

### I. Statement of Purpose

The purpose of having a Code of Ethics and Practices (Code) is to protect the credibility of Arizona Public Media (AZPM) original programming by ensuring high standards of honesty, integrity, impartiality and conduct of staff. We accomplish this by (a) articulating the ethical standards we observe in pursuing and presenting stories and program content, (b) setting rules and policies that prevent conflicts of interest, (c) establishing guidelines for outside work and activities that may reflect on AZPM, and (d) establishing policies and procedures to ensure that the activities of AZPM that fall outside journalism – corporate underwriting, foundation funding, marketing and donor activities – do not jeopardize our journalistic independence or involve AZPM reporters, editors, hosts or content producers in activities inappropriate to their role as journalists.

### II. Who and What are Covered

This Code covers all AZPM staff with a special emphasis on staff (full-time, part-time, freelance, students, interns and volunteers) who are involved in any way with the development, promotion, production and presentation of original program content (journalists). It also covers content support staff and senior managers. The Code applies to all content platforms for AZPM productions, including TV, radio, online and new media.

### III. Statement of Principles

Our coverage and presentation must be fair, unbiased, accurate, complete and honest. As AZPM staff members, we are expected to conduct ourselves in a manner that leaves no question about our independence and fairness. We must treat the people and topics we cover and our audience with respect.

We recognize that our first obligation is to the public and that any commitment other than service to the public undermines trust and credibility. We understand that service in the public interest creates an obligation to reflect the diversity of the community and guard against oversimplification of issues and events. We will provide a full range of information to enable the public to make informed decisions.

- **Truth** means that we will pursue facts aggressively and present stories accurately, in context, and as completely as possible.
- **Fairness** means that we present multiple views about a subject – and treat them even-handedly. This range of views may be encompassed within a single story on a topic, or it may be represented via a body of coverage or a series of presentations.
- **Unbiased** means that we separate our personal opinions – such as an individual’s religious beliefs or political ideology – from the subjects we are covering. We do not approach any coverage with overt or hidden agendas.
- **Honesty** means we do not deceive the people or institutions we cover about our identity or intentions, and we do not deceive our audience. We do not deceive our audience by presenting the work of others as our own (plagiarism), by editing interviews in ways that distort their meaning, or by manipulating audio and/or video in ways that distorts its meaning, or misrepresent the means whereby the audio and/or video was obtained. The same principle of honest representation applies to photographs used online. Honesty means owning up publicly and quickly to mistakes we make on air, online or in public.
- **Integrity** means that we present stories and information with integrity and decency, avoiding real or perceived conflicts of interest, and respect the dignity and intelligence of the audience as well as the subjects of our stories.

#### IV. Conflicts of Interest

Conducting ourselves in a manner that inspires confidence in AZPM as independent and fair means avoiding actual and apparent conflicts of interest or engaging in outside activities, public comment or writing that calls into question our ability to report fairly on a subject.

All employees of AZPM have a responsibility to disclose potential conflicts of interest. Revealing a conflict of interest after an individual has already participated in coverage where such a conflict exists or appears to exist, can be extremely damaging to the reputation of the organization. AZPM staff must, at the time they are first assigned to cover or work on a matter, disclose to their immediate supervisor any business, commercial, financial or personal interests where such interests might reasonably be construed as being in actual, apparent or potential conflict with their duties.

#### V. Outside Work, Freelancing, and Speaking Engagements

1. The primary responsibility of AZPM full-time journalists is to gather, write, edit, produce, or present content for AZPM and not to work in direct competition with AZPM. An example of competing with AZPM would be breaking a story for another news outlet before reporting the story for AZPM.
2. Full-time AZPM staff must get **written permission** for all outside freelance or journalistic work. Requests should be submitted in writing to the employee's immediate supervisor. If the employee's immediate supervisor is unavailable, the request must be submitted to the supervisor's department head. If the department head is unavailable, the request must be submitted to the Chief Executive Officer (CEO). Approval will not be unreasonably denied if the proposed work will not discredit AZPM, conflict with AZPM's interests, create a conflict of interest for the employee or interfere with the employee's ability to perform AZPM duties. Supervisors must respond within five business days of receiving a written request. A copy of the request and disposition will be filed with the AZPM Human Resources Coordinator.
3. Full-time AZPM staff may not engage in outside public relations work, paid or unpaid. Exceptions may be made for certain volunteer non-profit, nonpartisan activities, such as participating in the work of a church, synagogue or charitable organization, so long as such work would not conflict with the interests of AZPM in reporting on activities related to that charity. When in doubt, employees must consult their supervisor before engaging in such work.
4. Full-time AZPM staff may only accept speaking fees from educational or non-profit groups not engaged in significant lobbying or political activity. Determining whether a group engages in significant lobbying or political activity is the responsibility of the staff member seeking permission, and all information must be fully disclosed in writing to the staff member's supervisor before engaging in such activities.
5. AZPM journalists may not speak to groups where the journalist's appearance might put in question his or her impartiality. Such instances include situations where the employee's appearance may appear to endorse the agenda of a group or organization.
6. AZPM journalists must receive written permission from the News Director to appear on TV or other media. It is not necessary to seek permission in each instance when the employee is a regular participant on an approved show. Permission for such appearances may be revoked if AZPM determines they raise questions about the journalist's impartiality.
7. In appearing on TV or other media, AZPM journalists should not express views they would not air in their role as journalists on AZPM programs. They should not participate in shows that encourage punditry and speculation rather than fact-based analysis.

