

Reporting Standards

National Newspapers



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trust in media

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INTRODUCTION

This document contains the Reporting Standards for print and digital edition of products registered in the National Newspapers sector.

The PDF versions of the Reporting Standards are issued at a certain point in time. As Reporting Standards are updated periodically, please check the website <https://www.abc.org.uk/reporting-standards> to ensure you are using the latest applicable standards.

Each category of circulation in the Reporting Standards has the following:

- Definition
- Principles
- Requirements
- Reporting
- Guidance

If you are after a quick understanding of the key points of any section then the definition and principles will provide an overview.

The guidance sections provide examples of how the requirements might be complied with. We will add to or amend these over time where we consider there may be a benefit following the identification of specific circumstances or requests for advice.

If you have any queries regarding how the Reporting Standards affect you or any specific queries please contact the ABC Client services team on 01442 870 800 or email enquiries@abc.org.uk.

GENERAL PRINCIPLES AND RECORD KEEPING

INTRODUCTION

This section sets out some key requirements relating to the overall reporting and auditing of your ABC claim.

PRINCIPLES

1. **Publication must be eligible to report under the Reporting Standards**
2. **Copies must comply with the Reporting Standards**
3. **Transactions related to the claim must be bona fide 'arms length' arrangements**
4. **Evidence to support the claim must be retained and available for a minimum period**
5. **There is a designated Audit Issue**

REQUIREMENTS

1. **The publication must be eligible to report under the Reporting Standards**
 - a) You may apply to register a printed UK National Newspaper under the UK National Newspaper Reporting Standards if it is widely distributed (i.e. handled by the majority of wholesalers) in at least one of the following:
 - i) England, Wales and Northern Ireland; or
 - ii) Scotland; or
 - iii) The Republic of Ireland.
 - b) Where a newspaper operates alternative distribution methods, the ABC National Newspaper Reporting Standards Group will decide whether or not the range of distribution is sufficiently wide to admit the newspaper to the sector.
2. **Copies must comply with the Reporting Standards**
 - a) Copies claimed must comply with the relevant sections of these Reporting Standards with the following exceptions which you specifically cannot claim:
 - i) Free copies to contributors
 - ii) Free copies to advertisers
 - iii) Free copies to advertising agencies
 - iv) Free copies to press cutting agencies
 - v) File or office copies
 - vi) Free publisher employee copies
 - vii) Paid publisher employee copies (unless they qualify under the Paid Employee Copies category or they are purchased as a normal consumer).
 - viii) Electronic versions of the publication unless they meet the requirements to be claimed as a Digital Edition.
3. **Transactions related to the claim must be bona fide 'arms length' arrangements**
 - a) Transactions or arrangements (such as sales, circulation or distribution services) with your own organisation or Related Parties will initially be deemed as not bona fide 'arms-length' for ABC purposes, meaning they cannot be included in

your claim. However they can be included if you are able to demonstrate to the satisfaction of your auditor or ABC that these comply with the Reporting Standards and are bona fide 'arms length' arrangements.

- b) Related Parties for ABC purposes will include where:
- i) One party has direct or indirect control of the other party; or
 - ii) The parties are subject to common control from the same source; or
 - iii) One party has influence over the financial & operating policies of the other party to an extent that the other party might be inhibited from pursuing at all times its own separate interests; or
 - iv) The parties, in entering a transaction, are subject to influence from the same source to such an extent that one of the parties to the transaction has subordinated its own separate interests.
 - v) Transactions between contract publishers and their clients are deemed not to be arms length in relation to a specific publication produced for that client.

This means the following are considered Related Parties for ABC purposes:

- The publisher, its subsidiary, parent and fellow undertakings (and Directors of these)
- Associates and Joint Ventures (and their investors)

4. Evidence to support the claim must be retained and available for a minimum period

- a) You must retain and be able to provide all records supporting the claim, including but not limited to:
- i) An analysis of the claim by issue.
 - ii) Evidence supporting the number of copies printed for each issue claimed.
 - iii) Evidence supporting the number of copies distributed for each issue claimed, relevant to its circulation type.
 - iv) Evidence for each copy supporting the relevant circulation category and geographical region in which it is claimed on an issue by issue basis (i.e. not on a transactional basis), except for copies claimed in the Other Countries category where copies can be accounted for on a transactional basis (monthly as a minimum).
 - v) A copy of each issue and any Editions claimed.
 - vi) Financial records.
- b) Records supporting the claim must be retained until 3 months after the end of the Reporting Period.
- c) Records supporting the claim must be retained and made available to your Auditor or ABC on request, in accordance with the ABC Byelaws.

5. There is a designated Audit Issue

- a) The Audit Issue is a designated issue in the Reporting Period for which the Reporting Standards specify certain information is required to be retained or reported.
- i) If two issues are equidistant from this date then you may choose either as the Audit Issue.
- b) The Audit Issue is the issue distributed nearest to the 21st of the month. Where this issue was either not published or excluded under the exclusion rules then the previous claimed issue will be the Audit Issue.

