



## STANDARDS OF INTEGRITY FOR EMPLOYEES OF KUER

The trust we cultivate with the public is at the heart of our success as a station. The public expects us to offer honest and accurate news and information, free from outside interests, political influences or personal agendas. Our listeners, sources, and supporters expect us to be transparent in our actions and accountable for our decisions. We expect this of each other as staff members.

As employees of the University of Utah, we follow university policies and legal standards. We also abide by policies of the Federal Communications Commission (FCC) and Corporation for Public Broadcasting (CPB). This document does not outline all of those rules, although it does make reference to some policy and legal standards. As journalists, development professionals, and representatives of KUER, we have unique ethical questions to consider, and the purpose of this document is to outline best practices for meeting those additional expectations.

This document draws liberally, with permission, from the ethical guidelines adopted by the NPR Board of Directors as well as the work of the [“Editorial Integrity for Public Media”](#) project, which engaged hundreds of executives and senior staff of public broadcasting organizations, faculty from schools of journalism, and advisers in the areas of philanthropy, community engagement, and new media. The editorial codes from public radio stations WUWM in Milwaukee, Wisconsin, and WOSU in Columbus, Ohio, played a significant role in crafting this document and, with permission, are sourced throughout, as is material from the Utah Department of Human Resource Management.

Please note that while we expect our employees to adhere to these standards of integrity, nothing in this policy constitutes a contract of employment or creates any specific contractual right or obligation between KUER and its employees or any individual employee. All decisions regarding the application or interpretation of this policy are also in KUER’s sole discretion.

## GUIDING PRINCIPLES OF PUBLIC MEDIA

Public broadcasters, as employees of valued public service institutions, have adopted shared principles to strengthen trust and integrity with their community. They contribute to a strong civil society and active community life, provide access to knowledge and culture, extend education, and offer varied viewpoints and sensibilities.

These standards of integrity apply to all the content public media organizations produce and present, regardless of subject matter, including news, science, history, information, music, arts, and culture. These standards apply across all public media channels and platforms — broadcasting, online, social media, print, media devices, and in-person events.

As public media employees, we individually and collectively:

- Contribute to communities' civic, educational, and cultural life by presenting a range of ideas and cultures and offering a robust forum for discussion and debate.
- Commit to accuracy and integrity in the pursuit of facts about events, issues, and important matters that affect communities and people's lives.
- Pursue fairness and responsiveness in content and services, with particular attention to reflecting diversity of demography, culture, and beliefs.
- Are transparent in news gathering, reporting, and other content creation and share the reasons for important editorial and programming choices.
- Protect the editorial process from the fact and appearance of undue influence, exercising care in seeking and accepting funds and setting careful boundaries between contributors and content creators.
- Encourage understanding of fundraising operations and practices, acknowledge program sponsors, and disclose content-related terms of sponsor support.
- Maintain respectful and accountable relationships with individual and organizational contributors.
- Seek editorial partnerships and collaborations to enhance capacity, perspective, timeliness, and relevance and apply public media standards to these arrangements.
- Expect employees to uphold public media's integrity in their personal as well as their professional lives, understanding that employee actions, even when "off the clock," affect trust, integrity, credibility, and impartiality.
- Promote the common good, the public interest, and these commitments to integrity and trustworthiness in organizational governance, leadership, and management.

The freedom of public media professionals to make editorial decisions without undue influence is essential. It is rooted in America's commitment to free speech and a free press. It is reflected in the unique and critical media roles that federal, state, and local leaders have encouraged and respected across the years. It is affirmed by the courts. Trust is equally fundamental. Public media organizations create and reinforce trust through rigorous, voluntary standards for the integrity of programming and services, fundraising, community interactions, and organizational governance.

## ESTABLISHING EDITORIAL INDEPENDENCE

Public broadcasting is guided by the constitutional guarantees of a free press and by the regulatory framework established by Congress. The Radio Act of 1927 established the requirement that broadcasters operate in the "public interest, convenience, and necessity."

Our independence is deeply rooted in American values of freedom of speech and of the press, both protected by the First Amendment to the Constitution. The Public Broadcasting Act of 1967 reinforces that independence, directing the CPB to protect public broadcasting entities "from interference with, or control of, program content or other activities."