#### VI. Personal Gain, Gifts, Freebies, Loaned Equipment or Merchandise, etc.

1. AZPM staff may not accept compensation, including property or benefits of any kind, from people or institutions they cover. AZPM staff may accept gifts of token value (hats, mugs, t-shirts, etc.). Unsolicited items of significant value will be returned with a letter thanking the sender, but stating our policy on gifts.
2. AZPM staff may not use any non-public information acquired at work for personal gain, or use their association with AZPM for personal gain. No AZPM staff may disclose information acquired by AZPM to anyone inside or outside of AZPM if the intent is to use that information for personal or institutional gain. This prohibition does not apply to accepted journalistic practices, such as sharing information as a member of a media “pool.”
3. AZPM staff may not sell items like books, CDs, etc., that are received at AZPM for review. Such items belong to AZPM and to the University of Arizona. Books, CDs and the like which are no longer needed will be offered first to the UA Library and then to UA Surplus Property for disposition.

#### VII. Ethical Conduct in Coverage of News

1. There is zero tolerance for plagiarism. AZPM journalists may not take other peoples’ work and present it as their own. Please note that much of this document is based on the codes of ethics adopted by NPR and the Radio Television Digital News Association (RTDNA), and is used with permission.
2. AZPM journalists must take special care in the use they make of information from wire service stories, reports by other broadcast news organizations, newspaper clips or articles in other publications. No material from another source should ever be included verbatim, or substantially so, without attribution.
3. Wire services: There is only one category of quotation from wire services for which it is acceptable to use quotes without attribution. The exception is when an AP or other wire service story is about a public event (e.g., a press conference, speech by a public official in a public setting, an official statement of a government agency, a congressional hearing, and the like). In such cases, we reasonably expect that AP is a reliable conveyor of those quotes in the same way we regard the transcript services we use for such events. However, reporters and editors must use caution and check source material if there is reason to believe that a quote has been inaccurately reported or has been taken out of its proper context.
4. When using material from newspaper stories, AZPM journalists must double-check “facts” and other material gleaned from those stories. Too often, incorrect information is passed down from one news story to another because of the failure of one news organization to get it right. AZPM strives to never pass on such errors.
5. AZPM journalists are required to pay special attention when using information from news websites and other informational websites, social media sites such as Facebook and Twitter and other digital media, even if that information is for background only and not attribution. All the principles of this policy apply, and an extra note of caution is prescribed because of the rapid moving nature of digital information and the difficulty there might be in tracing it to its origin.
6. AZPM journalists must treat the people they cover fairly and with respect. They must always keep in mind that gathering and reporting information may cause harm or discomfort, and journalists must weigh that against the importance of the story. AZPM journalists must show sensitivity when seeking or using interviews of those affected by tragedy or grief. They must show special sensitivity when dealing with children and inexperienced or unsophisticated sources or subjects, or individuals who have difficulty understanding the language in which they are being interviewed.

7. There are also legal considerations when dealing with minors (anyone under the age of 18). Prior to interviewing any minor, written or recorded permission MUST be obtained from the minor's parent or legal guardian before using the material. Minors cannot be identified in any way (by name, description, location, etc.) without permission. Only if the minor is not individually identifiable – for example, the sound of a gaggle of children on a playground – is permission not required. If there are other more routine instances in which a reporter wishes to use audio from a minor who is identified when permission has not been obtained, the reporter should consult the News Director to determine whether use of the material might be permissible in that specific instance.
8. AZPM journalists may not pay for information from sources or newsmakers. They may not allow sources or interviewees to dictate how a topic will be covered, or which other voices or ideas will be included. They may not agree to submit questions in advance.
9. When AZPM journalists attribute information in a story to a "source" or "sources," it is expected that these are the AZPM journalists' sources and that they have obtained the information firsthand. If this is not the case, and the sources are ones quoted by other news organizations, then those sources must be attributed to those other news organizations.

