

North Carolina Public Radio – WUNC
Ethics Policy

Adopted January 2010

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Chapter 1: Introduction

The mission statement of North Carolina Public Radio – WUNC is as follows:

WUNC strives to influence public life by focusing on civic and cultural issues. Our goal is to be connected with the community. The station provides consistently high quality public service programming presented with integrity. WUNC creates original programming that reflects the diversity and range of opinion in North Carolina.

The purpose of this ethics policy is to elaborate on what it means to “provide consistently high quality public service programming presented *with integrity*.” Maintaining the integrity of WUNC is the responsibility of every staff member. This policy is an effort to articulate the staff’s shared values and standards that make up the station’s integrity.

While WUNC’s journalists share a special responsibility to abide by these values and standards, all staff members are expected to abide by them in any situation in which they could be interpreted as representing the station. And as employees of the University of North Carolina at Chapel Hill, all staff members are expected to abide by the policies of the university. This ethics policy also applies to independent producers, freelance reporters, consultants, and temporary employees who work for the station.

The material in this policy was drawn from a number of sources including (but not limited to): National Public Radio, The New York Times, Washington Post, Los Angeles Times, and the Society of Professional Journalists. Many of the provisions in this ethics policy are in theirs as well and there are some instances where we have adopted the same language from others because their wording was just right.

The process for developing this policy included consultation with the station’s Management Team, the University of North Carolina at Chapel Hill’s Office of University Counsel, and the university’s office of University Relations. WUNC staff was given the opportunity to comment on a draft version, and the staff’s feedback was useful in developing the final document.

No ethics policy can cover every situation and this policy is not intended to be a complete set of rules and regulations. Rather, it is a set of guidelines and a statement of shared values. When uncertainty arises about the application of these guidelines, the primary goal always should be to protect the station’s integrity. When in doubt, employees should not be shy about asking questions. A robust, ongoing discussion of ethics at all levels of the station is essential to producing consistently high quality public service programming.

Note: When this policy stipulates that written permission is required from a supervisor or station management, an email message will suffice as written permission.

Chapter 2: Fairness and Truth

There are several defining terms of what constitutes fairness at WUNC. They all concern the way our programming relates to the subject matter of our on-air work, to the people we deal with while creating our stories, and to the audience which hears them.

1. *Fairness* means that we present all important views on a subject, and treat them even-handedly. The range of views may be encompassed in a single story on a controversial topic, or it may play out over a body of coverage or series of commentaries. But at all times, the commitment to presenting all important views must be conscious and affirmative.

2. *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.

3. *Accuracy* means that each day we make rigorous efforts at all levels of the newsgathering and programming process to ensure our facts are not only right but also presented in the correct context. We make every possible effort to ensure commentaries are correct in assertions of fact. We attempt to verify what our sources and the officials we interview tell us when the material involved is argumentative or capable of different interpretations. We report statements as facts only when we are reasonably satisfied of their accuracy. We guard against errors of omission that cause a story to misinform our listeners by failing to be complete. We make sure that our language accurately describes the facts and does not imply a fact we have not confirmed.

4. *Honesty* means we do not deceive the people or institutions we cover about our identity or intentions in our process of gathering stories, and we do not deceive our listeners once we have the stories in hand. We do not deceive our listeners by presenting the work of others as our own (plagiarism), by cutting interviews in ways that distort their meaning, or by manipulating audio in a way that distorts its meaning, how it was obtained or when it was obtained. The same applies to photographs we post. Honesty means owning up publicly to what we have aired and acting quickly to rectify mistakes we make on air (or sometimes off-air).

5. *Respect* means treating the people we cover and our listeners by recognizing the diversity of the country and world on which we report, and the diversity of interests, attitudes and experiences of our audience. We approach subjects in an open-minded, sensitive and civil way. WUNC journalists must treat the people they cover fairly and with respect. They always keep in mind that gathering and reporting information may cause harm or discomfort, and they weigh that against the importance of the story. WUNC journalists show sensitivity when seeking or using interviews of those affected by tragedy or grief. They 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.

Chapter 3: Sources

Plagiarism is an unforgivable offense. WUNC journalists do not take other peoples' work and present it as our own.

WUNC puts its highest value on firsthand news gathering and confirmation of facts, as opposed to relying on material from other sources (AP, other newspapers and networks, etc.)

