

Editorial code of practice and guidance

Guardian News & Media

| | |
|--|-----------|
| Introduction | 3 |
| Notes and key to symbols and terms | 4 |
| Editorial code of practice | 5 |
| Editorial code guidance | 10 |
| A. Accuracy and objectivity | 10 |
| B. Anonymous contributions | 10 |
| C. Anonymous quotations | 10 |
| D. Children | 11 |
| E. Digital enhancement of images and multimedia | 11 |
| F. Direct quotations | 12 |
| G. Errors and amendment requests | 12 |
| H. Generative AI | 12 |
| I. Grief | 12 |
| J. Guidance labels and distressing content | 13 |
| K. Interviewees | 13 |
| L. Language | 13 |
| M. Major incident reporting and unfolding events | 14 |
| N. Mental health | 14 |
| O. Open court reporting and inquests | 14 |
| P. Pictures and video | 14 |
| Q. Plagiarism | 15 |
| R. Privacy | 15 |
| S. The right to reply | 16 |
| T. Sources | 17 |
| U. Sourcing - social media | 17 |
| V. Subterfuge and covert behaviour | 17 |
| W. Suicide and self-harm | 17 |
| X. Verification | 18 |
| Internal guidance for GNM journalists | 19 |
| Legal guidance | 19 |
| A. The Bribery Act 2010 | 19 |
| B. Contempt of court and court reporting | 20 |
| C. Copyright | 20 |
| D. Data protection | 21 |
| E. Defamation | 22 |
| F. Privacy | 22 |
| Professional behaviour | 24 |
| A. Commercial products and promotions | 24 |
| B. Commissioning | 24 |
| C. Conduct at work | 25 |
| D. Confidentiality | 25 |
| E. Copy approval | 25 |
| F. Credits | 25 |
| G. Declarations of corporate interest | 25 |
| H. Declarations of personal interest | 25 |
| I. Financial reporting | 26 |
| J. Freebies | 26 |
| K. Freelance work and media appearances | 27 |
| L. GNM connections | 27 |
| M. Offers of financial assistance | 27 |
| N. Outside interests and engagements | 27 |
| O. Payments for stories | 28 |
| P. Relationships | 28 |
| Q. Social media conduct | 29 |
| R. Source care and protection | 29 |
| Appendix - CP Scott's centenary essay, 1921 | 30 |

Introduction

“A newspaper[’s]... primary office is the gathering of news. At the peril of its soul it must see that the supply is not tainted.”

[CP Scott, Centenary Essay, 1921](#)

Our most important currency is trust. This is as true today as when CP Scott marked the centenary of the founding of the Guardian with his famous essay on journalism in 1921 (which you can read in full at the end of this document).

This document consists of three sections:

- First, the [Guardian News & Media \(GNM\) editorial code of practice](#) which sets out the professional editorial and ethical standards that GNM expects all journalists to follow (and which replicates in many aspects the Editors’ Code of Practice used by members of the Independent Press Standards Organisation (Ipsos) - see [Note 1](#));
- Second, [GNM editorial code guidance](#) which expands upon and gives additional guidance on some matters in the code;
- Third, [internal guidance for GNM journalists](#) on conduct and practice outside the code, including [legal guidance](#).

The purpose of this document is to set out in a clear and transparent way the principles, values and standards that drive Guardian and Observer journalism, and by which GNM expects all journalists and contributors to abide. Above all, our aim is to protect and foster the bond of trust between the organisation and its audience, and thereby to protect the integrity of GNM and its journalism. The standards in this code apply globally to all GNM journalists, to all our practices, and to all published GNM journalism.

It is written into GNM’s terms of employment that it is the responsibility of staff to adhere to the GNM editorial code of practice. The code forms the basis on which complaints can be raised against GNM’s journalism to the readers’ editor, and forms the basis of any appeal against a decision of the readers’ editor to the review panel. It should be read bearing in mind the free expression rights and responsibilities of journalists but also respecting the rights of others. Journalists and external contributors should swiftly cooperate with the readers’ editor, and with the review panel in the event of an appeal against a decision of the readers’ editor, in the resolution of such complaints.

By observing the code and guidance fully, to the spirit as well as the letter, journalists working for GNM will protect the independence, standing and reputation of GNM, colleagues and themselves.

We will review the GNM editorial code of practice periodically and update it if appropriate in line with future developments and, where considered necessary, to reflect any updates made to the [Editors’ Code of Practice](#) enforced by Ipsos.

This document was amended in July 2023

Notes and key to symbols and terms

1. The GNM editorial code of practice below builds upon the [Editors' Code of Practice](#) followed by members of Ipso, which is produced by the editors' code committee convened under the auspices of the Regulatory Funding Company.

While the Guardian is not a member of Ipso, which is the chosen self-regulator of the majority of national and regional UK newspapers, we reproduce many of the clauses of the latest edition of the Editors' Code, because we consider them to be sound statements of ethical behaviour for journalists. The Editors' Code is itself an updated version of the Press Complaints Commission (PCC) Editors' Code, to which GNM provided input over many years. We make reference to Ipso guidance notes for journalists where we believe that to be useful.

2. Where GNM's code differs from the Editors' Code of Practice, we have marked the relevant clauses with a .

3. The use of * denotes that there may be exceptions to clauses so marked, where they can be demonstrated to be in the public interest.

4. References in this document to **journalists/staff** are to Guardian and Observer journalists employed by GNM worldwide as well as to casual workers, external contributors and freelancers, all of whom are expected to be familiar with and abide by the GNM editorial code and guidance when working for GNM. Freelancers are also bound by [GNM's freelance charter](#).

5. Where this document refers to the **"relevant senior duty editor"** this means the **editor-in-chief** or:

- **In the UK**, the deputy editor; executive editor, news; executive editor, features; or the managing editor;
- **In the US** the editor; managing editor; deputy editor, news; executive editor, features; or the west coast editor;
- **In Australia** the editor; managing editor; deputy editor; or head of newsroom.

6. References in the code to courts are to courts in England and Wales. Australian and American laws may be different. Colleagues in the US and Australia should consult their own local legal advisers.

Editorial code of practice

1. Accuracy

- i) Journalists must take care not to publish inaccurate, misleading or distorted information or images, including headlines not supported by the text.
- ii) A significant inaccuracy, misleading statement or distortion must be corrected promptly and with due prominence, and – where appropriate – an apology published.
- iii) A fair opportunity to reply to significant inaccuracies should be given, when reasonably called for.
- iv) While free to editorialise and campaign, a publication must distinguish clearly between comment, conjecture and fact.
- v) A publication must report fairly and accurately the outcome of an action for defamation to which it has been a party, unless an agreed settlement states otherwise, or an agreed statement is published.

*2. Privacy

- i) Everyone is entitled to respect for their private and family life, home, health and correspondence, including digital communications.
- ii) Editors will be expected to justify intrusions into any individual's private life without consent. In considering an individual's reasonable expectation of privacy, account will be taken of the complainant's own public disclosures of information and the extent to which the material complained about is already in the public domain or will become so.
- iii) It is unacceptable to photograph individuals, without their consent, in public or private places where there is a reasonable expectation of privacy.

*3. Harassment

- i) Journalists must not engage in intimidation, harassment or persistent pursuit.
- ii) Journalists must not persist in questioning, telephoning, pursuing or photographing individuals once asked to desist; nor remain on property when asked to leave, and must not follow individuals. If requested, they must identify themselves as a GNM journalist.
- iii) Editors must ensure these principles are observed by those working for them and take care not to use non-compliant material from other sources.

Ⓞ/* 4. Intrusion into grief or shock

In cases involving personal grief or shock, inquiries and approaches must be made with sympathy and discretion, and publication handled sensitively. These provisions should not restrict the right to report on proceedings in court, including inquests.

