

# Draft CEN WORKSHOP AGREEMENT

prCWA xxxxx

2019

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ICS xx.xxx.xx

English version

## Journalism Trust Initiative

This CEN Workshop Agreement has been drafted and approved by a Workshop of representatives of interested parties, the constitution of which is indicated in the foreword of this Workshop Agreement.

The formal process followed by the Workshop in the development of this Workshop Agreement has been endorsed by the National Members of CEN but neither the National Members of CEN nor the CEN-CENELEC Management Centre can be held accountable for the technical content of this CEN Workshop Agreement or possible conflicts with standards or legislation.

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EUROPEAN COMMITTEE FOR STANDARDIZATION  
COMITÉ EUROPÉEN DE NORMALISATION  
EUROPÄISCHES KOMITEE FÜR NORMUNG

**CEN-CENELEC Management Centre: Rue de la Science 23, B-1040 Brussels**

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Ref. No.:CWA xxxxx:2019 E

1

2 **Foreword**

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4 [To be added after publication]

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6 [Note: the line numbers were added for the purpose of the public commenting process; they will  
7 be deleted upon publication]

Draft for public comments

## I. Introduction

*Quoted from the approved JTI Project Plan:*

The ultimate goal of the “Journalism Trust Initiative” (JTI) is to support the universal, individual freedom of opinion through access to information and independent, pluralistic media. By safeguarding professional standards, a more healthy digital media landscape should emerge, from which each citizen and media worker, but also societies at large, could benefit.

In our digital age, it has become increasingly difficult to distinguish information shaped by vested interests from that produced by independent and fair news professionals. An open and honest public debate, aimed at informing the general public, is more and more difficult to sustain, especially when propaganda and ‘fake news’ seem on the rise and trust in institutions and the media is declining.

To face those challenges, in line with the fight for freedom of information, this Initiative aims at concretely enhancing and safeguarding journalism worthy of this name, complying with ethical rules, approved journalistic methods, and guarantees of independence. In a context of growing distrust towards the media, we consider it important to set up a transparent framework to promote principles of ethical journalism, both to provide guidance to the public and to encourage news providers to raise their professional norms and practices.

We put the term “trust” at the centre of JTI because it signifies the level of credibility that journalism enjoys – or the lack thereof. This trust has of course to be earned. Journalists work in the public interest only if they act as “trusted third parties,” spreading information that enables people to be aware of, and fully comprehend, the challenges they face in their environment, and to form their own opinion.

Trust is deeply intertwined with transparency, responsibility, and accountability.

We believe in self-regulation; however, non-binding ethical guidelines have not always proven successful without meaningful mechanisms of compliance. These would require agreed norms, standards or equivalents that function as verifiable sets of rules and benchmarks and that define the best practice of our profession.

It also means implementation through tangible incentives.

## II. Preamble

*This introductory declaration reflects the spirit and philosophy upon which the document was drafted by consensus of a broad coalition of media companies, professional bodies and media development organisations. The authors and stakeholders of the process wish to express their mutual understanding of the ethical dimension of journalistic activity as follows in this preamble.*

*Acknowledging the fact that values are not always objectively measurable, it is considered even more important to state them clearly.*

*Wherever possible, these principles are further detailed and translated into verifiable criteria in [The Standards](#) found in Chapter V.*

*Compliance with this CEN Workshop Agreement requires a pledge and an explicit commitment to both the principles outlined in the following preamble and to the Standards that implement them.*

### Declaration on Ethical and Professional Journalism

We define Journalism as the gathering, production and dissemination of information in a framework of ethical values. Its purpose is to provide citizens with information that empowers them to fully participate in society.

Acts of journalism may be performed by individuals or collectively organised through news media.

We commit ourselves to four primary indicators of ethical quality in journalistic work: ethical practice in editorial activity; good governance in the ownership and management of news media; respect for principles of self-regulation and active engagement with the public.

#### A. Ethical Practice

We practice journalism according to the following key principles:

- **Accuracy** and fact-based communication;
- **Independence** from political, corporate or other centres of power;
- **Impartiality** and a systematic approach to reporting and editing;
- **Fairness, respect** and consideration of the impact of journalism on the lives of others;
- **Transparency** to facilitate **accountability** and responsibility to the public.

We implement these principles through a code of conduct or mission statement, enhanced through Editorial Guidelines, which provide practical guidance on ethical challenges that we might face.

1           **B. Good governance**

2           We strive to reflect high levels of good governance that protect editorial  
3           independence by showing transparency of ownership and management, whether  
4           public or private.

5           We demonstrate commitment to recognised and essential principles of internal  
6           transparency and accountability to the public.

7           We agree that good governance, which includes respect for recognised norms of  
8           human rights, equality, and contractual obligations, may be identified and  
9           monitored through periodic reflection and auditing of internal systems and rules  
10          designed to strengthen ethics and management of Media Outlets.

11

12          **C. Self-regulation**

13          We work to develop systems to strengthen awareness of core values of editorial  
14          practice through codes of conduct and editorial ethical guidelines. We also work to  
15          provide mechanisms for internal self-regulation, including dealing with complaints  
16          and comments from the public through the appointment of readers' editors or  
17          ombudspersons or a designated editorial manager. We further demonstrate respect  
18          for self-regulation through attachment to industry-wide or national bodies  
19          established to promote ethical journalism and to deal with complaints from the  
20          public.

21

22          **D. Engagement with the public**

23          Building public trust in journalism requires that we be actively engaged with the  
24          public at large. We provide opportunities for our audience to comment, to respond,  
25          and to suggest improvements to the editorial process. We implement accessible and  
26          transparent systems to deal with complaints from the public and, where  
27          appropriate, to provide remedies.

28

### III. The Scope

*The JTI Standards that begin below in Chapter V have two main sections: “Identity and Transparency” [Section A] and “Professionalism and Accountability” [Section B].*

*This chapter describes those two sections.*

#### A. Identity and Transparency

The first section (A) has been drafted to define Standards of “Identity and Transparency”.

The JTI promotes the disclosure of information regarding:

- The persons or organisations involved in the activity of the media (“Identity”);
- Owners who control the media and the sources of revenue (“Transparency”).

It could be understood as “Tell us who you are”. The more transparent news media outlets are about their direct and/or indirect ownership, the more trustworthy they are likely to be in the eyes of the public.

Faced with the proliferation of online information sources, the public needs access to trustworthy information revealing basic identity data (name, activity, contact details, etc.) as well as all relevant information on ownership and sources of revenue of news media organisations.

Such information can reduce levels of scepticism among readers and viewers caused by potential media concentration and conflicts of interests, and can reinforce public attachment to and respect for high-quality news media that are characterized by, if not financial, at least editorial, independence.

All news providers, old or new, print or digital, big or small, including individual media, should be interested in engaging in this process: the traditional media will take a better look at themselves, and new media players will be encouraged to be clear about their business models. In both cases, it will help increase their credibility.

This section contains relevant indicators about the identity and transparency status of a content provider, and requires Media Outlets to list information such as names, contact details, founding date, activity, location, ownership, sources of revenue, means of distribution, etc.

1           **B.      Professionalism and Accountability**

2           The second section (B) has been drafted to define Standards of “Accountability  
3           and Professionalism”.

4           This section could be understood as ‘Tell us how you work’. It focuses on the  
5           professional and enabling environment of editorial work and journalistic  
6           production at the organisational level. It consists of agreed criteria and  
7           organisational benchmarks to secure best practice in professional working  
8           methods, as well as upholding principles of ethical journalism and promoting  
9           public accountability. These include, in particular, the existence and functioning  
10          of complaints and correction mechanisms, the presence and implementation of  
11          editorial guidelines as well as the organisation of management and newsroom  
12          structures.

13          This section contains indicators on accountability and professionalism in the  
14          activities of a Media Outlet that facilitate the provision of trusted and pluralistic  
15          journalism. They are meant to ensure that news media operate according to  
16          criteria that promote transparency and accountability and are thereby deserving  
17          of public trust.

18

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## IV. Terms and Definitions

*This chapter also includes a definition of mandatory and optional clauses, indicating the respective wording and tags used.*

*An additional glossary is to be found as Annex C.*

### Language (ISO standards) and Format

In order to be clear about what is mandatory and what is not, we use different verbal forms and respective tags in the questionnaire in {braces}, as defined in the [ISO/IEC Directives, Part 2, 2018](#) :

Mandatory requirements: shall, shall not {M}

*A requirement is defined as an "expression, in the content of a document that conveys a suggested possible choice or course of action deemed to be particularly suitable without necessarily mentioning or excluding others".*

Optional recommendations: should, should not {O}

*A recommendation is defined as an "expression, in the content of a document that conveys objectively verifiable criteria to be fulfilled and from which no deviation is permitted if conformance with the document is to be claimed".*

Permission: may, need not

*A permission is defined as an "expression, in the content of a document that conveys consent or liberty (or opportunity) to do something".*

Possibility and capability: can, cannot

*A possibility is defined as an "expression, in the content of a document that conveys expected or conceivable material, physical or causal outcome".*

*A capability is defined as an "expression, in the content of a document that conveys the ability, fitness, or quality necessary to do or achieve a specified thing".*

The format of the question response is indicated in [brackets].

Answers that are dependant on a previous answer are indicated with {D}.

"N/A" means "Not Applicable" and is an acceptable answer when shown.

### 'Media Outlet' - the Conforming Entity

We put Media Outlets at the centre of this process as the Conforming Entity.

