



# PRINCIPLES AND GUIDELINES

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ORGANIZATIONAL ETHICS AND EDITORIAL INTEGRITY

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*Approved by the witf Board of Directors  
March 13, 2012*

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## INTRODUCTION

**witf**, a non-profit community-based organization, uses media in public service. **witf** is licensed by the Federal Communications Commission to operate the non-commercial broadcasting frequencies **witf**-TV, **witf**-FM and WYPM-FM. **witf** also provides Educational Services and operates **witf.org**, Pennsylvania Public Radio (a statewide public radio service) and Media Solutions, a production services division. Top Flight Media, a wholly owned for-profit subsidiary of **witf**, is a promotion and advertising agency that also operates Radio Pennsylvania, a statewide news network for commercial radio stations.

*Note: “Programs” or “programming” refers to content in any media format, radio, TV, web, mobile or print.*

**witf** is committed to the ethical and transparent operation of our organization and to the ethical practice of journalism, whether in our non-profit and for-profit enterprises. We will treat our donors, staff and members of the community with respect, and be open about our finances and policies. **witf** is committed to providing high quality content that is distinctive and responsive to the needs and interests of our communities.

The Board of Directors, Management, and the Community Advisory Board each have important, separate and distinct roles in **witf**'s editorial philosophy and decision-making guidelines.

These *Principles and Guidelines* provide direction to management and information to the public about the operation of **witf** and its media enterprises.

## ACKNOWLEDGEMENTS

**witf** gratefully acknowledges several documents as sources and inspiration for these *Principles and Guidelines*. The *Principles and Guidelines* are based in part upon the *Code of Editorial Integrity, Local Public Media Organizations*, a 2012 collaboration of public television's Affinity Group Coalition and public radio's Station Resource Group. See Appendix A. This document also benefitted from *This is NPR: These Are The Standards of Our Journalism*, issued in February 2012 and available at [NPR.org](http://NPR.org).

Historically, the still relevant *Editorial Integrity In Public Broadcasting, Proceedings of the Wingspread Conference on Editorial Integrity* (1985) has provided an ethical and legal foundation for many public broadcasting organizations, including **witf**. See Appendix B.

These *Principles and Guidelines* build upon **witf**'s *Editorial Philosophy and Decision-making Guidelines*, approved by the **witf** Board of Directors in February 2000.

# RESPONSIBILITIES

## RESPONSIBILITIES OF THE BOARD OF DIRECTORS

1. Establish and enforce the Principles and Guidelines, which serve the public interest, convenience and necessity.
2. Delegate to the President the authority to manage the organization and make programming decisions (what to produce or schedule, when, and how to present it).
3. Demand the highest journalistic standards of fairness and accuracy in all news and information programming.
4. Resist pressures to compromise the editorial decision-making process delegated to the President and managers in item #2 above. Act as a "heat shield" when witf is criticized for the practice of responsible journalism.
5. Share the opinions of viewers in their communities, and encourage all citizens to express their views about programming to the board, President and staff.

## RESPONSIBILITIES OF THE PRESIDENT/CEO

1. Develop the Principles and Guidelines (what to produce or schedule, when, and how to present it) which are consistent with the mission of the organization and which result in programs that audiences can trust and value.
2. Demand the highest journalistic standards of fairness and accuracy in all news and information programming.
3. Present a regular strategic and annual plan to the Board of Directors based upon an assessment of community needs.
4. Encourage citizens to express their views regarding programming; respond promptly and fully to viewer questions and concerns.

## RESPONSIBILITIES OF THE COMMUNITY ADVISORY BOARD

The Federal Communications Commission and the Board of Directors of **witf** have established a Community Advisory Board, which is broadly representative of the communities served by **witf**. The Community Advisory Board shall:

1. Review the *Principles and Guidelines* as established for **witf** by the Board of Directors.
2. Review the services and programming provided by **witf**, providing constructive criticism and recommendations to staff and the Board of Directors.
3. Advocate for, and inform the community about, the value of public service media and its contribution to community life.

## NINE PRINCIPLES IN SUMMARY

Our purposes are to support a strong civil society, increase cultural access and knowledge, extend public education, and strengthen community life through electronic media and related community activities. The public's trust in our organizations, content, services, and relationships is fundamental to achieving these purposes.

We earn the public's trust through the quality and excellence of our work, the inclusion and reflection of the diversity of our communities, and a commitment to defined professional standards and practices. We take specific steps to ascertain community needs and interests; to assure respect and civility in our discussions and impartiality in our coverage of complex matters; and to be accessible, accountable, and transparent to the community as a whole.

Our standards apply to all the content we produce and present, regardless of subject matter and they apply across all the channels and platforms we use – broadcasting, online, social media, print, and in person events.

- X. GOVERNANCE AND MANAGEMENT FOR THE COMMON GOOD**  
We govern our activities in ways that promote the common good and the public interest and that reflect our commitment to integrity and trustworthiness. These obligations supersede personal and institutional agendas.
- XI. IDEAS, CULTURE AND FORUMS WITH RESPECT AND CIVILITY**  
We contribute to the civic, educational, and cultural life of our communities by presenting a range of ideas and cultures and offering a robust forum for discussion and debate.
- XII. JOURNALISM THAT REPORTS EVENTS AND ISSUES WITH ACCURACY AND INTEGRITY**  
We pursue facts about events and issues in our communities and other important matters that affect people's lives with accuracy and integrity.
- XIII. INCLUSION AND REFLECTION OF OUR COMMUNITIES' DIVERSITY**  
The integrity of our work is strengthened by incorporating the diversity of demography, culture, and beliefs in our communities and the nation into our work and our content.
- XIV. TRANSPARENCY IN PROGRAM SELECTION AND CONTENT CREATION**  
We share with our audiences and the public the mission-based and practical reasons for our program choices. We seek to be transparent in how we gather and report news and create other content.
- XV. TRANSPARENCY IN FUNDRAISING**  
We aim for respectful relationships with our donors and 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.

**XVI. PREVENTING UNDUE INFLUENCE**

We strive to assure that our editorial process is free from undue influence. We take care in deciding from whom we seek and accept funds and in setting boundaries with respect to those who contribute.

**XVII. CONSISTENT EDITORIAL STANDARDS IN PARTNERSHIPS AND COLLABORATIONS**

Editorial partnerships expand our capacity to serve and the perspectives we can share with our audiences. They enhance the timeliness and relevance of our programming and activities.

**XVIII. EMPLOYEE ACTIVITIES BEYOND THEIR PUBLIC MEDIA WORK**

The actions of our employees, even when “off the clock,” affect public trust in our integrity, credibility, and impartiality. We expect employees to strive for congruency in their personal and professional lives.