Ⓢ / * 5. Reporting suicide and self-harm

When reporting suicide or self-harm, journalists should be conscious of the risk of encouraging others and therefore care should be taken to avoid excessive detail of the methods used, while taking into account the media's right to report legal proceedings. [See also [clause 4.](#)]

Ⓢ / * 6. Children

- i) All pupils should be free to complete their time at school without unnecessary intrusion.
- ii) They must not be approached or photographed at school without permission of the school authorities.
- iii) Children aged 17 and under must not be interviewed or photographed on issues involving their own or another child's welfare without consent from someone with appropriate parental responsibility or a similarly responsible adult.
- iv) Children aged 17 and under must not be paid for material about themselves, nor parents or guardians for material about their children or wards, unless it is clearly in the child's interest.
- v) Editors must not use the fame, notoriety or position of a parent or guardian as sole justification for publishing details of a child's private life.

7. Children in sexual offence cases

1. Journalists must not, even if legally free to do so, identify children aged 17 or under who are victims or witnesses in cases involving sexual offences.
2. In any press report of a case involving a sexual offence against a child:
 - i) The child must not be identified.
 - ii) Subject to any court order or statutory restriction to the contrary, the adult may be identified.
 - iii) The word "incest" must not be used where a child victim might be identified.
 - iv) Care must be taken that nothing in the report implies the relationship between the accused and the child.

*** 8. Hospitals**

- i) Journalists must identify themselves and obtain permission from a responsible executive before entering non-public areas of hospitals or similar institutions to pursue inquiries.
- ii) The restrictions on intruding into privacy are particularly relevant to inquiries about individuals in hospitals or similar institutions.

Ⓢ / * 9. Reporting of crime

- i) Relatives or friends of persons convicted or accused of crime should not generally be identified without their consent, unless they are genuinely relevant to the story.
- ii) Particular regard should be paid to the naming of victims, the reporting of invasive, insensitive or graphic details, or the use of images that could compromise a victim's dignity.
- iii) Particular regard should be paid to the potentially vulnerable position of children aged 17 or under who witness, or are victims of, crime. This should not restrict the right to report legal proceedings.

iv) Journalists should generally avoid naming children aged 17 or under who have been arrested for a criminal offence but have not yet appeared in a youth court unless they can show that the individual's name is already in the public domain, or that someone with appropriate parental responsibility or a similarly responsible adult has given their consent.

This does not restrict the right to name juveniles who appear in a crown court, or whose anonymity is lifted.

Ⓢ / * 10. Clandestine devices and subterfuge

- i) Journalists must not seek to obtain or publish material acquired by using hidden cameras or clandestine listening devices; or by intercepting private or mobile telephone calls, messages or emails; or by the unauthorised removal of documents or photographs; or by accessing digitally held information without consent.
- ii) Engaging in misrepresentation or subterfuge, including by agents or intermediaries, can only be justified in the public interest, and then only when the material cannot be obtained by other means.

Ⓢ / * 11. Victims of sexual assault

Journalists must not identify victims of sexual assault or publish material likely to lead to the identification of a victim of sexual assault unless there is adequate justification and we are legally free to do so. In this case, you will need permission from the relevant senior duty editor.

Ⓢ / * 12. Discrimination and incitement to hatred

- i) Journalists must avoid prejudicial or pejorative reference to an individual's race, colour, ethnicity, nationality, religion, age, sex, gender identity, sexual orientation, disability, or to any physical or mental illness.
- ii) Details of an individual's race, colour, ethnicity, nationality, religion, age, sex, gender identity, sexual orientation, disability, or any physical or mental illness must be avoided unless genuinely relevant to the story.

13. Financial journalism

- i) Even where the law does not prohibit it, journalists must not use for their own profit financial information they receive in advance of its general publication, nor should they pass such information to others.
- ii) Journalists must not write about shares or securities in whose performance they know that they or their close family members have a significant financial interest without disclosing the interest to the editor or head of business.
- iii) They must not buy or sell, either directly or through nominees or agents, shares or securities about which they have written recently or about which they intend to write in the near future.

14. Confidential sources

Journalists have a moral obligation to protect confidential sources of information.

Ⓢ 15. Witness payments in criminal trials

i) No payment or offer of payment to a witness - or any person who may reasonably be expected to be called as a witness - should be made in any case once proceedings are active as defined by the Contempt of Court Act 1981. This prohibition lasts until the suspect has been freed unconditionally by police without charge or bail, or the proceedings are otherwise discontinued; or the accused has entered a guilty plea to the court; or, in the event of a not guilty plea, the court has announced its verdict.

Ⓢ / * ii) Where proceedings are not yet active but are likely and foreseeable, journalists must not make or offer payment to any person who may reasonably be expected to be called as a witness. Any rare exceptions must be discussed in advance with the relevant senior duty editor and editorial legal services. In no circumstances should any such payment be conditional on the outcome of a trial.

* iii) Any payment or offer of payment made to a person later cited to give evidence in proceedings must be disclosed to the prosecution and defence. The witness must be advised of this requirement.

Ⓢ / * 16. Payment to criminals

i) Payment or offers of payment for stories, pictures or information which seek to exploit a particular crime or to glorify or glamorise crime in general, must not be made directly or via agents to convicted or confessed criminals, or to their associates - who may include family, friends and colleagues.

ii) Journalists invoking the public interest to justify payment or offers would need to demonstrate that there was good reason to believe the public interest would be served. If, despite payment, no public interest emerged, the material should not be published. Any payment must be discussed in advance with the relevant senior duty editor and director of editorial legal.

Ⓢ The public interest

The definition of the public interest by the Ipso Editors' Code of Practice continues to provide a strong basis for use by the Guardian.

There may be exceptions to clauses marked * where they can be demonstrated to be in the public interest.

1. The public interest includes, but is not confined to:

- i. Detecting or exposing crime, or the threat of crime, or serious impropriety.
- ii. Protecting public health or safety.
- iii. Protecting the public from being misled by an action or statement of an individual or organisation.
- iv. Disclosing a person or organisation's failure or likely failure to comply with any obligation to which they are subject.
- v. Disclosing a miscarriage of justice.
- vi. Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public.
- vii. Disclosing concealment, or likely concealment, of any of the above.

2. There is a public interest in freedom of expression itself.
3. The extent to which material (including related material) is already in the public domain or will become so, is also a consideration, as is the extent to which the material under consideration is likely to contribute to a current debate of public interest.
4. Journalists considering invoking the public interest in their reporting should discuss this at the outset with senior editors and, where appropriate, editorial legal.
5. Journalists who invoke the public interest will need to demonstrate that they reasonably believed publication - or journalistic activity undertaken with a view to possible publication - would both serve, and be proportionate to, the public interest, and will need to be able to explain how they reached that decision at the time.
6. An exceptional public interest would need to be demonstrated to override the normally paramount interests of children aged 17 or under.

This editorial code of practice was revised in July 2023

Editorial code guidance

The GNM editorial code guidance should be read in conjunction with the [GNM editorial code of practice](#) above.

A. Accuracy and objectivity

Journalists should take care to be accurate. Significant errors must be corrected as soon as possible, and if a piece of journalism misleads, it should be clarified. [See [clause 1](#) of the GNM editorial code of practice above, on accuracy.] Any significant corrections should be made through the readers' editor.

Journalists working in news should always strive to be fair and objective in their reporting, and recognise how their natural personal biases could affect that.

