

Undeb Bangor Student Media Code

Approved by: Undeb Bangor Trustee Board

Date approved:

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1. Introduction

Undeb Bangor believes that effectively run Student Media Groups provide an important means of reflecting student voice and student life. They also provide challenging and rewarding opportunities for students, enabling members to develop practical skills and experience in journalism, broadcasting, publishing and media production.

The purpose of Student Media Groups can be summarised as follows:

- To produce student publications, broadcasts and other media content that is organised by students for students.
- To act as a forum for student debate and discussion, reflecting as accurately as possible student life and the views and experiences of Undeb Bangor members.
- To provide students with opportunities to gain skills and experience in the organisation, production and distribution of media content.
- To provide content which informs and entertains its audiences, with accuracy, fairness and responsible journalism at its forefront.

- To provide a means through which students can scrutinise, question and comment upon issues affecting students.

Student Media Groups are affiliated Student Societies of Undeb Bangor and are supported by the Student Opportunities team.

Student Media Groups must therefore comply with:

- this Student Media Code;
- the Students' Union and Student Media Group Agreement;
- their approved constitution;
- Undeb Bangor policies, procedures and governing documents;
- requirements applying to affiliated Student Groups; and
- applicable legal and regulatory requirements.

Student Media Groups are responsible for ensuring that their members and contributors are aware of the requirements relevant to the activities they undertake.

For the purposes of this Code:

Student Media Group means an Undeb Bangor affiliated Student Society whose activities include producing journalistic, editorial, broadcast or other media content.

Student Media Leader means the President, Chair, Editor, Station Manager or other committee member with overall responsibility for the relevant Student Media activity.

Editor means any person authorised by a Student Media Group to make editorial decisions or approve material for publication or broadcast.

Contributor means any individual producing or contributing material to a Student Media Group.

Content includes printed, digital, audio, broadcast, photographic, video and social media content.

Student Opportunities team means the relevant Undeb Bangor staff responsible for supporting Student Groups. The team may seek further advice from other appropriate Undeb Bangor staff, insurers, legal advisers or other specialist advisers where required.

Where there is uncertainty about the application of this Code, advice should be sought from the Student Opportunities team.

2. Code of Conduct and Ethical Standards

Student Media Groups are subject to the law and must also operate in accordance with appropriate professional journalistic and broadcasting standards.

Relevant professional standards include:

Print and digital journalism

- The IPSO Editors' Code of Practice
- The National Union of Journalists Code of Conduct

Broadcast media

- Applicable Ofcom requirements and the Ofcom Broadcasting Code where relevant to the service concerned

Where Undeb Bangor or a Student Media Group is not formally regulated by a particular professional body, the relevant code should nevertheless be regarded as an appropriate standard of good journalistic or broadcasting practice where applicable.

Student Media volunteers should familiarise themselves with the principles of the NUJ Code of Conduct.

In particular, Student Media should:

1. uphold freedom of expression, media freedom and the importance of the public being informed;
2. strive to ensure that information is honestly conveyed, accurate and fair;
3. take reasonable steps to correct significant or harmful inaccuracies;
4. clearly distinguish between fact, comment, conjecture and opinion;
5. obtain information by honest, straightforward and open means, except where another method is justified by a significant public interest and has been appropriately considered under the High-Risk Content process;
6. respect people's privacy, grief and distress unless intrusion can be justified by a legitimate public interest;
7. protect confidential sources where confidentiality has properly been agreed, subject to the limitations of the law;
8. resist pressure or inducements intended improperly to influence or suppress editorial content;
9. avoid unlawful discriminatory, hateful or abusive content;
10. take particular care when reporting on children, vulnerable people or individuals experiencing significant distress;
11. avoid plagiarism; and
12. respect copyright and other intellectual property rights.

Student Media Groups should ensure that contributors understand these standards before undertaking relevant activity.

3. Editorial Independence

The relationship between Student Media Groups and Undeb Bangor is set out in more detail within the **Students' Union and Student Media Group Agreement**.

The key principles can be summarised as follows:

- Student Media Groups are affiliated Student Societies and therefore form part of Undeb Bangor's Student Group structure.
- Student Media Groups are not organisationally independent from Undeb Bangor.
- Undeb Bangor provides support, resources, training and guidance to Student Media Groups.

