

From the office of the Chief Executive

111 Buckingham Palace Road, London, SW1W 0DT  
[www.telegraph.co.uk](http://www.telegraph.co.uk)

14<sup>th</sup> September, 2011

Name  
Address 1  
Address 2  
Town  
County  
Postcode

Dear «Forename»,

Recent events at the News of the World have placed into very sharp focus the issues of ethics and integrity. The newspaper industry is under unprecedented scrutiny.

At the Telegraph Media Group, we have always given top priority to ensuring that we maintain the very highest standards in the way we work. That means not just how we gather and report the news, but in the way we do business, too.

The rules by which we work, and the Codes and protocols which cover our business, are set out in a number of places - in the Staff Handbook, in guidance notes on key issues such as data protection, and in the Codes of Practice of the Press Complaints Commission and the Advertising Standards Authority.

I thought it might be useful to all colleagues to draw these principles together in one note, covering the key legal and regulatory issues, and a copy of this is attached. None of it is new, and you will be familiar with a great deal of it. But please read it, and keep a copy of it. Our brand is based on integrity and honesty, and it is vital that we continue to uphold the highest standards that I know all of us believe in.

If you have any questions about anything in this note, then please talk to your Head of Department about it.

I hope you find this helpful.

With kind regards

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September 2011

## TELEGRAPH MEDIA GROUP

### EDITORIAL CODE OF CONDUCT

Telegraph Media Group (TMG or Company) is a trusted and well respected media publisher, committed to providing journalism of the highest quality. The development and well being of our business depends on each employee maintaining the highest standards of integrity and personal conduct in all matters.

The Company recognises its obligations to those with whom it has dealings, namely its proprietors, employees, readers, viewers, advertisers, suppliers, retainers, contributors and the general public.

TMG's reputation is its most vital asset and depends for its protection upon the honesty and integrity of each of its employees. We expect all our staff to be honest, to obey the law, and to be committed to our core journalistic values of fairness, thoroughness, accuracy and integrity.

This editorial code guides TMG journalists on how these essential standards of good conduct are to be maintained. It is not a statement of new values, rather a reaffirmation of our existing values and practices, some of which have been modernised and strengthened.

These principles have been prepared for guidance purposes, and must be read in conjunction with all other relevant legislation and Company policies and procedures, including your employment contract, the Staff Handbook, the 1998 Data Protection Act, the 2010 Bribery Act and the 1998 Human Rights Act. (From time to time, the Company issues directives or guidance on such legislation, or draws attention to useful publications from other sources, such as the Media Trust's guide to Reporting Human Rights, available here: <http://www.mediatrust.org/about-media-trust/reports/>)

**This editorial code must also be read in conjunction with the Editor's Code of Practice issued by the Press Complaints Commission (PCC Code), to which all TMG journalists must contractually comply.**

It is your duty to familiarise yourself with these policies and, when offered periodically by the Company, attend seminars and training sessions updating staff on policies and procedures.

Non-compliance with this editorial code and Company policies may result in disciplinary action being taken against you.

## Obeying the Law

TMG journalists and non-staff on assignment for us must obey the law. They may not purloin data, documents or other property. They may not tap telephones or intercept email or voice mail messages, engage in telephone hacking or knowingly or recklessly obtaining or disclosing personal data or information without the consent of the subject (blagging) or commission or encourage others to do it on their behalf.

As stated in the PCC Code, there may be extraordinary circumstances where exceptions to this rule (and others) can be justified in the public interest. The PCC Code defines this as including, but not confined to:

- i) Detecting or exposing crime or serious impropriety.
- ii) Protecting public health and safety.
- iii) Preventing the public from being misled by an action or statement of an individual or organisation.

Further to the PCC Code, whenever a decision is taken by senior TMG journalists that the public interest does justify a breach of this rule (or others), it is a requirement by the Company that the decision is taken by the Editor, Deputy Editor, Associate Editor, Assistant Editor or Departmental Head (Editors) and is fully and contemporaneously documented as to the circumstances involved, and the reasons why it is believed the action or publication would be in the public interest. It is encouraged that Editors, before taking such decisions, seek the advice of in-house lawyers, and where appropriate, the guidance of PCC officials and outside legal counsel.

## Privacy

The PCC Code states:

- i) Everyone is entitled to respect for his or her private and family life, home, health and correspondence, including digital communications.
- ii) Editors will be expected to justify intrusions into any individual's private life without consent.

This editorial code endorses this and adds the following guidance: that there should be a reasonable prospect of success, i.e. journalists should not engage in 'fishing' expeditions; that there should be sufficient cause to justify any intrusion, in terms of the public good which would follow from publication and any damage caused by the intrusion; that the methods used should be the minimum possible; and, as with any breach of the PCC Code, the intrusion must be authorised at a sufficiently senior level, normally by the Editors, and the reasons and justification fully and contemporaneously documented.

### **Conflicts of Interest**

The PCC Code gives clear and concise guidance as to how journalists must behave when covering financial matters, particularly those who make recommendations to buy, sell or hold shares.

Further to that, any TMG employee who has a personal interest in an organisation or individual with whom the Company has or may have a business relationship is vulnerable to allegations of impropriety. If a personal interest (or that of a member of one's family or friends) might influence the Company's business relationship, it must be formally declared in writing to the Company Secretary, (c/o Group Commercial Legal) who will record the declaration in a Register of Interests maintained for this purpose.

