

Annual statement to the Independent Press Standards Organisation (IPSO)

From: Mediahuis Uk Ltd

Period covered: January 1, 2021 – December 31, 2021

1 Introduction

1.1 Mediahuis Uk Ltd publishes the Belfast Telegraph and Sunday Life newspapers in both print and online. It also publishes business-to-business (B2B) titles Ulster Business and Ulster Grocer, both in print and online.

In addition, it also publishes a range of digital-only platforms, including NIJobFinder.co.uk.

1.2 The Mediahuis Uk Ltd responsible person for IPSO is Editor-on-Chief Eoin Brannigan.

1.3 Mediahuis Uk Ltd is the largest newspaper publisher in Northern Ireland, with offices at Belfast Telegraph House, 33 Clarendon Road, Clarendon Dock, Belfast BT1 3BG. The company is also a leading commercial printer, printing and distributing newspapers, including UK national titles, across Ireland. It is part of the Dublin-based Mediahuis Group, publishers of the Irish Independent and other titles in the Republic of Ireland.

2 Internal manuals, codes, or guidance used by journalists

2.1 Attached is a copy of the Mediahuis Uk Ltd Code of Practice (see attachment 1). Every staff member (including editorial staff) is contractually obliged to study the document carefully and reflect on how it might apply to his, or her, duties. Staff members are expected to consult the Editor-in-Chief, title editors, or other senior staff, if they have any doubts about a particular situation covered by the document. Any deliberate violation of the Code is taken extremely seriously and may issue in a formal investigation.

3 Our editorial standards

Mediahuis Uk Ltd fully subscribes to the principles of UK industry best practice, including IPSO's advice and guidance. Editorially, our guiding documents are the Editors' Code of Practice, along with the Editors' Codebook. The latest version of the Editors' Code and Editors' Codebook have been circulated to all Mediahuis Uk Ltd journalists. All Mediahuis Uk Ltd titles are happy to seek both pre- and post-publication guidance from IPSO. To this end, senior staff have been issued with the relevant daytime and out-of-hours phone numbers.

3.1 Complaints about content published by Mediahuis Uk Ltd titles can be accepted in writing, by email, or by telephone, to reporters, senior executives, the Editor-in-Chief's personal assistant, or directly to editors. Reporters must escalate the complaint to an editorial manager as soon as possible. A complaints protocol exists, which provides written instructions to staff on how to deal with complaints (see attachment 2). Complaints are logged by the Editor-in-Chief's personal assistant. In the case of the Belfast Telegraph, complaints are directed to the Editor-in-Chief, who delegates the day-to-day investigatory and procedural work to the associate editor. Either the associate editor or the editorial legal counsel will then respond to the complainant.

In the case of Sunday Life, complaints are directed to the Deputy Editor-in-Chief, who delegates the day-to-day work to the head of news. Either the head of news or the editorial legal counsel will then respond to the complainant. In the case of the business-to-business (B2B) magazines, complaints are directed to the individual editors, who will then liaise with the associate editor, Belfast Telegraph.

Wherever possible, resolution is sought by agreement with the complainant. Where this is not possible, for whatever reason, the complainant is advised about IPSO and its work and given its contact details. We still find that many complainants go directly to lawyers, leading to a letter of claim. Complaints to IPSO (and their outcomes) are logged by the Editor-in-Chief's personal assistant.

Both the Belfast Telegraph and Sunday Life carry details of how to make a complaint prominently on page two of each print edition. This also sets out contact details for IPSO and explains the IPSO process. The business-to-business (B2B) magazines carry this information on the title/contents page.

Online, every webpage also features a 'complaints' button, which directs to a page entitled: 'How to make a complaint — Belfast Telegraph and Sunday Life'. There is also a link to IPSO's website.

Since November 2018, this information has been accompanied by the IPSO kitemark across all platforms.

Information about complaints to IPSO (even where a complaint is not upheld) are cascaded to the journalists involved and, more informally, throughout the newsroom. Fact-checking of stories follows the standard journalistic model: (1) information is gathered and evaluated; (2) the editorial value is assessed and a legal/ethical/public interest view is taken, as required; (3) a decision is made on whether to proceed with the preparation of the story, and; (4) where possible, the subject of any claim, or allegation, is given adequate opportunity to respond. The editorial legal counsel

provides the editors with specific pre- and post-publication advice on matters such as defamation, privacy, contempt, copyright and intellectual property rights.