- Undeb Bangor does not ordinarily seek to exert editorial control over Student Media content; however, it must have the ability to protect itself from litigious action.
- Student Media Groups should be able to determine their own editorial priorities and produce content which scrutinises, challenges or criticises Undeb Bangor, Bangor University and others.
- Editorial freedom exists within the requirements of the law, this Code and Undeb Bangor's responsibility to manage legal, regulatory, safeguarding, welfare, financial and other significant organisational risks.
- Undeb Bangor must therefore retain the ability, in exceptional circumstances, to require content to be amended, withheld, suspended, removed or retracted where this is reasonably necessary to manage such risks.

The purpose of the controls within this Code is to manage risk, rather than to prevent legitimate scrutiny, debate or criticism.

4. Advertising and Sponsorship

Student Media Groups may seek advertising or sponsorship opportunities in accordance with Undeb Bangor's Student Group financial, sponsorship and advertising procedures.

No Student Media Group or individual member may enter into an advertising, sponsorship or commercial agreement on behalf of Undeb Bangor without the appropriate approval.

All advertising and sponsorship arrangements must:

- follow Undeb Bangor's financial procedures;
- be appropriately documented;
- comply with relevant advertising standards and legal requirements;
- comply with any restrictions or exclusions applied by Undeb Bangor; and
- clearly distinguish paid or sponsored content from independent editorial content.

Sponsorship or advertising must not give an advertiser improper influence over independent editorial decisions.

All income and expenditure associated with advertising and sponsorship must be administered through the appropriate Undeb Bangor financial processes.

Where there is uncertainty about an advertising or sponsorship proposal, the Student Media Group must consult the Student Opportunities team before committing to the arrangement.

5. High-Risk Content

The following process must be followed by Student Media Leaders, Editors and contributors.

Identifying High-Risk Content

High-Risk Content is editorial content which it is reasonable to believe may create a significant:

- legal risk;
- regulatory risk;
- safeguarding risk;

- risk to the welfare or safety of an identifiable person;
- data protection or confidentiality risk;
- financial risk; or
- other serious organisational risk,

or which is reasonably likely to result in serious complaint or legal challenge.

Content includes output in print, broadcast and digital formats, including websites, podcasts, livestreams and social media.

The following is a non-exhaustive list of content which would normally be considered High-Risk Content:

- Content relating to ongoing police investigations or criminal investigations.
- Reporting of ongoing court proceedings or matters which may be subject to reporting restrictions or contempt of court law.
- Content relating to terrorism, proscribed organisations or organisations which incite or promote unlawful hatred.
- Content which names or otherwise enables the identification of an individual and alleges criminality, misconduct, dishonesty, discrimination, harassment, abuse or other serious wrongdoing.
- Serious allegations made against a business, landlord, letting agent, organisation or other identifiable body.
- Content making serious criticism or allegations about identifiable members of Undeb Bangor or Bangor University staff, elected officers or students.
- Content identifying an individual where publication may create a foreseeable risk to their safety or welfare.
- Content involving allegations of sexual misconduct, sexual violence, domestic abuse, harassment or safeguarding concerns.
- Content involving children or vulnerable adults where significant welfare, privacy or identification issues arise.
- Content involving suicide, self-harm or serious mental health concerns where inappropriate reporting may create a risk of harm.
- Confidential or leaked documents or information.
- Content relying materially upon anonymous or confidential sources to support serious allegations.
- Covert recordings or other covert newsgathering techniques.
- Significant use of sensitive personal information.
- Content where significant copyright or intellectual property concerns exist.
- Content where a legal complaint, threatened legal action or threatened injunction has been received.
- Content which may breach a legal restriction, confidentiality obligation or court order.
- Any other content which the Student Media Leader, Editor or contributor believes may present an unusual or significant legal or other risk.

This list is not exhaustive.

Student Media Leaders and Editors should raise content with the Student Opportunities Team where they are uncertain whether it creates a significant risk.

Political content

Care must be exercised when reporting on party political matters.

As a registered charity, Undeb Bangor must remain independent from political parties and candidates and must comply with applicable charity law.

Student Media Groups may legitimately report on, scrutinise and debate political parties, elections, candidates and political issues. Commentary on party politics should be balanced and provide a student view of the topic being debated.

However, Student Media Groups must take care not to use Undeb Bangor resources in a way which could reasonably amount to the Union or the Student Media Group supporting or opposing a political party or candidate.

Advice should be sought from the Student Opportunities team where this distinction is unclear.

6. Process for Managing High-Risk Content

Where content is identified as High-Risk Content, the following process must be followed.