Irrespective of size or legal form, a Media Outlet is defined as an entity, composed by means, procedures and individuals, which produces and disseminates journalistic content. As a legal entity or through its legal representatives or staff, it carries operational editorial responsibility for such content. The objective of this definition is to allow for a variety of entry points to achieving conformity with this Standard. A Media



1 Outlet can be a single individual (e.g. a blogger), one team or department within a larger  
2 media organisation (e.g. a certain radio channel, a newsroom, a show, website or paper)  
3 or a whole media organisation with many outlets and brands.

4 Regardless of the organisational structure of an entity, working with this document and  
5 the subsequent conformity assessment should always start where the editorial decisions  
6 are being made on a day-to-day basis.

7 In case they exist, additional layers above – such as a combined media organisation,  
8 owners, shareholders – and ‘downstream’ below – like brands and products – are then  
9 defined according to their relationship with the entity conforming to these standards.

10 In other words, the applicant decides what the entities are that will follow these  
11 standards, and then those entities are responsible for conforming with those standards.

### 14 **Individual journalist and One-person-enterprises**

15 We believe that professional standards should be alike for all types and sizes of media. At  
16 the same time we understand that a certain level of differentiation is needed as large,  
17 well-resourced organisations might be better positioned to comply with the clauses of  
18 this document, simply because of management capacity to handle such a process.

19 In addition, some clauses might not apply to certain types of media outlets.

20 In order to not disadvantage small entities, but rather encourage them to conform with  
21 this Standard, it includes special clauses for individual journalists, one-person  
22 enterprises and very small media outlets. Disclosure rules are specified for different  
23 types of media and some clauses may not apply.

### 26 **Editorial Guidelines**

27 According to the Preamble, the implementation of transparent Editorial Guidelines is  
28 fundamental to the ethical performance of a Media Outlet. These guidelines can be self-  
29 sourced or adopted by subscribing to existing ones (of which one model is referenced in  
30 chapter VII), but shall at least include the minimal requirements of the Standards in  
31 Chapter V.

### 34 **Safety Concerns**

35 Safety of news media staff and freelancers is paramount. We understand that full  
36 transparency, although desirable in principle, can in certain conditions create  
37 unacceptable levels of risk to media outlets and journalists. Legitimate reasons exist not  
38 to disclose a physical address, a name or phone number. However, in those exceptional  
39 cases, the reasons shall be stated and explained to the fullest extent possible. Safety  
40 concerns shall not be misused to refrain from disclosure for other reasons.

41 The protection of journalistic sources is considered to be a separate issue and is dealt  
42 with separately in this document.

## V. The JTI Standard – Clauses

### Section A: Identity and Transparency

#### 1. Basic Requirements on media's identity

##### 1.1. Legal Entity Name

The applicant shall provide the name designating the legal entity or entities under which it is conducting business. In some cases, this will be the corporation or public entity (branch of government, parliament, legally-authorized state institution, etc.) that has ultimate legal ownership of the applicant. This usually is the body that would be held liable in a court case. It is the body that enters into transactions such as paying employees and suppliers or receiving funds from readers, viewers, customers, advertisers and other sources of funding.

##### 1.2. Contact Details and Identifiers

The contact details that shall be provided are the postal address and both a general telephone number and email address for the Legal Entity or entities designated in 1.1 Legal Entity Name, as well as existing identifiers. *Clarification: This should be the contact details for the Legal Entity. Elsewhere in this document, means of contact for reader, viewer or listener enquiries, editorial input and other purposes are required.*

##### 1.3. Definition of Media Outlet

The applicant shall list all Brand Names, Titles, Publication Names, etc. under which its Content is published, broadcast, printed or otherwise disseminated to the public or customers. These will be known for this document and this process collectively as the Media Outlet. It is that Media Outlet that will conform with these Journalism Trust Initiative Standards. This is the Conforming Entity. These include all names used on website URLs and on social media accounts, etc.

##### 1.4. Safety Concerns

The Media Outlet shall at all times keep the safety (including digital safety) of staff, contributors and owners as a primary concern. If full transparency of contact details or other information might endanger individuals, the Media Outlet shall describe what it can about the legitimate reasons for a lack of disclosure, or use of pseudonyms for that purpose. Safety concerns shall not be misused to refrain from disclosure.

##### 1.5. Location

The Media Outlet shall provide the physical address of the headquarters of the legal entity referred to above in 1.1 Legal Entity Name. *Clarification: This is necessary in cases where the address listed in the Contact Details paragraph (1.2.) does not specify a physical location, or where the location designated by the contact details referred to in 1.2 is not the same location as the headquarters.*

1           **1.6. Founding date**

2           The founding date of the Legal Entity referred to in 1.1 Legal Entity Name  
3           shall be specified. If the Media Outlet designated in 1.2 Media Outlet has a  
4           different founding date, the history of former legal entities and their  
5           founding dates shall be listed.

6  
7           **2. Editorial Mission**

8           **2.1. Editorial Mission Statement**

9           The Media Outlet shall disclose its Editorial Mission Statement which shall  
10          be consistent with the fundamental ethical principles of trustworthy  
11          journalism, and, as described in the Preamble, should incorporate  
12          principles of: Ethical Practice, Good Governance, Self-Regulation and  
13          Engagement with the Public. A Media Outlet shall set up how it proposes  
14          to uphold these journalism principles through its editorial guidelines and  
15          processes which shall include arrangements in relation to internal  
16          accountability and of appropriate external accountability (see paragraphs  
17          8 – 14). Best practice is to have these arrangements codified and made  
18          available to all.

19  
20          **3. Disclosure of type of ownership**

21          **3.1. Privately-held**

22          The Media Outlet shall declare its legal status clarifying what type of  
23          company it is registered as. For example, if it is a limited or incorporated  
24          company. It should use the legal definition used in its country of  
25          registration and provide the relevant registration information.

26          **3.2. State-owned**

27          The Media Outlet shall state clearly if it is fully or partly owned by the  
28          government, a state institution, or other public body, providing  
29          information on the specific department, entity, or body that exercises that  
30          ownership and its relationship with the government.

31          **3.3. Public Service Media**

32          The Media Outlet shall describe its public service mission and the legal  
33          instrument on which it is based. It shall describe its governance structure,  
34          including the role of all relevant governance bodies or organisations (for  
35          example, regulator, supervisory board, government/parliament role). It  
36          shall state how its financial income is generated and what proportion of its  
37          financial resources are totally or partially provided by public funds. It  
38          shall state if both external and internal governance measures guarantee  
39          its editorial independence.

1           **3.4. Publicly traded company**

2           The Media Outlet shall indicate if it is a publicly-traded company and  
3           where it is legally registered and where its shares are traded. The  
4           company shall also provide its share name and indicate what proportion  
5           of its ownership is publicly traded.

6           **3.5. Other**

7           If the ownership of the Media Outlet is different from the above, for  
8           example if the organisation is a co-operative, the Media Outlet shall  
9           indicate its form of ownership and provide links to local legal definitions  
10          of the type of ownership.

11          If the ownership of the Media Outlet is made up of a combination of the  
12          above types of ownership, then it shall provide a breakdown of the  
13          ownership indicating clearly which share is which ownership type.

14  
15          **4. Requirements on owners' identity**

16          The identity of owners shall be disclosed: including direct owners, indirect or  
17          beneficial owners, shareholders, indirect or beneficial shareholders. Information  
18          on any type of influence and/or conflict of interest should be provided and  
19          monitored by internally. The information shall be updated on an annual basis and  
20          easy to access, preferably online. If the Outlet has no website, the information  
21          should be published or communicated clearly in all its publications or  
22          transmissions.

23          **4.1. Names of owners and board members**

24          The names of direct, indirect, controlling or beneficial owners shall be  
25          disclosed, preferably online, along with the names of the members of  
26          supervisory structures, like the Board. If the owner is also the founder or  
27          the owner of another company, the name and main activities of that  
28          company shall be clearly stated. The business sectors in which these other  
29          companies are operating shall also be indicated. If the owner is an active  
30          member of a political party or movement, holder of an elected office, or a  
31          candidate to a political election, the name and political orientation of that  
32          party or movement shall be clearly stated.

33          **4.2. Contact details of direct and indirect owners**

34          The contact details of direct and indirect owners shall be disclosed,  
35          preferably online, along with the contact details of the and the members of  
36          the board of directors.

37          **4.3. Names of shareholders**

38          The names of direct and beneficial majority and major shareholders shall  
39          be disclosed. If the shareholder is a company, the name and main activities  
40          of that company shall be clearly stated. The business sector in which this  
41          company is operating shall also be indicated.

42          **4.4. Percentage of shareholdings**

43          The percentage of the controlling shareholdings should be disclosed,  
44          regardless of the percentage.

## 5. Disclosure of identity of the management team and its location

The organisational structure of the Media Outlet shall be publicly available with up-to-date information on the names, positions and contact details of the people in charge. The address, usually the headquarters, shall be clearly indicated. If the company has several offices based in different places, their addresses shall also be disclosed. If the physical address cannot be stated for security concerns a correspondence address shall be provided.

### 5.1. Management directory

CEO, managing director, directors, all the people holding responsibility in the company shall clearly be identified. Their name, position and professional contact details shall be disclosed.

### 5.2. Location of branches and offices

The location of the headquarters, branches and offices of the Media Outlet shall be disclosed, including the full address, a contact phone number and email address.

## 6. Disclosure of editorial contact details

### 6.1. Social Media

The Media Outlet shall provide the addresses of the professional social media accounts of those responsible for interacting with and responding to public queries about the organisation's editorial content. This can be management, senior editorial staff, the ombudsperson, or equivalent.