A particular emphasis is placed on the importance of Mediahuis Uk Ltd journalists conducting their own interviews, as opposed to ‘recycling’ interviews carried by other media. Journalists are obliged to identify themselves as being members of the media before commencing any interview. Editorial managers operate a ‘zero-tolerance’ policy as regards the use of deception to secure an interview

Where interviewees are waiving their right to lifelong anonymity (for example, as the victim of a sexual assault), a pro-forma consent form must be signed by the interviewee. The completed forms are retained by the Editor-in-Chief’s personal assistant.

Unlike previous years, in the period covered by this report (January 1, 2022-December 31, 2021) there were no occasions when covert filming was used by any Mediahuis Uk Ltd title, or journalist.

IPSO guidance for journalists (including updates to the Editors’ Code) are circulated among staff. IPSO’s private advisory notices are now sent to senior editors and cascaded to other staff, as appropriate. The same applies to advisory notices from the News Media Association (NMA) and Society of Editors (SoE).

As outlined above, complaints to IPSO are regularly shared with the journalist involved, in preparation of the paper’s response, and the outcome (even where a complaint is not upheld) is discussed with the journalist.

Mediahuis Uk Ltd’s position on financial transparency and conflict of interest is as stated in the Editorial Code of Practice (updated May 2018; see attachment 1):

3.2 Reviewing products or services

We should make every effort to ensure there is no element of unqualified “plugging” when we review products or services. Reviews must be seen to be a service to the reader. Advertorial-style material should be indicated. Negative reviews should be rigorously backed up by evidence.

3.3 Conflicts of interest

There must never be any suggestion that personal, commercial, business, financial or other interests have influenced Mediahuis UK Ltd editorial decisions. Journalists have a duty to pay their own way. They should accept no free trips or gifts from sources other than nominal courtesies such as business lunches or seasonal gifts. Transparency is important and if in doubt run past your Editor.

We should not normally accept expenses-paid trips unless they are the only way to cover a significant event, or they are for travel articles, or to speak at/address bona fide media, or related, conferences. Any proposal to accept an expenses-paid trip must be referred to a senior editorial figure and approved in writing.

Under no circumstances should anyone working for Mediahuis Uk Ltd accept personal benefits from suppliers, or accept goods, or services which could be

construed as inducements. These situations can be covered by explanatory letters and the gifts can be returned or redirected to appropriate charities.

Journalists are required to declare any personal interest, or relationships, which may affect their work. Interests should be declared on a Declaration of Personal Interest Form and given to the Editor-in-Chief. In relation to a particular story, journalists must discuss any possible conflicts of interest with their Editor.

3.4 During the period in question (January 1, 2021-December 31, 2021) the following complaints against Mediahuis UK Ltd were ruled on by IPSO's Complaints Committee during the period in question:

See attached schedule.

3.5 In October 2021, all Mediahuis UK Ltd editorial staff participated in intensive legal training (including the operation of the Editors' Code of Practice). This training was delivered remotely because of the restrictions surrounding the Covid-19 virus. The trainer was Fergal McGoldrick, associate solicitor (commercial litigation/media) at Carson McDowell LLP, Mediahuis UK Ltds Belfast-based solicitors and by Paul McDonnell. Editorial Legal Counsel, Mediahuis UK Ltd

Mediahuis UK Ltd Editorial Code of Practice

Mediahuis UK Ltd is pledged to be professional, courageous and relentless in their pursuit of truth and of news. They are also committed to independence, fairness and balance in informing people of events and issues about which they have a right to know.

An important goal of this code is to protect and foster the bond of trust between Mediahuis UK Ltd in print and online and our audience.

The reputation of our brands is based on the editorial independence, integrity and high standards of our journalism. Full editorial control lies with the Editors.

The Editors and the editorial executives of the titles within the group are committed to defining, upholding and protecting those standards in every aspect of journalistic work. Central to those principles is the public's right to be informed on issues of public interest. This right is balanced by compliance with relevant legal codes, in particular the laws of defamation and data protection, and adherence to the principles of taste, balance, and accuracy.

Mediahuis Uk Ltd adheres to the Press Ombudsman/Press Council of Ireland Editors' Code of Practice (See Appendix 1).

Every staff member must read this document carefully and reflect on how it might apply to his or her duties.

The provisions presented here can offer only broad principles and some examples. No written document could anticipate every possibility. We expect staff members to consult the Editor-in-Chief, Editors or other senior staff if they have any doubts about any particular situation covered by this document.