The process exists to protect Student Media volunteers, subjects of reporting and Undeb Bangor from avoidable legal, regulatory, safeguarding and other serious risks.

Deliberate disregard or circumvention of this process may place individuals and Undeb Bangor at significant risk and may therefore be treated as a disciplinary matter.

High-Risk Content Process

Action	Responsible Person	Expected Timeline
Identify potential High-Risk Content and inform the Student Opportunities team	Student Media Leader / Editor	As early as possible and normally no later than 5 working days before planned publication or broadcast
Provide draft content and relevant supporting evidence to the Student Opportunities team	Student Media Leader / Editor	As soon as reasonably practicable following identification
Provide relevant source material, evidence, correspondence and details of verification undertaken where requested	Student Media Leader / Editor	Normally within 1 working day of request
Consider whether further specialist, insurance or legal advice is required	Student Opportunities team	As soon as reasonably practicable
Seek further advice where required	Student	As soon as reasonably

	Opportunities team / appropriate Undeb Bangor staff	practicable
Offer an appropriate right of reply where significant criticism or allegations are being made	Student Media Leader / Editor	Normally before the final decision on publication
Provide any response received to those reviewing the content	Student Media Leader / Editor	As soon as received
Consider whether content can proceed as drafted, requires amendment, should be delayed, or should not be published	Student Opportunities team with relevant advice	Before publication
Make any agreed amendments and provide revised content where required	Student Media Leader / Editor	Before publication
Final confirmation that identified High-Risk Content controls have been satisfactorily addressed	Student Opportunities team / designated senior staff member where required	Before publication

These timescales should be treated as the normal process.

Student Media Groups should therefore identify potentially High-Risk Content early enough for appropriate review to take place.

Where journalism is genuinely urgent or time-sensitive, the Group should contact the Student Opportunities team as early as possible. A shorter timetable may be used where reasonably practicable.

Possible risk controls

Depending on the circumstances, the Student Media Group may be required or advised to:

- undertake further fact checking;
- obtain additional evidence;
- seek further comment;
- provide a longer or more appropriate right of reply;
- distinguish more clearly between fact and opinion;
- amend potentially defamatory wording;
- anonymise an individual;
- remove identifying information;
- remove material which cannot be sufficiently substantiated;
- remove material which breaches copyright;

- include appropriate context;
- include a warning or signposting;
- delay publication while advice is obtained; or
- take another proportionate action to manage the identified risk.

Withholding or preventing publication

Undeb Bangor may require content to be withheld, amended or not published where it reasonably considers that the content:

- is or is likely to be unlawful;
- creates a material risk of legal liability;
- breaches an applicable regulatory requirement;
- creates a serious safeguarding risk;
- creates a serious and identifiable risk to an individual's welfare or safety;
- materially breaches this Code or another applicable Undeb Bangor policy or governing requirement; or
- creates another significant organisational risk which cannot reasonably be controlled through less restrictive measures.

Where practicable, the Student Media Group will be informed of:

- the concern identified;
- the reason for the decision;
- any amendments or controls which could enable publication; and
- how the decision can be reviewed.

Where possible, Undeb Bangor will seek to use the least restrictive effective measure available.

Final authority to prevent or require removal of content will rest with the Board of Trustees, following appropriate advice.

Urgent action may be taken where necessary to prevent an immediate or serious risk.

7. Right of Reply and Reporting Allegations

Student Media Groups should provide a reasonable right of reply where content contains significant criticism or allegations about an identifiable person or organisation.

The request should:

- explain the substance of the proposed criticism or allegation;
- provide sufficient information for the person or organisation to respond meaningfully;
- clearly identify the deadline for response; and
- provide reasonable time to respond having regard to the complexity and urgency of the matter.

Where possible, at least 48 hours should normally be allowed for significant or complex matters.

A shorter period may be reasonable for genuinely time-sensitive journalism.

A failure to respond does not automatically prevent publication where reasonable attempts have been made to obtain comment.

Relevant responses should be accurately and fairly reflected.

Records of attempts to obtain comment should be retained.

8. Conducting Interviews and Recording

Where reasonably practicable, individuals should understand when they are being interviewed or providing information for publication.

Student Media contributors should make clear:

- that they are acting on behalf of the relevant Student Media Group;
- the broad subject of the interview; and
- where appropriate, whether the discussion is on the record.

Where a conversation is intended to be:

- off the record;
- on background; or
- not for attribution,

this should be agreed clearly between the parties.

Permission should normally be sought before recording interviews.