GUIDANCE

G4. Evidence to support the claim must be retained and available for a minimum period

- a) In relation to evidence supporting the number of copies distributed for each issue claimed, this must enable identification of the publication name, issue and quantity of copies. This means copies posted using a franking machine will not normally be able to be claimed as the records will not identify what has been posted.
- b) In relation to mailed copies there is no need to remove copies from the claim that are returned because they are undeliverable. *For example copies returned addressee gone away or not known.*
- c) In relation to print evidence you will normally provide print invoices and evidence of payment. If printing is carried out in-house or within a Related Party organisation then production records may be required. Other financial records may also be reviewed.
- d) In relation to distribution evidence you will normally provide distributors' invoices/despatch notes and evidence of payment. Other financial records may also be reviewed.
- e) In relation to publication sales you may need to provide access to financial records including sales ledgers and bank statements on request.
- f) The auditor may accept copies of records stored electronically, but we advise you check first.
- g) If records are not available or not accepted by your auditor/ABC then this may result in copies being disallowed, certificates being withdrawn or cancellation of the publication's ABC registration.
- h) For ease of auditing and to avoid additional costs any mailing list supplied for audit should be presented in a format agreed between you and your auditor. One agreed format is:
 - i) One file per publication in a comma-delimited format
 - ii) One line per addressee
 - iii) Each addressee coded to identify the circulation category/rate in which it has been claimed
 - iv) Separate fields for name, job title, company name, address records, circulation code, geographical code, request dates, number of copies etc
- i) We offer an optional 'sealed galley' service whereby a mailing list tested at an audit can be treated as a valid source record for future audits. This avoids the need to go back to original documentation at a future audit if a record is included on a mailing list previously audited and sealed. Please contact us for further details.

- ii) The percentage variance will be reported separately for the UK and Republic of Ireland geographical areas detailed above.

3. Optional metrics

- a) You may report optional metrics in addition to the required mandatory metrics, providing these are to an industry-agreed definition. *Note: There may be additional costs associated with the preparation of the certificate and audit of the additional data.*

PAID SINGLE COPIES

Retail Sales (Sale or Return)

DEFINITION

A copy sold to a retailer, on a sale or return basis, for resale as a single copy to a consumer.

PRINCIPLES

1. **Single copy knowingly paid for by the consumer to the retailer**
2. **Copies are purchased from the publisher by the retailer, on a sale or return basis, either direct or via the distribution chain (typically distributor and/or wholesaler)**
3. **Cover price must be published on or inside front or back cover of the publication**
4. **The price paid for the publication by the consumer must be clear and conspicuous**
5. **There must be an incentive for unsold copies/net sale to be reported to the publisher**
6. **If the final net sale and/or rate classification are not known then estimates must be made**
7. **Reported by rate, comparing price paid by the consumer with the Basic Cover Price**

REQUIREMENTS

1. **Single copy knowingly paid for by the consumer to the retailer**
 - a) The purchase by the consumer may be in cash or by other means agreed by ABC in writing.
 - b) You cannot claim sales of back issues.
2. **Copies are purchased from the publisher by the retailer, on a sale or return basis, either direct or via the distribution chain (typically distributor and/or wholesaler)**
 - a) 'Sale or Return' means unsold copies are returned or reported for credit. The copies claimed will therefore be the net sale (copies supplied less credited copies).
 - b) Where the publisher is not third party to the retailer then evidence of purchase by the consumer is required. *For example EPOS reports and retailer revenues.*
 - c) You must account for net sales on an issue by issue basis.
3. **Cover price must be published on or inside front or back cover of the publication**

No additional requirements.
4. **The price paid for the publication by the consumer must be clear and conspicuous**
 - a) If a voucher from a publisher controlled promotion is used the amount paid by the consumer is deemed to be the total of the cash paid to the retailer and any cash they paid for the voucher.
 - b) The value (or perceived value) of gifts or cover mounts to the consumer have no effect on the price paid for ABC purposes. However cash reimbursements to the consumer must be taken into account (excluding limited low chance lottery style promotions).
 - c) You must retain details of promotional or special offers during the reporting period.

d) Where you are operating a retail incentive scheme:

- i) You must have appropriate management controls and processes in place to ensure the copies sold under a retail incentive offer are compliant and properly accounted for. This may include:
 - o Supporting evidence of relevant process and financial arrangements (including with third party intermediaries where applicable)
 - o Instructions to retailers and stores on the operation of the incentive in-store
 - o Your own checks of in-store compliance
- ii) The quantity of copies should not exceed potential demand by the intended consumers. *This should take into account factors such as store size/footfall, non-scheme sales, evidence of returns etc.*
- iii) You must provide to your auditor on request details of stores currently operating the scheme and those upcoming in order to facilitate planning of in-store checks.