Mediahuis Uk Ltd believes that its staff share the values this code is intended to protect. It will be the policy of the company to try to resolve any differences of opinion or concerns over the application of these values through discussion.

Nevertheless, Mediahuis Uk Ltd will view any deliberate violation of this code as serious and this may be the subject of a formal investigation.

1. General

Journalists have a duty to observe and comply with the full letter and spirit of this Code of Conduct in the performance of duties for and in the name of Mediahuis Uk Ltd. Journalists are expected to exhibit a high standard of propriety, integrity, efficiency and competence in all dealings.

2. Accuracy, distinguish fact from comment

Journalists must strive to be accurate and establish the facts of circumstances. Stories must be well sourced, based on sound evidence, thoroughly tested and presented in language which distinguishes clearly between comment, conjecture and fact. Unfounded speculation should be avoided.

3. Fact checking

Journalists must check and verify information, facts and documents. Vigilance and factchecking should be applied to information sources, particularly those researched on the internet. This may include confirming with an individual or organisation that they posted online material and satisfying yourself that it is accurate. Online sources, while useful, should not be the sole source of information and should be treated with appropriate caution. The important thing to remember is that when you are dealing with facts, you either have the full facts or you don't. If you have a doubt, always check it out. You can never, ever assume.

4. Hear the other side

It is a basic tenet of good and responsible journalism to put any critical or damaging claim or allegation to the subject before publication. This requirement will also assist in defending any defamation action.

Where allegations are being made, the individual or organisation concerned should always be given a fair opportunity to respond to the allegations before publication. Journalists should always describe the allegations in sufficient detail to enable an informed response. They should also give sufficient time for a response. The response should be reflected fairly and accurately. You may not get one. You may even get an emphatic denial which may give you pause for thought. Records should be kept of attempts to get a reply if one is not forthcoming.

There may be circumstances where getting a response is not feasible, practical or realistic. There must be strong reasons for believing that the subject matter is sufficiently newsworthy and in the public interest to justify publication in the absence of a response.

In such cases, the Editor-in Chief or Editor must always be consulted.

5. Opinions

Journalists have a right to trenchant opinions on matters of public interest. However, journalists have a duty to ensure that when they comment on a matter of public interest that such comment is based upon facts which are either set out in the article or are otherwise known to the reader.

Writers of comment need to be aware that the rules about getting facts right apply to them as much as other writers. If relying on facts from other publications, always seek verification that they are true or that the circumstances have not changed.

6. Misleading readers

Journalists should never distort known facts, present invented material as fact, or knowingly do anything to mislead our readers or audience.

Journalists should ensure that any digital editing of photographs does not distort the meaning of events, alter the impact of genuine material, or otherwise materially mislead readers. Headlines and introductions to stories should accurately represent the body of the story.

7. Archived content

When archive material is used, journalists are responsible for ensuring that no legal issue has arisen in respect of that material and that it has not been overtaken by later events. Photos of individuals taken from archive must be checked to confirm identity. Therefore, always double-check captions and verify the people in the photos are actually those named in the caption.

8. Researching online

You should be cautious how you use the internet and social media for both sourcing and verifying material for a story in terms of trustworthiness, identification in the

case of a photo/video and also the copyright related to material. Apply the same rigorous standards to verifying information on social media as elsewhere.

When using a picture from social media relating to something controversial, defamatory or involving a tragedy (e.g. someone who has died), it is Mediahuis UK Ltd policy that unless identified by three people, including a member of the close family (in relation to a tragic event), that it should not be used.

9. Legal checking

Journalists should not publish anything which is defamatory, in contempt of court, in breach of statute, copyright or privacy or which exposes Mediahuis UK Ltd to any other possible legal repercussions. Journalists must always seek advice from our lawyers if in doubt about a story.

Any decision to proceed with a story, where legal concerns have been expressed, must be referred to the most senior editorial level. There may be occasions when a story is legally safe to publish but raises editorial issues, such as taste, prurience, abuse etc In these circumstances, Mediahuis UK Ltd seeks to strike a reasonable balance between public interest and ethical issues. While lawyers can therefore offer legal advice, the final decision remains an editorial one. The duty for the facts to be right rests with the journalist.

Always be rigorous in your fact-checking. Do not rush to publish if you have any doubt. Always consult with your editorial manager if you have concerns.