B. Anonymous contributions

Articles commissioned by GNM should only be published anonymously or pseudonymously in exceptional circumstances, for example where the author's safety, privacy or livelihood may be compromised. In these cases, motive and alternatives should be considered, and the permission of the relevant senior duty editor is needed. This provision need not apply to authors with established pseudonyms who are commissioned or hosted by GNM in that capacity. For vox pops and other similar contributions it may sometimes be appropriate to refer to an interviewee by their first name only.

Regular anonymous columns should be kept to a minimum and must be approved by the editor-in-chief, or the US editor or Australia editor, or the managing editor.

In the rare instances where anonymity has been offered, journalists must be diligent in providing it. In these cases, readers should be made aware that identities have been obscured or withheld.

[See also [clause 14](#) of the GNM editorial code of practice on confidential sources above; and editorial code guidance [section D](#) below on children and [section U](#) below on sourcing - social media.]

C. Anonymous quotations

Journalists should always aim to attribute information to its source, and anonymous quotations should generally be avoided. GNM recognises that people may sometimes speak more honestly if they are allowed to speak anonymously. The use of non-attributed quotes can therefore sometimes give readers a truer understanding of a subject than bland on-the-record quotes. Do not use indiscriminately.

Anonymous pejorative quotes may be used only in rare circumstances – and only after consultation with the relevant senior duty editor. In the absence of specific approval, journalists should paraphrase anonymous pejorative quotes. Bear in mind that non-attributed quotes can confer an unfair advantage on speakers who cannot be challenged; and their value is decreased when readers cannot assess the source.

[See also [clause 14](#) of the GNM editorial code of practice on confidential sources above; and editorial code guidance [section D](#) below on children and [section U](#) below on sourcing - social media.]

D. Children

Special care should be taken when dealing with children. Children merit special protection as they may be less aware of the risks and consequences of their actions. GNM considers anyone aged 17 or under to be a child (this is in line with the [UN convention on the rights of the child](#), the UK's Information Commissioner's Office guidance on [children and the GDPR](#) and its [age appropriate design code of practice for online services](#), and most criminal law legislation in England and Wales). Articles that include significant intrusions into children's private lives without their understanding and consent need a strong public interest justification.

In view of the longevity of online material, editors should consider whether children's identities (eg names and photographs) should be withheld to protect them from embarrassment or harm as they grow older.

In any event, children should not be photographed or interviewed without consent from someone with appropriate parental responsibility or a similarly responsible adult on matters that may affect their welfare, and you must speak to the senior duty editor if for any exceptional reason you wish to publish such material without securing such consent. On occasion, when it doesn't affect welfare, it may be acceptable to interview children without such consent but without publishing identifying details. Special considerations apply when children write, or are commissioned for, articles - and such proposals should always be discussed with the relevant senior duty editor and editorial legal services.

These provisions extend to journalists who are considering making their own children the subject of their work for GNM.

[See [clause 6](#) of the GNM editorial code of practice above, on children, and [clause 7](#) on children in sexual abuse cases, above.]

E. Digital enhancement of images and multimedia

Video, audio, images, montages and illustrations should generally not be digitally enhanced or altered. Any rare exceptions must be approved in advance by the relevant senior duty editor and must be clearly labelled.

[See also [section P](#) below on pictures.]

F. Direct quotations

Direct quotations should not be changed to alter their context or meaning. Please also read the section on [quotes](#) in the Guardian's style guide.

G. Errors and amendment requests

It is GNM's policy to correct significant errors as soon as possible. All complaints and corrections under the code, and requests by readers for articles to be amended or, in exceptional cases, deleted, should be brought to the attention of the office of the readers' editor in the first instance. Journalists have a duty to cooperate frankly and openly and in a timely fashion with the readers' editor. All journalists should read the [daily](#) and [Sunday](#) correction columns published in print and online.

[See [clause 1](#) of the GNM editorial code of practice above, on accuracy.]

H. Generative AI

Generative AI is a broad label describing any type of artificial intelligence that uses unsupervised learning algorithms to create new digital text, images, video, audio or code. Prominent examples include ChatGPT and Midjourney and the technology is rapidly becoming more sophisticated and accessible. Material created using generative AI raises significant issues around bias, ownership, plagiarism and intellectual property rights. Most importantly for journalism, it is not reliable or consistent, and tends to introduce errors and inaccuracies in unpredictable ways.

AI systems should not be used to generate text or images intended to be directly inserted into published journalism outside of exceptional and specific circumstances. Any exceptional use must be explicitly approved by the relevant senior duty editor and must be clearly signalled to readers on the article itself.

I. Grief

People should be treated with sensitivity during periods of personal grief and trauma.

[See [clause 4](#) of the GNM editorial code of practice above.]

Clause 4 is not aimed at preventing the publication of stories involving death and shocking events, but care should be taken to avoid exacerbating people's distress through intrusive or insensitive reporting, or by publishing unnecessary or sensational details of an event. Journalists should bear in mind the international readership and make the same considerations however distant events are from the location of publication.

In most circumstances, journalists should wait until death has been formally confirmed and the family has been notified before identifying a deceased person. However, in some cases this may not be practicable, for example where police must publicly identify a deceased person in order to find their next of kin. This clause is not breached if the public interest in the act, or publication, outweighs any potential harm caused.

Journalists should be particularly careful to avoid making any approaches that may result in the harassment of a person who is suffering from grief or shock. *[See also [clause 3](#) of the GNM editorial code of practice above, on harassment.]* Knocking on a person's door to gain first-hand details for a story may be an acceptable method of newsgathering, provided this is done in a reasonable and sensitive manner. Requests to desist must be respected.

See also Ipsos guidance on [reporting major incidents](#).

J. Guidance labels and distressing content

Descriptions or depictions of graphic or violent details should be included only when essential to the facts of our journalism. Where audio, video or photographs are editorially justified but likely to cause distress, it may sometimes be appropriate to preface them with warnings, explanations or labels as appropriate. Such labels should not generally be necessary on articles, where headlines and trails can usually give a clear indication of the subject matter.

K. Interviewees

Treat all interviewees and journalistic subjects with respect, fairness and dignity. You must ensure that interviewees understand that you are a journalist, understand your questions and are in a position to reply to them. Make sure that interviewees understand that you are speaking to them with a view to publication; in rare circumstances in which we agree to conversations off the record or for background only, both sides should be clear about the terms of such arrangements. *[see also [clause 10](#) of the GNM editorial code of practice on clandestine devices and subterfuge, above and, below, editorial code guidance [section V](#) on subterfuge and covert behaviour.]* Give special consideration when interviewing people who have been victims of crime or tragedy, children *[see also guidance [section D](#) on children, above]* and other vulnerable people, for example, people with a learning disability or dementia.

L. Language

Our use of language reflects our values, as well as changes in society. Journalists must read and adhere to the [Guardian and Observer style guide](#). Take particular care when writing about sensitive issues, and familiarise yourself with the guidance on topics involving protected characteristics as well as [suicide](#), [self-harm](#) and [abuse](#). Add footnotes to relevant support organisations where appropriate. *[See also [clause 12](#) of the GNM editorial code of practice, on discrimination and incitement to hatred.]*

It is almost never appropriate to use a swearword outside direct quotes unless absolutely essential to the facts of the piece. In rare instances where an editor wishes to make an exception, eg in a first-person or opinion piece, the stronger the swearword, the greater thought should be given to using it. Avoid using them in headlines, pull quotes and standfirsts and never use asterisks, which are a cop-out. Journalists should not casually use words that are likely to offend some readers. Please also read the sections on [swearwords](#) and [racial terminology](#) in the style guide.

M. Major incident reporting and unfolding events

When reporting on major incidents (eg suspected or actual terrorist incidents or natural disasters) it is particularly important to remain objective, verify information before publication, and avoid speculation, stereotypes and sensationalist language. Anyone considering publishing or linking to live footage of major incidents as they are unfolding, or to material by perpetrators seeking to publicise their motives, should talk to the relevant senior duty editor. Consider the safety of individuals who are caught up in such events.