**I. GOVERNANCE AND MANAGEMENT FOR THE COMMON GOOD**

***We govern our activities in ways that promote the common good and the public interest and that reflect our commitment to integrity and trustworthiness. These obligations supersede personal and institutional agendas.***

**WE HAVE A PUBLIC SERVICE MISSION.**

We make important organizational decisions in open meetings of our governing bodies, which we announce to the public. Our audited financial statements and IRS 990 forms are available to the public at [witf.org](http://witf.org). As per a whistleblower policy, the **witf** Audit Committee is available to receive and respond to complaints of financial or ethical improprieties by **witf** staff. The only exceptions to these provisions are in matters related to personnel, business matters of a proprietary and competitive nature, and legal matters that require confidentiality.

We assess community needs and interests to inform and guide editorial decisions and employ approaches that assure we have been inclusive of the full community and a diversity of voices, experiences, and views.

We require our decision-makers to disclose possible conflicts of interests to their colleagues, and to remove themselves from decisions where such conflicts exist. Conflict of interest policies are in place for members of the Board of Directors (in bylaws) and for staff (in the Employee Handbook). Senior members of our staff are accessible to the public and information about how to contact them is available at [witf.org](http://witf.org).

We regularly discuss and debate elements of these *Principles and Guidelines* (and related policies), review the success of their application in our work, and update them as appropriate.

In fulfilling these commitments to accountability, we are guided by and adhere to multiple legal and regulatory frameworks within which we work. Principal among these are laws, rules, and regulations that govern the licensees of noncommercial, educational broadcast stations, federal and state policies that apply to nonprofit organizations, and requirements applied by the Corporation for Public Broadcasting to organizations that benefit from the federal investment in public media.

## II. IDEAS, CULTURE AND FORUMS WITH RESPECT AND CIVILITY

*We contribute to the civic, educational, and cultural life of our communities by presenting a range of ideas and cultures and offering a robust forum for discussion and debate.*

In doing this work we provide:

- Public access to information, resources and opportunities for lifelong education, the cultural offerings of the arts, humanities and sciences, and forums and media through which to experience a diversity of voices, experiences and views.
- In program selection and scheduling, we note that programs for children are substantively different from programs for adults. Not every program provided by **witf** will be appropriate for children and such programs will be presented, scheduled or provided in such a way as to direct them to the attention of adults. In general, **witf** believes that adults should have the information and breadth of perspectives necessary to make their own decisions. Programming for children will be selected and presented for its ability to educate and inform, as well as to provide a non-violent safe haven among today's media choices.
- Citizen access to means for expressing concerns, asking questions, providing answers and sharing viewpoints and ideas in ways that are heard and respectfully considered.
- Civil discourse and interaction among people with varying interests and perspectives, leading to greater shared knowledge and understanding of differences, constructive problem-solving and sustained community building.

Portions of these activities are accomplished through forums for perspectives and opinions on matters that are important to our communities, including interview programs, panel discussions, talk shows, debates, on-line discussions and similar opportunities for officials, experts, advocates, and citizens to express their views and hear the views of others.

In all these settings we strive to support a vigorous marketplace of ideas without advocating, endorsing or certifying a particular point of view.

When inviting participants, we seek people who, by reason of their expertise and experience, are able to add perspectives and insights across a broad range of views on issues of concern to our communities. From time to time, audience members may hear points of view with which they disagree.

Controversy may arise from subject matter, political or cultural point of view, or the inclusion of indecent material. Programs are subject to individual personal judgment. **witf** recognizes the need to consider a variety of tastes, viewpoints, and standards of public behavior represented in its region. **witf** also recognizes inherent differences among broadcast, print and web-based media and between news and other formats.

In cases of potential controversy, the content (in whatever media format) will be reviewed by the media manager with a recommendation made to Senior Vice President, Content and to the President when appropriate. The considerations for selection include the editorial and production quality of the program in the context of its own medium; its place among other programs and points of view already selected, its value in addressing subjects of community and societal significance, and any applicable legal requirements (such as infringement of copyright, obscenity, etc.).

### III. JOURNALISM THAT REPORTS EVENTS AND ISSUES WITH ACCURACY AND INTEGRITY

***We pursue facts about events and issues in our communities and other important matters that affect people's lives with accuracy and integrity.***

We aim to foster an informed and engaged public that, in turn, enables a strong and effective democracy, and to support individuals in making good decisions for themselves and their families and in their pursuit of a high quality of life.

We take responsibility for the validity of the content we present. We operate within a system of defined professional principles, ethics and practices in gathering data and perspectives. We are transparent about editorial decision-making processes.

#### KEY PRINCIPLES THAT GUIDE OUR REPORTING AND EDITING

##### Accuracy

We make every effort to assure that we are accurate. We use consistent standards and approaches in verifying the facts we present and the sources of information we use.

##### ATTRIBUTION

Whenever feasible we attribute the sources of our information. We resist anonymity, especially with respect to opinion, speculation, or personal attacks, and permit it only if we are without other means to gather compelling, verifiable information.

##### CONTEXT AND IMPARTIALITY

We place the facts we report in context. In our coverage of politics and controversial topics, we emphasize not only accuracy and full attribution, but also an impartial, non-partisan approach and attention to competing views.

##### CORRECTIONS

When we make mistakes we admit and correct them, either in the same venue in which they were made, such as an on-air broadcast, in the enduring version of a report or program, such as the online version of a story or on-demand version of a program, or both. We welcome comments and additional facts; if they add to the precision of what we present, we are committed to timely modifications.

##### INCLUSIVITY

We present a full range of views on controversial subjects – sometimes in a single story and sometimes over the course of a series of programs or set of commentaries presented in a timely fashion.

We seek out individuals and organizations mentioned in our coverage and reports when others have made unfavorable or critical allegations about them so that they have an opportunity to respond to such assertions and our audiences are more fully informed about the controversy.

We avoid stereotyping, with particular attention to race, gender, age, religion, ethnicity, geography, sexual orientation, disability, physical appearance, and social status.

In our reporting we make a distinction between the accountability of public officials, business and non-profit leaders and others who serve the public or seek power and influence, and the greater rights and expectations of privacy for private individuals, which we endeavor to respect and protect.

### **IDENTIFICATION OF SOURCES**

We are straightforward with our audiences. When we present the work of others we say so, but all media content produced by **witf** on any platform shall be the sole editorial responsibility of **witf**.

Audiences shall never be in doubt about the origin of any materials included in a **witf** program, whether video used as “background” or sound bites from a press conference. The source of all such elements shall be identified in a way appropriate to the medium (e.g., in the credits of television program, in the intro to a radio story, in the cutline of a photograph.) No **witf** programs of any kind (news or non-news) shall distribute complete, pre-produced video or audio stories or segments from corporate, government or third-party non-news sources.