1. *Crediting sources*: WUNC journalists must take special care in the use they make of information from wire service stories, reports by other broadcast news organizations, newspapers, articles in other publications, or online sources. No material from another source should ever be included verbatim, or substantially so, without attribution. WUNC journalists should give credit to other news organizations for stories that demonstrate enterprise or contain exclusive information. If there is any doubt about whether to credit another news organization, ask your supervisor or Program Director.

Note: Wire services is one category where it is acceptable to use material without attribution.

When using material from newspaper stories, WUNC 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. We should never pass on errors in this way. Our corrections policy is to correct substantive errors of fact in a timely way. If a reporter, host, editor or producer believes WUNC got something wrong – or that there was a serious defect in a piece – s/he has an affirmative responsibility to get that defect or error on the table for investigation and possible correction. Many times WUNC learns these things when someone outside brings an error to our attention. But if WUNC journalists have reason to believe there was a significant error, they should not wait for it to be pointed out. WUNC journalists should err on the side of caution in checking corrections, clarifications or retractions with the Program Director before they air or are posted online if there is any possibility the material in question poses a legal liability.

2. *Minors*: Dealing with minors (generally defined as anyone under the age of 18) always invokes legal issues. An interview of a minor about a sensitive subject requires WUNC journalists to secure written permission from the minor's parent or legal guardian. Examples of sensitive subjects include, but are not limited to, cheating, sexual activity, involvement in gangs or crime, difficult family relationships, probation violation, out-of-wedlock pregnancy or parenthood, victims' sexual abuse and similar topics that could have legal ramifications or lead to embarrassment. An interview of a minor in a special custodial situation, such as foster care, juvenile detention, or holding facilities for illegal immigrants, requires the consent of the person who has custody of the minor.

An interview on a non-sensitive topic (normal childhood activities, sports, books, movies, trips to the zoo, baseball and the like) does not require consent. Generally, however, any

interview on school premises will require the consent of the school authorities. If a minor is a witness to a crime, the WUNC journalist must weigh carefully whether we are exposing the minor to physical risk by identifying him or her by name as a potential witness, and whether there is potential for the minor to be accused as a participant.

Situations like school shootings require special care when interviewing visibly distressed minors who may have witnessed horrific scenes. Witnesses such as teachers or students over 18 are preferable interviewees. If continued interviewing substantially increases the distress of a minor who is a witness, the WUNC journalist should carefully balance the importance and quality of the information being obtained with the interviewee's emotional state and decide whether respect for the witness requires the interview to be ended. WUNC journalists must also discuss with their supervisor whether that interview should be aired.

In cases where there is even a hint of doubt about whether to get consent, the WUNC journalist or supervisor should consult with their supervisor.

3. *Privacy:* WUNC journalists think carefully about the boundaries between legitimate journalistic pursuit and an individual's right to privacy. We recognize that private people have a greater right to control information about themselves than do public officials and others who seek power, influence or attention. Only an overriding public need to know can justify intrusion into anyone's privacy.

4. *Actualities:* WUNC journalists make sure actualities, quotes or paraphrases of those we interview are accurate and are used in the proper context. An actuality from an interviewee or speaker should reflect accurately what that person was asked or was responding to. If we use tape or material from an earlier story, we clearly identify it as such. We tell listeners about the circumstances of an interview if that information is pertinent (such as the time the interview took place, the fact that an interviewee was speaking to us while on the fly, etc.). Whenever it's not clear how an interview was obtained, we should make it clear. The audience deserves more information, not less. The burden is on the WUNC journalist to ensure that our use of such material is true to the meaning the speaker intended.

5. *Representing ourselves:* Journalism should be conducted in the open. WUNC journalists do not misrepresent themselves and should not pose as anyone other than themselves.

6. *Hidden microphones:* WUNC journalists do not use hidden microphones, recorders or cameras except in unusual circumstances. Occasionally information that serves an important journalistic purpose, such as in reporting on illegal, antisocial or fraudulent activities, cannot be obtained by more open means. In such circumstances, written approval must be obtained from the Station Manager before any undisclosed taping or photographing takes place. WUNC journalists do not record phone calls without notifying the people on the phone.

7. *Legality*: If there is a question of legality in pursuit of a story, WUNC journalists should consult their supervisors and the Program Director. If you have any question about the legality of your conduct, contact your supervisor, who will in turn have the Program Director or Station Manager contact the station's legal counsel.