### 6.2. Newsroom contact details

The Media Outlet shall provide public contact details that will allow communication with the newsroom(s). This communication channel can be monitored and moderated, if applicable, by an ombudsperson. The editorial staff, when informed of the public's queries, should be able to communicate back to the public.

### 6.3. Customer service contact details

The Media Outlet shall provide all available contact details: telephone numbers, email addresses, and correspondence address of its customer service. If the organisation does not have a department, a contact should be provided for readers or other stakeholders to be able to get in touch with the Media Outlet.

## 7. Disclosure of revenue sources and data collection

The aim of disclosure is to be able to assess potential conflicts of interests. Media Outlets are encouraged to exceed the financial disclosure requirements mandated by their national laws in order to achieve this goal. In cases where the requirements cannot be met, a justification for non-compliance should be published.

Small publications and websites with little reach or influence may be exempted, on a case-by-case basis, to avoid a hindrance to freedom of expression.

1           **7.1. Sources of Revenue**

2           The Legal Entity shall disclose the categories of its sources of revenue,  
3           including the respective ratio: subscriptions, advertising, major donors  
4           and donations, subsidies, fees, sales, etc. Organisations obliged to publish  
5           or make public their financial information shall provide a reference to the  
6           source where the data is accessible. The Legal Entity may disclose its  
7           revenue.

8           A Media Outlet owned by the state or the government, financed with  
9           public money, shall disclose the nature of its source(s) of revenue: license  
10          fees, government budget, partnerships, public subscriptions, grants,  
11          commercial advertising, or other.

12          Where a media entity deems itself precluded from disclosure of  
13          information due to safety and security concerns as outlined in the Terms  
14          and Definitions section these shall be explained.

15          **7.2. Data collection disclosure**

16          Where a Media Outlet collects data from online visitors, that shall be  
17          disclosed. The purpose for that collection shall also be disclosed. That  
18          outlet shall describe what information is collected by “cookies” or other  
19          similar technology.

Draft for public comments



## Section B: Professionalism and Accountability

### 8. Accountability for Journalism Principles

#### 8.1. Editorial Guidelines

A Media Outlet shall produce a set of Editorial Guidelines, or adhere to an external set of guidelines, to which its journalistic operations comply. They should govern meaningful principles of journalistic content, dissemination and conduct. These guidelines, and the identity of the person or group of persons with ultimate responsibility for them within its organisation, shall be made available to the public in a readily accessible and understandable form. Best practice is to have these guidelines available publicly rather than on request.

#### 8.2. Purpose of Guidelines

A Media Outlet shall ensure that these Editorial Guidelines set clear expectations of the behaviour it expects from its own staff, its contractors and from all other contributors to its editorial content. It should also set out the structure of responsibility within the organisation, making sure it is clear who is accountable for each stage of the process that leads to publication.

#### 8.3. Guidelines and Journalism Principles

A Media Outlet shall ensure that these Editorial Guidelines embody the core ethical principles of journalism. The editorial guidelines may impose specific requirements in addition to these core ethical principles; but any additional requirements shall not compromise these core ethical principles.

#### 8.4. Conflicts Of Interest

Editorial Guidelines shall ensure that there are no conflicts of interests damaging the integrity of the story or the editorial independence of those preparing it. They should have guidance on how to deal with conflicts related to political, business and personal interests. Editorial structures should protect the journalism from any undue influence by the Media Outlet's executive management or ownership authorities outside the formal editorial process and from any external interests, commercial, social or political.

### 9. Responsibility For Content Provided By The General Public

#### 9.1. User Generated Content/Eyewitness News

A Media Outlet shall ensure that the same rigors of checking for accuracy, legal, and ethical compliance are applied to journalistic content sourced from the general public (UGC or Eyewitness News content) as with all content it publishes.

1           **9.2. Editorial Guidelines for UGC/Eyewitness News**

2           There should be specific categories within the Media Outlet's Editorial  
3           Guidelines for dealing with User Generated Content (UGC) or Eyewitness  
4           News and these should be publicly accessible.

5           In relation to his type of content the guidelines shall indicate the  
6           verification process to be used, how the content should be published with  
7           any labelling required and include guidance on dealing with the content  
8           providers in a responsible manner.

9           **9.3. Opinion Guidelines**

10          In relation to opinion or comment pieces the guidelines should set clear  
11          expectations of the ethical principles expected which may include but is  
12          not limited to prohibition of comment due to defamation, privacy, hate  
13          speech and harassment. The Media Outlet should make clear its policy on  
14          the moderation of such content, whether it is pre or post publication, and  
15          its policy on take-down, notice and appeal provisions.

16  
17       **10. Responsibility For Sources**

18           **10.1. Responsible Use Of Sources**

19           A Media Outlet shall ensure that the sources used for its journalism are  
20           dealt with responsibly and their anonymity protected when justified.

21           **10.2. Anonymity**

22           The procedures for granting anonymity to sources should be covered by  
23           the [editorial guidelines](#). The identity of the source should be known to the  
24           journalist and editor and the reason for anonymity should be clarified for  
25           the public.

26           **10.3. Privacy Rights**

27           Editorial guidelines should protect the privacy rights of individuals and  
28           their safety.

29           **10.4. Independence and Sources**

30           There should be guidelines on establishing relations with sources which  
31           protect the independence of the journalism.

32           **10.5. Diversity Of Sources**

33           Editorial guidelines should ensure that a diversity of sources are  
34           consulted in preparing the story with adequate time for response.

35  
36       **11. Professionalism For Labelling Affiliations**

37           **11.1. Sponsored Content Policies**

38           Professional journalism principles shall have clear and distinct editorial  
39           practices in distinguishing advertising and sponsored content, commercial  
40           or commissioned, from editorial content independently produced by the  
41           Media Outlet.



1       **11.2. Sponsored Content Labels**

2       In Media Outlets, sponsored content shall be clearly identified with the  
3       words content 'sponsored by', 'paid by' or other explicit and easy to  
4       understand terms. Particular care should be taken in distinguishing so  
5       called 'native' content (where the item is sponsored but is published side  
6       by side with ordinary editorial content) from its surrounding material.

7       **11.3. Separation of News and Opinion**

8       Editorial Guidelines shall ensure that there is a clear distinction between  
9       news content and opinion and between news content and other content  
10       provided by an external non-journalistic body by requiring labelling or an  
11       equivalent mechanism.

12  
13   **12. Professionalism For Accuracy**

14       **12.1. Structure Ensuring Accuracy**

15       There shall be a systematic structure to the editorial processes to ensure  
16       the accuracy of the content. This may include the verification processes for  
17       content used in the editorial output. There shall be a systematic structure  
18       to ensure adherence to the editorial guidelines and appropriate editorial  
19       oversight.

20       **12.2. Process Review**

21       There shall be a mechanism for the periodic review of the editorial  
22       processes to ensure that they are in compliance with the Editorial  
23       Guidelines and that the accountability processes are effective and being  
24       used to support them.

25       **12.3. Statistics, and External Content**

26       Statistics and external photographs/video/audio content should be  
27       sourced and verified.

28       **12.4. Identification of Journalists, Agencies**

29       Principle and secondary authors should be identified, or if not, then  
30       recorded via publishing mechanisms, so that this information can be  
31       accessed if there is a query. This includes the News Agency material  
32       subscribed to by the Media Outlet. Any details of individuals should be  
33       subject to the legal requirements of data protection and security  
34       considerations.

35       **12.5. Location Reporting**

36       In news reporting, it should be clear to any reader or audience where a  
37       report is being written from, and if it includes location reporting. Where  
38       location reporting is constrained due to the mechanism or conditions of  
39       the facilitation this should be identified, e.g. a facility with an official army  
40       or travelling independently with local militias. This may also include  
41       occasions where the reporting has been facilitated by a commercial, NGO  
42       or governmental organisation and labelling is necessary for transparency.

1       **12.6. Automatically Generated Content**

2       News content generated, wholly or partly, automatically by means of  
3       algorithmic processes (such as but not limited to text generating systems,  
4       bots or artificial intelligence) shall be clearly labelled.

5       **12.7. Algorithmic Dissemination**

6       A Media Outlet shall indicate its policy on the use of algorithms for news  
7       content dissemination or its adherence to best practice requirements from  
8       regulatory or advisory bodies.

9       **12.8. Treatment Of Explicit Content**

10       Editorial processes shall ensure the ethically appropriate treatment of  
11       violent and explicit content, of content, which features children or other  
12       vulnerable people, and of live content.

13  
14   **13. Internal Accountability**

15       **13.1. Dealing With Inaccuracies**

16       There shall be a systematic editorial structure in the Media Outlet to  
17       ensure that any inaccuracies in its content are corrected in a timely and  
18       transparent manner. This shall include a clear process to allow potential  
19       errors to be communicated to the Media Outlet by the public and those  
20       with knowledge of the story and for assessing and dealing with the claims.

21       **13.2. Publishing Corrections**

22       In particular, in relation to inaccuracies, a Media Outlet shall adopt good  
23       practice for correcting inaccuracies, such as making a clear indication of  
24       the correction in a similar place and manner as the original version, such  
25       as the same URL or in similar time and format of broadcast.

26       **13.3. Contact for Complaints**

27       A Media Outlet shall have a nominated person and/or contact information  
28       for members of the public to open a dialogue with the organisation in the  
29       event of complaints about potential breaches of its journalism principles  
30       or editorial guidelines. This information shall be easily available to all  
31       stakeholders.