**witf** may distribute pre-produced video or audio stories or segments only from other news organizations (commercial or public) whose news judgment is trusted by **witf** news and public affairs professionals. However, before use by **witf**, such stories must be evaluated by the staff and deemed to meet **witf**’s editorial standards.

Note that this policy does not apply the use of pre-produced video or audio stories or segments from our national news suppliers (i.e., PRI, NPR, the Associated Press), as these content elements are the product of an editorial partner whose editorial standards are known and approved by **witf**. If a national news supplier does not meet **witf**’s editorial standards, it will be replaced.

### **TRANSPARENCY**

When we edit interviews and other material we strive to preserve the original meaning. When we process audio, video, or images electronically, we do so only to enhance clarity and not to distort meaning or mislead audiences as to how or when the content was obtained.

We tell the people and the organizations we cover who we are and what we are doing unless public or personal safety is at serious risk and this open approach will not produce vital information. We will generally avoid an undercover approach, but will disclose when we have done so.

We work to include individuals who help provide balance among the main positions on important issues, although not always in a single program, online discussion or event.

We ask participants in our forums to create a level of clarity by providing details, examples, and evidence to support their contentions. We give them opportunities to respond to criticism and seeming inconsistencies.

## **IV. INCLUSION AND REFLECTION OF OUR COMMUNITIES’ DIVERSITY**

*The integrity of our work is strengthened by incorporating the diversity of demography, culture, and beliefs in our communities and the nation into our work and our content.*

We look to the full diversity of our community as we ascertain needs and interests to which we might respond.

We assure that people with different backgrounds, perspectives, and experiences are heard and seen as both sources and subjects of our programming and are invited to participate in our activities.

We seek to create content and activities that reach and serve a diversity of people, recognizing that different programming attracts people with different values, beliefs, lifestyles, and demography.

We treat the subjects of our programming with respect. We include points of view that may not be widely shared and individuals and groups that are infrequently heard or seen outside their own communities.

## **V. TRANSPARENCY IN PROGRAM SELECTION AND CONTENT CREATION**

*We share with our audiences and the public the mission-based and practical reasons for our program choices. We seek to be transparent in how we gather and report news and create other content.*

### **SELECTING MATERIAL FOR BROADCAST AND ONLINE**

We choose programs and content for broadcast and online presentation that are consistent with our overall mission and purposes. We are also guided by our public service priorities, which focus our work on particular needs and issues and on service to particular communities and audiences. Our mission statement and service priorities are published on our website.

Our content decisions are also shaped by practical considerations, such as the need for an overall coherence to our service and identity, the interests of audiences, the availability of material through other media, the costs of different kinds of programming we create, the costs of programs we acquire, and our overall resources.

We aim for public understanding of these public service and practical reasons for our decisions, especially when we make substantial changes in the direction or focus of our programming or services.

### **SELECTING STORIES AND ISSUES FOR NEWS AND PUBLIC AFFAIRS PROGRAMS**

TOPICS WE COVER FOR BROADCAST AND ONLINE DELIVERY ARE SELECTED AT REGULAR editorial meetings of our professional staff. We welcome suggestions about what to cover and encourage comments, criticisms, and corrections of our work. We publish the names, position, and contact information for senior members of our staff on our website.

Several criteria influence topic selection, beginning with the importance to our community and the fit with our organization's public service priorities. Other factors include relevance to our audience, timeliness, potential impact, our capacity to bring something new or unique to the topic, and our ability to take on the topic or issue in a way that meets our defined editorial standards.

### **SHOWING HOW WE GATHER AND REPORT INFORMATION**

We work to verify and authenticate the information we present in ways that are visible and understandable to the public.

We use and cite public records, publications and databases whenever possible. We identify the individuals or organizations that are sources of our information unless such disclosure jeopardizes the livelihood or safety of the source or it is otherwise impossible to obtain information that we believe to be newsworthy and reliable. We identify the locations where we gather facts and from which we report.

We offer opportunities for audiences to learn more about the matters we cover through providing sources of additional information and views, such as fuller versions of interviews from which we have quoted, original documents used in our research and reporting, or places to find the views of those we consulted or considered in preparing our report.

We engage with our audiences on all these matters, including in settings in which editorial decision-makers discuss our broad principles, policies, and practices as well as specific editorial decisions with the public.

## VI. TRANSPARENCY IN FUNDRAISING

***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 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 rarely exchange or rent our donor lists to other organizations, and do so only to non-profit organizations whose donor policies are consistent with our own. If we change lists, we inform donors and give them an easy means to "opt out." We do not exchange or rent donor lists to political candidates or political action committees.

We communicate directly and explicitly with donors about our editorial standards that bring rigor and integrity to our work, the legal requirements that surround our donor relationships, and the boundaries between funders and our editorial process. Within that framework, we keep donors informed about operations, welcome their suggestions and feedback, and value their role as advocates in the community.

We always disclose, on air or online as appropriate, the funders of specific 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, as follows: We acknowledge donors that sponsor 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 acknowledge donors that support the production of specific programs in on-air announcements. We keep a list of these donors in a publicly available file. We acknowledge donors that sponsor political programming or discussions of controversial issues of public importance (other than such discussions during regular news and public affairs programs) in on-air announcements. We keep a list of these donors and additional FCC-required information about the sponsors in a public file.

We do not accept anonymous gifts for the production of specific programs.

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, and in our annual reports and 990 filings posted at [witf.org](http://witf.org).

## VII. PREVENTING UNDUE INFLUENCE

***We strive to assure that our editorial process is free from undue influence. We take care in deciding from whom we seek and accept funds and in setting boundaries with respect to those who contribute.***

A large and diverse group of funders supports our work, including many individuals, businesses, governmental entities, and foundations. Most of the funding and underwriting 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 the reality and to limit 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 framework outlined below.

### FUNDING AND UNDERWRITING FOR NEWS PROGRAMMING

We exercise close scrutiny when deciding who can fund, sponsor, or otherwise underwrite news and information programming. We are especially cautious with respect to potential funders whose principal purpose or agenda is to bring about a specific political outcome or to influence public policy on controversial matters that are the current subjects of our ongoing coverage. We do not accept funding of news and information programming from political parties and candidates for public office. We don't accept funding that would obligate us to provide coverage of a topic that we would not have covered with general funds or that requires more extensive coverage than the topic's value or importance warrants.

#### Funding and Underwriting for Music, Arts, and Cultural Programs

We do not accept funds for arts and cultural programs that focus on reviews and recommendations from organizations with a direct interest in the works or performances. We occasionally consider funding from a music or cultural performing group or venue to support the presentation of performances by such groups or at such venues, depending on the answers to such questions as:

- Is the performance likely to meet our standards of quality for such material?
- Does the group or venue have broad community support and interest or is there another community-focused rationale for presenting the performance?
- Is there an appropriate reason to accept production funding from one community arts organization while declining such funding from another?