Examples of a personal interest that must be declared include:

- i) A directorship
- ii) A significant shareholding
- iii) A promise of future employment
- iv) The employment of immediate family or friend in a position of influence in an organisation with which TMG may be transacting business or have awarded contracts to
- v) The employment of an immediate family or friend within TMG.

The Company requires that all employees avoid situations in which any conflict might arise between their own personal interests and those of the Company in dealings with readers, viewers, advertisers, suppliers, retainers, contributors and all other organisations or individuals currently undertaking or seeking to undertake business with TMG.

If you are in any doubt as to whether a conflict of interest exists or may develop, you must raise this immediately with the Company Secretary or a member of the Executive Management Team.

### **Political and Civil Activities**

It is not the intention of TMG, or this policy, to dissuade employees from actively participating in charitable, educational or public duties.

It is important, however, that in undertaking such activities there is no suggestion to any third party that the employee is acting on behalf of, or with the support of, TMG.

To avoid any misunderstanding, no employee should permit TMG's affiliation to be noted in any outside organisation's materials or activities without the express written permission of a member of the Executive Management Team.

### **Entertainment, Gifts or Benefits in Kind**

Great care needs to be taken in order to avoid any accusation that the Company or any of its employees is giving or receiving preferential treatment. All employees must remain scrupulously free from any obligations to customers, suppliers, retainers and contributors.

A good benchmark to judge whether any proposed action is appropriate, is to ask yourself whether the Company or the recipient would be embarrassed if the event should become public knowledge.

Examples of situations to be avoided include:

- i) Receiving or giving gifts of cash or cash equivalents are not permissible regardless of the amounts
- ii) Gifts, services, entertainment or benefits to/from the Company's customers, suppliers, retainers or contributors will only be permitted where they are considered normal in the course of carrying out your duties. Should something be offered which is out of the ordinary, or if you have any doubts, you must seek written approval from your immediate Manager before offering/accepting.

TMG will only reimburse the cost of entertainment, gifts and other benefits where they are consistent with accepted business practice and comply with the Company's expense policy.

### **Confidential Information**

All employees have a responsibility to safeguard the confidentiality of any information acquired during the course of their work and a duty never to use it for personal advantage or gain. Such information should not be disclosed to any outside organisation or individual and should only be divulged internally to other employees on a need to know basis to enable them to carry out their business duties and responsibilities. Employees must safeguard against careless talk which may damage the Company's business or that of its customers, suppliers, retainers or contributors.

### **Inside Information**

There are various UK regulations covering the buying and selling of stocks, shares and bonds. These provide for severe penalties, both civil and criminal, for those who make use of "inside information" to buy and sell stocks, shares and bonds for their own (or connected persons) benefit and profit. Inside information includes any important fact which might be significantly relevant in the decision to buy or sell particular shares. The insider definition may apply to an employee, family member, friend, broker or anyone to whom he (or she) communicates the information. Stocks, shares and bonds which are relevant in this respect to you

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as an employee include those of any company which you have acquired important knowledge of as a result of your employment with TMG and which is generally not in the public domain. If you have any doubts as to whether a sale or purchase of stocks, shares and bonds you are proposing to undertake might be in breach of the insider dealing regulations, you must ask the Company Secretary for advice.

### **Plagiarism**

The appropriation, copying, close imitation, or purloining and publication of works from other publications or external sources without appropriate legal acknowledgement must be avoided and, if used, all such works must be libel checked by Editorial Legal before publication.

### **Social Media**

There is a distinction between accounts that are managed by editorial teams and the personal Twitter or Facebook accounts of journalists. Any accounts managed by editorial teams are subject to this editorial code and other guidance such as the PCC Code.

TMG journalists who have personal social media accounts should also follow the rules set out in this editorial code and in the PCC Code, particularly in being honest, respecting copyright and generally obeying the law – they will, after all, be personally liable for what they post and the laws of privacy, libel and confidence apply to such writings. Wherever practical, TMG journalists should use a disclaimer on their personal account, saying something like: “This is my personal Twitter account/blog and the views expressed are my own, not those of the Telegraph.” TMG journalist should not blog anonymously, using pseudonyms or false names. They should refrain from being unnecessarily rude, inflammatory or insensitive; even if this is your personal account, you are at all times a TMG employee and need to act as such, and do nothing to bring the Company’s name into disrepute. Do not say or repeat anything you should not be happy to see in print. Avoid being drawn into debates about TMG, its products or its personnel. Journalists are free, of course, to talk about their work generally on their personal accounts, but it is not acceptable to publish confidential information about TMG, such as current projects, commercially sensitive information, personal information about co-workers, and trade secrets.

If a tweet or blog or comment itself is the subject of a complaint and it originated from an editorially controlled account, this should be treated in the same way as a complaint about a story in the paper or online, and the appropriate procedure followed. Where necessary, we will remove the offending comment and post a clarification.

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**If in doubt**

If you are ever in doubt about any matter concerning business conduct, please seek advice from the Company Secretary or any member of the Executive Management Team.

If you ever feel under pressure from a senior colleague to carry out action that you feel breaks this editorial code, you should contact, in confidence, any of the following: The Editor; the Executive Director, Editorial; the Managing Editor; or the Head of Human Resources.