10. Complaints

Journalists should inform their Editor-in Chief and the Editor of any complaints which they receive either verbally or in writing. If you are in direct contact with the complainant, for example, on the phone, be courteous and avoid confrontation. You should also take a written note. Do not offer an apology or anything which could amount to an admission of liability in any subsequent legal action.

11. Accountability/corrections

Journalists should be open to admitting mistakes. Where significant mistakes are highlighted, it is our policy to acknowledge those errors at the earliest opportunity in our Corrections and Clarifications columns. All corrections should be referred to the Editor -in-Chief and for approval.

12. Privacy

Privacy is a human right, protected as a personal right in the Irish Constitution and the European Convention on Human Rights.

Journalists should respect privacy and should not infringe it without legally justified cause or reason. Private behaviour, correspondence and conversation should not be brought into the public domain unless it is of clear public interest. It is essential, in

order to exercise a right of freedom of expression and information, that we work within a framework which respects an individual's privacy and treats people fairly while investigating, reporting on, commenting and commentating on matters which are in the public interest to report, comment or reveal.

Public persons are entitled to privacy. However, where a person holds public office, deals with public affairs, follows a public career, or has sought or obtained publicity for his activities, publication of relevant details of his/her private life and circumstances may be justifiable where the information revealed relates to the validity of the person's conduct, the credibility of his/her public statements, the value of his/her publicly

expressed views or is otherwise in the public interest.

Individuals must not be photographed or filmed in places where they have a 'reasonable expectation of privacy' unless justified by the public interest. Each case must be judged on its merits. The location, while relevant, is not itself the sole test for an expectation of privacy. The context of the story may render a situation one where an expectation of privacy may not apply. Equally, being in a public place can give rise to an expectation of privacy where intrinsically personal matters are involved. Seek advice from company lawyers or the Editor-in-Chief if in doubt.

13. Reporting suffering and distress

We must always balance the public interest in full and accurate reporting against the need to be compassionate and to avoid any unjustified infringement of privacy when we report accidents, disasters, disturbances or war or instances where people are involved in distressing situations. In cases involving personal grief or shock, enquiries and approaches must be made with sympathy and discretion.

We should not report at private funerals if the family has requested privacy. There must be a clear public interest if we decide to proceed against requests for privacy.

14. Children

Journalists must always have regard for the vulnerability of children.

Journalists should seek the consent of parents or legal guardians or persons in similar positions – teachers etc – before interviewing children under 16. Any decision to proceed without parental consent is normally only editorially justified on the basis of a clear public interest, or the freedom of a child or young person to express themselves in noncontentious ways. The onus is on the journalist to establish an accurate age.

Young people should be free to complete their time at school without unnecessary intrusion. The fame, notoriety or position of a parent or guardian must not be used as sole justification for publishing details of a child's private life.

15. Children (photos/video)

When photographing children under the age of 16, it is imperative that no room is left for doubt about whether consent has been granted and you should always seek clarity before photographing/filming, if there is any doubt. Always bear in mind the context of the situation, whether it is likely to be in any way controversial. Under-16s must not be photographed or filmed on subjects about their welfare – or the welfare of other children – without the consent of their parent/guardian or someone in loco parentis.

Be particularly vigilant when photographing children at times of grief or at funerals.

16. Harassment

Journalists must not engage in intimidation, harassment or persistent pursuit. They must not persist in questioning, phoning, pursuing or photographing people once asked to stop, unless there is a good reason not to do so. In this case, the decision must lie with the Editor after all the facts of the case have been attained by him/her (the Editor).

17. Court cases

When writing about court cases involving children or any aspect of family law or sexual offences, be aware of the law and any specific restrictions. Sometimes writers who have not been at court will comment on these cases or bring them into related stories. It is always their ongoing responsibility to check on restrictions. Journalists covering court cases should always make the news desks, Head of News and the Editor aware of any specific reporting restrictions issued by a judge.

18. Your use of social media

Mediahuis Uk Ltd encourages its journalists to engage with social media and blogs as they may assist our titles and websites in gaining exposure and growing our audience. However, it is essential that journalists adhere to the same standards on social media as they would in publishing material in one of our print titles or websites. Despite the apparent informality of such online activities, they are publications in law and are subject to the same laws concerning defamation among other things. Our journalists should not promote political views or make offensive comments as these can undermine our reputation.

Anyone who breaches our social media policy may be subject to disciplinary procedures.