5. There must be an incentive for unsold copies/net sale to be reported to the publisher

- a) Copies purchased using vouchers from publisher controlled promotions can be claimed as long as the consumer pays at least the retail margin in cash.

6. If the final net sale and/or rate classification are not known then estimates must be made

- a) If at the time you submit your circulation claim:
 - i) Unsold copies could still be returned or reported, you must make an estimate of final sales.
 - ii) You are running a promotional scheme where the final position (e.g. the number of discounted sales via redeemed vouchers) is not known you must make an estimate of the final net sale and classification.

You must adjust your claim in the following period to reflect any difference between the estimated net sale and classification and the actual net sale and classification.

- b) In relation to promotional schemes utilising voucher redemption: If you are reporting on a monthly basis and the effect of not making an estimate is judged to be unlikely to affect the figures claimed by more than 2% of the total average circulation then you can account for the vouchers on a wash through basis (i.e. as they are redeemed).

7. Reported by rate, comparing price paid by the consumer with the Basic Cover Price

- a) Sales by retailers will be treated as sales at the cover price unless there is evidence to the contrary.

REPORTING

You will report retail sales as follows, which will be broken out on the ABC Certificate (note: the term Full Rate will replace full or Basic Cover Price for reporting purposes):

1. By geographical type:
 - a) United Kingdom;
 - b) Scotland - as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI);
2. By rate band:
 - a) UK, UK subsets and ROI each by:
 - i) Full Rate
 - ii) Below Full Rate

3. By combination with other circulation types.
 - a) Retail sales (sale or return) will be reported combined with single copy sales.
4. By total average circulation over the period.

GUIDANCE

G1. Single copy knowingly paid for by the consumer

- a) Cash means legal tender notes and coins, cheque, credit/debit card, wireless payment systems.
- b) This doesn't preclude a retailer selling more than one copy to a single purchaser (without the publisher's knowledge).

G2. Copies are purchased from the publisher by the retailer, on a sale or return basis, either direct or via the distribution chain (typically distributor and/or wholesaler)

- a) You will need to ensure all records required to support the retail sale claim are available for audit. This will include:
 - i) Full details of the exact numbers claimed as unsold or returned copies (including undelivered, lost or stolen copies) for every issue in the audit period.
 - ii) Full issue by issue details of all financial records and contracts with distributors, wholesalers and retailers, with specific regard to normal and recognised trade terms. These must be reconcilable to the distribution and returns records on an issue specific basis and to the average net retail sales claim.
 - iii) Details of any change in trading terms from firm sale (if allowed) to sale or return (either temporarily or permanently) or vice versa.
 - iv) Details of discounts, special offers or restrictions on the return of unsold or undelivered copies.
- b) Copies reported using a pay on scan system will be reported in this category. You will need to ensure appropriate records of sales are available for audit.
- c) Retail sales of Digital Editions via a third party retailer (*for example Apple Newsstand, Google, Amazon etc*) will be reported in this category.

G4. The price paid for the publication by the consumer must be clear and conspicuous

- a) As the price paid may be affected by promotional schemes you should keep details of purchases and promotional spends so you can demonstrate copies are purchased and that sales under incentives/offers are classified correctly, or disallowed as necessary. You can contact ABC for confidential advice, supplying copies of the promotional material and offer wording. The information kept may include:
 - Title/s involved
 - Issues involved
 - Duration of promotion
 - Retail outlets involved
 - Wording of the promotion displayed at the retail outlet/s
 - How the resultant copies are claimed
 - How the promotion will be paid for
- b) Treatment of bundle/package promotions
 - i) As each case can vary we recommend you contact us for advice before carrying out your promotion.
 - ii) How the price of the publication is presented to the consumer will affect how or whether the copy may be claimed for ABC purposes.
 - If the price of the publication appears in the promotional material and it is legible (taking into account its presentation and prominence (including the size of the font used) and assuming a reasonable speed of reading) then the price is likely to be considered clear and conspicuous.

- Stating the publication's price in relation to the promotion/bundle in the main wording of the offer will provide most clarity.
- The further away from the main offer wording and/or less prominent in the promotion the price of the publication becomes, the more likely it will not be considered clear and conspicuous.
- If the price of the publication is linked to the main offer wording with, say, an asterisk - this would make it more conspicuous.
- Merely stating the price of the publication without reference to the bundle/package could just be a statement about the normal price of the publication and so will not necessarily render the price clear and conspicuous.
- If there is conflicting information about the price, then the lowest price assessment would be taken for ABC purposes (which might mean it is free).
- The absence of a clear and conspicuous price would render the copies as free, as would explicit wording stating the publication is free.

Examples:

1. Promotion "*Buy the publication and a bottle of water for £x*".

The price of the publication is not clear and conspicuous.