32       **13.4. Process For Complaints**

33       The Media Outlet shall have a clear procedure in place to ensure that all  
34       staff are aware of the process that must be followed when such a  
35       complaint is received. For example in larger Media Outlets, it must be  
36       known and accepted that the creator of a piece of journalism that is  
37       subject to such a complaint must escalate the issue to a designated third  
38       person. A Media Outlet shall ensure that complaints are addressed within  
39       the Media Outlet in a fair, reasonable and timely manner.

1       **13.5. Independence of Ombudsperson**

2       Where a Media Outlet's internal accountability mechanism takes the form  
3       of an ombudsperson, that person may be appointed by the Media Outlet;  
4       but in this case there shall be a transparent process for their appointment  
5       and the ombudsperson's independence shall be protected to ensure that  
6       they cannot be removed from the position simply for challenging  
7       journalistic or editorial decisions or actions.

8       **13.6. Powers of Ombudsperson**

9       Where a Media Outlet's internal accountability mechanism takes the form  
10       of an internal or external ombudsperson or equivalent, it should take  
11       steps to ensure that this person/s has powers to remedy any breaches of  
12       its editorial guidelines, provide redress to affected parties, deter future  
13       guidelines' breaches and provide an opportunity for its decisions to be  
14       appealed or reviewed.

15  
16   **14. External Accountability**

17       **14.1. External Oversight**

18       Trust in the Media Outlet is enhanced if it is subject to a form of external  
19       accountability that is effective and independent. To this end where  
20       appropriate, a Media Outlet may wish to subscribe to an independent and  
21       effective form of external accountability for its journalism principles,  
22       which may take the form of an external ombudsperson, press or media  
23       council or statutory regulator.

24       **14.2. Compliance With External Accountability**

25       Where a Media Outlet subscribes to a form of external accountability, it  
26       shall comply with any guidance, structures or best practice directions  
27       issued by that body.

28       **14.3. Absence of External Oversight**

29       External accountability is not always possible due to the absence of such  
30       mechanisms in many countries or a lack of confidence in the efficacy,  
31       independence or trustworthiness of existing mechanisms. Where this is  
32       the case it may be helpful for the Media Outlet to state the reasons for non-  
33       compliance, taking into account the legal requirements applicable to  
34       particular media. The Media Outlet may in certain cases align with other  
35       media entities to participate in a more appropriate mechanism.

36       **14.4. Contacting External Accountability Bodies**

37       Where a Media Outlet subscribes to a form of external accountability, it  
38       shall publicise the process by which the public can contact that body to  
39       complain about potential breaches of its editorial guidelines in a manner  
40       that is easily accessible for all.

1       **14.5. Independent Research**

2       External accountability may be supplemented by data from internationally  
3       recognized independent research organisations that measure trust and  
4       accountability in its market based on international best practices. Any  
5       such organisation must be widely accepted as meeting previously agreed  
6       criteria.

7  
8       **15. Professionalism In The Media Outlet**

9       **15.1. Recruitment And Training**

10       There shall be professional guidelines for the recruitment and training of  
11       editorial staff. This includes responsibilities for implementing diversity  
12       policy and staff welfare. Recruitment policy, (use of open competition etc.)  
13       and staff welfare principles should be publicly available.

14       **15.2. Working Conditions, Contract Policy and Labour Relations**

15       Journalistic principles should be supported by the organisational  
16       environment including protection for journalistic integrity through  
17       adherence to the labour laws and regulations, transparency of contract  
18       policy and freedom to organize. The duration or nature of the contract  
19       should not inhibit a journalist from operating in an ethical manner and the  
20       organisation structure should protect that principle.

21       **15.3. Staff Welfare**

22       Responsibility for the welfare of staff and those contracted on a  
23       freelance basis should be an important part of a Media Outlet's role.  
24       Organisational Editorial Guidelines should be protective against  
25       any form of discrimination and supportive of equality of  
26       opportunity. It should ensure safety at work and in the working  
27       environment (including online) and have guidelines, which support  
28       staff who have been exposed to material of a sensitive or upsetting  
29       nature or have suffered physical or psychological harm in the  
30       course of their work.

31       **15.4. Diversity**

32       The Media Outlet should reflect the diversity of the communities it serves  
33       in its staff and contributors, its editorial choices and priorities.

34  
35       **16. Training**

36       **16.1. Training in Editorial Guidelines**

37       A Media Outlet should have a structured mechanism to ensure that its  
38       employees or operators have full training in journalism principles,  
39       Editorial Guidelines and the demands laid down by legal and ethical  
40       compliance.

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**16.2. Continuous Training**

Its training process should be continuous to ensure content creators, including technical staff developing new editorial tools, are fully acquainted with changes in relevant laws or ethical requirements.

**16.3. Support and Advice**

A Media Outlet should provide a support structure to ensure all its employees feel they can seek expert advice when necessary, for example when reporting court or legal proceedings.

Draft for public comments

1 **VI. The Annexes**

2 A. *[Manual – How to use this document]*

3 B. Questionnaire

4 C. *[Glossary]*

5

6

Draft for public comments

## Annex B – Questionnaire

### 1. Basic Requirements on media's identity

#### 1.1. Legal Entity Name

1. What is the Legal Entity Name? [long text field] {M}

The applicant shall provide the name designating the legal entity or entities under which it is conducting business. In some cases, this will be the corporation or public entity (branch of government, parliament, legally-authorized state institution, etc.) that has ultimate legal ownership of the applicant. This usually is the body that would be held liable in a court case. It is the body that enters into transactions such as paying employees and suppliers or receiving funds from readers, viewers, customers, advertisers and other sources of funding.

#### 1.2. Contact Details and Identifiers

2. What is the postal address for the Legal Entity? [long text field] {M}
3. What is the general telephone number for the Legal Entity? [short text field] {M}
4. What is the email address for the Legal Entity? [short text field] {M}
5. Is the Legal Entity required to have a Tax ID? [Y/N] {M}
6. What is the Tax ID for the Legal Entity? [short text field] {M} {D}
7. Is the Legal Entity required to have a Registration ID? [Y/N] {M}
8. What is the Registration ID for the Legal Entity? [short text field] {M} {D}
9. Is the Legal Entity required to have an ISIN code? [Y/N] {M}
10. What is the ISIN code for the Legal Entity? [short text field] {M} {D}
11. Is the Legal Entity required to have a DUNS number? [Y/N] {M}
12. What is the DUNS number for the Legal Entity? [short text field] {M} {D}
13. Are there any other governmental or other identifiers that a certification body could use to verify the identity of those who control the Content of the Legal Entity? [Y/N] {M}
14. What are those identifiers? [long text field] {O} {D}

The contact details that shall be provided are the postal address and both a general telephone number and email address for the Legal Entity or entities designated in 1.1 Legal Entity Name, as well as existing identifiers.

*Clarification: This should be the contact details for the Legal Entity. Elsewhere in this document, means of contact for reader, viewer or listener enquiries, editorial input and other purposes are required.*

#### 1.3. Definition of Media Outlet

15. What Brand Name(s) do you use to publish Content? [long text field] {M}

1 16. On what URLs do you publish Content and/or Advertising? [long  
2 text field] {M}

3 17. On what social media URLs do you publish Content and/or  
4 Advertising? [long text field] {M}

5 The applicant shall list all Brand Names, Titles, Publication Names, etc. under which  
6 its Content is published, broadcast, printed or otherwise disseminated to the public  
7 or customers. These will be known for this document and this process collectively as  
8 the Media Outlet. It is that Media Outlet that will conform with these Journalism  
9 Trust Initiative Standards. This is the Conforming Entity. These include all names  
10 used on website URLs and on social media accounts, etc.

#### 11 1.4. Safety Concerns

12 18. Do the Media Outlet's Editorial Guidelines state that the safety of all  
13 journalists shall be treated as a primary concern? [Y/N] {M}

14 19. Are there any reasons that the Media Outlet has for withholding  
15 information on any of the questions as part of this JTI Standards  
16 process? [Y/N] {M}

17 20. What are the reasons? [long text field] {O} {D}

18 The Media Outlet shall at all times keep the safety (including digital safety) of staff,  
19 contributors and owners as a primary concern. If full transparency of contact details  
20 or other information might endanger individuals, the Media Outlet shall describe  
21 what it can about the legitimate reasons for a lack of disclosure, or use of  
22 pseudonyms for that purpose. Safety concerns shall not be misused to refrain from  
23 disclosure.

#### 24 1.5. Location

25 21. Is your physical address different than the address listed in 1.4  
26 Contact Details or do you have a safety-related reason for not  
27 providing it? [y/n] {M}

28 22. If the answer to the previous question is "Yes" then what is your  
29 physical address or what is the reason for not disclosing it? [long  
30 text field] {O}{D}

31 The Media Outlet shall provide the physical address of the headquarters of the legal  
32 entity referred to above in 1.1 Legal Entity Name.  
33 Clarification: This is necessary in cases where the address listed in the Contact  
34 Details paragraph (1.2.) does not specify a physical location, or where the location  
35 designated by the contact details referred to in 1.2 is not the same location as the  
36 headquarters.

#### 37 1.6. Founding date

38 23. What is the founding date of the Legal Entity? [short text field] {M}

39 24. Do the Brand Names listed above in the 1.2 Media Outlet section  
40 have a different founding date? [Y/N] {M}

41 25. If the answer to the previous question is "Yes" then provide a  
42 history of former legal entities and their founding dates. [long text  
43 field] {M}{D}



The founding date of the Legal Entity referred to in 1.1 Legal Entity Name shall be specified. If the Media Outlet designated in 1.2 Media Outlet has a different founding date, the history of former legal entities and their founding dates shall be listed.