A number of clauses in the GNM editorial code of practice are relevant to the issue of reporting major incidents. These include [clause 1](#) (accuracy), [clause 2](#), (privacy), [clause 3](#), (harassment), [clause 4](#) (intrusion into grief or shock), [clause 6](#) (children), and [clause 8](#) (hospitals) and related GNM guidance. [See also [Ipsos guidance on reporting major incidents](#); [Rusi report on terrorism and the mass media](#).]

N. Mental health

Journalists should take particular care with stories about mental health. They should not mention or speculate about a person's mental health unless it is of direct relevance to a story. Please also read the Guardian and Observer style guide section on [mental health](#).

If relevant, they should include helpline information at the end of the piece, for example:

In the UK, the charity [Mind](#) is available on 0300 123 3393 and [Childline](#) on 0800 1111. In the US, [Mental Health America](#) is available on 800-273-8255. In Australia, support is available at [Beyond Blue](#) on 1300 22 4636, [Lifeline](#) on 13 11 14, and at [MensLine](#) on 1300 789 978

O. Open court reporting and inquests

Reporting from open court, including inquests, is generally safe legally as long as it is fair and accurate [see legal guidance [section B](#) on contempt of court and court reporting, below], but careful consideration should always be given to the publication of invasive, insensitive or graphic details, or images that could compromise a victim's dignity, or impact on their privacy. This is true even if such information is given in open court (as is often the case, particularly at inquests), is more widely reported by others, and/or the victim is not identified. Journalists should be able to justify the inclusion of such details in their reporting. Where particularly graphic details are to be published, this should be done only after consultation with the relevant senior duty editor.

P. Pictures and video

Journalists should take care when using images or footage that may be considered invasive, insensitive or graphic. [See also [section J](#) of editorial code guidance on guidance labels, above.]

Journalists should consider human dignity when selecting photographs/videos to illustrate stories - this also applies when using generic images to illustrate sensitive issues, such as mental and physical health (including eating disorders, obesity, depression, self-harm etc), as well as social issues, such as domestic violence, child abuse etc.

The use of images or footage that can be seen as disrespectful of the people depicted can have implications not just for those individuals, but for others living with any of these issues.

Government handout photographs should be used only if they have news value, and should always be clearly labelled as such.

If you are in any doubt, please consult the picture desk. *[See also the GNM editorial code of practice [clause 2](#) on privacy, [clause 3](#) on harassment and [clause 6](#) on children, above; and editorial code guidance [section E](#) on digital enhancement of images and multimedia, and [section J](#) on guidance labels, both above; and [section R\(i\)](#) on privacy: photography, below.]*

Q. Plagiarism

Journalists must not represent others' work as their own. Journalists must not reproduce other people's material without attribution, other than in exceptional circumstances - for example where the source cannot be identified – and only with the permission of the relevant senior duty editor.

R. Privacy

In keeping with article 8 of the European convention on human rights, GNM believes in respecting people's privacy. Privacy is both an ethical consideration and a legally enforceable right. [Clause 2](#) of the GNM editorial code of practice requires journalists and editors to show respect for an individual's private and family life, home, health and correspondence, and to justify any intrusions as being in the public interest.

Much journalism may be intrinsically intrusive, but where any potential intrusion into people's privacy may be involved, there must be proper prior consideration of the public interest and authorisation from the relevant senior duty editor: the degree and method of any intrusion must be justified by the seriousness of the story and the public good that is likely to follow from its publication. There may be circumstances where people can reasonably expect privacy even in a public place. GNM does not conduct "fishing" expeditions into people's private lives unless the issue, suspicion and prospects of success are all serious.

i. Photography and video footage

Care should be taken when taking photographs or filming in both public and private places in circumstances where an individual has a reasonable expectation of privacy, is unaware that the picture or footage is being taken for publication, and/or has not provided consent. The location and the activity engaged in can be important considerations. [Clause 2](#) does not prohibit the use of long-lens photography, but the use of a long lens may be a relevant factor when considering whether there has been an intrusion into an individual's privacy in a particular situation. *[See also editorial code guidance [section P](#) on pictures, above.]*

ii. Identifying details

Caution should also be exercised about reporting and publishing identifying details, such as street names and house numbers, that may enable others to intrude on the privacy or safety of people who have become the subject of media coverage.

iii. Application of the Omand principles

The former UK security and intelligence coordinator Sir David Omand has previously written about the need for proportionality before committing an action that would infringe upon an individual's right to privacy. The degree of intrusion must be justified by the seriousness of the story and the public good that is likely to follow from its publication. GNM has used the principles set out by Omand to pose five questions that journalists should ask themselves about a situation in which they are considering intruding on privacy:

1. Is there sufficient cause? The intrusion must be justified by the scale of potential harm that might foreseeably result from it.
2. Is there integrity of motive? The intrusion must be justified in terms of the public benefit that might reasonably follow from any possible publication.
3. Will the methods used be in proportion to the seriousness of the story and its public interest, using a reasonable level of intrusion?
4. Is there proper authority? Any intrusion must be authorised at a sufficiently senior level and with appropriate oversight.
5. Is there a reasonable prospect of success? Fishing expeditions are not justified.

Where there is a legitimate expectation of privacy, journalists and editors must, when called upon, be able to demonstrate, in regard to both the gathering and publication of information, why an infringement of privacy is justified in the public interest.

In addition to [clause 2](#) of the GNM editorial code of practice on privacy, journalists should also heed [clause 3](#) (harassment), [clause 4](#) (intrusion into grief or shock), [clause 6](#) (children), and [clause 8](#) (hospitals), and any advisory notices circulated by Ipso. Please also refer to [section D](#) (data protection) and [section F](#) (privacy) in the legal guidance.

If you are in doubt about any matter with potential privacy implications, you must seek guidance from the relevant senior duty editor and, where appropriate, editorial legal services before publication.

S. The right to reply

“The voice of opponents no less than that of friends has a right to be heard.”

[CP Scott, Centenary Essay, 1921](#)

Journalists should make every effort to contact the person or organisation that is the subject of a story before publication, in order to put allegations to them and give them an opportunity to respond. This assists accuracy, is a matter of fairness and is vital in demonstrating that the public interest in publishing a story has been considered. The complexity of the issues and the ability to respond over time zones should also be taken into account. The more serious the criticism or allegations, the greater the obligation to allow the subject the opportunity to respond. Editorial legal services can advise on best practice.

T. Sources

When a source seeks anonymity or requests confidentiality, journalists should discuss this request with the relevant senior duty editor.

Journalists have a moral obligation to protect confidential sources of information. Otherwise sources of information should be identified as specifically as possible.

[See [clause 14](#) of the GNM editorial code of practice on confidential sources, above; [section B](#) of the editorial code guidance on anonymous contributions, above; and [section R](#) in the professional behaviour guidance on source care and protection, below.]

U. Sourcing - social media

GNM's editorial code of practice covers GNM content published on social media as well as print and online platforms. Before accessing, publishing or sharing material taken from social media or the wider internet, you must consider legal, copyright and ethical issues as you would with any other source. *[See also [section O](#) of the professional behaviour guidance on social media conduct, below.]* Journalists should also familiarise themselves with [GNM's social media guidelines](#).

V. Subterfuge and covert behaviour

Journalists should identify themselves as GNM employees (or freelancers on assignment for GNM) when working on a story or gathering material for publication, and be clear about the purpose of the interview. There may be rare instances involving public interest stories where this does not apply and subterfuge is justifiable, but this should be approved in advance by the relevant senior duty editor, and editorial legal should be consulted.