2. Promotion "*Buy the publication and a bottle of water for £x*" which is accompanied by the statement "*The price of the publication in this promotion is £y*"

The price of the publication is likely to be considered clear and conspicuous if the accompanying statement is either within the main body of the promotion, or is in a footnote that is asterisked to the main body and is legible.

3. Promotion "*Buy the publication and bottle of water for £x.*" Elsewhere in promotion "*Publication is £y Monday to Friday and £z on Saturdays*".

The price of the publication is not in the promotion and is unlikely to be considered clear and conspicuous as this statement appears to be the normal price of the publication.

4. Promotion: If a publication 'ABC News' is promoted as '*Buy ABC News for £x and get a free bottle of water*' then the bottle of water is treated as a free gift and it is clear the price paid is solely for the purchase of the publication.

5. Promotion: If the promotion is '*Buy a bottle of water and get a free copy of ABC News*' then the publication will be treated as free for ABC purposes.

- c) Per section 4b: "The discount or cash reimbursement must be taken into account

Examples:

1. Promotion: "*Buy publication and spend £5 and you get £1 off your publication*".

The publication is discounted by £1.

2. Promotion: "*Buy publication, spend £5 and get £1 off your shopping basket*".

The publication is discounted as it is part of the shopping basket, but it is difficult to determine how much it is discounted and will be considered on a case by case basis. In this example, using the minimum spend requirement of the offer gives a 20% discount and would seem a reasonable treatment.

3. Promotion: “Buy publication and get £1 off a jar of coffee”. Or “Buy publication and get the money off the rest of your shopping”.

The publication is full price, provided that the publication is sold at full price and the reimbursement does not exceed the cost of the items being discounted.

d) Retail Incentive schemes – Management controls and processes

- For each scheme the detail and extent of these controls and processes will vary as they should be appropriate to the nature of the promotion, including the scale and associated risk. A list illustrating potential risk factors is included below for information. The list is not exhaustive.
- These controls and processes are reviewed as part of the audit process and help the auditor determine the level of risk and consequently the type and extent of audit work undertaken.
- If the auditor judges the controls and checks in place for a particular scheme are not operating sufficiently effectively then they may require changes or, ultimately, decide copies under the scheme are not eligible for inclusion.

Risk factors associated with retail incentive schemes include:

- The total quantity of copies sold under a retail incentive scheme relative to the total ABC claim
- The details of how the scheme operates and relevant financial arrangements between the publisher, any retail merchandising companies, and the retailer groups involved in the scheme
- The nature and extent of controls put in place by the publisher and/or retail merchandising company to ensure retailers operate the scheme correctly
- Whether the scheme allows the consumer a choice of publication or is for a single title
- Whether the schemes are regular and ongoing or one-off/intermittent at particular outlets
- The ‘value’ of the incentive to the consumer

G6. If the final net sale and/or rate classification are not known then estimates must be made

a) Estimates of final sale

An assessment of likely sales should be based on current and historic information such as:

- Current levels of sales and unsold copies
- Historic data and seasonal trends
- Promotional activity
- Print orders
- Competitor activity
- Information from sales force

Particular attention should be given to periods of promotion, re-launch and to non-UK circulation in general in order to arrive at a fair and reasonable representation of the net circulation. You should record the calculations and assumptions used to arrive at the estimated net sale.

- b) All unsold copies must be accounted for. This means that all estimates of net sale must be reviewed in the next audit period to establish their accuracy and that claim adjusted to account for any over or under estimate from the previous period. This must be done for each relevant geographical area reported [Note: If the difference for a period is found to be material following an ABC audit or inspection, ABC may amend the Certificate for the period to which the estimate relates).

Worked example (assuming 12 issues in a reporting period)

Issue ID	Supply	Total Returns	Net Sale	Sales%
1	88,500	26,229	62,271	70.36% closed
2	88,500	24,728	63,772	72.06% closed
3	88,250	23,688	64,652	73.26% closed
4	89,630	14,266	75,364	71.08% closed
5	89,820	27,620	62,200	69.25% closed
6	89,650	21,982	67,668	75.48% closed

7	88,500	26,229	62,271	70.36% closed
8	88,500	24,728	63,772	72.06% closed
9	88,250	23,688	64,652	73.26% closed
10	89,630	14,266	75,364	84.08% unclosed
11	89,820	9,655	80,165	89.25% unclosed
12	89,650	465	89,185	99.48% unclosed

In this example issues 10, 11 and 12 are not yet closed so an estimate of the final net sales figures have to be made using the criteria mentioned above. You will, of course, notice that a proportion of the unsold copies have already been received, but at this stage you should just concentrate on what you think the final net sales will be.

When all the estimates have been made the final figures for your claim may look something like this: -
Issue Total

ID	Supply	Returns	Est. Sale	Sales%
10	89,630	25,096	64,534*	72% Estimated
11	89,820	25,150	64,670*	72% Estimated
12	89,650	24,205	65,445*	73% Estimated

This means that your estimate of final net sale for these three unclosed issues is 194,649*.