8. *Paying sources*: WUNC journalists do not pay for information from sources or newsmakers.

9. *Non-disclosure agreements and embargoes*: WUNC journalists do not sign non-disclosure agreements, except in the rarest of circumstances. Exceptions to this rule must be approved in writing by the Station Manager. WUNC journalists respect embargoes on news unless the circumstances surrounding the embargo make adherence to it inappropriate, such as where the information has already surfaced elsewhere or a strong public interest requires the disclosure to place other news in the proper context.

10. *On the record*: A reporter or host should make clear when an interview has begun or has ended so there is no question about what is or isn't for broadcast, or what is on the record or not.

11. *Off the record*: This is tricky, because so many people misuse the term. By our definition, off-the-record information cannot be used, either on the air or in further reporting. But many sources, including some sophisticated officials, use the term when they really mean "not for attribution to me." We must be very careful when dealing with sources who say they want to be "off the record." If they mean "not for attribution to me," we need to explain the difference, and discuss what the attribution will actually be. If they really mean off the record as we define the term, then in most circumstances, we should avoid listening to such information at all. We do not want to be hamstrung by a source who tells us something that becomes unusable because it is provided on an off-the-record basis.

One alternative to off-the-record is "for guidance." A source may be willing to give us information for our guidance or to prompt further reporting, on the understanding that we will not use his comments as the basis for putting something on the air. This, for example, was the relationship between "Deep Throat" and Bob Woodward and Carl Bernstein. Such guidance can be useful even if we can't broadcast it at once.

12. *Anonymous sources*: Anonymous sources should only be used when there is no other way to get the information. The information should be significant. Journalists should not grant confidentiality if the information is trivial. A supervisor must give written approval before a WUNC journalist grants confidentiality to a source. The supervisor has an obligation to satisfy him/herself that the source is credible and reliable, and there is a journalisticly justifiable reason to let that person speak without attribution. This obligation also holds where individuals ask that their real names be withheld. The editor or producer has a twofold responsibility: (a) to judge whether anonymity (or a pseudonym) is justifiable, and (b) to satisfy him/herself that this person is who the piece

says s/he is. No one should ever be in the position of having to verify these matters after a story has aired. If a pseudonym is used, the reporter must disclose this in the story.

Before granting confidentiality, it must be clear that the WUNC journalist may reveal the source's identity and information to supervisors and possibly to the station's legal counsel. The agreement to keep a source confidential should be premised on truthfulness. If the source lies, the confidentiality agreement will be considered void. Anonymous sources will not be allowed to make personal attacks on others and remain anonymous. WUNC journalists must make these policies clear to sources before entering into a confidentiality agreement.

At present, it is unclear whether the state's open records law would require WUNC to disclose the identity of an anonymous source after receiving an open records request. The state's reporter shield law may provide protection but the apparent conflict between the two laws has not been resolved by the courts. Anonymous sources must be made aware of this.

13. "*Sources say*": When WUNC journalists attribute information in a story to a "source" or "sources," it is assumed that these are the sources of WUNC journalists 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 organizations.

14. *Previewing scripts*: WUNC journalists do not show scripts in advance or preview pieces to any person not affiliated with WUNC. WUNC journalists may review portions of a script or read back a quotation to assure accuracy. WUNC journalists may also play audio or read transcripts of an interview to a third party if the purpose is to get that party's reaction to what another person has said. WUNC journalists may send a list of potential questions to a source before an interview but it should be clear that WUNC journalists will not necessarily limit themselves to those questions. WUNC journalists do not allow sources or interviewees to dictate how a topic will be covered, or which other voices or ideas will be included.

15. *Interpreters*: WUNC journalists should hire their own interpreter or translator whenever possible. It's best to have the interpreter and interview subject present at the same time for broadcast or recording. If a WUNC journalist uses an interpreter who knows the interview subject (such as a family member or advocate), this should be indicated in the story or interview.

16. *Audio archives*: Archival audio or audio that was obtained from a past story must be identified as such if it is used in a new piece. The listener should not be left to think that any archival or previously obtained audio was gathered in the context of the current piece. As an example, a story updating a controversy surrounding an individual would be misleading if it included new assertions of fact but only used past statements by that individual and failed to identify them as such.