19. Subterfuge

For certain stories where there is a clear public interest and when dealing with allegations of serious criminal, fraudulent, unlawful or anti-social behaviour, it may occasionally be acceptable to use subterfuge. Subterfuge should be the minimum necessary in proportion to the subject matter. Any proposal to use subterfuge must be referred to your Editor in advance.

20. Impartiality

Journalists should seek to reflect all opinions by exploring a range of conflicting views. Journalists should be objective and even-handed in their approach.

Mediahuis Uk Ltd will strive to reflect a wide range of opinion in its publications, and explore a range of conflict of views to allow expression to its wide readership market. Mediahuis Uk Ltd exercises its editorial freedom to produce content about any subject at any point on the spectrum of debate as long as there are good editorial reasons for so doing. Mediahuis Uk Ltd's titles and websites will sometimes need to report on or interview people whose views may cause offence to our readers. This would be the subject of a clear decision from the Editor that the public interest outweighs the possible offence which may be caused. It is the policy of the titles to allow a forum for the expression of opposing views either through editorial columns or Letters to the Editor.

21. Copy approval

The general rule is that no one should be given the right to prior copy approval. Doing otherwise, no matter how trivial the subject matter of the article, impinges on the freedom of the press. On occasion, we may allow people to see copy or quotes but we are not required to change the copy. In all cases such as this, consult with the Head of Content or Editor.

22. Legal

The Republic of Ireland and Northern Ireland has the harshest defamation law regime in Europe. The consequences of losing or settling actions are very expensive and damaging commercially and reputationally. Even where an action may seem to have little grounds, if our facts are wrong, the costs of fighting the case are often prohibitive. All journalists need to be very familiar with defamation law and adhere to the fundamental tenet of journalism: check your facts.

23. Picture selection

NEVER ever take a chance on a picture. Too many defamations and embarrassing mistakes are caused by picture errors. Never select a picture for use where the subject(s) have not been identified and confirmed. ALWAYS recheck pictures of

people identified as criminals, relatives or associates of criminals, subject of legal proceedings, leaving or entering court, associated with controversial circumstances such as bankruptcy, corruption etc. Agency pictures need to be carefully checked as well.

Never use a picture of a crime scene or contentious situation without checking that the location identified is absolutely accurate.

24. Mind your language

We should never casually use words likely to offend in our journalism. Use swear words only when necessary – and in consultation with senior editors. The stronger the swear word, the more you should think about it. Avoid using in headlines, pull quotes, Tweets or standfirsts. Asterisks may be used where a particularly offensive word is deemed necessary to the story.

25. Suicide / attempted suicide

When reporting suicide, care should be taken to avoid excessive detail about the method used. Please note that the term ‘commit suicide’ is considered offensive by some people. See also and familiarise yourself with the Editors’ Code of Practice (Appendix I).

26. Reviewing products or services

We should make every effort to ensure there is no element of unqualified ‘plugging’ when we review products or services. Reviews must be seen to be a service to the reader. Advertorial style material should be indicated. Negative reviews should be rigorously backed up by evidence.

27. Conflicts of interest

There must never be any suggestion that personal, commercial, business, financial or other interests have influenced Mediahuis Uk Ltd editorial decisions. Journalists have a duty to pay their own way. They should accept no free trips or gifts from sources other than nominal courtesies such as business lunches or seasonal gifts.

Transparency is important and if in doubt run past your Editor.

We should not normally accept expenses paid trips unless they are the only way to cover a significant event or they are for travel articles or to speak at/address bona fide media or related conferences. Any proposal to accept an expenses paid trip must be referred to a senior editorial figure and approved in writing.

Under no circumstances should anyone working for Mediahuis Uk Ltd accept personal benefits from suppliers or accept goods or services which could be construed as inducements.

These situations can be covered by explanatory letters and the gifts can be returned or redirected to appropriate charities.

Journalists are required to declare any personal interest or relationships which may affect their work. Interests should be declared on a Declaration of Personal Interest Form and given to the Editor. In relation to particular stories, journalists must discuss any possible conflicts of interest with their Editor.

Journalists may not work without permission for any person or body except Mediahuis Uk Ltd. Any payment must be approved by the Editor/Managing Editor/Editor-in-Chief. They must seek the approval of their Editor/Managing Editor for any work done with other departments in IMediahuis Uk Ltd outside Editorial. The right to engage in freelance work for publications that compete with Mediahuis Uk Ltd is subject to management approval in every case.