Remember that you must report separate figures for any geographical areas broken out on the Certificate (e.g. UK / Republic of Ireland or overseas).

Adjustment for the estimate

In the next reporting period you would have a report giving you the actual net sales for issues 10, 11 and 12 because by then they would be closed off and complete. For example, the final report may be as follows:

Issue	Total	Actual		
ID	Supply	Returns	Sale	Sales%
10	89,630	25,382	64,248*	71.68%
11	89,820	25,884	63,936*	71.18%
12	89,650	26,312	63,338*	70.65%

In this example the actual net sales relevant to your estimate, is 191,522*.

The difference between your original estimate and the actual figure (i.e. 194,649 minus 191,522) means you have overestimated sales by a total of 3,127 copies over those 3 issues.

The average overestimate of sold copies was therefore 3,127 divided by 12 (total issues in the previous period) = 261.

So you must deduct 261 copies from the average in the current period, to ensure the overestimate from the previous period is accounted for.

- c) In relation to promotional schemes utilising voucher redemption a wash through basis means vouchers are accounted for as they are redeemed. The specific point at which they are treated as redeemed is not prescribed but you should use a reasonable and consistent basis.

G8 REPORTING

- a) Scottish sales analysis: The analyses of sales in Scotland will be based on net sales to the wholesalers whose address is in Scotland.

PAID SINGLE COPIES

Retail Sales (Firm Sale)

DEFINITION

A copy sold to a retailer, on a firm sale basis, intended for resale as a single copy to a consumer.

PRINCIPLES

1. **Single copy made available for purchase by the consumer from the retailer**
2. **Copies are purchased from the publisher by the retailer, on a firm sale basis, either direct or via the distribution chain (typically distributor and/or wholesaler)**
3. **Cover price must be published on or inside front or back cover of the publication**
4. **The price paid for the publication by the consumer must be clear and conspicuous**
5. **The retailers' ability to vary supply must not be unduly restricted**
6. **If the final rate classification is not known then estimates must be made**
7. **Reported by rate, comparing price paid by the consumer with the Basic Cover Price**

REQUIREMENTS

1. **Single copy made available for purchase by the consumer from the retailer**
 - a) Contractual arrangement with the retailer must make clear that copies are for resale to the consumer.
 - b) Contractual arrangement with the retailer must make clear that data of sales to consumers must be made available to ABC on request.
 - c) The purchase by the consumer may be in cash or by other means agreed by ABC in writing.
 - d) You cannot claim back issue sales to the retailer.
2. **Copies are purchased from the publisher by the retailer, on a firm sale basis, either direct or via the distribution chain (typically distributor and/or wholesaler)**
 - a) 'Firm sale' means that unsold copies are not returned or reported for credit.
 - b) The total trade discount must not exceed the current published newstrade margins.
 - c) If you make any reciprocal payments, or the retailer makes any reciprocal charges for goods or services as part of the deal (*for example: for distribution or marketing*) then you must take these into account when calculating whether the trade discount exceeds this level.
 - d) Where you sell copies of a publication directly to a retailer on both a firm sale and sale or return (or limited sale or return) basis, then the trade discount must be the same for each.
 - e) Copies can only be claimed in relation to retailers that have not previously received supplies of national newspapers on a Sale or Return basis, either directly from the publisher or from one or more of the following wholesalers:
 - i) Smiths News
 - ii) Menzies Distribution
 - iii) Newsflash

- iv) EM News (Belfast), EM News (Dublin)
 - v) Newsread
 - vi) Independent News & Media Ltd
 - vii) Dash of Redruth
 - viii) News UK Distribution Ltd
 - ix) Whites (Isle of man)
 - x) Le Gallez (Guernsey)
 - xi) Jersey Evening Post (Jersey)
- f) The claimed total average Retail Sale (Firm Sale) must be limited to a cap based on the publication’s claimed Retail Sale (Sale or Return) for the relevant Reporting Period, as set out in the following table:

Retail Sale (Sale or Return)	Firm Sale cap
0 – 200,999	4,000
201,000 – 400,999	8,000
401,000 – 600,999	12,000
601,000 – 800,000	16,000
801,000 – 999,999	20,000
1,000,000 – 1,249,999	22,500
1,250,000 – 1,499,999	25,000
1,500,000 – 1,999,999	27,500
2,000,000+	30,000

- g) You must account for sales on an issue by issue basis.

3. Cover price must be published on or inside front or back cover of the publication

No additional requirements.

4. The price paid for the publication by the consumer must be clear and conspicuous

- a) If a voucher from a publisher controlled promotion is used the amount paid by the consumer is deemed to be the total of the cash paid to the retailer and any cash they paid for the voucher.
- b) The value (or perceived value) of gifts or cover mounts to the consumer have no effect on the price paid for ABC purposes. However cash reimbursements to the consumer must be taken into account (excluding limited low chance lottery style promotions).
- c) You must retain details of promotional or special offers during the reporting period.