Where GNM is offered such material by a third party, journalists should immediately seek advice from the managing editor and editorial legal.

This applies to all GNM journalism, including material acquired (whether by GNM or third parties) by using hidden cameras/listening or recording devices, even if the material is not published. This also applies to any information obtained by the subterfuge of others. *[See [clause 10](#) of the GNM editorial code of practice, above, on clandestine devices and subterfuge.]*

W. Suicide and self-harm

Journalists should exercise particular care with stories about suicide and self-harm, bearing in mind the risk of encouraging others. This applies both to presentation, including the use of pictures, and to descriptions of methods. Any substances or methods used should be referred to in general rather than specific terms if possible. Journalists should avoid speculation that appears to suggest a single/simple motive - these are often complex. Journalists should avoid using images that could act as "triggers", for example places where suicides have occurred, or scars from cutting. The feelings of relatives should be carefully considered. Journalists should be particularly careful when reporting legal proceedings and inquests; it is usually not necessary or appropriate to report every detail

revealed during these proceedings.

[See [clause 5](#) of the GNM editorial code of practice, above, on reporting suicide and self-harm, and editorial code guidance [section O](#), above, on open court reporting and inquests.]

Where appropriate the following note should be appended to stories about suicide:

In the UK and Ireland, [Samaritans](#) can be contacted on freephone 116 123, or email jo@samaritans.org or jo@samaritans.ie. In the US, the [National Suicide Prevention Lifeline](#) is at 988 or chat for support. You can also text HOME to 741741 to connect with a crisis text line counselor. In Australia, the crisis support service [Lifeline](#) is 13 11 14. Other international helplines can be found at [befrienders.org](#)

The order should be changed if necessary to reflect the context and origin of the story; only the Samaritans number need be used in print editions that are not sold outside the UK.

Journalists should also read the [Samaritans' media guidelines on reporting suicide](#).

X. Verification

Trust in the authenticity and reliability of journalists' sources is essential, and journalists should be tenacious in seeking reliable corroboration. Digital communications and a fast-moving news environment present special challenges for verification, and journalists should be particularly careful in verifying online, social media and email sources. They should state the level of substantiation they have been able to achieve (eg "the Guardian has been unable to independently verify the facts"). Journalists should not state as fact information about or from someone whom they cannot authenticate (eg "A woman who says she witnessed the riot", not "A woman who witnessed the riot"). Where relevant, journalists should be open with readers in saying what medium was used to conduct an interview (eg "told the Guardian via email" or "told the Observer in a Zoom interview"). Satisfaction with sources is the responsibility of desk editors as well as reporters and correspondents, and subeditors should be confident in challenging the dependability of information.

Internal guidance for GNM journalists - legal guidance

Laws around the world that may affect our reporting include those on defamation, privacy, data protection, copyright and contempt. Such laws are complex, and constantly developing, and may differ from country to country. In addition, there are laws around national security, official secrets and terrorism which may also affect our reporting. Please always consult the [editorial legal team](#).

The guidance below summarises the general legal position in the UK only. Colleagues in the US and Australia should consult their own legal advisers.

We are a global news organisation and our journalism is read around the world. This means we can potentially be sued anywhere for any article we publish.

Journalists should:

- a) Familiarise themselves with the current state of the law in their main area(s) of operation and ensure they undertake the training provided by GNM's in-house legal departments.
- b) Consult GNM's in-house or external legal departments or night lawyers in a timely manner before publication about specific legal concerns on stories.
- c) Read the regular legal notices about active cases and reporting restrictions emailed by the legal departments.
- d) Complete any online legal training in a timely fashion when requested to do so.
- e) Discuss their intentions with the editor-in-chief or the managing editor at the earliest opportunity if they are considering giving evidence to any court.

On any matter where the public interest has a role to play, please also refer to the [GNM editorial code of practice](#) and the relevant sections on [professional behaviour](#).

A. The Bribery Act 2010

This takes a robust approach to bribery, and creates a number of criminal offences which, even if committed abroad, can be prosecuted in the UK. These include (i) bribery - ie offering someone in the UK or abroad a financial or other advantage to improperly perform an activity (whether public or private), (ii) being bribed and (iii) bribing a foreign public official.

In some circumstances, offers or acceptances of hospitality and/or facilitation payments paid to public officials abroad in order to secure or expedite the performance of a routine or necessary action will come within the act. Journalists should be familiar with GNM's anti-bribery and corruption, and gifts and hospitality policies. There is no public interest defence, although where an individual is left with no alternative but to make a facilitation payment in order to protect against loss of life, limb or liberty there may be a defence of duress. Journalists should always discuss with the relevant senior

duty editor beforehand if they are concerned that any payments might fall into these categories and, if such payments are requested or made, they should inform the relevant senior duty editor of the circumstances as soon as they are able to afterwards. *[See also [section J](#) on freebies in the professional behaviour guidance, below.]*

B. Contempt of court and court reporting

Articles that relate to ongoing court cases can run the risk of prejudicing those cases. Statutory restrictions on reporting criminal cases start from the time of arrest and can last until a trial has finished (including, where appropriate, sentencing) or an appeal has been heard. Great care needs to be taken when publishing stories during this period. “Prejudice” could mean anything that improperly affects the proceedings. Particular concerns arise in respect of any information that suggests a defendant is guilty, or that relates to their character or previous convictions (as this would ordinarily not be heard by the jury). Online comments on such stories should always be turned off; any rare exceptions will need to be discussed with editorial legal and approved by the relevant senior duty editor. Be especially wary when reporting on cases that may involve a jury, such as inquests or those that will be tried in the crown court.

Similar considerations may also exist when reporting on other courts or tribunals.

Some restrictions apply automatically and courts can also impose their own orders restricting reporting. Journalists reporting on court cases should always check whether any such restrictions or orders are in place.

Automatic statutory restrictions on what can be reported exist in a number of areas but particularly around cases involving the family courts, children, vulnerable adults and the victims of sexual offences.

Journalists should take account of relevant provisions of the GNM editorial code of practice when reporting on court cases *[see clauses [4](#), [7](#), [9](#) and [11](#) above]* and any relevant code guidance on these sections. Please also read the section on [child sexual abuse](#) in the Guardian’s style guide. Ipso has produced some [useful guidance](#) on reporting of sexual offences.

Contemporaneous, fair and accurate reports of open court cases generally provide a legal defence against complaints of defamation and contempt of court. Journalists should, however, be aware that even where invasive, insensitive or graphic details or images are given in open court, publishing these may still compromise a victim’s dignity or impact on their privacy. *[See [section O](#) of the editorial code guidance on open court reporting and inquests, above.]*

C. Copyright

Journalists should not use content - whether pictures, text or other media - without checking that GNM has the necessary permissions (eg from agencies such as Reuters, AP). This includes social media. There are limited legal situations in which permission may not be needed but journalists must check with the picture desk, relevant senior duty editor or editorial legal before using such material without permission. Journalists should especially familiarise themselves with GNM’s [social media guidelines](#), which include a section on [copyright](#).

D. Data protection

Data protection legislation in the UK governs the processing of personal data by organisations. The definition of personal data is very wide and means any information about an identifiable living person. It will include using an individual's name, picture or any information about them in a story. The definition of “processing” is also very wide and is likely to include most journalistic uses of personal data, from obtaining it, holding and storing it, through to publishing it and retaining it thereafter. In most cases, journalists will be using personal data in a way that is reasonably necessary for the purposes of GNM journalism and will therefore be able to rely on GNM's legal bases for processing personal data, such as its legitimate interests as a commercial news, current affairs and information publisher.