## 2. Editorial Mission

### 2.1. Editorial Mission Statement

26. Does your Media Outlet have an editorial mission statement, or stated set of principles or editorial values? [Y/N] {M}
27. Provide that statement here. [long text field] {M}
28. Is that statement posted online? [Y/N] {O}
29. What is the URL where it is published? [validated URL field] {O}{D}

The Media Outlet shall disclose its Editorial Mission Statement which shall be consistent with the fundamental ethical principles of trustworthy journalism, and, as described in the Preamble, should incorporate principles of: Ethical Practice, Good Governance, Self-Regulation and Engagement with the Public. A Media Outlet shall set up how it proposes to uphold these journalism principles through its editorial guidelines and processes which shall include arrangements in relation to internal accountability and of appropriate external accountability (see paragraphs 8 – 14). Best practice is to have these arrangements codified and made available to all.

## 3. Disclosure of type of ownership

### 3.1. Privately-held

30. What is the legal status of the Media Outlet? [short text field] {M}
31. What country is the Media Outlet registered in? [short text field] {M}

The Media Outlet shall declare its legal status clarifying what type of company it is registered as. For example, if it is a limited or incorporated company. It should use the legal definition used in its country of registration and provide the relevant registration information.

### 3.2. State-owned

32. What is the status of this Media Outlet as it relates to this standard on ownership by the government, state institution or public body. [long text field] {M}
33. What specific department, entity or governmental body has ownership? [long text field] {M}

The Media Outlet shall state clearly if it is fully or partly owned by the government, a state institution, or other public body, providing information on the specific department, entity, or body that exercises that ownership and its relationship with the government.

### 3.3. Public Service Media

34. Is the Media Outlet a Public Service Media? [Y/N] {M}
35. What is the public service mission for which it is responsible? [long text field] {M} {D}

- 1 36. Is this governed by legislation? [Y/N] {M}  
2 37. What law or legal instrument specifies its role and responsibilities?  
3 [long text field] {M} {D}  
4 38. Provide a reference URL here. [long text field] {M} {D}  
5 39. What are the stakeholders with which it has formal relations, and  
6 what is the nature of the relationship? [long text field] {M} {D}  
7 40. How is income generated? [long text field] {M} {D}  
8 41. What portion of income is public funds? [long text field] {M} {D}  
9 42. Does the governance guarantee editorial independence? [Y/N] {M}  
10 {D}  
11 43. If the answer to the previous question is Yes, state here in what  
12 way. [long text field] {M} {D}

The Media Outlet shall describe its public service mission and the legal instrument on which it is based. It shall describe its governance structure, including the role of all relevant governance bodies or organisations (for example, regulator, supervisory board, government/parliament role). It shall state how its financial income is generated and what proportion of its financial resources are totally or partially provided by public funds. It shall state if both external and internal governance measures guarantee its editorial independence.

#### 20 3.4. Publicly-traded company

- 21 44. In what way is the Media Outlet or the Legal Entity publicly traded?  
22 If not, skip to the next section. (If yes, the following questions in this  
23 section are mandatory.) [Y/N] {M}  
24 45. Where is the Media Outlet or Legal Entity registered? [short text  
25 field] {M}{D}  
26 46. On what exchange are the shares traded? [short text field] {M}{D}  
27 47. What is the trading name and/or ticker symbol? [short text field  
28 {M}{D}  
29 48. What percent of the ownership of the Legal Entity is publicly  
30 traded? [short text field] {M}{D}

The Media Outlet shall indicate if it is a publicly-traded company and where it is legally registered and where its shares are traded. The company shall also provide its share name and indicate what proportion of its ownership is publicly traded.

#### 35 3.5. Other

- 36 49. Is the ownership of the Media Outlet different from the four  
37 previous standards in this section? (If yes, the following questions  
38 in this section are mandatory.) [Y/N] {M}  
39 50. What is the form of ownership? [long text field] {M}{D}?  
40 51. If there is a combination, explain that here along with a breakdown  
41 by ownership type. [long text field] {M}{D}

1 If the ownership of the Media Outlet is different from the above, for example if the  
2 organisation is a co-operative, the Media Outlet shall indicate its form of ownership  
3 and provide links to local legal definitions of the type of ownership.  
4 If the ownership of the Media Outlet is made up of a combination of the above types  
5 of ownership, then it shall provide a breakdown of the ownership indicating clearly  
6 which share is which ownership type.

#### 8 **4. Requirements on owners' identity**

9 The identity of owners shall be disclosed: including direct owners, indirect or  
10 beneficial owners, shareholders, indirect or beneficial shareholders. Information  
11 on any type of influence and/or conflict of interest should be provided and  
12 monitored by internally. The information shall be updated on an annual basis and  
13 easy to access, preferably online. If the Outlet has no website, the information  
14 should be published or communicated clearly in all its publications or  
15 transmissions.

##### 16 **4.1. Names of owners and board members**

17 52. What are the names of all direct or indirect owners? [long text field]  
18 {M}

19 53. Are the names of the owners in the previous question available  
20 online? [Y/N] {M}

21 54. What is the URL that contains the names of the owners, or, if not  
22 available online, please indicate where that information can be  
23 obtained? [long text field] {O}

24 55. What are the names of the members of supervisory boards? [long  
25 text field] {M}

26 56. Are the names of the members of the board of directors in the  
27 previous question available online? [Y/N] {M}

28 57. What is the URL of the page that contains the names of the people  
29 in the previous question? [validated URL field] {O} {D}

30 58. Are the listed owners also founders or owners of other companies?  
31 [Y/N] {M}

32 59. If the answer to the previous question is Yes, state here the names  
33 and main activities of those companies. [long text field] {M} {D}

34 60. What are the business sectors for the companies listed in the  
35 previous question? [long text field] {M}

36 61. Are any of the owners active members of a political party or  
37 movement or candidates in a political election or current office  
38 holders? [Y/N] {M}

39 62. If the answer to the previous question is Yes, what are the names of  
40 the parties, movements or offices the listed owners are affiliated  
41 with. [long text field] {M} {D}

The names of direct, indirect, controlling or beneficial owners shall be disclosed, preferably online, along with the names of the members of supervisory structures, like the Board. If the owner is also the founder or the owner of another company, the name and main activities of that company shall be clearly stated. The business sectors in which these other companies are operating shall also be indicated. If the owner is an active member of a political party or movement, holder of an elected office, or a candidate to a political election, the name and political orientation of that party or movement shall be clearly stated.

#### 4.2. Contact details of direct and indirect owners

63. What is the contact information for all direct and indirect owners? [long text field] {M}

64. Is the contact information in the previous question available online? [Y/N] {M}

65. What is the URL with the contact information from the previous question? [validated URL field] {O} {D}

66. What is the contact information for the board? [long text field] {M}

67. Is the contact information in the previous question available online? [Y/N] {M}

68. What is the URL with the contact information from the previous question? [validated URL field] {O} {D}

The contact details of direct and indirect owners shall be disclosed, preferably online, along with the contact details of the and the members of the board of directors.

#### 4.3. Names of shareholders

69. What are the names of the majority or major or controlling shareholders? (If shareholders are companies, list the main activity and business sector of that company along with the name.) [long text field] {M}

The names of direct and beneficial majority and major shareholders shall be disclosed. If the shareholder is a company, the name and main activities of that company shall be clearly stated. The business sector in which this company is operating shall also be indicated.

#### 4.4. Percentage of shareholdings

70. List the shareholders and the percentage of the holdings. [long text field] {O}

The percentage of the controlling shareholdings should be disclosed, regardless of the percentage.

### 5. Disclosure of identity of the management team and its location

The organisational structure of the Media Outlet shall be publicly available with up-to-date information on the names, positions and contact details of the people in charge. The address, usually the headquarters, shall be clearly indicated. If the company has several offices based in different places, their addresses shall also be disclosed. If the physical address cannot be stated for security concerns a correspondence address shall be provided.

## 5.1. Management directory

71. What are the names, positions, and contact details of all members of management for the Media Outlet? [long text field] {M}

CEO, managing director, directors, all the people holding responsibility in the company shall clearly be identified. Their name, position and professional contact details shall be disclosed.

## 5.2. Location of branches and offices

72. What are the locations for branches and other offices not listed in the Locations section for headquarters, above? (List the full address, etc.) [long text field] {M}

The location of the headquarters, branches and offices of the Media Outlet shall be disclosed, including the full address, a contact phone number and email address.

# 6. Disclosure of editorial contact details

## 6.1. Social Media

73. Does the Media Outlet have social media accounts for the public to use to make queries or respond to Content? [Y/N] {M}

74. What are the URLs or other identification of all social media accounts used by members of the public to contact the Media Outlet? (Write N/A if the previous answer was no. [long text field] {M}

The Media Outlet shall provide the addresses of the professional social media accounts of those responsible for interacting with and responding to public queries about the organisation's editorial content. This can be management, senior editorial staff, the ombudsperson, or equivalent.

## 6.2. Newsroom contact details

75. Does the Media Outlet have an ombudsperson or other person responsible for dealing with communication from the public regarding the Content? [Y/N] {M}

76. Is the method for contacting the ombudsperson or others at the Media Outlet clearly visible to the public? [Y/N] {M}

77. How is the communication to the Media Outlet monitored by the staff responsible for the Content? [long text field] {M}

78. In what ways does the staff of the Media Outlet responsible for the Content communicate back to the public results of queries, concerns, etc.? [long text field] {O}

The Media Outlet shall provide public contact details that will allow communication with the newsroom(s). This communication channel can be monitored and moderated, if applicable, by an ombudsperson. The editorial staff, when informed of the public's queries, should be able to communicate back to the public.