## **FUNDERS AND UNDERWRITERS AS PARTNERS IN CONTENT CREATION**

When we accept funding from an organization that will also play a role in the creation of content, we do not substitute others' editorial judgment for our own. We assure that our presentation of content produced through partnerships with funders meets our defined editorial standards. We disclose when a funder has joined us in the creation of content we present.

## **VIII. CONSISTENT EDITORIAL STANDARDS IN PARTNERSHIPS AND COLLABORATIONS**

***Editorial partnerships expand our capacity to serve and the perspectives we can share with our audiences. They enhance the timeliness and relevance of our programming and activities.***

We engage in ongoing efforts to build connections that deepen our knowledge of the communities we serve and our awareness of potential partners for projects. We look for alignment in the motivation and goals of potential partners and collaborators and those of our own organization. We focus on principles, values, and practices and understand that differences in style or tone among our partners may contribute to our ability to serve the full community.

We maintain our defined editorial standards when partnering with other entities. We identify and articulate our principles, policies, and practices to all stakeholders in our partnerships and other collaborations. We require our partners to adhere to the same standards for any shared content, including transparency in the editorial process and the disclosure of content funders.

Our standards follow our content to other technologies and contexts. For example, hosting or facilitating a community discussion, town hall or forum requires editorial judgments using the same standards we apply in our broadcast or online activities.

We disclose our editorial partners and provide to the public a brief description of their and our roles and responsibilities. The form and frequency of these acknowledgements and disclosures will vary with the character of the relationship and the editorial content or activity that it produces.

## **IX. EMPLOYEE ACTIVITIES BEYOND THEIR PUBLIC MEDIA WORK**

***The actions of our employees, even when "off the clock," affect public trust in our integrity, credibility, and impartiality. We expect employees to strive for congruency in their personal and professional lives.***

We respect the active personal lives of public media employees and their many interests, activities, and relationships. We are mindful, though, that employees' activities beyond their public media work can affect our reputation and public trust. We therefore ask employees to integrate the principles and values of public media editorial integrity into their personal lives.

### **ALL PUBLIC MEDIA EMPLOYEES SHOULD:**

Aspire to high standards of integrity and ethics in their personal lives, including dealings with friends and associates, public behavior, and use of social media.

Be alert and sensitive to conflicts of interest between personal interests (including family members) and their professional public media responsibility.

Make a distinction between communications that are part of professional public media responsibilities and all other communications.

Exercise careful judgment in engaging in partisan activities or advocacy regarding controversial issues of public importance.

**For employees with direct responsibilities for news and public affairs content, including reporters, producers, and the SVP/Content and President, with whom ultimate editorial decisions reside:**

Do not participate in partisan political activities and activities supporting, opposing, or espousing views on controversial issues of public importance. This includes running for elected office, contributing to candidates for office, participating in rallies, marches, and demonstrations, signing petitions, and displaying lawn signs and bumper stickers.

Do not participate in groups, including online groups, with agendas or activities that may give rise to real or perceived bias on matters of public interest or controversy.

Do not accept gifts, favors, and fees (including free travel or special treatment) from those with an agenda on matters of public importance or with whom it is important to preserve detachment and impartiality.

## **APPENDIX A:**

Resource Document for **witf** Principles & Guidelines

### STATEMENT OF PRINCIPLES OF EDITORIAL INTEGRITY IN PUBLIC BROADCASTING

## **PROCEEDINGS OF THE WINGSPREAD CONFERENCE ON EDITORIAL INTEGRITY, 1985**

The mission of public broadcasting is to bring to its audience the highest accomplishments of our society and civilization in all of its rich diversity, to permit creative talent to fulfill the potential of the electronic media to educate and inform, and to provide opportunities for the diverse groupings of the North American people to benefit from a pattern of programming unavailable from other sources.

No one is more important to the fulfillment of public broadcasting's mission than the men and women of the boards of trustees of the licensee stations. They are custodians of their institutions' fiscal reputation, a currency necessary to acquire support from those whose taxes and donations make public broadcasting possible. They are also the final guardians of public broadcasting's editorial integrity and its reputation in the marketplace of ideas, where reputation is legal tender.

Editorial integrity in public broadcasting programming means the responsible application by professional practitioners of a free and independent decision-making process, which is ultimately accountable to the needs and interests of all citizens.

In order to assure that programs meet the standards of editorial integrity the public has a right to expect, the following five principles and guidelines establish a foundation for trustee action. The principles and guidelines also form a basic standard by which the services of a public broadcasting licensee can be judged. At the same time, they form a basis for evaluating all aspects of a public broadcasting station's governance, from enabling legislation to the policy positions of the licensee board. The ultimate goal of the principles and guidelines is to assist public broadcasting trustees in fulfilling their vital role in this important public service.

### **1. WE ARE TRUSTEES OF A PUBLIC SERVICE**

Public broadcasting was created to provide a wide range of programming services of the highest professionalism and quality which can educate, enlighten and entertain the public, its audience and source of support. It is a noncommercial enterprise, reflecting the worthy purpose of the federal and state governments to provide education and cultural enrichment to their citizens.

As trustees of this public service, part of our job is to educate all citizens and public policy makers to our function, and to assure that we can certify to all citizens that station management responsibly exercises the editorial freedom necessary to achieve public broadcasting's mission effectively.

## **2. OUR SERVICE IS PROGRAMMING**

The purpose of public broadcasting is to offer its audiences public and educational programming which provides alternatives in quality, type and scheduling. All activities of a public broadcasting licensee exist solely to enhance and support excellent programs. No matter how well other activities are performed, public broadcasting will be judged by its programming service and the value of that service to its audiences.

As trustees, we must create the climate, the policies and the sense of direction, which assure that the mission of providing high quality programming remains paramount.

## **3. CREDIBILITY IS THE CURRENCY OF OUR PROGRAMMING**

As surely as programming is our purpose, and the product by which our audiences judge our value, that judgment will depend upon their confidence that our programming is free from undue or improper influence. Our role as trustees includes educating both citizens and public policy makers to the importance of the fact and to assuring that our stations meet this challenge in a responsible and efficient way.

As trustees, we must adopt policies and procedures, which enable professional management to operate in a way, which will give the public full confidence in the editorial integrity of our programming.

## **4. MANY OF OUR RESPONSIBILITIES ARE GROUNDED IN CONSTITUTIONAL OR STATUTORY LAW**

Public broadcasting stations are subject to a variety of statutory and regulatory requirements and restrictions. These include the federal statute under which licensees must operate, as well as other applicable federal and state laws. Public broadcasting is also cloaked with the mantle of First Amendment protection of a free press and freedom of speech.