That being so, licensees hold their federal licenses in trust for the American people and are required to operate in the public's interest rather than in the licensee's interest. The University of Utah has a responsibility to operate KUER in the public interest as a public trustee of an asset belonging to the American people. As a trustee, it must enable professional management to operate in a way that will give the public full confidence in the editorial integrity of our

programming, meaning the responsible application by professional practitioners of a free and independent decision-making process that is ultimately accountable to the public. We believe that KUER's broadcasting activities best benefit the University of Utah when they are perceived to be independent, honest, and of the highest quality.

We give careful attention to contributions and grants that support specific programs, projects, and activities and avoid both the reality and the appearance of inappropriate influence. We reserve the right to refuse any donation for any reason, including, but not limited to, perceived conflicts of interest, potential audience misconception regarding a funder's role or influence, and perceived impact on our reputation, integrity, or fundraising ability. We review the propriety of prospective funders on a case-by-case basis, using the principles outlined below.

- A large and diverse funding group supports our work, including many individuals, businesses, governmental entities, and foundations. Most of the funding we receive supports overall operations, rather than specific programs or series. A diversity of sources, the number of contributors, and the unrestricted character of funds all reinforce the independence and integrity of our editorial process.
- We give careful attention to contributions and grants that support specific programs, projects, and activities. We seek to avoid both the reality and the appearance of inappropriate influence.
- We do not accept funding of ongoing news and information programming from political parties and candidates for public office.
- We do not accept funding that would obligate us to provide coverage of a topic we would not have covered with general funds or that requires more extensive coverage than the topic's value or importance warrants.
- As journalists who deal with a wide range of community issues, it is inevitable that we will talk with experts and officials who work at organizations that fund us. Those individuals, however, will have no influence in the news coverage itself.
- The general manager will designate individuals who will serve as contacts with funders for grant-making purposes or other communications.
- Under no circumstances do we skew our reports for personal gain, to help KUER's bottom line, or to please those who fund us. Decisions about what we cover and how we do our work are made by our journalists, not by those who provide KUER with financial support.

## GUIDELINES FOR ALL EMPLOYEES

### CONFLICTS OF INTEREST

As employees, we participate in many outside activities in our personal lives and free time, sometimes compensated or related to our professional experience. However, we don't engage in an outside activity if it conflicts with our responsibilities at KUER. When it appears that a material conflict may arise between a personal interest and responsibilities at the station, we notify a supervisor before the event or activity occurs.

Our actions, even when “off the clock,” affect public trust in our integrity, credibility, and impartiality. We are mindful that activities beyond our professional work can affect our reputation and public trust. We therefore:

- Aspire to high standards of integrity and ethics in our personal lives, including dealings with friends and associates, public behavior, and use of social media.
- Are alert and sensitive to conflicts of interest between personal activities (including those with family members) and our professional public media responsibilities.
- Make a distinction between communications that are part of professional public media responsibilities and all other communications.
- Exercise careful judgment about, limit, and in some cases, forego, engaging in partisan activities or advocacy regarding controversial issues of public importance.

## POLITICAL ACTIVITY

We do not engage in any political activity at work. KUER does not support specific political interests, but we do support individuals engaging in the democratic process. We vote, but this is a private matter, and because listeners, donors, and other members of the public regularly visit the station, we do not display political cartoons, stickers, or posters at our work stations and offices. Displaying partisan symbols or engaging in partisan rhetoric can lead to accusations of bias.

## SOCIAL MEDIA

Platforms for online collaboration are changing the way we work and offer new ways to engage with listeners, colleagues, and the world at large. KUER encourages ethical behavior on social media. But we understand that we are responsible for the content we individually post online and that we can be held personally liable for violations of copyright, fair use, trademark, other intellectual property and financial disclosure laws. That is why we exercise good judgment and common sense in our postings.

- Pause to think before posting.
- Respect proprietary information and confidentiality.
- When disagreeing with others’ opinions, keep it appropriate and polite.
- Avoid using social media when highly emotional.