28. Foreign assignments

Editorial staff on trips for INM to dangerous parts of the world or countries where journalists can be at risk must obtain clear written permission from their head of department or editor on the scope of their task, what is expected of them and where they are going before leaving Ireland. Please consult with the Department of Foreign Affairs website which regularly updates travel advice on countries (<https://www.dfa.ie/travel/travel-advice/>). Any change to the work you are being asked to do will be discussed and agreed with you and will also be put in writing so there can be no confusion.

The reason for this approach is because we place the safety of our staff at the heart of all we do. Operational decisions are based on a clear assessment of risk and journalists should be particularly cognisant of the risk in countries where there is armed conflict or a significant terrorist threat. The Managing Editor and/or HR must be made aware of all foreign trips for insurance purposes. Under no circumstances should staff unilaterally decide to venture beyond their brief by straying from one country to another. This could unwittingly place themselves and others in danger.

29. Confidentiality

Journalists must not disclose confidential information about the operations, policies or plans of INM. Disclosing confidential information to competitors will be regarded as a serious breach of the Code and will be subject to disciplinary procedures.

30. Radio and TV

Journalists who are asked to guest on radio and TV programmes should discuss the opportunity with the Editor. In deciding whether to make a radio, television or internet appearance, a journalist should consider its probable tone and content to make sure they are consistent with INM standards. They should not say anything that could not appear under their bylines. Journalists must always keep in mind that their first duty is to their title and its readers or audience. Under no circumstances should they ever scoop their newspaper or website by disclosing information which has not yet been submitted for publication.

31. Speeches, seminars and other appearances

Journalists should only make speeches and undertake other appearances subject to prior approval of their Editor, Head of News or Editor-in-Chief. They should not write for any other publications/websites unless this is approved by their Editor.

32. Business journalists

Business and financial journalists are required to disclose all financial holdings or investments and any other financial interests or dealings by them and their family. Journalists should not write about shares or securities if they know that they, their partners or close family have a significant financial interest unless they have disclosed this information to their Editor or Editor-in-Chief.

Journalists must not use for their own profit any privileged information they receive in advance of its general publication, nor should they pass on such information to others.

To maintain their integrity, journalists should not speculate by buying and selling shares on a short-term basis if they have written about them recently or know that they will be doing so in the near future.

It is essential that financial journalists do not promote, or give the impression of promoting, any business or financial service. However, where editorially justified, references may be made to particular services, businesses or branded products. In some cases, it will be editorially relevant to evaluate the advantages and disadvantages of a financial service or product. Financial journalists must always guard against the impression of promoting or plugging particular products or services.

The onus is on the journalist to let Mediahuis Uk Ltd know if they have any interests or relationships which could be perceived as a conflict of interest.

33. Confidential sources

Quotes with names attached always carry more weight. Journalists have a moral and professional obligation to protect confidential sources when anonymity is a pre-condition for the story. Care should be taken to ensure that the identities of any confidential sources are protected and do not appear in any notes that might become the subject of a court order or can be seen by third parties. When we agree to protect the identity of the source, that identity will not be made known to anyone outside Mediahuis Uk Ltd. Before any information is accepted without full attribution, however, reporters must make every reasonable effort to get it verified. This also applies to tip-offs from unknown or criminal sources where a journalist should exercise particular caution. Efforts should be made to get the information elsewhere and, if possible in the context of the article, a reason for protecting the source's identity should be included in the story.

When our journalists undertake to protect sources, they must establish how far the protection is required: Is it understood that the writer could be challenged to identify the source in court? Will the source give evidence if the paper is sued?

34. Note-taking/recording

Journalists must either record or take accurate, reliable and contemporaneous notes of all significant conversations and other relevant information. Any such notes or recordings which provide the basis for a story must be kept for a minimum of two years. When anonymity is essential and has been offered, great care should be taken that no document, computer file or other record could identify a source. Journalists may use personal recording devices to record telephone conversations with individuals in the interests of accuracy. There is no legal obligation to inform the other side that they are being taped if the journalist is the other party to the conversation – however, if specifically asked, the journalist should confirm that the conversation is being recorded. Recordings used in this way should be retained for a minimum of two years. Any request for notes to be handed over in legal proceedings needs to be approved by the Editor and Managing Editor.

35. Publication of the decision of the Press Ombudsman

When requested or required by the Press Ombudsman and/or the Press Council to do so, Mediahuis UK Ltd shall publish the Ombudsman's decision in relation to a complaint with due prominence in accordance with the publication guidelines specified by the Press Ombudsman.

