

Appendix

Response to the Leveson Inquiry from
The Scotsman Publications Limited and Yorkshire Post Newspapers Limited

***** Denotes confidential treatment requested.**

(a) Any current training materials, guidance, practices, codes of practice, code of conduct, handbooks or policies on, or bearing upon, any of the following:

- a. Sources
 1. Phone Hacking and Listening Devices (issue No. 2 dated 15/07/11)
- b. Use of sources
 1. Listening Devices – A briefing note from the Johnston Press Editorial Review Group (ERG)
- c. Use of private detectives
- d. Checking of sources
- e. Payment of sources
 1. Schedule of payments to freelance sources for The Scotsman (2005 to present)***
Yorkshire Post have confirmed that the circumstances when freelance journalists are paid for providing information which is turned into stories by the paper (rather than written buy the freelancer) are extremely rare.
 2. Johnston Press plc Expenses Policy (issue No. 3 dated 15/07/2011)
 3. Freelance Agreement and Letter of Engagement – Photographer
 4. Freelance Agreement and Letter of Engagement - Journalist
- f. Regulation of Investigatory Powers Act 2000
 1. Request for access to staff monitoring data
- g. Data Protection Act 1998
 1. Policy on Management and Disclosure of Employee Data
 2. Regional Data Protection Co-ordinator Training – Presentation
 3. Editorial Data Protection Briefings
 4. Data Protection policy (Issue No.4 dated 8/6/2009)
- h. Computer Misuse Act 1990
- i. Editorial Policy
 1. Johnston Press plc Editorial Policy (Issue No. 3 dated 25/01/2007)
 2. Johnston Press plc Editors and Press Freedom Policy (Issue No.2 dated 17/05/2004)
 3. Annex to journalists' contract used throughout the Group (covering Editorial Code of Conduct, Defamation, Syndication/Lineage and Press Cards)***
- j. Oversight of editorial policy
 1. ERG Terms of Reference, January 2004
- k. Editorial guidance
 1. The JP editor mentoring scheme and editor mentoring checklist

2. Johnston Press editors' handbook, 2009***
 3. Key roles of the editor
 4. "Role of the editor" training day programme
 5. Note on using a notebook
 6. Appointment of Editors (Issue No.5 dated 7/12/10)
- i. Editorial decision making
1. Johnston Press plc Editors and Press Freedom Policy (Issue No.2 dated 17/05/2004) - see (a) i. 2. above
 2. Editorial Workshop Exercise – An example of a representative editorial training and development exercise.
 3. Dealing with all legal complaints***
- m. Compliance
1. Johnston Press plc Anti-Corruption and Bribery Policy (Issue No. 1 dated July 2011)
 2. Whistleblowing Policy (Issue No.2 July 2004)
 3. JP plc Law Refresher presentation
 4. NCE Law Refresher presentation
- n. Risk register
1. The risk "Discovering that phone hacking or bribery of policemen has taken place in the past or is ongoing" features on our corporate risk management matrix with a likelihood of one and an impact of five, in each case on a scale of one to five with five being the greatest. "Offence by employee under Bribery Act" has a likelihood of one and an impact of four.***
- o. Internal Inquiries onto phone hacking and/or computer hacking and/or "blagging" and/or bribery and/or corruption
1. Review of culture, ethics and practices. Letter from Chief Operating Officer and questionnaire required to be completed by all senior editorial staff in Johnston Press Group (September 2011).
- (b) Any past training materials, guidance, practices, codes of practice, code of conduct, handbooks or policies on, or bearing upon, any of the following:**
- a. Sources
 1. Listening Devices (issue No. 1 dated 01/02/2008)
 - b. Use of sources
 - c. Use of private detectives
 - d. Checking of sources
 - e. Payment of sources
 1. Schedule of payments to freelance sources for The Scotsman (2005 to present)*** - see (a) e. 1. above
Yorkshire Post have confirmed that the circumstances when freelance journalists are paid for providing information which is turned into stories by the paper (rather than written buy the freelancer) are extremely rare.

