk	m.newmarketjournal.co.uk
News Guardian	www.newsguardian.co.uk	m.newsguardian.co.uk
News Post Leader	www.newspostleader.co.uk	m.newspostleader.co.uk
Newtownabbey Times	www.newtownabbeytoday.co.uk	m.newtownabbeytoday.co.uk
Northampton Chronicle and Echo	www.northamptonchron.co.uk	m.northamptonchron.co.uk
Northamptonshire Telegraph	www.northantstelegraph.co.uk	m.northantstelegraph.co.uk
Northumberland Gazette	www.northumberlandgazette.co.uk	m.northumberlandgazette.co.uk
Pendle Today	www.pendletoday.co.uk	m.pendletoday.co.uk
Peterborough Telegraph	www.peterboroughtoday.co.uk	m.peterboroughtoday.co.uk
Peterlee Star	www.peterleestar.co.uk	m.peterleestar.co.uk
Pocklington Post	www.pocklingtonpost.co.uk	m.pocklingtonpost.co.uk
Pontefract and Castleford Express	www.pontefractandcastlefordexpress.co.uk	m.pontefractandcastlefordexpress.co.uk
Portadown Times	www.portadowntimes.co.uk	m.portadowntimes.co.uk
Portsmouth News	www.portsmouth.co.uk	m.portsmouth.co.uk
Retford Trader and Guardian	www.retfordtoday.co.uk	m.retfordtoday.co.uk
Ripley and Heanor News	www.ripleyandheanornews.co.uk	m.ripleyandheanornews.co.uk
Ripon Gazette	www.ripongazette.co.uk	m.ripongazette.co.uk
Rugby Advertiser	www.rugbyadvertiser.co.uk	m.rugbyadvertiser.co.uk
Rutland Times	www.rutland-times.co.uk	m.rutland-times.co.uk
Rye and Battle Observer	www.ryeandbattleobserver.co.uk	m.ryeandbattleobserver.co.uk
Seaham Star	www.seahamstar.co.uk	m.seahamstar.co.uk
Selkirk Weekend Advertiser	www.selkirkweekendadvertiser.co.uk	m.selkirkweekendadvertiser.co.uk
Sheffield Telegraph	www.sheffieldtelegraph.co.uk	m.sheffieldtelegraph.co.uk
Shields Gazette	www.shieldsgazette.com	m.shieldsgazette.com
Shoreham Herald	www.shorehamherald.co.uk	m.shorehamherald.co.uk
Skegness Standard	www.skegnessstandard.co.uk	m.skegnessstandard.co.uk

Sleaford Standard	www.sleafordstandard.co.uk	m.sleafordstandard.co.uk
South Yorkshire Times	www.southyorkshiretimes.co.uk	m.southyorkshiretimes.co.uk
Spalding Guardian	www.spaldingtoday.co.uk	m.spaldingtoday.co.uk
Spenborough Guardian	www.spenboroughguardian.co.uk	m.spenboroughguardian.co.uk
St Helens Reporter	www.sthelensreporter.co.uk	m.sthelensreporter.co.uk
Stamford Mercury	www.stamfordmercury.co.uk	m.stamfordmercury.co.uk
Stornoway Gazette	www.stornowaygazette.co.uk	m.stornowaygazette.co.uk
Suffolk Free Press	www.suffolkfreepress.co.uk	m.suffolkfreepress.co.uk
Sunderland Echo	www.sunderlandecho.com	m.sunderlandecho.com
Sussex Express	www.sussexexpress.co.uk	m.sussexexpress.co.uk
Thame Gazette	www.thametoday.co.uk	m.thametoday.co.uk
The Buteman	www.buteman.co.uk	m.buteman.co.uk
The North Yorkshire News	www.northyorkshirenews.com	m.northyorkshirenews.com
The Scarborough News	www.thescarboroughnews.co.uk	m.thescarboroughnews.co.uk
The Scotsman	www.scotsman.com	m.scotsman.com
The Southern Reporter	www.thesouthernreporter.co.uk	m.thesouthernreporter.co.uk
The Star	www.thestar.co.uk	m.thestar.co.uk
The Visitor	www.thevisitor.co.uk	m.thevisitor.co.uk
Thorne Gazette	www.thornegazette.co.uk	m.thornegazette.co.uk
Todmorden News	www.todmordennews.co.uk	m.todmordennews.co.uk
Tring Today	www.tringtoday.co.uk	m.tringtoday.co.uk
Tyrone Times	www.tyronetimes.co.uk	m.tyronetimes.co.uk
Ulster Star	www.lisburntoday.co.uk	m.lisburntoday.co.uk
Wakefield Express	www.wakefieldexpress.co.uk	m.wakefieldexpress.co.uk
Warwick Courier	www.warwickcourier.co.uk	m.warwickcourier.co.uk
Washington Star	www.washingtonstar.co.uk	m.washingtonstar.co.uk
West Sussex County Times	www.wscountytimes.co.uk	m.wscountytimes.co.uk
West Sussex Gazette	www.westsussextoday.co.uk	m.westsussextoday.co.uk
Wetherby News	www.wetherbynews.co.uk	m.wetherbynews.co.uk
Whitby Gazette	www.whitbygazette.co.uk	m.whitbygazette.co.uk
Wigan Today	www.wigantoday.net	m.wigantoday.net
Worksop Guardian	www.worksopguardian.co.uk	m.worksopguardian.co.uk
Worthing Herald	www.worthingherald.co.uk	m.worthingherald.co.uk
Yorkshire Evening Post	www.yorkshireeveningpost.co.uk	m.yorkshireeveningpost.co.uk
Yorkshire Post	www.yorkshirepost.co.uk	m.yorkshirepost.co.uk

