



## Independent News & Media (Northern Ireland)

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BELFAST TELEGRAPH • SUNDAY LIFE • COMMUNITY TELEGRAPH

21 October 2011

Khaleel Desai  
The Leveson Inquiry  
Royal Courts of Justice  
Strand  
London  
WC2A 2LL

Dear Khaleel Desai

Thank you for your letter of 29<sup>th</sup> September 2011. I enclose my statement below and accompanying documents

Should you require any further information from myself, please do not hesitate to get in touch.

1

Mike Gilson, editor, Belfast Telegraph. Former editor The Scotsman, The News, Portsmouth, Peterborough Evening Telegraph. Senior positions Western Mail, Hull Daily Mail, Kent Evening Post. Member of PCC Code Committee 2003 to 2009.

2

Contracts of Employment (no. 27) refer to Code of Practice (copy attached) and state that an employee is required to comply with the Code of Practice for Newspaper and Magazine Publishing in the UK ratified by the Press Complaints Commission.

Our in-house Policy on Standards of Business Conduct has been in place since circa the mid 1990s (amended in 2002), the purpose of which is to ensure that the Company maintain high standards of conduct in all areas of its business. As stated in the Policy the company relies on all its employees to observe these high standards of conduct in relation to the affairs of the company and the company's relationship with all other parties. It covers five key areas (copy attached).

In addition, INM plc recently communicated world wide to all its staff a more detailed Code of Conduct entitled INTEGRITY Has No Detours. – The Ethical Way is Always the Right Way. (Copy attached).

In both policy documents there is reference that any breach, or perceived breach, of corporate governance should be brought to the attention of management. In particular the Integrity Code of Conduct document is extensive with full information on contacts and telephone numbers should an employee wish to raise a concern in any such area.

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Actual documents are issued to staff by H.R. on commencement of employment. In practice, breaches of company policies are managed by the employee's line manager in conjunction with Human Resources. The Company has both Grievance and Disciplinary Policies in place to manage such matters. (copies attached) As Editor I would be kept fully briefed on all such matters that require disciplinary action or raised grievances.

4

General day to day work matters requiring people management are ongoing in any organisation. As Editor I am of the view that editorial staff adhere to our policies. Any concerns on this front, either by myself, or one of my line managers would be dealt with promptly by fully investigating the matter.

5

Although, group wise, individual newspapers had their own policies in place, a decision was taken by the Board to roll out a code of business conduct across the Group. This decision was first outlined in an email by INM in June 2010 (see attached email). The document was issued this year and is still in distribution process. In practice there is no actual change to the way our current operations are carried out.

6

The reporter will be aware of both the newspapers' codes and the PCC Code of Practice. He or she will be aware of the need to have fairness and accuracy at the core of their daily business. For stories that might be considered more controversial or important the news desk will be expected to examine the background to the story, the motivations for its production and the "players" within it. The news editor (of features and sports editors) is primarily responsible for verifying that the sourcing of the article was within codes.

7

An editor will always ask before he or she publishes major stories that may affect people's lives, work or welfare. He or she is ultimately responsible for the good provenance of major stories. News editors will always be encouraged to flag up background and source issues to the editor.

8

Ethics do play a part alongside what is accurate and as importantly what is fair. A newspaper should avoid hypocrisy, cant and the strain to over sensationalise. Ethics for us mean always putting the well being and interests of readers first before the interests of either the newspaper or powerful vested interests.

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There have been no such cases

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Never

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Never

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See above

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See above

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See above

15

We have a number of contributors, columnists and freelances who are paid either for shifts or for individual articles. All are made aware of both our standards of business conduct and of course the PCC Code of Practice. Copies of the code are handed to all contributors. (copy attached)

16

We have a strict policy of not paying for information from sources. Those who seek finance for "tip offs" are declined. Only information gathered by normal means by journalists at the newspaper or journalists working on our behalf is published in the newspaper. Obviously on occasion non-journalists will contribute opinion pieces or "first person" articles but explanation will always be given as to their background and history.

17

There are of course stories which individuals would rather not be published appearing in newspapers every day. The public interest is clearly defined by the PCC and I support that definition. Incidentally I whole-heartedly support the clause which highlights that there is public interest "in freedom of expression itself." This I suspect goes to the heart of the many of the issues over press freedom today. We would override an individuals rights for all or some of the reasons defined in the code but particularly where the rights of a certain individual would appear to work against the rights of our readers or at the very least there was a need for a public debate on the issue.

Two small examples included illustrate this. In the first there was clearly an issue that the artist involved may have been selling works or art bearing a striking similarity to a more established painter in America. The rights of the individual to practice his trade were, in our view, overridden by the rights of the public to be informed of the similarities. In the second the rights of the special political adviser at the Northern Ireland Assembly to a private life were clearly superseded by the right for the public to know that there was, at the very least, suspicion that abuse of power and influence was at play.(copies of both stories attached)

Yours sincerely



Mike Gilson  
Editor

**Enclosures**

- 2
  - a Company Employment contract
  - b Editors Code of Practice – The Code
  - c Standard of business Conduct
  - d Integrity booklet
- 3
  - a Grievance procedure
  - b Discipline procedure
- 5 Michael Brophy's (CEO') email re Draft code of Business conduct
- 15 Society of Editors Code of Practice - copies given to journalists
- 17a Artist whose work bore striking similarity to established American painter story
- 17b Political advisor at Northern Ireland assembly story