There is also a “special purposes exemption” from needing to show a lawful basis, which should enable journalists to process personal data that has been collected with a view to publication and where a reasonable belief in a public interest justification has been identified before publication. The journalism exemption protects freedom of expression in public interest journalism both before and after publication. The scope of the journalism exemption is very broad and it can exempt most journalistic activities including gathering, investigating, publishing and retaining information after publication from most provisions of the UK GDPR and [Data Protection Act 2018 \(DPA\)](#), but it never exempts, for example, the obligation to keep personal data secure.

To be covered by this exemption, personal data must be being processed for the purposes of journalism and with a view to publication. It will apply where we reasonably believe that (1) publication of the material would be in the public interest and (2) complying with the usual requirements of the UK GDPR and DPA (which include processing of data in a lawful, fair and transparent manner; and only processing and retaining what is necessary) would be incompatible with journalism. When considering the public interest, journalists, together with their appropriate editors, should have regard to (1) the special importance of the public interest in freedom of expression; and (2) the requirements of the GNM editorial code of practice. When considering whether it would be compatible with journalism to comply with the usual requirements of the UK GDPR and DPA it is important to note that these obligations are more onerous when applied to “special category” data (such as racial and ethnic origins, political or religious opinions or beliefs, trade union membership, health, sex life and orientation), as well as when applied to data relating to suspected offenders in the context of criminal allegations, investigations and proceedings.

Where journalists are seeking to rely on the exemption for more high-profile, intrusive or potentially reputationally damaging public interest stories they should consider carefully the public interest in their intended publication. The Information Commissioner's Office (ICO), which is the regulator for information rights in the UK, expects GNM to be able to show, preferably by way of contemporaneous evidence, that where personal data which is more than minimally intrusive, or which could cause more than minimal harm, is included in a public interest story, there was an appropriate decision-making process in place to consider the public interest in publishing that data. Such stories are likely to require a more formal consideration of the public interest (weighed against other relevant legal rights) with the relevant senior duty editor and editorial legal services. Special considerations apply when children write articles, and such proposals should always be discussed with the relevant senior duty editor and editorial legal services.

Journalists should always make sure that all personal data is kept securely, which means taking reasonable steps to prevent it from being shared, lost, stolen or misused. They should comply with the [GNM information security policy](#).

If you suspect or become aware of a potential data incident, report it as soon as possible to information security (infosec@theguardian.com), the GNM data protection officer (dpo@theguardian.com) and editorial legal (legal@theguardian.com) so they can assess whether there has been a potential breach.

Data protection legislation also offers individuals the right to ask for their personal data or to request that their personal data is erased (among other rights). Should you be contacted with what sounds like a data access or data erasure request please contact editorial legal (legal@theguardian.com). It is not necessary for an individual to use the words “subject access request” or refer to the UK GDPR to exercise these rights.

The ICO has issued a [statutory data protection and journalism code of practice](#) under the [Data Protection Act 2018](#). Staff should familiarise themselves with it. Training sessions covering data protection law and journalism are regularly provided by editorial legal, with resources made available to colleagues.

E. Defamation

To sue for defamation in the UK, a claimant has to prove that a) they are identifiable in the piece; b) there was a publication; c) the piece is in whole or in part defamatory of them, ie it lowers someone in the estimation of right thinking members of society; and d) the publication has caused or is likely to cause them serious harm. The publisher then has the burden of proving a defence, ie that what was written was true, or honest opinion, or in the public interest, or covered by privilege. The editorial pre-publication right to reply (or invitation to comment) process can be an important part of the public interest defence in defamation. This may also involve pre-publication consideration of other relevant legal rights, such as privacy and data protection.

F. Privacy

[See also [section R](#) of the editorial code guidance on privacy, and [section D](#) of the legal guidance on data protection, both above.]

In keeping with article 8 of the European convention on human rights, GNM believes in respecting people’s privacy and recognises that where any potential intrusion into people’s privacy may be involved, whether in gathering or publishing information, there must be proper prior consideration of the public interest, balanced against any privacy rights.

As a starting point, where newsgathering or reporting, including pictures, audio or video, involves private information (which may include private and family life, home and correspondence, health and relationships, as well as, in some instances, reputation and professional and business activities), consideration should be given to whether there is a “reasonable expectation of privacy”. Determining whether there is a reasonable expectation of privacy is a fact-specific inquiry. Celebrities and people in public places, particularly children, may still retain, in some circumstances, a reasonable expectation of privacy.

Where an individual has a reasonable expectation of privacy, journalists must balance the public interest in freedom of expression against the competing privacy right. Any infringement of privacy in either the gathering of material or its publication should be justifiable as proportionate in the circumstances of each case.

The UK's supreme court has ruled that, as a legitimate starting point, people who are under criminal investigation, or have been arrested, are considered to have a reasonable expectation of privacy until they are charged, and as such they should not generally be named. Any exceptions will need to be discussed with editorial legal and approved by the relevant senior duty editor.

If you are in doubt about any matter with potential privacy implications, you must seek guidance from the relevant senior duty editor and, where appropriate, editorial legal services before publication.

Professional behaviour

GNM values its reputation for independence and integrity. Journalists should avoid conflicts of interest that could, or could appear to, undermine the editorial integrity or independence of GNM's journalism or fall short of the sort of transparency that our readers would expect. Journalists should disclose circumstances that may appear to be conflicts and could undermine trust if exposed by others. Consult the managing editor if in doubt.

A. Commercial products and promotions

No Guardian or Observer journalist or freelance contributor primarily associated with GNM should personally endorse commercial products without the express permission of the editor-in-chief, or the US editor or Australia editor, or the managing editor.

Freelance contributors considering writing about a product or brand from which they earn money outside their work with the Guardian/Observer must declare that relationship in advance to commissioning editors, and a footnote acknowledging the relationship must be included in the article.

Journalists should not agree to promote through text, pictures or other media, or through footnotes or product placement, the financial interests of prospective interviewees or contributors, or their sponsors, as a means of securing access to them. Promotional information about a subject or author provided in footnotes should be included only where, in the editor's judgment, it is of genuine interest or assistance to the reader.

Journalists should not be influenced by commercial considerations - including the interests of advertisers or the inclusion of [affiliate links](#) – in the selection and preparation of material for GNM.

Journalists working in editorial departments may not work on [paid content or advertisement features](#) produced by commercial teams.

B. Commissioning

GNM supports good commissioning practice, including fair treatment of freelancers. Editors should make reference to [GNM's freelance charter](#) when commissioning new contributors.

C. Conduct at work

Anyone representing GNM should behave professionally, dress appropriately and be courteous in all exchanges and contacts with readers, sources, interviewees and the subjects of our stories, members of the public and colleagues. This is the case whether an exchange takes place in person, by telephone, letter, email, online or on social media. Journalists and contributors should adhere to GNM's [social media guidelines](#).

D. Confidentiality

Journalists with access to personal information relating to other GNM employees are required to treat such information as confidential, and must not disclose it to anyone except in the course of discharging formal responsibilities.

E. Copy approval

No one should be given the right to copy approval. Never offer copy approval as a method of securing interviews or cooperation. In certain circumstances we may allow people to see quotes, for example in order to confirm accuracy. In exceptional circumstances we may allow people to see copy in advance but this should be offered only after obtaining senior editorial approval and should not be made subject to any obligation to alter copy.

F. Credits

The source of published material - whether pictures, text or other media - obtained from another organisation should be acknowledged, including quotes taken from other newspaper articles and from social media. Bylines should be carried only on material that is substantially the work of the bylined journalist. If an article contains a significant amount of agency copy then the agency should be credited.