Internal Editorial Complaints Policy (FOR STAFF ONLY)

1. Internal Strategies for minimising complaints

In line with Johnston Press's commitment to upholding standards in editorial quality and content, all Publishing Units should ensure that they strive to employ the following internal strategies in order to minimise the likelihood of complaints:

- external pre-publication legal advice for editorial operations should be sought, where considered appropriate and authorised by the relevant Editor who has legal and ethical responsibility for the publication, but with reference to the Editor In Chief/Editorial Director so costs are effectively managed;
- importance should be placed on the local content checking process;
- on-going training should be invested in each PU through their Editor In Chief/Editorial Director; such training should be centrally recorded by the Head of Editorial Learning and Development.

2. Internal Process for resolving complaints

This process considers complaints alleging a breach of the Editor's Code of Practice ("the Code") and which potentially fall under the remit of our Regulator, IPSO. Other complaints not alleging a breach of the Code should be considered in a similar way but without reference to IPSO.

All alleged breach of Code complaints <http://www.ipso.co.uk> must be submitted in writing to the relevant Editor with legal and ethical responsibility and must comprise the following:

- a copy of the article in question, if there is one;
- a written outline of the concerns by reference to the Code;
- any other documents which will help IPSO to assess the complaint

***NOTE: Code complaints should only be accepted where the complaint is received within four months from the date of the conduct or first publication of the article complained of OR up to 12 months of the first publication if it remains accessible on the Company's website.**

The following internal process, including the Appeal, requires to be fully actioned and completed within a maximum of 28 days from receipt of the complaint:

➤ **On receipt of a complaint:**

- the relevant Editor In Chief/Editorial Director should **immediately** be informed and further action agreed in accordance with the external complaints policy.
- The Editor should **acknowledge receipt** of the complaint in writing within **five working days of receipt of the complaint** and confirm that the complaint will be investigated in accordance with JP's external complaints policy. Consideration should also be given as to whether the story is safe to leave on-line.

➤ A letter confirming the outcome of the investigation should then be issued to the complainant ideally within **7 working days** from the acknowledgement letter and this should include the complainant's right to appeal the decision.

➤ **Appeal**

Any appeal received in writing should be promptly forwarded to the relevant Editor In Chief/Editorial Director and dealt with in accordance with the external complaints policy and legal advice should be sought, where appropriate. The outcome of any appeal should be confirmed to the complainant within 7 working days of receipt of the appeal letter.

**Please note that IPSO can take over the handling of a complaint either once the Publisher's internal complaints procedures have been exhausted, or if the matter has not been resolved after 28 days. It is therefore important that we look to complete the process within the 28 day period.

IPSO

If the matter is unable to be resolved internally then it may be referred to the complaints committee of IPSO and the company must respond to any requests for further information. IPSO will seek to mediate a resolution between the company and the complainant.

If the complaint cannot be resolved by mediation, IPSO will determine whether there has been a breach of the Code and will notify the complainant and the company of its decision.

The company must implement the decision of IPSO within the timescales and conditions determined by IPSO.

All the following complaints alleging a breach of the Code should be promptly logged into the Internal IPSO Complaints folder and the outcome of the process should also be logged (as this will form part of an annual statement to IPSO):

1. Solicitor's letter seeking redress
2. Any complaint that has been referred to IPSO
3. Any complaint referred to JP from IPSO

When logging any such complaint, you should also notify:

1. The relevant PU MD;
2. The Legal Director ([REDACTED]) and
3. The Head of Editorial Learning and Development for future training purposes

Where a complaint may lead to legal action by the complainant or such action is threatened, the Editor with reference to the Editor In Chief/Editorial Director should authorise seeking legal advice on the matter, if they believe it is required, from Foot Anstey solicitors (for English and Northern Irish claims) and Campbell Deane of Bannatyne, Kirkwood France & Co Solicitors (for Scottish Claims) (full contact details are available from the JP internal website). The Legal Director should also be notified ([REDACTED]) of the complaint at the same time.

3. IPSO Complaints Record

The internal complaints recorded for each PU shall be reviewed and discussed on a quarterly basis by the JP IPSO editorial group in order to assess any identifiable training issues and/or

requirement to tighten policies/procedures as well as for the purposes of preparing for the IPSO annual statement.

