

STRICTLY PRIVATE AND CONFIDENTIAL

JOHNSTON PRESS PLC : REVIEW OF CULTURE, ETHICS & PRACTICES

The following email is strictly private and confidential. It must not be copied or disclosed to anyone who does not work for Johnston Press plc or any of its subsidiary companies. It must not be removed from your place of work, or disseminated in any way to any unauthorised person or organisation.

Failure to respect the confidentiality of this document may result in disciplinary proceedings being taken against you.

Foreword by Danny Cammiade, Chief Operating Officer

Everyone in the newspaper business is aware of the publicity regarding allegations of “phone-hacking” at the News of The World.

You will also know that Lord Justice Leveson, a Senior Judge, has been appointed to chair an inquiry into:

“the culture, practices, and ethics of the press, including:

- *contacts between national newspapers and politicians;*
- *the relationship between the press and the police;*
- *the extent to which the current policy and regulatory framework has failed; and*
- *the extent to which there was a failure to act on previous warnings about media misconduct.”*

Part of that inquiry will focus on: *“the extent of unlawful or improper conduct within News International and other newspaper organisations”.*

I want to emphasise right at the outset that there is no suggestion whatsoever that any of our people or publications have been involved in the high-profile issues surrounding phone-hacking, or any other illegal activity.

However, as a responsible publisher, it is clearly appropriate first, to take steps to satisfy ourselves, our shareholders, and any subsequent external review, that none of the unethical and improper practices which are currently in the spotlight affect our organisation; and second, to take appropriate steps to ensure that our staff are reminded of the legal issues.

Our external lawyers, Foot Anstey LLP, have prepared a questionnaire that we require you to complete. It has been prepared as a way of seeking confirmation that as far as our senior editorial managers are aware, none of these issues affect our publications. Foot Anstey will also be involved should any legal issues emerge from the review.

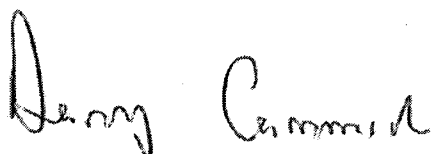
The questionnaire should be completed online and can be found at www.jpsurveys.co.uk/ethics

Only senior editorial managers are being asked to complete this questionnaire. However, all our journalists will shortly be receiving a letter from me, outlining the current situation and reminding them that if they have any concerns, they should alert the company via the Johnston Press whistleblowing policy.

I have every confidence that, at all times, our people will have exercised the highest standards of ethics and journalistic integrity on which Johnston Press prides itself. However, senior editorial managers are being asked to complete this questionnaire so as to give them an opportunity to confirm that this is the case, and to raise any issues of concern with Management.

Please be assured, therefore, that the results of the Questionnaire will be treated in confidence and will be used only for the purposes of collating information, ensuring that nothing improper has occurred, and (if necessary) responding to the Leveson enquiry and reviewing any other legal issues that may arise.

Thank you, in advance, for providing your full co-operation and support with this process.



Instructions for completing the Questionnaire

Open up the Internet on your computer and, in the address bar, go to <http://www.jpssurveys.co.uk/ethics>

Please answer each question by clicking the box next to the appropriate answer. Depending on your answer, you may be asked to provide further information.

On the final screen of the survey, please enter your name, job title and the date on which you've completed the survey then click the 'submit' button.

Please complete the questionnaire within the next 7 days.

Thank you.

1. Questionnaire

1.1. Phone Hacking

Under the Regulation of Investigatory Powers Act 2000, it is an offence for a person intentionally and without lawful authority to intercept, at any place in the United Kingdom, any communication in the course of its transmission by means of:

- (a) a public postal service; or
- (b) a public telecommunication system.

Interception of a communication in the course of its transmission includes listening to a recording of a transmission, such as a voicemail.

Q1: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, any interception of mail, email, voicemail, or telephone calls?

Yes	No
<p><i>If yes, please provide details:</i></p>	

1.2. Data Protection & Blagging

The Data Protection Act 1998 regulates the way in which “personal data” is collected, stored and used (legally known as “processing”) by “data controllers”. Personal data is information such as names, addresses, etc or any other data by which an individual can be personally identified. It is an offence under the Data Protection Act 1998, knowingly or recklessly to obtain or disclose personal data or information without the consent of the data controller.

Q2: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, the acquisition of personal information without the consent of its data controller?

Yes	No
<p><i>If yes, please provide details:</i></p>	

The practice of “blagging” relates to obtaining addresses, phone bills, bank statements, health records and materially similar “personal data” by deception.

Q3: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, any practice which is, or bears the characteristics of, “blagging”?

Yes	No
<p><i>If yes, please provide details:</i></p>	

1.3. Payments to Third Parties

The Bribery Act 2010 makes it an offence for someone to promise or to give a financial or other advantage to another person, intending that advantage to induce the other person to perform improperly their relevant function or activity. It is similarly an offence to receive a bribe. One of the core principles at the heart of the Bribery Act is proportionality, so buying a coffee or a drink for a contact, or giving or accepting reasonable hospitality from a source, is not bribery.

Q4: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, any payment to a member of the Police for information of any nature?

Yes	No
<i>If yes, please provide details:</i>	

Q5: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, any payment to a member of central or local government, or any other source, for information of any nature?

Yes	No
<i>If yes, please provide details:</i>	

1.4. Collection of Information from Refuse

Q6: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, any trawling through the refuse of any person, company or entity?

Yes	No
<i>If yes, please provide details:</i>	

Q7: If your answer to Q6 above is "Yes", did you, or do you, stress to the collector of such information, the need to comply with the law at all times?

Yes	No
<i>If yes, please provide details:</i>	

Q8: If your answer to Q6 above is “Yes”, were any of the items retained?

Yes	No
<p><i>If yes, please provide details:</i></p>	

1.5. Press Complaints Commission: Editor’s Code of Practice

Q9: Please confirm that you understand, and endeavour to comply with, the requirements of the Editors’ Code of Practice published by the Press Complaints Commission (which can be viewed online at www.pcc.org.uk).

Yes	No
<p><i>If no, please provide details:</i></p>	

1.6. Private Detectives

Q10: Have you ever instructed a private detective or third party investigator in the course of your employment, or instructed another employee to do so?

Yes	No
<p><i>If yes, please provide details:</i></p>	

1.7. Police National Computer

Q11: Have you ever been involved in, instructed anyone else to become involved in, or been aware of, the accessing of the Police National Computer?

Yes	No
<p><i>If yes, please provide details:</i></p>	

1.8. Miscellaneous

Q12: Remembering the company's whistleblowing policy and the assurance of confidentiality in the foreword to this questionnaire, do you have any knowledge of, or suspicions that, any other Johnston Press employee has behaved in the way described in any of the above questions, or has been involved in any kind of improper behaviour?

Yes	No
<i>If yes, please provide details:</i>	

2. Training Needs

Part of the purpose of this Questionnaire is to identify if there are any staff training needs surrounding issues of ethics, journalistic integrity, the law, or best practice.

If you have any training needs, or you feel that the staff who report to you may have training needs, please provide details in the box below:

3. Continuation Sheet

A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for the user to provide a continuation of text from the previous page.

4. Confirmation

I confirm that the information set out in this Questionnaire is true to the best of my knowledge and belief.

Signature

Dated

Name

Job Title