G. Declarations of corporate interest

The Guardian and Observer are part of Guardian Media Group (GMG). Journalists should be careful to acknowledge that relationship in stories where appropriate. Anyone writing a story concerning GMG-related businesses should seek comments and/or confirmation in the normal way. Journalists should familiarise themselves with GMG's companies and interests. Full details are on the [on the GMG website](#). The same applies to foundations that support Guardian journalism through philanthropic partnerships, [details of which can be found here](#).

H. Declarations of personal interest

1. It is always necessary to declare an interest when a journalist is writing about something with which they have a significant connection. This applies to staff journalists and freelancers/contributors. The declaration should be to a head of department or editor during preparation. Full transparency may mean the declaration should appear in print and on the website.
2. A connection does not have to be a formal one before it is necessary to declare it. Acting in an advisory capacity in the preparation of a report for an organisation, for example, would require a declaration every time the journalist wrote an article referring to it.

3. Some connections are obvious and represent the reason why the writer has been asked to contribute. These should always be stated at the end of the contribution, even if the writer contributes regularly, as long as the writer is writing about their area of interest.
4. If you are employed as a columnist - with your views openly on display - you may have more latitude than a staff reporter, who would be expected to bring qualities of objectivity to their work.
5. Generally speaking, a journalist should not commission, write about or quote a relative, partner or close friend in a piece, even if the person is an expert in the field in question. If, for any reason, an exception is made to this rule, the connection should be made clear.
6. Commissioning editors should ensure freelancers are aware of these rules and make any necessary declaration.

I. Financial reporting

Journalists must report objectively on financial products and must not use or pass on financial information for their own or their associates' profit. Journalists must not write about shares in which they or their associates have a significant interest, and they must not deal in shares about which they have written or intend to write in the near future.

Financial and business journalists must take particular care not to publish inaccurate material and to distinguish between comment, conjecture and fact. This is particularly important for any journalists making investment recommendations to readers about whether to buy, sell or hold shares.

All business desk staff are expected to list all shares that they own, any transactions in those shares and any other investments which they believe ought to be properly disclosed because of a potential conflict of interest.

We maintain a register of these personal shares, which must be kept up to date. While it is acceptable for financial journalists to own shares, it is not acceptable for them to be market traders on a regular basis.

[See [clause 13](#) of the GNM editorial code of practice on financial journalism, above, and the [Ipsos best-practice guidelines on financial journalism](#).]

J. Freebies

- a. Journalists should not use their position to obtain private benefit for themselves or others.
- b. GNM will not allow any payment, gift or other advantage to undermine accuracy, fairness or independence. Any attempts to induce favourable editorial treatment through the offer of gifts or favours should be reported to the relevant senior duty editor. Where relevant, payments, gifts or other advantages will be disclosed.
- c. It should be made clear, through footnotes on any relevant article or other content, when an airline, hotel or other interest has borne the cost of transporting or accommodating a journalist. Acceptance of any such offer is conditional on GNM being free to assign and report, or not report, any resulting story as it sees fit.

d. Journalists should not be accompanied on any free trip or other arrangement by their partners, family members or friends. A rare exception to this rule might be a travel piece about family holidays. If a partner, family member or friend accompanies the journalist on a trip, the additional costs should be paid for by the journalist or person accompanying the journalist. Any exceptions must be cleared with the managing editor.

e. Gifts other than perishable or low-value items (less than £50) should be politely returned or donated to charity. Items supplied for use in reviews/photo shoots etc should be returned to the supplier, or if this is not appropriate/practical, stored for future use or donated to charity.

K. Freelance work and media appearances

Full-time staff journalists should not be contributing to other publications or media outlets without prior authorisation from the managing editor.

Staff journalists should talk to the Guardian's communications team before agreeing to appear on TV or other media to ensure that the opportunity is appropriate, and that you are fully prepared. In the first instance, please contact media.enquiries@theguardian.com.

Any requests to film inside the GNM offices must also be sent to media.enquiries@theguardian.com for approval.

L. GNM connections

Journalists should not use their positions to seek any benefit or advantage in personal business, financial or commercial transactions not afforded to the public generally. They should not use GNM email addresses or social media accounts in connection with non-GNM matters, or cite a connection with the Guardian or Observer to resolve consumer grievances, get quicker service or seek discounts or deals.

M. Offers of financial assistance

Journalists are occasionally contacted by readers who wish to give money or other help to people whose financial hardship the Guardian has highlighted. Neither GNM nor individual journalists should act as intermediaries for any such donations or fundraising initiatives, beyond putting people in contact if both parties are willing. Staff journalists should not set up crowdfunders connected with Guardian/Observer articles, and should not link to online fundraising appeals without the approval of the relevant senior duty editor.

N. Outside interests and engagements

GNM accepts journalists' right to a private life and the right to take part in civic society. However, it is important that outside interests do not come into conflict with journalists' work for GNM in any way that could compromise, or appear to compromise, the editorial integrity and reputation of individual journalists or GNM.

In particular, GNM considers that active political involvement and commitments may give rise to actual or perceived conflicts of interest. As such, it will generally not be appropriate for staff journalists working for GNM to hold political office at local, national or international levels.

Staff journalists should discuss their intentions with the editor-in-chief, or the US editor or Australia editor, or the managing editor at the earliest opportunity if they are considering any of the following:

- Working in an unpaid or paid capacity for a political party, or taking on any campaign role for a political party, whether at local, national or international level;
- Undertaking any outside employment likely to conflict with their professional duties;
- Giving evidence to any court;
- Making representations or giving evidence to any official body in connection with material that has been published by GNM;
- Chairing or speaking at public events in their capacity as a GNM journalist.

Where a public speaking engagement has been approved by the editor-in-chief, or the US editor or Australia editor, or the managing editor, GNM journalists should not accept or request payment for any event that takes place within work hours, although travel and other reasonable expenses may be accepted. If preparation or attendance at an event involves a significant call on private time it may be appropriate to accept a reasonable fee but this must be approved in advance by the managing editor, having particular regard for other clauses within these guidelines, such as conflict of interest, declarations of interest and endorsement of commercial products. Staff journalists should never provide public relations advice.

Any personal or financial interests, relationships or activities that could create the impression of a conflict of interest or lead to questions about professionalism should be declared on all staff and freelance journalists' online biographies. This could include, for example, any office held, paid or unpaid, in any organisation or company, charitable or otherwise. Anyone who is unsure about whether to declare something should consult the managing editor.

Journalists should have regard for other sections within this guidance, such as [section H](#) on declarations of personal interest and [section A](#) on endorsement of commercial products.

O. Payments for stories

GNM does not pay sources or interviewees either financially or through gifts or inducements. The relevant senior duty editor must approve rare exceptions. *[See also [clause 15](#) of the GNM editorial code of practice, above, on witness payments in criminal trials.]*

Journalists should not engage the paid services of external non-journalistic agents or assistants without the prior knowledge and approval of the relevant senior duty editor. On occasion we may pay tip fees to bona fide freelance journalists.

P. Relationships

Journalists should not generally commission, write about, photograph, film or make editorial decisions about any individual with whom they have a close personal or financial relationship. Journalists should consider whether a relationship with a public figure or journalist inside or outside GNM creates a potential conflict of interest, and if they consider it does, they should discuss this with the managing editor.

Q. Social media conduct

Always treat people with respect and professionalism on social media, even if you disagree with them. Remember that anything you write on a “private” social media page can easily be shared or published by other people. Use common sense and think twice before you post.

[GNM’s full social media guidelines](#) and a document on [staying safe online - responding to abuse and harassment and where to get support](#) are available on GNM’s intranet, Spike. All journalists working for GNM should familiarise themselves with these documents and adhere to them. *[See also [section U of GNM’s editorial code guidance on sourcing - social media, above.](#)]*

R. Source care and protection

Journalists who work regularly with sources should ensure they understand the practicalities and limitations of source care and protection. When communicating with potential sources, journalists should be realistic about the limitations of source protection methods, and ensure that they do not commit to outcomes that are outside GNM’s control. Journalists must remember they are not in a position to offer sources practical or legal advice about the consequences of publishing articles.