36. Attribution

Journalists should never use material from other publications without permission and credit. Where stories are 'rewrites' using material in other media, there should be proper accreditation and there should be no breach of copyright. Pictures should also be properly accredited in captions.

37. Payments

In general, Mediahuis UK Ltd does not pay for stories, except from bona fide freelance sources.

Written approval must be obtained from the Group Editor-in-Chief or Group Managing Editor in any rare exceptions.

Please note that:

- Payment or offers of payment for stories, pictures or information, which seek to exploit a particular crime or to glorify or glamorise crime in general, must not be made directly or via agents to convicted or confessed criminals or to their associates – who may include family, friends and colleagues. The only exception to this is if it is approved by the Managing Editor and this would only be done if clearly in the public interest and unobtainable without such a payment.
- No payments should be made to serving public officials.

38. Data protection

Mediahuis UK Ltd, as a media organisation, and journalists who work on its behalf are data controllers because they decide how they will use the personal data that they hold about individuals. The Data Protection Commission is responsible for upholding the privacy rights of individuals in relation to the processing of their personal data.

The equivalent body in the UK is the Information Commissioner's Office.

Journalists have a right to gather information and process it for journalistic purposes and have an exemption under data protection law to do so (Article 85 of the General Data Protection Regulation). This right should not be abused – the information gathered should not be used unless for the public interest and must be processed securely through the media organisation systems, processes and procedures. It should not be given to third parties unless for journalistic reasons.

Reasonable steps should be taken to ensure any personal data is processed securely and to prevent it being lost, stolen or misused. Steps should also be taken to delete personal data that is no longer needed.

Sometimes data protection is mistakenly used as a reason to deny journalists information. Remember that the law covers personal data, not all the data, and even personal data can be lawfully released in some circumstances. Any data protection issues should be referred to our legal advisers. If you lose any work device, notify data.protection@inmple.com.

39. The right to erasure

Also known as, the 'right to be forgotten', provides individuals with the right to have personal data erased or amended if inaccurate. Newspaper websites are under no obligation to delete a story if it is still accurate – and often requests refer to internet search engines which have processed this data separately by deciding the order in which the information appears in search queries. However, discretion may be exercised in cases where deemed appropriate. All requests should be referred to the Group Managing Editor or designated deputy. The identity of the individual who made the request must be confirmed before proceeding to deletion.

40. The public interest

The press has a right to freedom of expression and to impart and convey information freely. In many circumstances, the press will invoke the public interest as a reason for reporting. The public interest includes, but is not confined to:

- Detecting or exposing crime or serious impropriety
- Exposing significantly anti-social behaviour
- Exposing corruption or injustice
- Exposing significant incompetence or negligence
- Protecting public health and safety
- Preventing the public from being misled

- Disclosing information that assists people to better understand or make decisions on matters of public importance

There is also a public interest in freedom of expression in itself. Also, it should be noted that exceptional public interest will need to be shown in cases involving children.

Addendum to Annual Statement to the Independent Press Standards Organisation (IPSO)

Steps taken by Mediahuis UK to respond to adverse adjudications

As noted in our Annual Statement, information about complaints to IPSO are cascaded to the journalists involved and, more informally, throughout the newsroom. The relevant journalists are consulted during the preparation of the paper's response, and the outcome (even where a complaint is not upheld) is discussed with the journalist.

In addition, Mediahuis UK took the following specific steps in responding to adverse adjudications during the period January 1, 2021 – December 31, 2021:

Nelson v Sunday Life

The journalist was reminded of the necessity of seeking comment before publication from individuals about whom we propose to make serious allegations (and, if safety concerns are identified, to consider other forms of contact). If the complainant is the subject of any future stories the newspaper will contact his representative for comment now we are aware who that is.

Mailey v Sunday Life

Reporters were reminded about the need for articles based on unidentifiable sources to be both fair and accurate and for the information to be verified with official sources where possible. It was discussed how, in this instance, other sources like the Prison Service could have been contacted for comment to prevent the publication of uncorroborated and inaccurate information.

Henderson v Sunday Life

The correction was published in print and online. Reporters were reminded to corroborate contested claims with on-the-record information / official sources or a statement from the relevant individual where possible.