As trustees we must be sure that these responsibilities are met. To do so requires us to understand the legal and constitutional framework within which our stations operate, and to inform and educate those whose position or influence may affect the operation of our licensee.

## **5. WE HAVE A FIDUCIARY RESPONSIBILITY FOR PUBLIC FUNDS**

Public broadcasting depends upon funds provided by individual and corporate contributions, and by local, state and federal taxes. Trustees must therefore develop and implement policies, which can assure the public and their chosen public officials alike that this money is well spent.

As trustees, we must assure conformance to sound fiscal and management practices. We must also assure that the legal requirements placed on us by funding sources are met. At the same time, we must resist the inappropriate use of otherwise legitimate oversight procedures to distort the programming process, which such funding supports.

## APPENDIX B

Resource Document for **witf** Principles & Guidelines

### LOCAL PUBLIC MEDIA ORGANIZATIONS: CODE OF EDITORIAL INTEGRITY

Trust is the most important asset public broadcasting carries forward into its evolving public media future. Audiences rely on our information and perspectives as they make decisions in their public and personal lives. The public consistently says public television and public radio are their most trusted sources among many media choices.

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 Corporation for Public Broadcasting to protect public broadcasting entities “from interference with, or control of, program content or other activities.”

Public confidence in our organizations is strengthened by the regulations and legal requirements that accompany our FCC licenses to broadcast, our federal recognition as nonprofit educational and charitable organizations, and the federal funds that contribute to our work.

We assure the public’s continued trust by holding ourselves to rigorous voluntary standards of integrity — in how we govern our local public media organizations, produce our work, raise funds for content and operations, and comport ourselves in our communities.

Our organizations operate in a wide range of circumstances – in the communities they serve, the programming and other activities they provide, and the scale of resources with which they work.

The Code of Editorial Integrity for Local Public Media Organizations has been developed through discussions, debates, and consultations involving hundreds of executives and senior staff of public broadcasting organizations, faculty from schools of journalism, and advisers in the areas of philanthropy, community engagement, new media, and best practices for nonprofit organizations. We have benefitted from statements of editorial practices and standards, programming guidelines, and fund raising policies from public television and public radio stations across the country.

While offered as a model for all public service media, the principal focus of the Code of Editorial Integrity is the public television and public radio stations that benefit from federal support through the Corporation for Public Broadcasting. The principles, policies and practices of the Code define and unify an evolving field. Stations and other public media organizations will adapt and apply the Code in ways that both reflect shared values and address their unique circumstances.

We affirm our principles, policies and practices through our support of this Code of Editorial Integrity.  
*February 2012*

**The Editorial Integrity Project is a collaboration of public television’s Affinity Group Coalition and public radio’s Station Resource Group. The Corporation for Public Broadcasting provided funding and the National Educational Telecommunications Association provided organizational support.**

## CODE OF INTEGRITY

Our purposes are to support a strong civil society, increase cultural access and knowledge, extend public education, and strengthen community life through electronic media and related community activities. The public's trust in our organizations, content, services, and relationships is fundamental to achieving these purposes. We earn the public's trust through the quality and excellence of our work, the inclusion and reflection of the diversity of our communities, and a commitment to defined professional standards and practices.

We take specific steps to ascertain and understand community needs, issues, and interests; to assure respect and civility in our forums and discussions and impartiality and objectivity in our coverage of complex and controversial matters; and to be accessible, accountable, and transparent to those who use our services and the community as a whole. Our standards apply to all the content we produce and present, regardless of subject matter, including news, science, history, information and cultural content. They apply across all the channels and platforms we use – broadcasting, online, social media, print, and in-person events.

### GOVERNANCE AND MANAGEMENT FOR THE COMMON GOOD

We govern our activities in ways that promote the common good and the public interest and that reflect our commitment to integrity and trustworthiness. These obligations supersede personal and institutional agendas.

### IDEAS, CULTURE AND FORUMS WITH RESPECT AND CIVILITY

We contribute to the civic, educational, and cultural life of our communities by presenting a range of ideas and cultures and offering a robust forum for discussion and debate.

### JOURNALISM THAT REPORTS EVENTS AND ISSUES WITH ACCURACY AND INTEGRITY

We pursue facts about events and issues in our communities and other important matters that affect people's lives with accuracy and integrity.

### INCLUSION AND REFLECTION OF OUR COMMUNITIES' DIVERSITY

The integrity of our work is strengthened by incorporating the diversity of demography, culture, and beliefs in our communities and the nation into our work and our content.

### TRANSPARENCY IN PROGRAM SELECTION AND CONTENT CREATION

We share with our audiences and the public the mission-based and practical reasons for our program choices. We seek to be transparent in how we gather and report news and create other content.

### TRANSPARENCY IN FUNDRAISING

We aim for respectful relationships with our donors and 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.

### **PREVENTING UNDUE INFLUENCE**

We strive to assure that our editorial process is free from undue influence. We take care in deciding from whom we seek and accept funds and in setting boundaries with respect to those who contribute.

### **CONSISTENT EDITORIAL STANDARDS IN PARTNERSHIPS AND COLLABORATIONS**

Editorial partnerships expand our capacity to serve and the perspectives we can share with our audiences. They enhance the timeliness and relevance of our programming and activities.

### **EMPLOYEE ACTIVITIES BEYOND THEIR PUBLIC MEDIA WORK**

The actions of our employees, even when “off the clock,” affect public trust in our integrity, credibility, and impartiality. We expect employees to strive for congruency in their personal and professional lives.

## **APPENDIX C:**

The Federal Communication Commission currently and in the past has had three rules which have implications for any public affairs series: the “Fairness Doctrine,” “Personal Attack,” and “Equal Time.”

### **1. FAIRNESS DOCTRINE.**

While the Fairness Doctrine is no longer in force, its content is still worth noting. The Fairness Doctrine stipulates that in presenting “controversial issues of public importance,” broadcasters provide a reasonable opportunity for the expression of a variety of opinions on the issues. Adherence to good journalistic standards should result in compliance with this rule. The definition of “controversial issues of public importance” is subject to a case-by-case analysis.

### **2. PERSONAL ATTACK RULE.**

If during the presentation of a “controversial issue of public importance,” qualities such as “honesty, character, integrity” or similar qualities of any “identifiable” person or group are attacked, the broadcaster must offer a reasonable opportunity for the attacked person to respond. Just as the definitions of “controversial issue” and “public importance” vary and are subject to a case-by-case analysis, the definitions of “identifiable” and such qualities as “honesty, character, and integrity” are subject to the same vagaries.