Any proposal to use covert recording or deception as part of newsgathering must be treated as High-Risk Content and referred to the Student Opportunities team before use wherever practicable.

Interview notes, recordings and relevant correspondence relating to potentially contentious content should be retained in accordance with this Code.

9. Plagiarism and Copyright

Student Media Groups must not permit plagiarism or breaches of copyright.

Use of content belonging to others

Images, audio, text, video, graphics and other copyright material belonging to third parties may only be used where:

- permission has been obtained;
- an appropriate licence permits the use;
- the material is genuinely copyright-free or out of copyright; or
- a relevant legal exception has been appropriately established.

Material being available online does not mean it is free to use.

Student Media Groups must retain appropriate evidence of copyright permissions and licences.

Content submitted to Student Media

By submitting original content for publication by a Student Media Group, the contributor grants the relevant Student Media Group and Undeb Bangor a non-exclusive, royalty-free licence to:

- publish;
- broadcast;
- reproduce;
- store;
- archive; and
- make the content available through the Group's relevant channels.

Potentially significant copyright disputes or claims must be referred immediately to the Student Opportunities team.

10. Use of Artificial Intelligence

Artificial Intelligence tools may be used to support Student Media activity where appropriate, but responsibility for the accuracy, legality and quality of published content remains with the Student Media Group and its contributors.

AI-generated content must not be treated as a reliable factual source without appropriate verification.

Student Media Groups must not knowingly publish fabricated:

quotations, sources, interviews, evidence, images, audio, or video

in a manner which could reasonably mislead the audience into believing it is authentic.

Where AI-generated or substantially AI-altered content could reasonably be mistaken for genuine journalistic evidence or an authentic depiction of a person or event, it should be appropriately labelled.

AI tools must not be provided with confidential, sensitive or personal information unless their use is permitted by applicable data protection and information security requirements.

Student Media Leaders should ensure that there is appropriate editorial oversight of significant use of generative AI.

11. Submission and Publication of Content

Contributors submitting material to Student Media Groups agree that the content may be edited for:

- accuracy;
- clarity;
- length;
- style;

- legal compliance;
- compliance with this Code; and
- appropriate editorial standards.

Significant changes which materially alter the meaning of a contributor's work should, where reasonably practicable, be discussed with the contributor.

Published content will not ordinarily be removed simply because:

- the contributor has changed their opinion;
- the contributor subsequently regrets publication;
- another person disagrees with it; or
- the content becomes controversial.

Where appropriate, material may instead be:

- corrected;
- clarified;
- updated; or
- accompanied by an editorial note.

Removal or retraction may be appropriate where required to address a significant legal, factual, safeguarding, privacy or other serious concern.

12. Online Content, Websites and Social Media

The requirements of this Code apply equally to:

- Student Media websites;
- blogs;
- social media accounts;
- podcasts;
- livestreams;
- video platforms;
- digital publications; and
- other online platforms operated on behalf of a Student Media Group.

The speed or informal nature of online publication does not remove the requirement to comply with this Code.

Student Media Group platforms should include wording making clear that:

“Views and opinions expressed by individual contributors do not necessarily reflect the views of Undeb Bangor.”

Where platforms allow comments or other user-generated content, Student Media Groups should establish appropriate moderation arrangements.

Content which is:

- unlawful;
- defamatory;
- threatening;
- harassing;
- unlawfully discriminatory;
- abusive; or
- otherwise in serious breach of applicable rules

may be removed.

Potentially serious complaints concerning online content should be referred to the Student Media Leader and, where appropriate, the Student Opportunities team.

13. Managing Relationships with Undeb Bangor and Bangor University

An effective working relationship between Student Media, Undeb Bangor and Bangor University is beneficial to students and the wider student community.

Student Media Groups should nevertheless retain appropriate editorial independence when reporting on either organisation.

Student Media Groups should seek to ensure that:

- appropriate right of reply is offered where significant criticism or allegations are made about Undeb Bangor or Bangor University;
- reasonable time is provided for responses;
- reporting about either organisation is accurate and appropriately verified; and
- contributors clearly identify themselves as acting on behalf of Student Media when seeking formal comment.

Undeb Bangor should seek to ensure that:

- reasonable Student Media enquiries are responded to in a timely manner;
- accurate and up-to-date information is provided where available; and

When speaking with an elected officer or member of staff, Student Media contributors should make clear where a conversation is intended to provide attributable comment for publication.