5. The retailers’ ability to vary supply must not be unduly restricted

No additional requirements.

6. If the final rate classification is not known then estimates must be made

- a) If at the time you submit your circulation claim you are running a promotional scheme where the final position (e.g. the number of discounted sales via redeemed vouchers) is not known you must make an estimate of the final classification. In this case you must adjust your claim in the following period to reflect any difference between the estimated classification and the actual classification.
- b) In relation to promotional schemes utilising voucher redemption: If you are reporting on a monthly basis and the effect of not making an estimate is judged to be unlikely to affect the figures claimed by more than 2% of the total average circulation then you can account for the vouchers on a wash through basis (i.e. as they are redeemed).

7. Reported by rate, comparing price paid by the consumer with the Basic Cover Price

- a) Copies sold to the retailer can be claimed as sales at the cover price unless there is evidence to the contrary, in which case claims should be adjusted as follows:
 - i) The retailer distributes copies free to the consumer (these should be removed from claim)

- ii) The retailer sells copies at less than the Basic Cover Price (these may be claimed in the appropriate rate band).
- iii) The consumer makes part payment using a voucher from a publisher controlled promotion (these may be claimed in the appropriate rate band unless acceptance and redemption of vouchers is explicitly not allowed in the agreement between the publisher and the retailer in which case the voucher can be ignored).
- iv) The consumer makes full payment using a voucher from a publisher controlled promotion (these should be removed from the claim).

For the avoidance of doubt: copies disposed of by the retailer (not provided to a consumer) do not need to be deducted.

REPORTING

You will report Retail Sales (Firm Sale) as follows, which will be broken out on the ABC Certificate (note: the term Full Rate will replace full or Basic Cover Price for reporting purposes):

1. By geographical type:
 - a. United Kingdom;
 - b. Scotland - as a subset of UK
 - c. England, Wales & N. Ireland – as a subset of UK
 - d. Republic of Ireland (ROI)
2. By rate band:
 - a. UK, UK subsets and ROI each by:
 - i. Full Rate
 - ii. Lesser Rate
3. By total average circulation over the period.

GUIDANCE

G1. Single copy made available for purchase by the consumer from the retailer

- a) Cash means legal tender notes and coins, cheque, credit/debit card, wireless payment systems.
- b) This doesn't preclude a retailer selling more than one copy to a single purchaser (without the publisher's knowledge).
- c) Details of sales to consumers made available to ABC on request may be in the form of EPOS reports or other means such as signed third party affidavits.

G2. Copies are purchased from the publisher by the retailer, on a firm sale basis, either direct or via the distribution chain (typically distributor and/or wholesaler)

- a) You will need to ensure all records required to support the retail sale claim are available for audit. This will include:
 - i) Full issue by issue details of all financial records and contracts with distributors, wholesalers and retailers, with specific regard to normal and recognised trade terms. These must be reconcilable to the distribution records on an issue specific basis and to the average retail sale claim.
 - ii) Details of any change in trading terms from firm sale (if allowed) to sale or return (either temporarily or permanently) or vice versa.
 - iii) Details of discounts or special offers.

G3. Cover price must be published on or inside front or back cover of the publication

No further guidance.

G4. The price paid for the publication by the consumer must be clear and conspicuous

a) As the price paid may be affected by promotional schemes you should keep details of purchases and promotional spends so you can demonstrate copies are purchased and that sales under incentives/offers are classified correctly, or disallowed as necessary. You can contact ABC for confidential advice, supplying copies of the promotional material and offer wording. The information kept may include:

- Title/s involved
- Issues involved
- Duration of promotion
- Retail outlets involved
- Wording of the promotion displayed at the retail outlet/s
- How the resultant copies are claimed
- How the promotion will be paid for

b) Treatment of bundle/package promotions

i) As each case can vary we recommend you contact us for advice before carrying out your promotion.

ii) How the price of the publication is presented to the consumer will affect how or whether the copy may be claimed for ABC purposes.

- If the price of the publication appears in the promotional material and it is legible (taking into account its presentation and prominence (including the size of the font used) and assuming a reasonable speed of reading) then the price is likely to be considered clear and conspicuous.
 - Stating the publication's price in relation to the promotion/bundle in the main wording of the offer will provide most clarity.
 - The further away from the main offer wording and/or less prominent in the promotion the price of the publication becomes, the more likely it will not be considered clear and conspicuous.
 - If the price of the publication is linked to the main offer wording with, say, an asterisk - this would make it more conspicuous.
- Merely stating the price of the publication without reference to the bundle/package could just be a statement about the normal price of the publication and so will not necessarily render the price clear and conspicuous.
- If there is conflicting information about the price, then the lowest price assessment would be taken for ABC purposes (which might mean it is free).
- The absence of a clear and conspicuous price would render the copies as free, as would explicit wording stating the publication is free.