### **3. EQUAL TIME.**

If a legally qualified candidate for federal public office appears in a broadcast, opponents have the right to demand equal time. While some appearances might come within an exception to the rule if they are incidental to the subject of a bone fide news documentary, producers should be aware that appearances might trigger equal time requests. The media manager should be informed about any person appearing in a program who is a candidate for public office.

## **APPENDIX D:**

### **RELATED POLICY, PREVIOUSLY APPROVED, TO WITF PRINCIPLES & GUIDELINES**

## **WITF POLICY ON THE PRODUCTION OF CANDIDATE DEBATES**

**Approved by the Board of Directors, July 2002**

### **INTRODUCTION**

**witf**-TV regularly presents political news coverage, candidate debates and forums as part of our mission to “create a shared civic...life to the communities of our region.” The criteria included here help guide our program producers in fulfilling that goal in a manner that best serves the citizens of Central Pennsylvania and meets the requirements of state and federal law.

Organization and production of our political coverage and special election year programming rests with the public affairs producers of **witf**-TV. The producers recognize their overarching goal must be to help citizens be better informed, so they may choose to be involved in their government, and the political process.

It should be noted that there are sometimes competing interests regarding election issues. We wish to provide the broadest possible range of ideas, issues, and exposure to candidates while at the same time providing the most useful and meaningful information. This may require selecting among ideas, issues, and candidates. Our purpose is to provide service to citizens, not candidates.

### **LEGAL OBLIGATIONS**

**witf**-TV shall follow all rules and regulations as mandated by the Federal Communication Commission pertaining to political coverage and programming. We also shall abide by and use as references all rulings on these matters emanating from the Supreme Court of the United States.

Federal law and administrative rules of the FCC establish that broadcasters, including **witf**, enjoy wide latitude in the exercise of editorial discretion, even in the case of sponsored political debates. Recently, the U.S. Supreme Court held that “...electoral speech may have its most profound and widespread impact when it is disseminated through televised debates.” (Arkansas Educational Television vs. Forbes, 118 S. Ct. at 1640) The court recognized the challenge of races that attract several candidates: “On logistical grounds alone, a public television editor might, with reason, decide that the inclusion of all ballot-qualified candidates would actually “undermine the educational value and quality of debates.” [Quoting from Let America Decide 148 (1995), at 148.] Their ruling in Forbes concluded that television (and radio) broadcasters may exclude candidates of limited appeal as long as the reasons for the exclusion are reasonable and the viewpoint neutral.

**witf** recognizes that fairness and public service demand editorially sound opportunities to hear the opinions of candidates and political parties that our criteria may exclude from participation in broadcast political debates and forums.

## SELECTION OF DEBATES

Our overarching goal is to inform voters in a responsible manner. Given our limited resources - financial, managerial, technical, and available airtime - we must determine whether hosting political debates for specific contested races would be a worthwhile use of those resources. In most instances **witf** television and radio programming is driven by our regional service. As a general rule, **witf** does not present city or county level debates or candidate forums.

In addition, **witf** may elect to simulcast or re-broadcast on tape delay debates sponsored and produced by other media organizations in the state. **witf** alone shall decide whether the debate constitutes a newsworthy event and whether the event meets the organizations own criteria for fairness and technical broadcast quality.

## CONTENT OF DEBATES

**witf** have in the past and will continue to collaborate with other media and institutions on the organization of candidate debates. These are valuable partnerships and the representatives of these groups will be important advisors in the development of the format and procedures used in the events. However, **witf** will have content control and be the sole owner of the broadcast rights on any political debate that we produce for our broadcast. (Policy and guidelines for excerpting the debates shall be covered by the existing policy for excerpting broadcast news material).

## SELECTION OF CANDIDATES

Since the law and subsequent court rulings provide considerable latitude for broadcasters to decide the format and which candidates should be invited to participate, **witf** established the following criteria to guide our decision. Under no circumstances should a decision to include or exclude a candidate be based on the opinions expressed or the political affiliation of the individual.

The only absolute requirement is that a candidate must be legally qualified and must be certified by the Pennsylvania Department of State to appear on the ballot for the office being contested in the debate. The other criteria are designed to subjectively determine who constitutes a newsworthy candidate for the office being sought. The overriding selection is based on the judgment of the professional journalists on staff.

All legally qualified campaigns will be given the opportunity prior to a planned debate to provide evidence of their status as a newsworthy candidate. Among the questions that may be asked of the candidate:

**Does the candidate actively campaign for election to the office across the jurisdiction he or she is seeking to represent? Indicators of an active campaign include:**

- Creating a legal campaign committee regulated under state or federal law
- Establishing a campaign headquarters and telephone number staffed by an active staff, paid or volunteer.
- Articulating views on principle issues that affect the electorate by issuing position papers or through an active, accessible Internet site.
- Making regular personal campaign appearances across the jurisdiction.
- Active marketing and/or advertising efforts
- Financial resources beyond the candidate's own and/or active fundraising activity
- Routine and sustained contact with news media in the jurisdiction.

**Does the candidate provide evidence of significant initial voter interest through a sizable volunteer effort, or significant turnouts at campaign stops, broad based financial support, or substantial news coverage?**

**Does the candidate demonstrate factual evidence that would include at least 5% voter preference in an independent poll or receipt of 5% of the total votes cast in the primary election?**

**Does the candidate provide evidence of popular support through service in a state or local elected office within the last five years within the candidate's current jurisdiction?**

**Is the candidate a representative of a nationally recognized political party, and does the candidate have the financial and logistical backing of that party?**

#### **OTHER ITEMS**

These criteria should be reviewed prior to each election cycle to assure they remain relevant, of benefit to the state's citizens, and of practical use to **witf**.

When necessary, outside experts in politics, journalism, and the law may be consulted to review both the guidelines and to offer opinions on the manner in which the guidelines were applied in individual debates.

**witf** should make every effort to provide information about all candidates on the ballot in major state and federal offices. Outlets might include candidate profiles, providing of additional information on **witf** web sites, or finding other creative ways to inform voters of alternative candidates and points of view available during any election cycle.

## APPENDIX E:

Related Policy, Previously Approved, to **witf** Principles & Guidelines

## PRIVACY POLICY FOR WITF.ORG VISITORS

Thank you for visiting **witf.org** and its associated sub-domains. As an extension of our broadcast mission, we want your visit to **witf.org** to inform and entertain you. We know you don't want the information you provide us shared indiscriminately. Here we explain what information **witf** (and our third-party vendors (collectively “we”) acting on our behalf to help deliver the services and operate and analyze use of the Site), collect, what we do with the information, and what controls you have over the information collected. We're committed to ensuring the privacy of your personally identifiable information, and to protecting your ability to make financial transactions and transmit your personal data with full confidence.