All journalists should attend training provided by GNM editorial legal and information security teams on the issue of source protection; consult with [InfoSec](#) to ensure that technology and software are up to date; and familiarise themselves with [methods for contacting the Guardian securely](#), such as Secure Drop. *[See also [clause 14 of the GNM editorial code of practice on confidential sources, above.](#)]*

Electronic devices used while working for GNM should be kept up to date, and must comply with [standards of encryption set out by GNM InfoSec](#). Alongside good digital practice, meeting in person or receiving information by post or hand delivery can still serve a purpose.

Further resources: [Protecting Sources and Whistleblowers in a Digital Age](#), by the Information Law and Policy Centre, Institute of Advanced Legal Studies: An initiative supported by Guardian News and Media.

This internal guidance was revised in July 2023

Appendix

CP Scott's essay published in the *Manchester Guardian* on the centenary of the paper's first issue

CP Scott, Editor, Thursday May 5, 1921

A Hundred Years

A hundred years is a long time; it is a long time even in the life of a newspaper, and to look back on it is to take in not only a vast development in the thing itself, but a great slice in the life of the nation, in the progress and adjustment of the world. In the general development the newspaper, as an institution, has played its part, and no small part, and the particular newspaper with which I personally am concerned has also played its part, it is to be hoped, not without some usefulness. I have had my share in it for a little more than fifty years; I have been its responsible editor for only a few months short of its last half-century; I remember vividly its fiftieth birthday; I now have the happiness to share in the celebration of its hundredth. I can therefore speak of it with a certain intimacy of acquaintance. I have myself been part of it and entered into its inner courts. That is perhaps a reason why, on this occasion, I should write in my own name, as in some sort a spectator, rather than in the name of the paper as a member of its working staff.

In all living things there must be a certain unity, a principle of vitality and growth. It is so with a newspaper, and the more complete and clear this unity the more vigorous and fruitful the growth. I ask myself what the paper stood for when first I knew it, what it has stood for since and stands for now. A newspaper has two sides to it. It is a business, like any other, and has to pay in the material sense in order to live. But it is much more than a business; it is an institution; it reflects and it influences the life of a whole community; it may affect even wider destinies. It is, in its way, an instrument of government. It plays on the minds and consciences of men. It may educate, stimulate, assist, or it may do the opposite. It has, therefore, a moral as well as a material existence, and its character and influence are in the main determined by the balance of these two forces. It may make profit or power its first object, or it may conceive itself as fulfilling a higher and more exacting function.

I think I may honestly say that, from the day of its foundation, there has not been much doubt as to which way the balance tipped so far as regards the conduct of the paper whose fine tradition I inherited and which I have had the honour to serve through all my working life. Had it not been so, personally, I could not have served it. Character is a subtle affair, and has many shades and sides to it. It is not a thing to be much talked about, but rather to be felt. It is the slow deposit of past actions and ideals. It is for each man his most precious possession, and so it is for that latest growth of time the newspaper. Fundamentally it implies honesty, cleanness, courage, fairness, a sense of duty to the reader and the community. A newspaper is of necessity something of a monopoly, and its first duty is to shun the temptations of monopoly. Its primary office is the gathering of news. At the peril of its soul it must see that the supply is not tainted. Neither in what it gives, nor in what it does not give, nor in the mode of presentation must the unclouded face of truth suffer wrong. Comment is free, but facts are sacred. "Propaganda", so called, by this means is hateful. The voice of opponents no less than that of friends has a right to be heard. Comment also is justly subject to a self-imposed restraint.

It is well to be frank; it is even better to be fair. This is an ideal. Achievement in such matters is hardly given to man. Perhaps none of us can attain to it in the desirable measure. We can but try, ask pardon for shortcomings, and there leave the matter.

But, granted a sufficiency of grace, to what further conquests may we look, what purpose serve, what task envisage? It is a large question, and cannot be fully answered. We are faced with a new and enormous power and a growing one. Whither is the young giant tending? What gifts does he bring? How will he exercise his privilege and powers? What influence will he exercise on the minds of men and on our public life? It cannot be pretended that an assured and entirely satisfactory answer can be given to such questions. Experience is in some respects disquieting. The development has not been all in the direction which we should most desire. One of the virtues, perhaps almost the chief virtue, of a newspaper is its independence. Whatever its position or character, at least it should have a soul of its own. But the tendency of newspapers, as of other businesses, in these days is towards amalgamation. In proportion as the function of a newspaper has developed and its organisation expanded, so have its costs increased. The smaller newspapers have had a hard struggle; many of them have disappeared. In their place we have great organisations controlling a whole series of publications of various kinds and even of differing or opposing politics. The process may be inevitable, but clearly there are drawbacks. As organisation grows personality may tend to disappear. It is much to control one newspaper well; it is perhaps beyond the reach of any man, or any body of men, to control half a dozen with equal success. It is possible to exaggerate the danger, for the public is not undiscerning. It recognises the authentic voices of conscience and conviction when it finds them, and it has a shrewd intuition of what to accept and what to discount.

This is a matter which in the end must settle itself, and those who cherish the older ideal of a newspaper need not be dismayed. They have only to make their papers good enough in order to win, as well as to merit, success, and the resources of a newspaper are not wholly measured in pounds, shillings, and pence. Of course the thing can only be done by competence all round and by that spirit of co-operation right through the working staff which only a common ideal can inspire. There are people who think you can run a newspaper about as easily as you can poke a fire, and that knowledge, training, and aptitude are superfluous endowments. There have even been experiments on this assumption, and they have not met with success. There must be competence, to start with, on the business side, just as there must be in any large undertaking, but it is a mistake to suppose that the business side of a paper should dominate, as sometimes happens, not without distressing consequences. A newspaper to be of value should be a unity, and every part of it should equally understand and respond to the purposes and ideals which animate it. Between its two sides there should be a happy marriage, and editor and business manager should march hand in hand, the first, be it well understood, just an inch or two in advance. Of the staff much the same thing may be said. They should be a friendly company. They need not, of course, agree on every point, but they should share in the general purpose and inheritance. A paper is built up upon their common and successive labours, and their work should never be task work, never merely dictated. They should be like a racing boat's crew, pulling well together, each man doing his best because he likes it, and with a common and glorious goal.

That is the path of self-respect and pleasure; it is also the path of success. And what a work it is! How multiform, how responsive to every need and every incident of life! What illimitable possibilities of achievement and of excellence! People talk of "journalese" as though a journalist were of necessity a pretentious and sloppy writer; he may be, on the contrary, and very often is, one of the best in the world. At least he should not be content to be much less. And then the developments. Every

year, almost every day, may see growth and fresh accomplishment, and with a paper that is really alive, it not only may, but does. Let anyone take a file of this paper, or for that matter any one of half a dozen other papers, and compare its whole make-up and leading features today with what they were five years ago, ten years ago, twenty years ago, and he will realise how large has been the growth, how considerable the achievement. And this is what makes the work of a newspaper worthy and interesting. It has so many sides, it touches life at so many points, at every one there is such possibility of improvement and excellence. To the man, whatever his place on the paper, whether on the editorial, or business, or even what may be regarded as the mechanical side – this also vitally important in its place – nothing should satisfy short of the best, and the best must always seem a little ahead of the actual. It is here that ability counts and that character counts, and it is on these that a newspaper, like every great undertaking, if it is to be worthy of its power and duty, must rely.