4. Retaining copies of articles

Before making any substantive changes to an on-line article or other material in response to a complaint, editorial staff must archive a complete copy of the article or other material under complaint.

This does not include trivial changes such as spelling or grammar.

The archived copy must be retained for a minimum of four months from the time of amendment to ensure IPSO has a copy of the material should it receive a subsequent complaint.

The method of capture would be through screen shots taken via the Snipping Tool or Paint and it would be archived via a group shared document.

We must ensure that all editorial staff responsible for amendments to on-line copy are made aware of this requirement. We will take all reasonable steps - including through training and reminders - to ensure relevant staff comply with the terms of this requirement.

Editorial Complaints Policy (External)

Johnston Press is committed to upholding standards in editorial quality and content and acting in compliance with our regulatory guidelines and obligations.

We take all complaints about editorial content very seriously and seek to accordingly abide by the Independent Press Standards Organisation (“IPSO”) requirements and its Editors’ Code of Practice (“the Code”).

When making a complaint, you must clearly state that your complaint is a formal complaint under this policy.

What does this policy cover?

This policy only applies to complaints about breaches of the Code in editorial content in our printed publications or on electronic services such as websites and apps, including text, pictures, video, audio/visual and interactive content, and which are either published or targeted at an audience in the UK, Channel Islands and Isle of Man. It does not cover:

- complaints about advertising (as that is regulated by the Advertising Standards Authority);
- concerns about matters of taste/decency and due impartiality;
- complaints about 'user generated content' (i.e. material on our websites that was not posted by us or on our behalf) which we have not reviewed or moderated;
- complaints about online material on sites which we do not own and which are not under our control;
- at our discretion, legal or contractual matters which are dealt with more appropriately in the courts or tribunals or elsewhere.

How to complain

Complaints should be made in writing, either by email to the Editor in question identified on the website of the publication to which the complaint relates to or by post to the address of the relevant publication and addressed in the first instance to the Editor. A copy of any complaint should also be copied to the Johnston Press head office email address at enquiries@johnstonpress.co.uk

Complaints will only be accepted within four months from the date of the behaviour complained of or first publication of the article that you are complaining about. If at the time

you submit your complaint, the article remains accessible on a website or other electronic service operated by us however, complaints may be accepted up to 12 months from the date of the behaviour or first publication of the article you are complaining about, provided it is still possible to investigate the complaint fairly given the period of time which has elapsed. Johnston Press shall have sole discretion in determining this.

Complaints must include:

- a copy of the article in question, or a link to the relevant webpage or a web address, if the complaint is about published material (or reference to the publication title, issue date, page and article title if a copy is unavailable);
- a written explanation of your concerns with reference to the Editors' Code;
- any other documents that will help us assess your complaint.

Complaints received without this essential information cannot be considered. We may however, at our discretion, seek further details from you after your initial contact. If you cannot provide any requested information we may be unable to consider your complaint.

We reserve the right to reject, without further investigation, complaints that show no breach of the Editors' Code, or those which are vexatious and/or disproportionate, or those which are without justification (such as an attempt to argue a point of view or to lobby).

We may also decline to consider complaints from third parties not directly affected by the alleged breach of the Editors' Code. When considering whether to accept such a complaint, the position of the party most closely involved in the matter will be taken into account.

What happens to your complaint?

The complaints process is free of charge irrespective of the outcome of your complaint

We aim to acknowledge receipt of your complaint within 5 working days of receipt. You in turn agree to respond promptly to any request for further information.

If we receive multiple complaints about the same issue we may choose to make one response to all such complaints.

We will aim to respond to complaints in writing within 7 working days of receiving everything we need from you to allow us to investigate your complaint.

We will always treat you courteously and with respect. We expect the same from you. We may decline to consider a complaint which is abusive or gratuitously offensive.

Appeals process

If you are dissatisfied with the outcome of your original complaint you have the right to appeal the decision by notifying the Editor, in writing, within 7 working days of receipt of the letter notifying you of the outcome.

Upon receipt of such appeal letter, the Editor, shall forward this for consideration to the Editor In Chief/Editorial Director of the relevant publishing unit, where appropriate, who will then aim to assess the appeal within 7 working days of receipt of such notification. After the Editor In Chief/Editorial Director has taken a decision in light of all the information made available at the time, you will be issued a letter confirming whether your appeal has been upheld or partially upheld and whether any actions will accordingly be taken.

For the avoidance of doubt, you will have no further right of appeal with the company following the determination of this appeals process. However, you may look to exercise your right to take the matter to IPSO.

6. Complaint to IPSO on exhaustion of our complaints procedure

If you are unhappy with our final response to your complaint you may complain to IPSO for consideration. Further details can be found at <http://www.ipso.co.uk>.

7. Policy Changes

We reserve the right to amend this policy as and when required. Members of the public can request a copy of this policy via the relevant editor or by emailing enquiries@johnstonpress.co.uk

Any complaint will be considered against the published policy on the date of receipt of your complaint.