The privacy policy set forth here refers solely to **witf.org**, and it's associated sub-domains such as, but not limited to, **netcommunities.witf.org**, **calendar.witf.org**, and **feeds.witf.org**. Please read it carefully, and if you have any questions or concerns, please contact us. Also, note that **witf.org** links to numerous other sites, such as PBS and NPR. Please consult those sites to learn more about their policies.

### 1. WHAT INFORMATION DO WE COLLECT ABOUT YOU

We collect two types of information from you: a) Personally identifiable information, includes personal information (such as your name, address, e-mail address, telephone number, credit card information and/or other identifying information) you voluntarily supply upon request when you register for our website, make a donation, complete a survey, register for an online discussion, enter a contest or provide your e-mail address; and b) Non-personally identifiable information, for example IP Addresses and cookies, which includes tracking information collected as you navigate through our site. Uses of this information are discussed in Section 2 below.

#### A. PERSONALLY IDENTIFIABLE INFORMATION

We will not collect personally identifiable information from you, other than what you supply to us on a voluntary basis upon request.

##### **REGISTRATION FOR OUR WEBSITES:**

*Anyone can view our site, however some pages of the Site may require a free registration, which enables full access to the information and resources offered throughout the Site. A unique email address (user name) and password must be supplied to register. By using the Site, you are agreeing to the conditions of our [Terms of Use](#).*

##### **PAID PRODUCTS AND SERVICES:**

*While the majority of our Site is free, we may now or in the future, charge fees for select products and services, such as purchases made through an online shop. To enable the purchase of these and other products we collect your telephone number, e-mail address, billing address and credit card information.*

### **SUPPORT OF witf:**

*On certain pages within the Site we may now or in the future offer visitors the opportunity to make a donation in support of **witf** or our programming. If a visitor chooses to make a donation, we will collect and store your telephone number, e-mail address, billing address and credit card information.*

### **FORUMS, FEEDBACK AND CONTENT SUBMISSIONS:**

*On certain pages within the Site you can submit content to be published, make community postings, comments, suggestions, and vote. We may collect your name, address, and e-mail addresses in connection with these activities. We will indicate which information is required and which is optional. We may contact users regarding their submissions in certain circumstances.*

### **YOUR SUBMISSION OF OTHERS' PERSONALLY IDENTIFIABLE INFORMATION:**

*On certain pages within the Site you can submit information about other people. For example, you may submit a person's name and email address to send an article. This information will only be used for your intended purpose.*

### **CONTESTS, SWEEPSTAKES, SURVEYS AND SPECIAL OFFERS:**

*On occasion, we may collect personal information from users in connection with optional sweepstakes, surveys, contests or special offers. We will indicate which information is required and which is optional. Such information will be used as indicated at the time of collection.*

### **E-MAIL AND E-MAIL NEWSLETTERS:**

*On occasion, we may collect personal information from users in connection with optional email and e-mail newsletters. We will indicate which information is required and which is optional. Such information will be used as indicated at the time of collection.*

### **MARKETING AND PROMOTIONAL COMMUNICATIONS:**

*On occasion, we may collect personal information from users in connection with optional marketing and promotional communications from **witf**, PBS, or a public broadcasting station. We will indicate which information is required and which is optional. Such information will be used as indicated at the time of collection.*

## **B. NON-PERSONALLY IDENTIFIABLE INFORMATION**

*In addition to information that you provide to us, we (again, this is **witf** and third party vendors) may also collect and store certain non-personally identifiable information automatically when you use the Site. This information helps us improve the experience you and other visitors have with the Site.*

*For example, we may collect your IP address, browser information and reference site domain, as well as related information such as the date on which you visit the Site. This information does not identify you personally and is only used in the aggregate.*

*As is common practice among web sites, we use "cookies" and similar technologies. In general, cookies -- the informational files that your web browser places on your computer when you visit a website -- are used on this Site to track and analyze how you and other visitors use our Site. We use these cookies in order to improve the Site, to identify the source of visitors and what pages you use*

*while on our site, to offer visitors interactive and/or personalized features that would not be possible without the cookies, to recall specific information to save visitors time when they return to the Site, to provide our sponsors targeted sponsorship opportunities, to provide visitors customized sponsorship messages or list of customized videos of interest, and to identify usage and statistical trends. By looking at this traffic we can better understand our community, which allows us to improve our Site and to provide you with an optimal experience and better service. Our sponsorship service vendors, which serve sponsorship messages onto our site, and third party vendors that measure and analyze the use of the Site for us, may also use their own cookies. At no time does the cookie reveal your name, address, or e-mail address (even if you have entered these in specific areas of the Site). The Site pages cannot extract any personally identifying information about you from what we receive via a cookie and your browser.*

*You can set your browser preferences to refuse cookies or to alert you when cookies are being sent. However, some parts of the Site will not function properly if you do so.*

## **2. HOW DO WE USE INFORMATION GATHERED ON THE SITE**

Neither **witf**, nor our third-party vendors acting on our behalf to help deliver the services and operate the Site, will willfully disclose any personally identifiable information about our online users to any non-affiliated third party without first receiving the user's permission, unless required by law. **witf**'s affiliates include our local productions (such as Smart Talk, Health Smart, Explore PA), PBS, and other public broadcasting stations or programming.

In terms of our own use of information, we may use your personally identifiable information for the activities described in the previous sections, for the activities described when you submitted the information, or for internal and marketing promotional purposes as further described in this policy.

We will typically explain the extent of use at the time you are asked to provide personal information. If you do not want this information to be collected or used by us for these purposes, you can simply “opt out.” Under certain circumstances, opting out may prevent your participation in activities for which personal information is needed, as in contests.

As mentioned, in certain cases, we contract with other companies to provide services on our behalf. These service providers maintain customer databases with e-mail addresses of Site visitors who have provided them to us by registering at our site, signing up for a newsletter or email, e-mailing us questions about the service, donors who submit online contributions, or online buyers who make a purchase. We (which includes our service providers) will use these addresses to respond to the general purposes for which we collected the information, to provide services and to operate the Site, including to respond to inquiries; to process credit card payments, billing, and shipping; to process e-mail distribution; for list processing and analysis; for promotions management; to send information about **witf**'s programs, services, or your local public broadcasting station's membership/fundraising; or to correspond about a purchase or product offers. Our service providers have access to your personally identifiable information as necessary to provide certain services on our behalf. They are required to maintain the privacy of all such information in their possession or control and can only use the information on our behalf for the purpose that we have contracted them, for example sending you a newsletter. They are not authorized to use your information for any other purpose.

Similarly, personally identifiable information provided in connection with a donation will be shared with third parties who perform services to process the donation.