Examples:

1. Promotion "*Buy the publication and a bottle of water for £x*".

The price of the publication is not clear and conspicuous.

2. Promotion "*Buy the publication and a bottle of water for £x*" which is accompanied by the statement "*The price of the publication in this promotion is £y*"

The price of the publication is likely to be considered clear and conspicuous if the accompanying statement is either within the main body of the promotion, or is in a footnote that is asterisked to the main body and is legible.

3. Promotion *“Buy the publication and bottle of water for £x.”* Elsewhere in promotion *“Publication is £y Monday to Friday and £z on Saturdays”*.

The price of the publication is not in the promotion and is unlikely to be considered clear and conspicuous as this statement appears to be the normal price of the publication.

4. Promotion: If a publication ‘ABC News’ is promoted as *‘Buy ABC News for £x and get a free bottle of water’* then the bottle of water is treated as a free gift and it is clear the price paid is solely for the purchase of the publication.
5. Promotion: If the promotion is *‘Buy a bottle of water and get a free copy of ABC News’* then the publication will be treated as free for ABC purposes.

- c) Per section 4b: “The discount or cash reimbursement must be taken into account

Examples:

1. Promotion: *“Buy publication and spend £5 and you get £1 off your publication”*.

The publication is discounted by £1.

2. Promotion: *“Buy publication, spend £5 and get £1 off your shopping basket”*.

The publication is discounted as it is part of the shopping basket, but it is difficult to determine how much it is discounted and will be considered on a case by case basis. In this example, using the minimum spend requirement of the offer gives a 20% discount and would seem a reasonable treatment.

3. Promotion: *“Buy publication and get £1 off a jar of coffee”*. Or *“Buy publication and get the money off the rest of your shopping”*.

The publication is full price, provided that the publication is sold at full price and the reimbursement does not exceed the cost of the items being discounted.

G5. The retailers’ ability to vary supply must not be unduly restricted

No further guidance.

G6. If the final rate classification is not known then estimates must be made

- a) In relation to promotional schemes utilising voucher redemption a wash through basis means vouchers are accounted for as they are redeemed. The specific point at which they are treated as redeemed is not prescribed but you should use a reasonable and consistent basis.

PAID SINGLE COPIES

Single Copy Sales

DEFINITION

A single copy sold to a consumer direct by the publisher.

PRINCIPLES

1. **Single copy knowingly paid for by the consumer**
2. **Copies are purchased direct from the publisher**
3. **Cover price must be published on or inside front or back cover of the publication**
4. **The price paid for the publication by the consumer must be clear and conspicuous**
5. **If the final rate classification is not known then estimates must be made**
6. **Reported by rate, comparing price paid by the consumer with the Basic Cover Price**

REQUIREMENTS

1. **Single copy knowingly paid for by the consumer**
 - a) The purchase by the consumer may be in cash or by other means agreed by ABC in writing.
 - b) You cannot claim sales of back issues.
2. **Copies are purchased direct from the publisher**
 - a) You must account for UK and ROI sales on an issue by issue basis.
3. **Cover price must be published on or inside front or back cover of the publication**

No additional requirements.
4. **The price paid for the publication by the consumer must be clear and conspicuous**
 - a) If a voucher from a publisher controlled promotion is used the amount paid by the consumer is deemed to be the total of the cash paid to the publisher and any cash they paid for the voucher.
 - b) The value (or perceived value) of gifts or cover mounts to the consumer have no effect on the price paid for ABC purposes. However cash reimbursements to the consumer must be taken into account.
 - c) You must retain details of promotional or special offers during the reporting period.
5. **If the final rate classification is not known then estimates must be made**
 - a) If at the time you submit your circulation claim you are running a promotional scheme where the final position (e.g. the number of discounted sales via redeemed vouchers) is not known you must make an estimate of the final classification.

In this case you must adjust your claim in the following period to reflect any difference between the estimated classification and the actual classification.

- b) In relation to promotional schemes utilising voucher redemption: If you are reporting on a monthly basis and the effect of not making an estimate is judged to be unlikely to affect the figures claimed by more than 2% of the total average circulation then you can account for the vouchers on a wash through basis (i.e. as they are redeemed).

6. Reported by rate, comparing price paid by the consumer with the Basic Cover Price

No additional requirements.

REPORTING

You will report single copy sales as follows, which will be broken out on the ABC Certificate (note: the term Full Rate will replace full or Basic Cover Price for reporting purposes):

1. By geographical type:
 - a) United Kingdom
 - b) Scotland - as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
2. By rate band:
 - a) UK, UK subsets and ROI each by:
 - i) Full Rate
 - ii) Below Full Rate
3. By combination with other circulation types:
 - a) Single copy sales will be reported combined with retail sales (sale or return).
4. By total average circulation over the period.

GUIDANCE

G1. Single copy knowingly paid for by the consumer

- a) Cash means legal tender notes and coins, cheque, credit/debit card, wireless payment systems.