### VIII. Politics, Community and Outside Activities

AZPM journalists, on-air, and management staff may not run for office, endorse candidates or otherwise engage publicly and openly in politics, nor issue any personal opinions about political races or issues via social media as noted in Section IX. Below.

1. AZPM journalists may not participate in marches and rallies involving causes or issues that AZPM covers, nor should they sign petitions or otherwise lend their name to such causes, or contribute money to them.
2. AZPM journalists may sit on community advisory boards, educational institution trustee boards, boards of religious organizations or boards of non-profit organizations. Such activities must be disclosed to the CEO, News Director or designee, and AZPM may revoke approval if continued service will create the appearance of a conflict of interest or an actual conflict.
3. When a spouse, family member or companion of an AZPM journalist is involved in political activity, the journalist should be sensitive to the fact that this could create real or apparent conflicts of interest. In such instances the AZPM journalist must advise his or her supervisor to determine whether he or she should recuse him or herself from a certain story or certain coverage.

### IX. Social Media Policy

Social media platforms offer significant opportunities to interact, build relationships, and enhance interpersonal and professional connections. As employees of AZPM, and as members of the University of Arizona (UA) community, we must be ever vigilant to recognize the ways social media content may positively and adversely affect:

- Our personal and professional reputations and credibility;
- The reputation and credibility of AZPM; and
- The reputation and credibility of the UA.

In an effort to protect employee privacy rights and interests, the professional interests of AZPM and the UA, and to provide firm, fair, consistent, and clear direction regarding the use of social media by AZPM employees, the mandatory guidelines set forth below have been established.

**Note:** As used in this policy, the term, "social media", refers to blogs, forums, and social networking sites including, but not limited to, Twitter, Facebook, LinkedIn, YouTube, Instagram, and SnapChat.

**a. Personal Accounts:**

1. Employees should use appropriate privacy settings to reduce the chance(s) that the personal information and/or work product/content they post on social media is accessible to an unintended audience. If you have questions regarding privacy settings that may minimize your exposure to unintended audiences, please contact AZPM IT Department Director Jason Katterhenry at 520.621.7374 for assistance.
2. Notwithstanding the implementation of approved privacy settings, employees must assume that their personal and professional lives merge online. Employees must not post anything, even on personal accounts, that could (or would) embarrass AZPM or the UA, or that might compromise their ability to do their jobs.
3. Employees should also work under the assumption that everything they write, send, or receive on a social media site is public and discoverable by anyone with access to a computer. It is recommended and preferred that AZPM employees use their personal email address to register on social media sites that are used for personal purposes.
4. Employees should remember that the internet archives almost everything; therefore, even deleted postings can be searched and may be required to be saved and retrieved under certain circumstances (e.g., AZPM and/or UA record retention policies and litigation).
5. Employees must review and comply with the user agreement(s) of the social media you use, paying particular attention to directives that prohibit harassment, threats of violence, discriminatory statements, and personal slurs and/or attacks. AZPM employees may not use language that discriminates on the basis of gender, race, religion, nationality, sexual orientation, or any other basis prohibited by law.
6. Employees are expected to demonstrate respect for the dignity of AZPM, the UA, and our stakeholders and underwriters. Employees must not use social media to criticize market competition or to compete with AZPM.
7. Employees must not post confidential or proprietary information belonging to AZPM, or post statements that disparage AZPM. Additionally, AZPM employees must ensure that student privacy rights are protected as required by the Family Educational Rights and Privacy Act (FERPA). Employees must not describe student behavior or provide personally identifiable information on any social media site.
8. It is recommended that AZPM employees regularly monitor social media sites to ensure that others have not included them in images depicting unprofessional conduct. If you discover this type of content, it is recommended that you invoke the protections accorded pursuant to the site's user agreement to have the images removed.
9. Employees must identify themselves online as an employee of AZPM if they would do so in a similar situation offline. If the communication is for the purpose of collecting information for a story or program, employees must make sure the recipient of the communication clearly and unambiguously understands for what purpose the information will be used.
10. Employees are welcome and encouraged to post information related to AZPM, its stations or its productions. This is an effective way to help programming and the AZPM brand reach additional audiences.
11. Due to the nature of AZPM's mission, employees are prohibited from engaging in overt or covert political advocacy. State law prohibits UA employees and, by extension, AZPM employees, from using their AZPM/UA affiliation to influence electoral and legislative outcomes.