On social networks, the lines between public and private, personal and professional are blurred. All employees are free to express their personal views in a private setting, but the definition of “private” is evolving. When we identify ourselves as KUER employees, we are creating perceptions about the station and ourselves for stakeholders, listeners, community partners, and the general public. That is why we are careful that social media content we create or with which we are associated is consistent with our professional work and with the station’s values and standards.

Also, because KUER is a department within a public institution, station work done by email or text using work or personal computers or phones could be subject to a request for public records.

## PERSONAL GAIN FROM KUER EMPLOYMENT

As employees of KUER, we do not act in a manner contrary to the interests of the station. We don't use or attempt to use our public position to gain or attempt to gain anything of substantial value for our private benefit, that of our immediate family, or an organization with which we are associated. We do not solicit or accept from any person or organization anything of value with an express or implied understanding that our conduct would influence station business.

We do not intentionally use or disclose confidential information that could result in the receipt of anything of value for ourselves, our immediate family, or for any other person or organization with whom we associate. Occasional, nominal gifts (coffee mugs, T-shirts, and books) that are valued at less than \$50 may be accepted by an employee as long as it does not impact any action or decision by the employee.

## PAYOLA AND PLUGOLA

According to the FCC, any broadcast station employee who has accepted or agreed to accept payment for the airing of program material, and the person making or promising to make the payment, must disclose this information to the station prior to the airing of the program. Similarly, the FCC strictly prohibits 'plugola' or the illicit practice of endorsing a product or service on radio or television for personal gain.

## NEPOTISM AND EMPLOYMENT DECISIONS

No employee may participate, formally or informally, in the decision to hire, retain, promote, or determine the salary of a member of his or her immediate family.

## OWNERSHIP OF WORK PRODUCT

The work product of a KUER employee is owned by KUER and, by extension, the University of Utah, which controls all legal rights. In contrast, work created by KUER employees outside the scope of their station employment are considered to be owned by the creators of the work, unless the work is created through substantial use of KUER resources.

## WHEN IN DOUBT

It is not possible for a document like this to address all possible ethical questions. When an issue arises, employees should discuss the matter with their supervisor. The supervisor may seek guidance from the general manager. The general manager may seek the guidance of others with expertise in journalistic ethics. The decision of the general manager is eligible for review by the university's vice president to whom the general manager reports.

## GUIDELINES FOR JOURNALISTS

### KEY PRINCIPLES THAT GUIDE OUR STORYTELLING

In addition to general employee guiding principles defined above, journalists have specific

professional obligations and limitations. Because our words and actions can color the public's opinion of KUER, we conduct ourselves in ways that honor professional impartiality. We have opinions, like all people, but the public deserves factual reporting and analysis that is not distorted by our personal opinions.

## ACCURACY

Our purpose is to pursue the truth. Diligent verification is critical. We take great care to ensure that statements of fact in our journalism are both correct and in context. In our reporting, we rigorously challenge both the claims we encounter and the assumptions we bring. We devote our resources and our skills to presenting the fullest version of the truth we can deliver, placing the highest value on information we have gathered and verified ourselves.

## FAIRNESS

To tell the truest story possible, it is essential that we treat those we interview and report on with scrupulous fairness, guided by a spirit of professionalism. We make every effort to gather responses from those who are the subjects of criticism, unfavorable allegations, or other negative assertions in our stories. What we broadcast and put online is edited for time and clarity. Whenever we quote, edit, or otherwise interpret what people tell us, we aim to be faithful to their meaning, so our stories ring true to those we interview. In all our stories, especially matters of controversy, we strive to consider the strongest arguments we can find on all sides, seeking to deliver both nuance and clarity. Our goal is not to please those whom we report on or to produce stories that create the appearance of balance, but to find the truth.

## COMPLETENESS

We do our best to report thoroughly and tell stories comprehensively. We won't always have enough time or space in one story to say everything we would like or quote everyone we would wish to include. But errors of omission and partial truths can inflict great damage on our credibility, and stories delivered without the context to fully understand them are incomplete. Our journalism includes diverse voices that reflect our society and divergent views that contribute to informed debate. When we find that we can't deliver all the answers to important questions, we explain what we don't yet know and work to fill any gaps in our reporting.