## 6.3. Customer service contact details

- 1 79. Does the Media Outlet have a department, or even a single person,  
2 who is responsible for customer service? [Y/N] {M}
- 3 80. What are the contact details -- including telephone numbers, email  
4 addresses, correspondence addresses -- for customer service or the  
5 equivalent within the Media Outlet? [long text field] {M}

6 The Media Outlet shall provide all available contact details: telephone numbers,  
7 email addresses, and correspondence address of its customer service. If the  
8 organisation does not have a department, a contact should be provided for readers or  
9 other stakeholders to be able to get in touch with the Media Outlet.

## 11 7. Disclosure of revenue sources and data collection

12 The aim of disclosure is to be able to assess potential conflicts of interests. Media  
13 Outlets are encouraged to exceed the financial disclosure requirements  
14 mandated by their national laws in order to achieve this goal. In cases where the  
15 requirements cannot be met, a justification for non-compliance should be  
16 published. Small publications and websites with little reach or influence may be  
17 exempted, on a case-by-case basis, to avoid a hindrance to freedom of expression.

### 18 7.1. Sources of Revenue

- 19 81. What are the categories of sources of revenue for the Legal Entity,  
20 including the percent of the total? [check boxes and short text fields  
21 next to each check box using list of categories from the standard in  
22 7.1] {M}
- 23 82. What is the total revenue for the Legal Entity [short text field] {O}
- 24 83. Is the Media Outlet required to make financial disclosures? [Y/N]  
25 {M}
- 26 84. Are those disclosures visible to the public? [Y/N/NA] {M}
- 27 85. What is the URL for those disclosures? [validated URL field] {M}
- 28 86. Is the Media Outlet owned by the state or the government? [Y/N]  
29 {M}
- 30 87. If so, what are the source(s) of revenue? [check boxes and short  
31 text fields next to each check box using list of categories from the  
32 second paragraph of standard 7.1] {M} {D}
- 33 88. Has the Media Outlet made financial disclosures above legal  
34 requirements? [Y/N] {M}
- 35 89. Are those disclosures visible to the public? [Y/N] {M}{D}
- 36 90. What is the URL for those disclosures? [validated URL field] {M}{D}
- 37 91. Is there any reason for safety and security that you have given  
38 incomplete data in this section? [Y/N] {M}
- 39 92. If Yes, what is the reason? [long text box] {M} {D}



1 The Legal Entity shall disclose the categories of its sources of revenue, including the  
2 respective ratio: subscriptions, advertising, major donors and donations, subsidies,  
3 fees, sales, etc. Organisations obliged to publish or make public their financial  
4 information shall provide a reference to the source where the data is accessible. The  
5 Legal Entity may disclose its revenue.

6 A Media Outlet owned by the state or the government, financed with public money,  
7 shall disclose the nature of its source(s) of revenue: license fees, government budget,  
8 partnerships, public subscriptions, grants, commercial advertising, or other.

9 Where a media entity deems itself precluded from disclosure of information due to  
10 safety and security concerns as outlined in the Terms and Definitions section these  
11 shall be explained.

## 12 **7.2. Data collection disclosure**

13 93. Does your Media Outlet automatically collect any information from  
14 online visitors? [Y/N] {M}

15 94. What is the purpose for gathering that information? [short text  
16 field] {M} {D}

17 95. What information is collected by "cookies" or similar  
18 technology? [short text field] {M} {D}

19 Where a Media Outlet collects data from online visitors, that shall be disclosed. The  
20 purpose for that collection shall also be disclosed. That outlet shall describe what  
21 information is collected by "cookies" or other similar technology.

## 23 **8. Accountability for Journalism Principles**

### 24 **8.1. Editorial Guidelines**

25 96. Does your Media Outlet have a set of guidelines, or adhere to an  
26 external set of guidelines, for journalistic content, distribution and  
27 conduct to which its journalistic operations comply? [Y/N] {M}

28 97. Are they made available to the public in a readily accessible form?  
29 [Y/N] {M}

30 98. What is the URL? [validated URL field] {O}

31 99. Is there a person or a group of persons responsible for these  
32 guidelines clearly identified? [Y/N] {M}

33 100. Is that identification visible on the page with the guidelines? [Y/N]  
34 {O}

35 101. If it is not visible on a web page, why not? [long text field] {O}{D}

36 A Media Outlet shall produce a set of Editorial Guidelines, or adhere to an external set  
37 of guidelines, to which its journalistic operations comply. They should govern  
38 meaningful principles of journalistic content, dissemination and conduct. These  
39 guidelines, and the identity of the person or group of persons with ultimate  
40 responsibility for them within its organisation, shall be made available to the public  
41 in a readily accessible and understandable form. Best practice is to have these  
42 guidelines available publicly rather than on request.

### 43 **8.2. Purpose of Guidelines**

1 102. Do the guidelines referred to in the section on Editorial Guidelines  
2 set clear expectations for the behavior for all the contributors,  
3 including editorial staff (journalists, editors) and all other  
4 contributors? [y/n] {M}

5 103. Do the guidelines referred to in the section on Editorial Guidelines  
6 make clear the structure of editorial responsibility for each stage of  
7 the publication process within the organisation? [y/n] {O}

8 A Media Outlet shall ensure that these Editorial Guidelines set clear expectations of  
9 the behaviour it expects from its own staff, its contractors and from all other  
10 contributors to its editorial content. It should also set out the structure of  
11 responsibility within the organisation, making sure it is clear who is accountable for  
12 each stage of the process that leads to publication.

### 13 8.3. Guidelines and Journalism Principles

14 104. Do your Editorial Guidelines include requirements for Accuracy in  
15 your output? [y/n] {M}

16 105. Do they include requirements for Independence of editorial  
17 decision making? [y/n] {M}

18 106. Do they include requirement of Fairness in the practice of  
19 journalism? [y/n] {M}

20 107. Do they include requirement for Accountability in the practice of its  
21 journalism? [y/n] {M}

22 A Media Outlet shall ensure that these Editorial Guidelines embody the core ethical  
23 principles of journalism. The editorial guidelines may impose specific requirements  
24 in addition to these core ethical principles; but any additional requirements shall not  
25 compromise these core ethical principles.

### 26 8.4. Conflicts Of Interest

27 108. Do your Editorial Guidelines include protection against conflicts of  
28 interest? [y/n] {M}

29 109. Do the guidelines include guidance on how to deal with conflicts  
30 related to Business? [y/n] {O}

31 110. Do the guidelines include guidance on how to deal with conflicts  
32 related to political interests? [y/n] {O}

33 111. Do the guidelines include guidance on how to deal with conflicts  
34 related to personal interests? [y/n] {O}

35 112. Does the Media Outlet's structure protect the editorial processes  
36 from any undue influence from within or without? [y/n] {O}

37 Editorial Guidelines shall ensure that there are no conflicts of interests damaging the  
38 integrity of the story or the editorial independence of those preparing it. They should  
39 have guidance on how to deal with conflicts related to political, business and  
40 personal interests. Editorial structures should protect the journalism from any undue  
41 influence by the Media Outlet's executive management or ownership authorities  
42 outside the formal editorial process and from any external interests, commercial,  
43 social or political.



## 9. Responsibility For Content Provided By The General Public

### 9.1. User Generated Content/Eyewitness News

113. Does your Media Outlet have set structures to ensure the checking of externally sourced material undergoes the same rigours as that created entirely by its own journalists? [y/n] {M}

A Media Outlet shall ensure that the same rigors of checking for accuracy, legal, and ethical compliance are applied to journalistic content sourced from the general public (UGC or Eyewitness News content) as with all content it publishes.

### 9.2. Editorial Guidelines for UGC/Eyewitness News

114. Do your Editorial Guidelines also include provision for externally-submitted material? [y/n] {O}

115. Are there Editorial Guidelines dealing with UGC/eyewitness news content? [y/n] {M}

116. Do they include details on the verification processes to be used for this content? [y/n] {M}

117. Do they include guidance on the appropriate labelling of such content? [y/n] {M}

118. Do they include guidance on dealing with the providers of such content in a responsible and ethical manner? [y/n] {M}

There should be specific categories within the Media Outlet's Editorial Guidelines for dealing with User Generated Content (UGC) or Eyewitness News and these should be publicly accessible.

In relation to his type of content the guidelines shall indicate the verification process to be used, how the content should be published with any labelling required and include guidance on dealing with the content providers in a responsible manner.

### 9.3. Opinion Guidelines

119. Do your Editorial Guidelines also include provision for ensuring comment material is free from defamation? [y/n] {O}

120. Do your Editorial Guidelines also include provision for ensuring comment material is free from invasions of privacy? [y/n] {O}

121. Do your Editorial Guidelines also include provision for ensuring comment material is free from hate speech? [y/n] {O}

122. Do your Editorial Guidelines also include provision for ensuring comment material is free from harassment? [y/n] {O}

123. Is it clear to the public whether your Media Outlet's moderation of such comment is pre- or post-publication? [y/n] {O}

124. Does this policy allow for the removal of offending material? [y/n] {O}

In relation to opinion or comment pieces the guidelines should set clear expectations of the ethical principles expected which may include but is not limited to prohibition of comment due to defamation, privacy, hate speech and harassment. The Media Outlet should make clear its policy on the moderation of such content, whether it is pre or post publication, and its policy on take-down, notice and appeal provisions.