12. Employees may use social media during work hours provided that the use is directly related to their work, approved by their immediate supervisor (or his/her designee), and does not identify or reference AZPM clients, underwriters, customers, vendors, or volunteers without prior express written permission.
13. AZPM retains the right to monitor employee use of computers and the Internet, including employee blogging and social network activity.

#### **b. Station Accounts**

1. AZPM employees must follow the guidelines set forth above and the provisions of the AZPM Code of Ethics and Editorial Practices, which are incorporated herein by this reference as though fully set forth.
2. AZPM employees must comply with all applicable laws, regulations, and rules promulgated by AZPM, the UA, the FCC, the EEOC, the CPB, and any other state, federal, or local governmental agency with legal oversight affecting AZPM's day-to-day operations.
3. Posts to social media sites made by AZPM employees must add value to AZPM's online presence.
4. Employees must always be respectful when responding to comments and replies, and always have in mind the best interests of AZPM and its audiences.

#### **General Provisions**

1. Nothing in this policy is intended to in any way limit AZPM employees' rights under any applicable federal, state, or local laws, nor should its provisions be so interpreted.
2. Violations of this policy may result in discipline up to and including termination of employment.
3. AZPM management, in its sole discretion, may modify this and other policies without prior notification.

#### **X. Underwriting, Foundation Grants, Advertising, Marketing and Development.**

1. A firewall will be maintained between AZPM journalists and funders. Staff will inevitably speak with experts and officials who work at foundations that fund AZPM or for organizations which receive funds from grantors that also fund AZPM. We may not, however, discuss coverage planning with grant-making officials, clients, or their agencies.
2. The CEO will designate individuals who will serve as contacts with funders for grantmaking purposes or for other communications.

#### **XI. Application and Enforcement of this Code**

Application and enforcement of this Code is the responsibility of every AZPM staff member. This responsibility extends to both him/herself and to every other AZPM staff member with whom he or she works. We should feel free to guide ourselves by offering suggestions to our peers to help them comply with their obligations under this Code.

#### **XII. Miscellaneous**

Generally, AZPM journalists may not endorse products or provide blurbs for books, movies or performances using their AZPM identification. The CEO may make exceptions to this rule, which shall be made in writing, such as when the author of a book is a colleague of the blurb-writer. However, permission will be denied in other circumstances, such as when the author is a politician or someone the AZPM journalist covers. Blurbs drawn accurately and in context from material that has been on our air or our websites are permissible.

#### **XIII. Payola/"Plugola"**

Payola is the illegal practice of accepting payment or other inducement from media producers/ distributors/ promoters for the broadcast of programming in which the content is presented as being part of the normal day's broadcast. Under U.S. law, [47 U.S.C. § 317](#), a (commercial) station may play a specific program in exchange for money,

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but this must be disclosed on the air as being sponsored airtime, and that play of the program content should not be counted as “regular airplay”. AZPM does not accept sponsored programming and does not “sell” airtime.

AZPM’s operational and editorial policy prohibits employees who are in any way responsible for the selection, production or broadcast of program content from (a) engaging in any outside business that might create a conflict of interest in program selection or broadcast; (b) accepting anything of any value from persons in exchange for the inclusion of program or promotional content in a broadcast without the prior approval of management; and (c) promoting on the air anything in which any employee has a financial interest, by any means other than a standard (contracted) underwriting announcement, without the prior written approval of the General Manager.

Adapted from the NPR News Code of Ethics, 2/25/2004; the Code of Ethics and Professional Conduct Radio-Television News Directors Association, 9/14/2000.

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**XIV. Understanding and Acknowledgement**

I acknowledge that I have received and read the *Code of Ethics and Practices for Arizona Public Media Staff* dated May 8, 2018, and agree to abide by its standards. I understand that failure to follow this code may involve disciplinary action up to and including termination of my employment.

Please print, sign (in both places) and return this page to the AZPM Human Resources Coordinator within 5 business days.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

**XV. Understanding and Acknowledgement**

I hereby state that I have read and understand the following materials below which are posted in *myazpm* and will fully comply with the laws, regulations, policies, and rules contained therein:

- (a) Sections 317 and 507 of the Communications Act of 1934, as amended;
- (b) Section 73.1212 of the Federal Communications Commission’s regulations;
- (c) The FCC *Public Notice* released September 3, 1975, which sets forth the Commission’s 36 interpretations of Section 317 and Rule Section 73.1212;
- (d) The FCC *Public Notice* released May 18, 1988.

I understand and will fully comply with the “Payola” policy outlined in section XII above. If I am ever unsure as to whether a course of action is prohibited under these rules or policies, I will discuss in advance my intent to pursue that course of action with station management and obtain the written consent of the General Manager before engaging in any such activity.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name

Print