17. *Sound effects:* WUNC journalists will use only authentic sound recorded at the stated location. WUNC journalists will not use canned sound effects (for example those purchasable online or in CD form) unless for obvious comic or satirical purposes (for instance on a bloopers reel or for an April Fools piece or program), or unless they are identified as pre-produced sound effects. Any questions as to the appropriateness of sound or sound effects should be taken to one's supervisor.

18. *Online:* The same ethical and editorial standards for radio journalism also apply to online journalism. Quotations and photographs are attributed to identifiable sources unless written permission from the Program Director provides for unattributed quotations; wherever relevant, permission to reproduce photographs, music and any supplementary audio has been sought and gained; potentially libelous material and offensive language has been vetted through proper channels. The basic rule is this: if the content on the website were translated into a radio transmission, it has to pass the standards set out in these ethics guidelines.

19. *Sexual assaults:* WUNC does not name victims of sexual assaults. There will at times be exceptions – such as certain instances when a victim goes public with his/her identity – and WUNC supervisors will judge these instances on a case-by-case basis.

Chapter 4: Independence

WUNC will defend the independence of our editorial content from those seeking influence or control. Our coverage must be fair, unbiased, accurate, complete and honest. We are expected to conduct ourselves in a manner that leaves no question about our independence and impartiality. We must treat the people we cover and our listeners with respect.

This includes gathering and reporting news with neither fear nor favor. We will not show favoritism to any outside forces, including advertisers, donors, sources, story subjects, powerful individuals, and special interest groups. We will also resist those who would seek to buy or politically influence news content or who would seek to intimidate those gathering news.

1. *Firewalls inside and outside of the station:* WUNC staff members are to determine news content solely through editorial judgment and not as the result of outside influence. They should resist any self-interest or peer pressure that might erode journalistic duty and service to the public.

2. *Sponsorship:* Sponsorship of our programming will not be used in any way to restrict or manipulate content.

3. *University management:* Recognizing that the University of North Carolina at Chapel Hill holds the license for WUNC, we will not allow the university or management to influence our news judgment or content in any way that would inappropriately alter our coverage and/or inappropriately promote university or management interests.

4. *Funders:* A firewall will be maintained between WUNC journalists and funders. While staff will inevitably end up talking to individuals who contribute to the station and experts and officials who work at organizations that fund us (and their grantees), our coverage will maintain editorial autonomy. If WUNC reports on an organization or individual who funds us, we will disclose that relationship on air in the unusual case where the subject of the report is *directly related* to the funding provided by the organization or individual.

5. *Promotional activities:* WUNC journalists may take part or be asked to take part in promotional activities or events involving supporters of WUNC, such as our coordinated fund drives or major donor events.

6. *Partnerships:* WUNC is seeking to be an engaged community actor and as such, is willing to build partnerships with other organizations that can help fulfill our mission, serve our listeners and the community. We shall approach such endeavors with the idea that we will not engage in partnerships that would in any way undermine our editorial independence or credibility. We will not create content with organizations that have a strong advocacy position on issues we cover.

Chapter 5: Conflict of Interest

Journalists should avoid conflicts of interest, real or perceived.

A conflict of interest in its simplest dictionary term is a conflict between private interests and the professional responsibilities of a person in a position of trust. An operative word in this sentence is “trust.” All of us are in positions of trust when it comes to both our audience and the people and institutions that we cover. To maintain that trust requires that there be no real or perceived overlap between the private interests and opinions of WUNC journalists and their professional responsibilities.

WUNC journalists have the responsibility to disclose potential conflicts of interest to their supervisor at the time they are first assigned to cover or work on a matter. The supervisor will decide whether the interests create an actual or perceived conflict of interest.

The following policies are supplemental to the University’s policy on conflicts of interest.

1. *Financial Relationships:* Journalists may not enter into business or financial relationships with their sources. Similarly, journalists may not cover individuals or institutions with which they have a financial relationship. An exception includes a journalist’s investment in mutual funds or pension funds that are invested by fund managers in a broad range of companies.

2. *Personal Relationships:* Activities of family members may create conflicts of interest. WUNC recognizes that it has no authority to restrict the activities of spouses, companions or close relatives of WUNC staff members who do not themselves work for the station. However, the station may restrict a staff member’s assignment based on the activities of a family member or loved one. Staff members are responsible for informing a supervisor whenever a companion’s or close relative’s activities, investments or affiliations could create a conflict. The definition of a family member for this policy is the same as the definition of a family member found in the University’s conflict of interest policy.