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## 10. Responsibility For Sources

### 10.1. Responsible Use Of Sources

125. Do your editorial guidelines ensure that the sources used for your journalism are dealt with responsibility and anonymity protected when justified? [y/n] {M}

A Media Outlet shall ensure that the sources used for its journalism are dealt with responsibly and their anonymity protected when justified.

### 10.2. Anonymity

126. Are there guidelines on the procedures to be followed for granting anonymity to sources? [y/n] {O}

The procedures for granting anonymity to sources should be covered by the editorial guidelines. The identity of the source should be known to the journalist and editor and the reason for anonymity should be clarified for the public.

### 10.3. Privacy Rights

127. Are there guidelines to ensure that the privacy rights and safety of individuals are protected in your journalistic activity? [y/n] {O}

Editorial guidelines should protect the privacy rights of individuals and their safety.

### 10.4. Independence and Sources

128. Are there guidelines to ensure the independence of journalism? [y/n] {O}

There should be guidelines on establishing relations with sources which protect the independence of the journalism.

### 10.5. Diversity Of Sources

129. Do the guidelines ensure that a variety of sources are used in the preparation of your stories? [y/n] {O}

Editorial guidelines should ensure that a diversity of sources are consulted in preparing the story with adequate time for response.

## 11. Professionalism For Labelling Affiliations

### 11.1. Sponsored Content Policies

130. Do your Editorial Guidelines have specific policies for distinguishing commercial or sponsored content? [y/n] {M}

Professional journalism principles shall have clear and distinct editorial practices in distinguishing advertising and sponsored content, commercial or commissioned, from editorial content independently produced by the Media Outlet.

### 11.2. Sponsored Content Labels

131. Do your Editorial Guidelines require all sponsored content to be clearly labelled? [y/n] {M}

1 132. Do your Editorial Guidelines require 'native' content to be labelled  
2 and clearly distinguishable from your own content? [y/n] {M}

3 In Media Outlets, sponsored content shall be clearly identified with the words  
4 content 'sponsored by', 'paid by' or other explicit and easy to understand terms.  
5 Particular care should be taken in distinguishing so called 'native' content (where the  
6 item is sponsored but is published side by side with ordinary editorial content) from  
7 its surrounding material.

### 8 **11.3. Separation of News and Opinion**

9 133. Do you in editorial practice require a clear distinction to be made  
10 between news content and opinion content? [y/n] {M}

11 134. Do your Editorial Guidelines require a clear distinction to be made  
12 between news content and opinion content? [y/n] {M}

13 135. Do your Editorial Guidelines require a clear distinction to be made  
14 between news content and commercial content? [y/n] {M}

15 136. Do you in editorial practice or in Editorial Guidelines require a clear  
16 distinction to be made between news content and content supplied  
17 by an external non-journalistic body? [y/n] {M}

18 Editorial Guidelines shall ensure that there is a clear distinction between news  
19 content and opinion and between news content and other content provided by an  
20 external non-journalistic body by requiring labelling or an equivalent mechanism.

## 22 **12. Professionalism For Accuracy**

### 23 **12.1. Structure Ensuring Accuracy**

24 137. Do your Editorial Guidelines require a systematic editorial process  
25 to ensure the accuracy of your content? [y/n] {M}

26 138. Do your Editorial Guidelines include a verification process for  
27 content supplied by the public? [y/n] {M}

28 139. Does your editorial structure ensure editorial oversight of all  
29 content to ensure its adherence to the editorial guidelines? [y/n]  
30 {M}

31 There shall be a systematic structure to the editorial processes to ensure the  
32 accuracy of the content. This may include the verification processes for content used  
33 in the editorial output. There shall be a systematic structure to ensure adherence to  
34 the editorial guidelines and appropriate editorial oversight.

### 35 **12.2. Process Review**

36 140. Do you have a mechanism for periodic review of the effectiveness  
37 of the implementation of your Editorial Guidelines in your editorial  
38 processes? [y/n/na] {M}

39 141. Is your accountability mechanism (internal or external) subject to  
40 periodic review? [y/n/na] {M}

41 There shall be a mechanism for the periodic review of the editorial processes to  
42 ensure that they are in compliance with the Editorial Guidelines and that the  
43 accountability processes are effective and being used to support them.

### 12.3. Statistics, and External Content

142. Do your Editorial Guidelines require that statistics should be sourced and verified? [y/n/na] {O}

143. Do your Editorial Guidelines require that external photographs/video/audio content should be sourced and verified? [y/n/na] {O}

Statistics and external photographs/video/audio content should be sourced and verified.

### 12.4. Identification of Journalists, Agencies

144. Are the Individual Journalists (including external sources) recorded in publishing mechanism so that this information can be accessed? [y/n/na] {O}

145. Is all News Agency material used by the Media Outlet recorded and tracked? [y/n/na] {O}

Principle and secondary authors should be identified, or if not, then recorded via publishing mechanisms, so that this information can be accessed if there is a query. This includes the News Agency material subscribed to by the Media Outlet. Any details of individuals should be subject to the legal requirements of data protection and security considerations.

### 12.5. Location Reporting

146. Is location reporting identified in your content? [y/n/na] {O}

147. Do your Editorial Guidelines ensure that any constraint on location reporting be explained in the report or in the context of its publication? [y/n/na] {O}

148. Do your Editorial Guidelines require transparency where a location report has been facilitated by an external body? [y/n/na] {O}

In news reporting, it should be clear to any reader or audience where a report is being written from, and if it includes location reporting. Where location reporting is constrained due to the mechanism or conditions of the facilitation this should be identified, e.g. a facility with an official army or travelling independently with local militias. This may also include occasions where the reporting has been facilitated by a commercial, NGO or governmental organisation and labelling is necessary for transparency.

### 12.6. Automatically Generated Content

149. Is it in the Editorial Guidelines of your Media Outlet to label content generated, wholly or partly, by means of AI or algorithmic processes? [y/n] {M}

News content generated, wholly or partly, automatically by means of algorithmic processes (such as but not limited to text generating systems, bots or artificial intelligence) shall be clearly labelled.

### 12.7. Algorithmic Dissemination

1 150. Do your Editorial Guidelines cover the use of algorithms for the  
2 dissemination of news content? [y/n/na] {O}

3 A Media Outlet shall indicate its policy on the use of algorithms for news content  
4 dissemination or its adherence to best practice requirements from regulatory or  
5 advisory bodies.

## 6 **12.8. Treatment Of Explicit Content**

7 151. Do your Editorial Guidelines ensure the ethically appropriate  
8 treatment of violent and explicit content? [y/n] {M}

9 152. Do your Editorial Guidelines ensure the ethically appropriate  
10 treatment of content which features children or other vulnerable  
11 people? [y/n] {M}

12 153. Do your Editorial Guidelines ensure the ethically appropriate  
13 handling of live content? [y/n] {M}

14 Editorial processes shall ensure the ethically appropriate treatment of violent and  
15 explicit content, of content which features children or other vulnerable people, and of  
16 live content.

## 17 18 **13. Internal Accountability**

### 19 **13.1. Dealing With Inaccuracies**

20 154. Do you have a clear process to allow potential errors to be  
21 communicated to the Media Outlet by the public? [y/n] {M}

22 155. Do you publish that process? [y/n] {O}

23 156. If yes, what is the URL where it can be seen? Or, where is it seen  
24 next to each bit of Content? [long text field] {O}

25 157. Do you have a clear process to allow potential errors to be  
26 communicated to the Media Outlet by those with direct  
27 involvement in the story? [y/n] {M}

28 158. Do you have a clear process for assessing and dealing with the  
29 claims? [y/n] {M}

30 159. Is there a systematic editorial structure in the Media Outlet to  
31 ensure that any inaccuracies in its content are corrected in a timely  
32 and transparent manner? [y/n] {M}

33 There shall be a systematic editorial structure in the Media Outlet to ensure that any  
34 inaccuracies in its content are corrected in a timely and transparent manner. This  
35 shall include a clear process to allow potential errors to be communicated to the  
36 Media Outlet by the public and those with knowledge of the story and for assessing  
37 and dealing with the claims.

### 38 **13.2. Publishing Corrections**

39 160. Does your Media Outlet guarantee the publication to all  
40 Stakeholders (including the full audience) of the correction of all  
41 significant inaccuracies and errors? [y/n] {M}

1 In particular, in relation to inaccuracies, a Media Outlet shall adopt good practice for  
2 correcting inaccuracies, such as making a clear indication of the correction in a  
3 similar place and manner as the original version, such as the same URL or in similar  
4 time and format of broadcast.

### 5 **13.3. Contact for Complaints**

6 161. Does your organisation have a first point of contact in the event of  
7 complaints about potential breaches of its journalism principles or  
8 editorial guidelines? [y/n] {M}

9 162. Is that information clearly available to all Stakeholders? [y/n] {M}

10 163. What is the URL of where this information is available? If it is not  
11 on a single page, describe where Stakeholders can find it. [long text  
12 field] {M}

13 A Media Outlet shall have a nominated person and/or contact information for  
14 members of the public to open a dialogue with the organisation in the event of  
15 complaints about potential breaches of its journalism principles or editorial  
16 guidelines. This information shall be easily available to all stakeholders.