2. Johnston Press plc Expenses policy (Issue No. 1 dated 18/1/2002)
 - f. Regulation of Investigatory Powers Act 2000
 - g. Data Protection Act 1998 - see (a) g. above
 - h. Computer Misuse Act 1990
 - i. Editorial Policy
 1. Johnston Press plc Editorial Policy (Issue No. 2 dated 17/05/2004)
 2. Johnston Press plc Editors and Press Freedom Policy (Issue No.2 dated 17/05/2004) - see (a) i. 2. above
 3. Annex to journalists' contract used throughout the Group (covering Editorial Code of Conduct, Defamation, Syndication/Lineage and Press Cards)*** - see (a) i. 3. above
 - j. Oversight of editorial policy
 1. Action points from ERG meeting on March 15 2007 including multi-channel publishing and the PCC code, editor mentoring checklist and a briefing note on listening devices***
 2. Action points from ERG meeting on September 11 2007 including PCC Code changes regarding online publication and phone tapping***
 - k. Editorial guidance
 1. See (a) k. above
 2. Appointment of Editors (Issue No.2 dated 17/5/04)
 3. Appointment of Editors (Issue No.4 dated 12/10/06)
 - l. Editorial decision making
 1. Johnston Press plc Editors and Press Freedom Policy (Issue No.2 dated 17/05/2004) - see (a) i. 2. above
 - m. Compliance
 1. Whistleblowing Policy (Issue No.2 July 2004) - see (a) m. above
 - n. Risk register
 1. N.B. The matters which are the subject of the Inquiry did not appear as specific risk on the Group's risk register prior to 'phone hacking scandal in the summer of 2011.
 - o. Internal Inquiries onto phone hacking and/or computer hacking and/or "blagging" and/or bribery and/or corruption
 1. N.B. No internal inquiries were undertaken in the matters which are the subject of the Inquiry prior to 'phone hacking scandal in the summer of 2011.
- (c) Any disciplinary action taken by or on behalf of the company in the period 1 January 2005 to the date of this notice to enforce the company's ethical and/or professional standards in relation to journalism and/or editing and/or use of sources of information.**
1. Schedule of Editorial Disciplinary Action – 1/1/2005 – To Date – Warnings Issued***
- (d) Any documents recording or relating to fees or expenses paid to private investigators, police, public officials, mobile phone companies or others with access to the same (you may exclude**

official sources such as the Associated Press but must state which official sources you are excluding) in the period from 1 January 2005 up to the date of this notice.

1. Schedule of Payments by The Scotsman Publications Limited to freelance journalists for stories and information they have been unable to turn into articles themselves which The Scotsman has printed*** - see (a) e. above
2. No fees or expenses have been paid to private investigators, police, public officials, mobile phone companies (other than charges for calls made) during the period stated. The Group has agreements to purchase regularly content from the Press Association, Associated Press and Reuters. It also purchases content from other reputable regional news agencies as and when a need arises.

(e) Any documents recording or relating to the payment of bonuses or other performance incentives to editors, sub-editors or journalists and/or qualifying requirements for such payments.

1. Johnston Press plc Senior Executive Bonus Scheme Rules 2005***
2. Johnston Press plc Senior Executive Bonus Scheme Rules 2006***
3. Johnston Press plc Senior Executive Bonus Scheme Rules 2007***
4. Johnston Press plc Senior Executive Bonus Scheme Rules 2008***
5. Johnston Press plc Senior Executive Bonus Scheme Rules 2009***
6. Johnston Press plc Senior Executive Bonus Scheme Rules 2010***
7. Johnston Press plc Senior Executive Bonus Scheme Rules 2011***
8. Summary Schedule of Bonus Scheme Payments (2005-2011)***

(f) Any minutes of board meetings at which matters within the scope of this inquiry were discussed in the period from 1 January 2005 up to the date of this notice.

1. Extract from minutes of the meeting of the Board of Directors of Johnston Press plc, dated 19 August 2011***

Johnston Press plc



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