3. *Perquisites (meals, travel, review items, gifts, tickets and admission):* As a principle, we pay our own way. However, news gathering often occurs in settings where payment is awkward or impossible. When that happens, staff members should make every effort to reciprocate as soon as possible. Let common sense and good manners be the guide.

It is WUNC’s policy to reimburse organizations that provide meals or refreshments to journalists covering events they sponsor. WUNC journalists may also simply decline meals or refreshments at events they cover.

WUNC also pays for travel by staff members on assignment. They may not accept free or discounted transportation or accommodations unless the same discount is available to the public. Exceptions may arise when the travel is for professional development and is

paid for by an organization dedicated to journalistic excellence, such as the Poynter Institute. Exceptions may also arise when access to a news event or source can be gained no other way. A journalist covering a military or scientific expedition, for example, may have no reasonable method to pay for travel. Those arrangements should, however, be the exception and must be approved in advance in writing by the Program Director.

The station receives countless unsolicited items, such as books, CDs and food, to review or cover. They are tantamount to news releases. Accordingly, staff members may keep such items for reference, share them with other staff members, donate them to charity or throw them away. No staff member may sell or otherwise profit by review materials.

Staff members are prohibited from accepting gifts from or giving gifts to news sources, potential news sources or those who seek to influence coverage. There may be some exceptions when reporting in countries and cultures where refusing to accept or provide a modest gift would give offense. When in doubt about the appropriateness of a gift, ask a supervisor.

Staff members attending cultural and sporting events purely for private enjoyment may not use their affiliation with WUNC to gain access or to avoid paying.

4. *Awards:* Staff members should enter their work only in contests whose central purpose is to recognize journalistic excellence. WUNC does not participate in contests that exist primarily to publicize or further the cause of an organization. Under no circumstances may staff members accept awards from groups they cover. A staff member who is offered an award should consult his or her supervisor before accepting it.

5: *Disclosure:* If a conflict of interest is unavoidable, it should be disclosed to our audience.

Chapter 6: Outside Activity

Professional journalists should recognize that they are accountable for their actions to the public, the profession, and themselves.

1. *Speaking*: Staff members are generally encouraged to speak to civic and community organizations about the station's mission and goals. It is also appropriate to appear as a panel moderator or panelist. WUNC acknowledges that outside appearances can enhance the reputation of the station.

However, there are some situations where a public appearance may not be advisable.

WUNC journalists must get written approval from a supervisor for speaking to groups that might have a relationship to a subject that WUNC may cover. WUNC journalists may not speak in settings where their appearance is being used by an organization to market its services or products, unless it is marketing WUNC's interests.

WUNC journalists are permitted to engage in promotional activities for books they have written (such as a book tour), or for outside projects such as documentaries. They are expected to get written approval from their supervisor on scheduling. They also must get written approval through the university's policy on "External Activities for Pay." WUNC programs are permitted to interview employees about books they have written, or other projects they have produced, if that material meets the same criteria applied to work by non WUNC employees. The employee(s) in question should not be involved in the decision making process of whether to do an interview, and careful consideration must be given to the appearance of favoritism. Plans to interview WUNC employees about such books or projects should be approved in writing by the Program Director who makes the final decision. The author must be identified as a WUNC employee during the course of the interview or program.

WUNC 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, or be seen as in opposition to an advocate with a particular political viewpoint (such as a point/counterpoint panel with a political advocate).

WUNC journalists must get written permission from a supervisor to appear on TV or other media. It is not necessary to get permission in each instance when the employee is a regular participant on an approved show. In appearing on TV or other media, WUNC journalists should not express views they would not air in their role as journalists on WUNC's programs.

WUNC journalists are discouraged from accepting honoraria or speaking fees. They may only accept speaking fees from organizations or 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 journalist. Supervisors will

determine whether a journalist can accept a fee. Any speaking fee must be declared on an employee's "External Activities for Pay" form filed with the university.

2. *Freelancing:* The primary responsibility of WUNC journalists is to gather, write, edit or produce news for WUNC and not work in direct competition with WUNC. WUNC journalists are allowed to contribute stories, audio or other journalistic projects to affiliated organizations and programs, such as NPR, APM, Marketplace. Staff members should consult with their supervisor before pitching a story to an outside program. The journalist may retain all payments.

