

SUBMISSION

The contents of the Inquiry's letter have been considered and company records researched accordingly.

I have been provided with a range of documents which I have detailed below and are enclosed with this correspondence. There are numbered consecutively for ease of reference, and a separate documents list is also attached.

Paragraph (a): All current training manuals/policies, guidance, etc

The company has a range of policies and guidance in place. Key amongst these is the INM group-wide Code of Conduct called 'Integrity Has No Detours' (instigated during 2010).

The following documents are attached:

1. *INM Code of Conduct (Integrity Has No Detours)*
2. *Specimen Contract of Employment*
3. *Editor's Code*
4. *Company policies on computer misuse, harassment, etc*

Many of the issues raised in points a - o, are addressed by these documents. Over and above the documents mentioned above, there are no specific documents on sources, private detectives, RIPA, etc.

There have been no internal inquiries into phone hacking and/or computer hacking and/or blagging and/or bribery and/or corruption. Nor have I found any evidence of any of these practices occurring.

INM has not operated formal journalism training programmes in the period under review, however it does operate programmes of refresher training on a range of issues including contempt of court, libel, general media law, investigative reporting, etc. This included hosting a PCC seminar in 2010.

Paragraph (b): All past training manuals/policies, guidance, etc

Many of the above documents still apply. The INM Code of Conduct superseded the previous Policy on Standards of Business Conduct.

The following document is also attached:

5. Policy on Standards of Business Conduct

Paragraph (c): Disciplinary action re ethical behaviour

The company has had one disciplinary action relating to ethical behaviour in the relevant period. It was suspected a Community Telegraph journalist had not attended council meetings despite publishing reports and internal notes which suggested he had. Result: formal written warning.

Paragraph (d): Fees or expenses paid to private investigators, police, public officials, phone companies etc

Public officials:

No evidence of payments to "police, public officials, phone companies, or others with access to the same" could be found and I am not aware of any such payments.

The Belfast Telegraph and Community Telegraph both operate a policy of no payments to sources.

Sunday Life generally operates a policy of no payments to sources, however it does operate an "exceptional cases" rule which has on occasion permitted a small number of assistance payments per year to sources (which have not included police officers or other public officials). These payments are at the Editor's discretion and the figure is generally in the range of £100 - £200 per story. Most payments were to members of the public to facilitate investigative journalism, with a small number being related to show-business stories.

Private investigators:

No payments have been made to private investigators by Belfast Telegraph or Community Telegraph.

A small number of payments were found to have been made to a private investigative agency, Justice Services, by Sunday Life, see attached spreadsheet (attachment no 7) for assistance with articles. These articles were public interest stories, for example the exposure of an illegal dog fighting gang. Indeed, an article subsequently appeared in Sunday Life describing the private investigator's role (attachment no 8) following his untimely death in Afghanistan.

Additionally, Sunday Life on one occasion, in 2008, engaged the services of a company called Priority Investigations. A range of routine inquiries/checks was made in Northern Ireland, the Irish Republic and Scotland in connection following a tip-off relating to alleged illegal activity. Nothing untoward was discovered and no

publication resulted. The belief is that payment was made for this service (in the low hundreds of pounds), however no record of an actual transaction can be found so I am unsure if payment was actually made.

The following documents are attached:

6. *Payments to Justice Services*

7. *Article on the role of Justice Services/Steve Ihinson*

Paragraph (e): Bonuses to editors, sub editors or journalists and qualifying requirements:

Attached is a summary of editorial bonuses since 2005. In general, bonuses have been suspended since 2007/08 financial year due to difficult trading conditions, apart from payments to two senior journalists which have been determined as contractually obliged and a few occasional merit payments.

When non-merit bonuses were paid pre 2007/08, they were paid to managers according to a range of up to three qualifying requirements: circulation measurements, certain production goals and/or budgetary cost controls. The maximum potential bonus that he could earned by managers ranged from 3.75% of salary to 15% of salary. The overall average payout of bonus in, for example, 2005, was 44% of the maximum potential.

The following document is attached:

8. *"Summary of Editorial Bonuses paid 2005 to 2011".*

Paragraph (f): Minutes of board meetings at which ethics was discussed

There are none.

Paul Connolly

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Publishers of the Belfast Telegraph, Sunday Life and Community Telegraph