**witf** will not sell, rent, lease, loan, trade, give, donate, transfer or exchange their membership or donor names to, with or from any local, state, or federal candidate for public office, authorized committee for such a candidate, or political party for any purpose whatsoever, except as required by law.

If at any time you would like to check or update our record of your information, please let us know by using the **witf.org** Contact Us page, calling the **witf** Main Switchboard (717-704-3000, Monday-Friday, 8am-5pm EST), or writing to us (**witf**, 4801 Lindle Road, Harrisburg, PA 17111).

We will not sell, exchange, or lend e-mail addresses to any non-affiliated third party, without your permission. However, we or our service providers may release personally identifiable information if we believe in good faith that the law or legal process requires it, we have received a valid administrative request from a law enforcement agency, or such release is necessary to protect anyone's rights, property or safety.

On certain pages, we may now or in the future, offer visitors the opportunity to provide comments, messages or other user-generated text, content or materials (collectively "User Materials"). Any information that you disclose when posting a message to these areas, such as your name, screen name or ID used, becomes public. In addition, the information that you disclose in these areas may be used by us for promotional and marketing purposes. We are not responsible for any personally identifiable information that you choose to disclose in these public areas. Further, **witf**, its production units, public broadcasting station affiliates and their licensees, may use, copy, sublicense, modify, transmit, publicly perform, display, create derivative works of, host, index, cache, tag, encode, and/or adapt any User Materials, and any information contained therein, in any and all media formats or channels, whether now known or hereafter devised, including, but not limited to, the Site, public broadcasting station web sites, other third party web sites, over the air (on radio or television), and on mobile platforms.

We reserve the right to send you e-mail relating to your account status. This includes order confirmations, renewal/expiration notices, notices of credit-card problems, other transactional e-mails and notifications about major changes to our Site and/or to our Privacy Policy. If you have registered for online discussions or other services, you may receive e-mail specific to your participation in those activities.

We offer several e-mail newsletters and emails. We will always provide a clear and convenient method of unsubscribing to our e-mailings. If you no longer wish to receive a specific newsletter, follow the "unsubscribe" instructions located in each newsletter or email, or by going to the Site's Contact Us page and send us a message. We will update our records as soon as possible.

**witf**, with the assistance from time to time of its third party service vendors, uses non-identifying aggregate information to analyze use of and better design the Site and to share with third parties in aggregate form only as appropriate. For example, we may tell a third party that a certain number of users accessed a particular video on our Site. However, we will not disclose any information that could be used to identify those users.

### 3. SECURITY OF INFORMATION

**witf** has in place what we believe to be appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. Credit card information provided on the Site is protected against unauthorized use by Secure Sockets Layer (SSL) security features. The SSL protocol is the industry standard method for creating an encrypted, secure connection between your web browser and a web server, such as the Site's server. You should, however, keep in mind that no Internet or e-mail transmission is ever fully secure or error free. Because most e-mail is not encrypted, you should take special care in deciding what information you send to us via e-mail.

### 4. CHILDREN'S GUIDELINES

**witf.org** is a general audience site and does not knowingly collect or store personally identifiable information about children under the age of 13.

Any portions of our Site that are directed to children under the age of 13 (e.g., the kids section under the Education section) comply with COPPA (Children's Online Privacy Protection Act) standards, which are in addition to **witf.org** policies. For complete guidelines on children's information collection, please visit the **witf** KIDS PRIVACY POLICY which is located below.

### 5. CORRECTIONS TO PERSONAL DATA; OPTING OUT

Please Contact Us to a) correct or update any personal information in the **witf** database that you state is erroneous, b) opt-out of future communications from **witf**, or c) request **witf** to make reasonable efforts to remove your personal information from the **witf** online database, thereby canceling your profile, newsletter registration and other **witf** registrations. This will not necessarily remove previous public comments and other User Materials submitted for public display on the Site. You should understand that it may be impossible to delete personal information entirely because of backups and records of deletions.

### 6. ACCEPTANCE OF THIS PRIVACY POLICY FOR **witf.ORG**

By using this Site, you signify your agreement to the terms and conditions of this Privacy Policy for **witf.org**. If you do not agree to these terms and conditions, please do not use this Site. We reserve the right, at our sole discretion, to change, modify, add, or remove portions of this policy at any time. Please check this page periodically for any changes. Your continued use of **witf.org** following the posting of any changes to these terms shall mean that you have accepted those changes. If you have any questions or concerns, please contact us.

### 7. CHANGES TO THIS PRIVACY POLICY

Whenever this Privacy Policy for our Site changes, we will post the changes to the Site, and such changes will be effective immediately upon posting. If you do not agree to the changes, please do not continue to use the Site. Under certain circumstances, we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as posting a notice on the front page of our Site or sending you an e-mail if we have your e-mail address.

### 8. TERMS OF USE

Please also make sure to read **witf.org**'s Terms of Use to understand the additional terms and conditions, which apply to your use of our Site.

## **Appendix F:**

Related Policy, Previously Approved, to **witf** Principles & Guidelines

### **CHILDREN'S PRIVACY POLICY FOR WITF.ORG**

**witf** takes great pride in the high-quality television, radio, and Web content we provide for children, as well as the public trust we have secured in doing so. As we move into providing an online Kids service on the Web, this trust becomes even more important to you, and to us. We believe the following understanding will enhance the safety, value and enjoyment of your child's visits to **witf** Online.

It is our goal to provide service on our site while maintaining our strong commitment to identifying children and protecting their privacy. When we collect information from our Web visitors, we routinely ask them to confirm whether they are older than 18 years of age. If we learn that a user is younger than 18, we will not store his/her personal information for future communication.

**witf** does not willfully disclose to any third party any personally identifiable information about our online visitors who have identified themselves as younger than 18.

From time to time, we may offer contests, quizzes, and surveys in the Kids section of **witf** Online. Our sole objective in these endeavors is to offer young visitors appropriate and entertaining interactive content. When we showcase online content specifically for young people that requires identifying information, we ask children to gain permission from a parent or caregiver first (e.g., "Hey, kids, before you enter our contest, make sure you get permission to participate from a parent or whoever takes care of you.")

If we know a visitor is younger than 18, we collect parental/caregiver permission offline (by US mail, fax, or phone) before we mail any prizes to the child. If your child submits stories, artwork, written comments, or anything else for us to post on our site, he or she will be identified only by first name, age, and state.

You and your child's use of this site are conditioned on your having accepted these terms. Please check this policy frequently, as it is subject to change from time to time, and your child's continued use of the site is conditioned upon your acceptance of any modifications hereto.

We want to make this site a safe haven for where families to surf together, and where parents and caregivers are happy to have their children interact, learn, and play. If you have any comments or questions, we'd be happy to hear them.