## HONESTY

Journalists who conduct themselves honestly prove themselves worthy of trust. In the course of our work, we are genuine and candid. We attribute information we receive from others, making perfectly clear to our audience what information comes from which source. We avoid hyperbole and sensational conjecture. We may sometimes construct hypotheticals to help explain issues and events, but we reveal any fabrication, and do not otherwise mix fiction with our news reporting. We edit and present information honestly, without deception, and we identify ourselves as KUER journalists when we report.

## INDEPENDENCE

To secure the public's trust, we must make it clear that our primary allegiance is to the public. Any personal or professional interests that conflict with that allegiance, whether in appearance or in reality, risk compromising our credibility. We are vigilant in disclosing to both

our supervisors and the public any circumstances where our loyalties may be divided — extending to the interests of spouses and other family members — and when necessary, we recuse ourselves from related coverage. Under no circumstances do we skew our reports for personal gain, to help KUER's bottom line, or to please those who fund us. Decisions about what we cover and how we do our work are made by our journalists, not by those who provide KUER with financial support.

## IMPARTIALITY

We strive to report and produce stories that treat all views fairly. We aggressively challenge our own perspectives and pursue a diverse range of others, aiming always to present the truth as completely as we can tell it.

## ACCOUNTABILITY

We take full responsibility for our work, so we must always be ready and willing to answer for it. Just as careful attention to our sources makes a story stronger, careful listening to our public makes our journalism better. So, we welcome questions or criticisms from our stakeholders and to the best of our ability, we respond. Mistakes are inevitable. When we make them, we correct them forthrightly, reflect on what happened, and learn from them.

## RESPECT

Everyone affected by our journalism deserves to be treated with decency and compassion. We are civil in our actions and words, avoiding arrogance and hubris. We listen to others. When we ask tough questions, we do so to seek answers — not confrontations. We are sensitive to differences in attitudes and culture. We minimize undue harm and take special care with those who are vulnerable or suffering. And with all subjects of our coverage, we are mindful of their privacy as we fulfill our journalistic obligations.

## EXCELLENCE

Our journalism is most valuable when we marry important truths with engaging narrative. We take enormous pride in the craftsmanship of our storytelling and in the quality of the words, sounds and images we use to help illuminate the world.

When we edit, it is to add impact and clarity to our journalism — never to slant or distort. We don't allow what is sensational to obscure what is significant. We aspire to tell stories that rise above the maudlin and mundane, avoiding shallow sentimentality. Above all, we do our best to faithfully and powerfully convey what is true.

## POLITICAL ACTIVITY

See general employee section above, but as journalists we also do not participate in any political party, campaign, or cause, including making financial contributions. We do not run for public office.

Because we don't want our audience to know our individual views, we don't sign petitions or write letters to the editor. We don't speak at public meetings or post yard signs relating to a political or social issue.

It is possible that our family members become involved in campaigns or causes. But as KUER journalists we make every attempt to distance ourselves from this activity. For example, we don't drive a family member's car to a news event if it has a political bumper sticker. If a spouse wants to make a contribution to a political campaign, it should be done in a manner that does not include the journalist's name.

## SOCIAL MEDIA

See general employee section above. As journalists, we are keenly aware that social media allow us to display portions of our lives that blur the lines between personal and professional activities, and we understand that what we post is accessible to our friends, as well as members of the public. This means that KUER journalists refrain from posting on social media the same kind of political activity noted above. Private communications to friends and family are excluded, as they are not accessible to the public.

- Be transparent. Follow the values of public radio: honesty, integrity, transparency. If you wouldn't say it on the air, pause before posting it to social media.
- Be judicious. Be smart about protecting yourself, your privacy, and any sensitive or restricted confidential and sensitive information. What is published is widely accessible, not easily retractable, and will be around for a long time, so consider the content carefully.
- Be knowledgeable. Respect brand, trademark, copyright, fair use and confidentiality.
- Pause. If you are about to publish something that makes you even the slightest bit uncomfortable, do not post the statement. Take a minute to review these guidelines and try to figure out what is bothering you, then fix it. If you are still unsure, you might want to discuss it with your manager. Ultimately, what you publish is yours, as is the responsibility, and any possible repercussions.
- Own mistakes. If you make a mistake, admit it. Be upfront and work with your editor to fashion a correction that acknowledges the mistake. If you are posting to a blog, you may choose to modify an earlier post. Make it clear that you have done so.