WUNC journalists must get written permission for all other types of outside freelance or journalistic work. Requests should be submitted to the employee's supervisor, in addition to filing a university "External Activities for Pay" form. Approval will not be given if the proposed work will discredit WUNC, conflict with the station's interests, create a conflict of interest for the employee or interfere with the employee's ability to perform WUNC duties.

WUNC journalists may not engage in public relations work, paid or unpaid. Exceptions may be made for certain volunteer non-profit and nonpartisan activities, such as participating in the work of a church or synagogue or charitable organization, so long as this would not conflict with the interests of WUNC in reporting on activities related to that charity.

3. *What constitutes representing the station:* Any programming staff member who is engaged in an activity in a public sphere, who makes it known they work at WUNC, is then representing the station, whether directly or indirectly. For some station staff, just using their name can constitute making it known that they work at the station. Common sense should be the guide here.

Other staff members not working in programming should also consider the repercussions of making their employment known when they are engaged in public activities and seek to avoid any appearance of conflicts of interest.

Chapter 7: Participating in Public Life

There is no desire to unduly restrict staff members' exercise of the rights and duties of citizenship. But we must recognize that the reputation of WUNC is important to us all, and that a full discussion of possible conflict is essential to avoiding public embarrassment.

1. *Political office:* WUNC journalists may not run for office, endorse candidates or otherwise engage in politics. Since contributions to candidates are part of the public record, WUNC journalists may not contribute to political campaigns, as doing so would call into question a journalist's impartiality in coverage.
2. *Campaigning:* WUNC journalists may not participate in marches and rallies involving controversial causes or issues, nor should they sign petitions or otherwise lend their name to such causes, or contribute money to them. Questions or concerns as to what constitutes a controversial cause should be brought to one's supervisor.
3. *Government service:* WUNC journalists may not serve on government boards or commissions.
4. *Non-profit work:* WUNC journalists may sit on community advisory boards, educational institution trustee boards, boards of religious organizations or boards of nonprofit organizations so long as they are not engaged in significant lobbying or political activity. Such activities should be disclosed to one's supervisor, and WUNC may revoke approval if it believes continued service will create the appearance of a conflict of interest or an actual conflict.
5. *Family members:* When a spouse, family member or companion of a WUNC 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 WUNC journalist should advise his or her supervisor to determine whether s/he should recuse him or herself from a certain story or certain coverage.
6. *Voicing opinions:* WUNC journalists should avoid advertising or blatantly espousing viewpoints on public issues while at work, such as wearing an anti-nuclear button while covering a rally or displaying political banners in their work areas. Reporters and editors should be aware that such blatant espousal casts doubt upon their impartiality. Staff members should avoid having bumper stickers or otherwise identifying themselves with causes they are expected to cover. Staff members should also refrain from expressing viewpoints on public issues using their WUNC email accounts. WUNC email messages could be subject to the state's open records law although certain kinds of correspondence with journalists might be protected by the state's shield law.

Chapter 8: Accountability

1. *Application of the code:* Application of and accountability to this Code is the responsibility in the first instance of every WUNC journalist. This responsibility extends to both him/herself and to every other WUNC journalist with whom he/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.

2. Editors and producers have special responsibility for application of this Code to matters they are editing or producing. For each story/show/segment/interview that is produced, they should be satisfied that the standards of this Code have been met.

3. *Ethics Review Committee:* WUNC employees who do not comply with the Code may be subject to disciplinary action up to and including termination. WUNC will establish an Ethics Review Committee, known as the ERC. The ERC is comprised of 5 WUNC staff members with a minimum of 3 coming from the Programming Department. Participation on the ERC is mandatory for all permanent staff and will rotate. Each member will serve a term of one year. The terms will be staggered and coordinated by the station's Human Resources director. The ERC will meet on demand, when an ethics violation or suspicion of an ethics violation is brought to its attention in writing by anyone working at WUNC. The ERC will review the situation, discuss the alleged violation with the employee in question and make a recommendation to the Program Director and General Manager. Complaints involving the Ethics code must be made first to the employee in question as well as to the employee's supervisor in writing. Complaints may not be made anonymously. This policy does not abrogate employee grievance rights afforded by university policy.