### 17 **13.4. Process For Complaints**

18 164. Are your staff (Employees and Freelance) aware of the process that  
19 must be followed in the event of such complaints? [y/n] {M}

20 165. Are they aware that all such complaints must be brought to the  
21 attention of a senior member of staff (of organisations large enough  
22 to have a staff) not directly connected with the creation of the  
23 story? [y/n] {M}

24 166. Is your Media Outlet committed to the resolution of any such  
25 complaints in a fair, reasonable and timely manner? [y/n] {M}

26 The Media Outlet shall have a clear procedure in place to ensure that all staff are  
27 aware of the process that must be followed when such a complaint is received. For  
28 example in larger Media Outlets, it must be known and accepted that the creator of a  
29 piece of journalism that is subject to such a complaint must escalate the issue to a  
30 designated third person. A Media Outlet shall ensure that complaints are addressed  
31 within the Media Outlet in a fair, reasonable and timely manner.

### 32 **13.5. Independence of Ombudsperson**

33 167. If these roles are fulfilled by an internal ombudsperson, is your  
34 Media Outlet committed to the independence of that role in terms  
35 of appointment and dismissal? [y/n/na] {O}

36 Where a Media Outlet's internal accountability mechanism takes the form of an  
37 ombudsperson, that person may be appointed by the Media Outlet; but in this case  
38 there shall be a transparent process for their appointment and the ombudsperson's  
39 independence shall be protected to ensure that they cannot be removed from the  
40 position simply for challenging journalistic or editorial decisions or actions.

### 41 **13.6. Powers of Ombudsperson**

42 168. Does your Media Outlet have an ombudsperson or similar  
43 accountability mechanism? [y/n] {M}



1 169. If these roles are fulfilled by an internal ombudsperson, does that  
2 person have full power to remedy any breaches of the  
3 organisation's Editorial Guidelines? [y/n] {M} {D}

4 170. If these roles are fulfilled by an internal ombudsperson, does that  
5 person have full power to provide redress to affected parties? [y/n]  
6 {M} {D}

7 171. If these roles are fulfilled by an internal ombudsperson, does that  
8 person have full power to deter future breaches? [y/n] {M} {D}

9 172. If these roles are fulfilled by an internal ombudsperson, does that  
10 person have full power to provide opportunity for any decisions to  
11 be reviewed or appealed? [y/n] {M} {D}

12 Where a Media Outlet's internal accountability mechanism takes the form of an  
13 internal or external ombudsperson or equivalent, it should take steps to ensure that  
14 this person/s has powers to remedy any breaches of its editorial guidelines, provide  
15 redress to affected parties, deter future guidelines' breaches and provide an  
16 opportunity for its decisions to be appealed or reviewed.

## 18 14. External Accountability

### 19 14.1. External Oversight

20 173. Does your Media Outlet subscribe to a system of external  
21 accountability for your editorial content? [y/n] {O}

22 174. What is it? [short text field] {O}

23 175. What is the URL? [validated URL field] {O}

24 Trust in the Media Outlet is enhanced if it is subject to a form of external  
25 accountability that is effective and independent. To this end where appropriate, a  
26 Media Outlet may wish to subscribe to an independent and effective form of external  
27 accountability for its journalism principles, which may take the form of an external  
28 ombudsperson, press or media council or statutory regulator.

### 29 14.2. Compliance With External Accountability

30 176. Is your Media Outlet committed to comply with any directions or  
31 guidance issued by the external accountability body to which you  
32 subscribe? [y/n/na] {M}

33 Where a Media Outlet subscribes to a form of external accountability, it shall comply  
34 with any guidance, structures or best practice directions issued by that body.

### 36 14.3. Absence of external oversight

37 177. Is your Media Outlet subject to an external regulatory mechanism  
38 for content that you find it not possible to comply with? [y/n] {O}

39 178. State here your reason for non-compliance. [long text field] {O}

40 179. Do you participate in any alternative national or international  
41 oversight mechanisms or networks? [y/n] {O}

1 180. If yes, which ones? [long text field] {O} {D}

2 External accountability is not always possible due to the absence of such mechanisms  
3 in many countries or a lack of confidence in the efficacy, independence or  
4 trustworthiness of existing mechanisms. Where this is the case it may be helpful for  
5 the Media Outlet to state the reasons for non-compliance, taking into account the  
6 legal requirements applicable to particular media. The Media Outlet may in certain  
7 cases align with other media entities to participate in a more appropriate  
8 mechanism.

9 **14.4. Contacting External Accountability Bodies**

10 181. Are the mechanisms for the public to complain about the breaches  
11 of its editorial guidelines to the external body publicly available?  
12 [y/n/na] {M}

13 182. What is the link? [validated URL field] {O}

14 Where a Media Outlet subscribes to a form of external accountability, it shall  
15 publicise the process by which the public can contact that body to complain about  
16 potential breaches of its editorial guidelines in a manner that is easily accessible for  
17 all.

18 **14.5. Independent Research**

19 183. Is there an internationally recognised independent research body  
20 which surveys trust and accountability measures in your territory?  
21 [y/n/na] {O}

22 184. What is it? [short text field] {O}

23 185. Do you publicise and respond to the surveys it publishes? [y/n/na]  
24 {O}

25 External accountability may be supplemented by data from internationally  
26 recognized independent research organisations that measure trust and  
27 accountability in its market based on international guidelines. Any such organisation  
28 must be widely accepted as meeting previously agreed criteria.

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30 **15. Professionalism In The Media Outlet**

31 **15.1. Recruitment And Training**

32 186. Do you have guidelines for the recruitment and training of editorial  
33 staff? [y/n] {M}

34 187. Do those guidelines contain diversity policy? [y/n] {M}

35 188. Do those guidelines contain staff welfare? [y/n] {M}

36 189. Are they publicly available? [y/n] {M}

37 190. What is the URL? [validated URL field] {O}

38 There shall be professional guidelines for the recruitment and training of editorial  
39 staff. This includes responsibilities for implementing diversity policy and staff  
40 welfare. Recruitment policy, (use of open competition etc.) and staff welfare  
41 principles should be publicly available.

42 **15.2. Working Conditions, Contract Policy and Labour Relations**



1 191. Do the regulations and guidelines for the employment of staff and  
2 engagement of contract journalists protect their editorial  
3 independence? [y/n/na] {0}

4 192. Are your employees (including freelance) covered by legal  
5 contracts and insurance? [y/n/na] {0}

6 193. Do your staff have the freedom to organise? [y/n/na] {0}

7 194. Do you have an existing structure for social dialogue including a  
8 collective bargaining arrangement with appropriate trade unions?  
9 [y/n/na] {0}

10 195. Are there guidelines for contracts of engagement with freelance  
11 journalists? [y/n/na] {0}

12 196. Do these guidelines ensure the ability of freelancers to adhere to  
13 the editorial principles? [y/n/na] {0}

14 | Journalistic principles should be supported by the organisational environment  
15 including protection for journalistic integrity through adherence to the labour laws  
16 and regulations, transparency of contract policy and freedom to organize. The  
17 duration or nature of the contract should not inhibit a journalist from operating in an  
18 ethical manner and the organisation structure should protect that principle.

### 19 **15.3. Staff Welfare**

20 197. Does your Media Outlet's rules and procedures protect against  
21 discrimination in the workplace? [y/n/na] {0}

22 198. Does your Media Outlet's rules and procedures support equality of  
23 opportunity? [y/n/na] {0}

24 199. Does your Media Outlet have a safety at work policy, which includes  
25 specific protection for journalists working in hostile environments?  
26 [y/n/na] {0}

27 200. Does your Media Outlet have guidelines to support editorial staff  
28 who have been exposed to material of a sensitive or upsetting  
29 nature? [y/n/na] {0}

30 201. Does your Media Outlet have guidelines to support editorial staff  
31 who suffered physical or psychological harm in the course of their  
32 work? [y/n/na] {0}

33 | Responsibility for the welfare of staff and those contracted on a freelance basis  
34 should be an important part of a Media Outlet's role. Organisational Editorial  
35 Guidelines should be protective against any form of discrimination and supportive of  
36 equality of opportunity. It should ensure safety at work and in the working  
37 environment (including online) and have guidelines, which support staff who have  
38 been exposed to material of a sensitive or upsetting nature or have suffered physical  
39 or psychological harm in the course of their work.

### 40 **15.4. Diversity**

41 202. Does your Media Outlet have a diversity policy as a part of the  
42 Editorial Guidelines? [y/n] {0}

1 203. Does your Media Outlet have a diversity policy distinct from the  
2 Editorial Guidelines? [y/n] {O}

3 204. Is it publicly available? [y/n/na] {O}

4 205. What is the URL? [validated URL field] {O}

5 | The Media Outlet should reflect the diversity of the communities it serves in its staff  
6 and contributors, its editorial choices and priorities.

7

## 8 **16. Training**

### 9 **16.1. Training in Editorial Guidelines**

10 206. Does your Media Outlet have a training programme for editorial  
11 staff that includes sections on the editorial guidelines and other  
12 legal and ethical issues? [y/n/na] {O}

13 | A Media Outlet should have a structured mechanism to ensure that its employees or  
14 operators have full training in journalism principles, Editorial Guidelines and the  
15 demands laid down by legal and ethical compliance.

### 16 **16.2. Continuous Training**

17 207. Is there refresher training available for significant changes in the  
18 law or guidelines? [y/n/na] {O}

19 | Its training process should be continuous to ensure content creators, including  
20 technical staff developing new editorial tools, are fully acquainted with changes in  
21 relevant laws or ethical requirements.

### 22 **16.3. Support and Advice**

23 208. Does your staff have expert advice available for consultation when  
24 dealing with legal and compliance issues? [y/n/na] {O}

25 | A Media Outlet should provide a support structure to ensure all its employees feel  
26 they can seek expert advice when necessary, for example when reporting court or  
27 legal proceedings.

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