## OUTSIDE ACTIVITIES

See general employee section above. As journalists, we also recognize our primary responsibility is to gather, write, edit, or produce news for KUER. We do not do work that is in direct competition with KUER.

If we want to do outside freelance work that does not compete with KUER, we must get written permission from our supervisor.

Because we are journalists, we do not engage in public relations work, paid or unpaid. Exceptions may be made for certain volunteer nonprofit, nonpartisan activities, such as participating in the work of a place of worship or charitable organization, so long as this would not conflict with the interests of KUER in reporting on activities related to that organization. When in doubt, consult your supervisor.

Supervisors will also approve any speaking engagements with organizations that might have a relationship to a subject that KUER might cover.

From time to time, we may be asked to appear on TV or other media. We get permission from



our supervisor so no conflicts arise with our role at KUER. During such appearances, we do not express views that would not be published or broadcast in our role as journalists on KUER programs.

Plagiarism is an unforgivable offense. KUER journalists are not to take another person's work and present it as their own.

## GUIDELINES FOR DEVELOPMENT EMPLOYEES

### KEY PRINCIPLES THAT GUIDE OUR FUNDRAISING ACTIVITIES

We aim for respectful relationships with our donors and a clear understanding among donors and others about our fundraising operations. We acknowledge the sponsors of our programming and disclose the terms on which we obtain such support.

Our public service depends on donations of all sizes from many different sources. We maintain the trust and confidence of these donors and our communities by making clear the purposes and uses for which we seek their support, making every effort to understand a donor's intent and, after accepting a gift, working to carry out the donor's wishes.

We inform donors upon request about how donor records will be used. We protect personal and confidential information that we obtain during fundraising activities or through our ongoing relationships with these donors. We give our donors a chance to opt out of having any of their information shared.

Our supporters do not shape our coverage. KUER greatly appreciates the support it receives from individuals, from foundations, and from corporations. Their support is essential. At the same time, KUER makes its own decisions about what stories to cover and how to report them. The people and organizations who support KUER financially do not dictate our news judgment. We communicate directly and explicitly with donors about our editorial standards, which bring rigor and integrity to our work, the legal requirements that surround our donor relationships, and the boundaries between funders and our editorial process.

There is no one better than a journalist to describe the value, impact, and character of journalism, so they may be called upon to talk about their work with those who might support it, whether over the air during a pledge drive or in person during a meeting with prospective funders. But in all interactions with potential funders, we observe this boundary: Journalists are there to talk about their work, not to discuss the agendas of our supporters. We ask journalists to describe the goals and ambitions of our editorial agenda, to promote the value of their work and the worthiness of supporting it, or to recount what they've experienced in their reporting. Sponsorship and development departments are there to support journalists in our service to the public, not vice versa.

We always disclose, on air or online as appropriate, the funders of programs, areas of coverage, or other activities. We acknowledge any person or organization that gives us money or other valuable consideration to broadcast specific content. We acknowledge donors that underwrite the broadcast of a program with broadcast announcements associated with the program. We also acknowledge with broadcast announcements (providing permission is given) donors that have provided substantial general support. We keep a list of these donors in a publicly available file, including additional FCC-required information about the sponsors in a

public file.

We do not accept anonymous gifts for the production of specific programs. We publish a list of donors that have contributed substantial funds for our general support, where we have received permission to do so.

We report the overall costs of fundraising, including personnel, consultants, special events, and related support costs. This reporting is part of our overall disclosure of revenue and expenses in our public file as part of our annual financial report to the CPB.

#### GIFT ACCEPTANCE

KUER retains the right to decline gifts for a variety of reasons. We are particularly sensitive to any gift that might create the appearance of influencing a program decision or create the impression of endorsement with an individual or organization that could cause harm to the reputation of KUER or the University of Utah.

#### CONCLUSION

Ethics are part of our personality and guide us throughout our lives, even — and perhaps especially — when we think no one is paying attention. We have professional obligations beyond our individual career and personal interests. We hope this document stimulates our moral imagination and nurtures many regular, vigorous conversations about our responsibilities and the consequences of our actions.