Neither elected officers nor staff members are required to participate in interviews or respond to every question.

Where a person declines to comment, this may be reported accurately.

14. Reporting on Sensitive Matters

Student Media Groups are likely to report on sensitive subjects affecting students.

Relevant recognised professional guidance should be used when reporting issues including:

- suicide and self-harm;
- mental health;

- sexual violence;
- domestic abuse;
- bereavement;
- crime;
- discrimination;
- hate incidents;
- children and vulnerable adults; and
- other matters involving significant distress or vulnerability.

Particular care should be taken not to include unnecessary detail which could increase the risk of harm.

Where appropriate, articles or broadcasts should include proportionate signposting to relevant support services.

Content involving significant safeguarding concerns must be treated as High-Risk Content.

15. Data Protection and Confidential Information

Student Media Groups must handle personal information responsibly and in accordance with applicable data protection requirements and Undeb Bangor procedures.

Particular care must be taken with information concerning:

- health;
- sexual life or sexual orientation;
- racial or ethnic origin;
- religious or philosophical beliefs;
- political opinions;
- criminal allegations or offences;
- children;
- safeguarding concerns; and
- other sensitive or confidential information.

Where a Student Media Group proposes to publish sensitive personal information and is relying upon a journalistic or public-interest justification, the matter should be treated as High-Risk Content where there is significant uncertainty or risk.

Confidential documents or information must not be published simply because they have been provided to Student Media.

The legality, public interest and potential consequences of publication must be considered.

16. Content Complaints

Student Media Groups must provide an accessible means by which a person can complain about published or broadcast content.

A complaint should normally first be submitted to the relevant Student Media Group.

The complaint should identify:

- the content concerned;
- the nature of the concern;
- where possible, the relevant section of this Code; and
- the remedy being sought.

The Student Media Group should acknowledge and consider the complaint within a reasonable timeframe.

Where a complaint is upheld, possible remedies may include:

- correction;
- clarification;
- amendment;
- apology;
- right of reply;
- editorial note;
- removal; or
- retraction.

Any remedy should be proportionate to the nature and seriousness of the breach.

Significant corrections should be given appropriate prominence.

Where the complainant is dissatisfied with the Student Media Group's response, or where the Group fails to respond within a reasonable timeframe, the matter may be escalated through the relevant Undeb Bangor complaints process.

Complaints concerning the **conduct of an individual or committee**, rather than the editorial content itself, will normally be considered through the relevant Undeb Bangor Student Group complaints or disciplinary process.

17. Corrections, Retractions and Removal of Content

Student Media Groups should correct significant inaccuracies promptly.

Where appropriate, the original content should remain available with a clear correction or editorial note rather than being deleted.

Content may need to be removed or retracted where it:

- is unlawful;
- contains a serious factual inaccuracy which cannot adequately be corrected;
- creates a serious safeguarding or welfare risk;
- seriously infringes privacy;
- infringes copyright or other intellectual property rights;
- breaches a legal reporting restriction;
- is subject to an appropriate legal requirement; or

- otherwise presents a significant ongoing risk.

Where Undeb Bangor considers that urgent removal is required, it may require the relevant Group to remove:

- online content;
- social media content;
- listen-again or watch-again material;
- digital publications; or
- remaining copies of printed material.

Where printed material needs to be withdrawn, the Student Media Group must provide reasonable assistance in removing remaining copies from circulation.

Where practicable, the Student Media Leader will be informed before action is taken and provided with the reasons for the decision.

Where urgent action is necessary, content may be temporarily removed while the matter is reviewed.

18. Breaches, Conduct and Discipline

Student Media Groups and their members are required to comply with this Code.

Where a breach occurs, Undeb Bangor will consider:

- the seriousness of the breach;
- the actual or potential harm caused;
- whether the breach was deliberate or accidental;
- whether appropriate advice had been sought;
- whether the Group cooperated in addressing the issue;
- previous relevant breaches; and
- whether agreed risk-control processes were deliberately circumvented.

Depending on the circumstances, action may include consideration through the relevant Undeb Bangor complaints or disciplinary process.

Deliberate disregard of, concealment from, or circumvention of the High-Risk Content procedure may be treated as a serious breach.

19. Changes to the Code

This Code will be approved by the Trustee Board.

Undeb Bangor will seek to consult relevant Student Media Groups and appropriate staff when making substantive changes to the Code.

The Code should normally be formally reviewed at least every three years. The Code may be reviewed earlier where appropriate.