MEDIAHUIS (UK)

Belfast Telegraph & Sunday Life IPSO complaints register 2021

IPSO complaint, date, name and number	Details of complaint	Editor's Code clause	How the complaint was dealt with	Outcome
<p>Sunday Life</p> <p>IPSO Ref: 06235-21</p> <p>ANDREW WILSON SMITH</p> <p>Series of articles Published May 16, 23, 30, July 18, Aug</p>	<p>The complaint was made on June 7, 2021. Complained about a series of articles published on May 16, 23, 30, July 18, Aug 8, 2021 re criminal cocaine connections</p>	<p>Clause 1 (Accuracy)</p>	<p>The complaint was originally sent to IPSO and after correspondence by SL, the complaint was not resolved.</p>	<p>The complaint was not Upheld – decision taken on Jan 17, 2022.</p>

<p>Sunday Life</p> <p>IPSO Ref: 07356-21</p> <p>RONNIE NELSON</p> <p>Article: <i>Revealed... Rathcoole's riot binlids</i>, published on 2 May 2021.</p>	<p>Date complaint received: 05/07/2021</p>	<p>Clause 1 (Accuracy)</p>	<p>After adjudication, the clarification which was offered clearly put the correct position on record, was offered promptly with due prominence, and was published</p>	<p>The complaint was partially upheld under Clause 1 (i) and Clause 1 (iv). concluded by IPSO: 15/11/2021</p>
<p>IPSO complaint, date, name and number</p>	<p>Details of complaint</p>	<p>Editor's Code clause</p>	<p>How the complaint was dealt with</p>	<p>Outcome</p>
<p>Sunday Life</p> <p>IPSO Ref: [REDACTED]</p> <p>[REDACTED]</p> <p><i>Teen 'threw fireworks at cops for a laugh' published November 21, 2021</i></p>	<p>Complainant alleged [REDACTED]</p> <p>[REDACTED]</p>	<p>Clause 1 (Accuracy)</p>	<p>Correspondence to clarify [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] did not reply</p>	<p>Jan 28, 2022 IPSO confirmed that the complaint was closed as complainant did not pursue case.</p>

<p>Sunday Life</p> <p>IPSO Ref: [REDACTED]</p> <p>[REDACTED]</p> <p>Article dated: May 4, 2021</p> <p><i>“Woman questioned after Pitt Park assault”</i></p>	<p>[REDACTED] complained about the article</p>	<p>Clause 1 (Accuracy)</p>	<p>Correspondence Sunday Life rejected his claim that there had been a breach.</p>	<p>Complainant has decided Against pursuing the complaint through IPSO process – file closed May 4, 2021.</p>
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<p>IPSO complaint, date, name and number</p>	<p>Details of complaint</p>	<p>Editor’s Code clause</p>	<p>How the complaint was dealt with</p>	<p>Outcome</p>
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<p>Sunday Life/ Belfast Telegraph</p> <p>IPSO Ref: [REDACTED]</p>	<p>The Independent Press Standards Organisation has received a complaint from [REDACTED] about an article dated 18 November 2021 in the belfasttelegraph.co.uk (Independent News & Media) headlined “Latest online abuse directed at Naomi Long driven by misogyny”. Please note that, if the complaint relates to published material, and has been made within four months of publication, IPSO will consider the matter in relation to any online and print versions of the article published by the belfasttelegraph.co.uk (Independent News & Media).</p>			<p>IPSO rejected Sunday Life aspect of [REDACTED] complaint. Case ongoing with Belfast Telegraph</p>
<p>Sunday Life</p> <p>IPSO Ref: 06077-20</p> <p>MARGARET HENDERSON</p>	<p>Unhappy with article headlined: <i>Killer Maggie Loses Prison Covid-19 job</i></p> <p>Published May 10, 2020</p> <p>Received May 11, 2020</p>	<p>Clause 1 (Accuracy)</p>	<p>Printed correction, clarification after adjudication.</p>	<p>Breach – sanction: publication of correction. The committee concluded that a correction was the appropriate remedy.</p>

<p>Sunday Life</p> <p>IPSO Ref: 27710-20</p> <p>Richard Mailey</p> <p>Received August 26, 2020</p>	<p>Complainant unhappy with article headlined Lockdown Drugs Bust Shocks Prison Bosses</p> <p>Published August 23, 2020</p>	<p>Clause 1 (Accuracy)</p>	<p>Correspondence, Printed correction, clarification after adjudication.</p> <p>Correct position put on record with due prominence</p>	<p>Partly Upheld under Clause 1 (i) Remedial Action required.</p>
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