G2. Copies are purchased direct from the publisher

- a) You will need to ensure all records required to support the single copy sale claim are available for audit. This will include financial records that adequately identify the numbers of each issue of the publication sold, including an audit trail to verify the money received.
- b) For copies sold at exhibitions or events evidence you may need might include:
 - i) Till receipts/cash sheets allowing monies to be traced through to evidence of banking.
 - ii) Evidence that the publisher or their representatives had a presence at the exhibition or event to corroborate that copies were sold there. *For example: evidence the publisher had booked a stand or pitch at the event, or evidence the copies were delivered to the event venue.*

G4. The price paid for the publication by the consumer must be clear and conspicuous

- a) As the price paid may be affected by promotional schemes you should keep details of purchases and promotional spends so you can demonstrate copies are purchased and that sales under incentives/offers are classified correctly, or

disallowed as necessary. You can contact ABC for confidential advice, supplying copies of the promotional material and offer wording. The information kept may include:

- i) Title/s involved
 - ii) Issues involved
 - iii) Duration of promotion
 - iv) Outlets involved
 - v) Wording of the promotion displayed
 - vi) How the resultant copies are claimed
 - vii) How the promotion will be paid for
- b) Promotions/gifts examples
- i) If a publication 'ABC News' is promoted as '*Buy ABC News and get a free bottle of water*' then the bottle of water is treated as a free gift and it is clear the price paid is solely for the purchase of the publication.
 - ii) If the promotion is '*Buy a bottle of water and get a free copy of ABC News*' then the publication will be treated as free for ABC purposes.

G5. If the final rate classification is not known then estimates must be made

- a) In relation to promotional schemes utilising voucher redemption a wash through basis means vouchers are accounted for as they are redeemed. The specific point at which they are treated as redeemed is not prescribed but you should use a reasonable and consistent basis.

PAID SUBSCRIPTIONS

Single Copy Subscription Sales

DEFINITION

A single copy sold and distributed to an individual or organisation for a contracted period.

PRINCIPLES

1. **There must be a contractual arrangement between the subscriber and the publisher (or their agent)**
2. **Single copy per issue, distributed to a known addressee**
3. **Single copy knowingly paid for by the subscriber**
4. **For a contracted period and for a minimum number of issues (at least two)**
5. **Standard subscription rates must be published**
6. **Reported by rate, comparing price paid by subscriber with standard rate**
7. **The price paid for the publication by the subscriber must be clear and conspicuous**

REQUIREMENTS

1. **There must be a contractual arrangement between the subscriber and the publisher (or their agent)**
 - a) You must be able to provide evidence of the contractual arrangements between the subscriber and the publisher (or their agent) including the issues/period and the price.
 - b) If you merge publications or purchase a subscription list from a ceased publication it must be clear that subscribers have made a choice to receive the publication claimed.
2. **Single copy per issue, distributed to a known addressee**
 - a) You must retain a list of individual recipients for one designated issue each reporting period (the Audit Issue - see General Principles and Record Keeping section). In addition you must be able to recreate a list for any issue in the reporting period on request.
 - b) You must be able to demonstrate the copy is distributed to the addressee.
3. **Single copy knowingly paid for by the subscriber**
 - a) The subscriber must be the addressee except:
 - i) Where the addressee is an employee whose employer is the subscriber.
 - ii) Where the addressee is the recipient of a gift subscription from the subscriber (maximum 12 gift subscriptions per subscriber).
 - b) The purchase by the subscriber may be in cash or by other means agreed by ABC in writing.
 - c) You can claim copies where payment is outstanding as long as there are reasonable grounds to consider them to be live, good and collectable.
4. **For a contracted period and for a minimum number of issues (at least two)**

- a) You cannot claim sales of back issues.

5. Standard subscription rates must be published

- a) The 'Basic Annual Rate' (BAR) is the standard 1 year subscription rate for the publication, in contrast to a special price only available to a limited class, or under limited conditions.
- b) There can only be 1 BAR per country/wider geographical region.
- c) If print subscriptions are not available separately then there is no need to publish a BAR.

6. Reported by rate, comparing price paid by subscriber with standard rate

- a) You must claim a subscription in the appropriate rate band by comparing the price paid for the subscription with the relevant Basic Annual Rate at the time of sale (pro-rate if less than 1 year). Note - ignore for ABC purposes:
 - i) Bank charges or exchange rate differences
 - ii) The value (or perceived value) of any gifts, or other incentives (including bundled publications or media products that are not claimed for ABC purposes). However cash reimbursements to the consumer must be taken into account.
- b) If a subscription promotion includes a gift or product that is being claimed for ABC purposes (for example a bundled copy of a publication or access to a paid website) then the price paid must be allocated according to the following, moving down the list until one can be applied:
 - i) According to the specific terms of the offer.
 - ii) Where specific terms are not clear, by pro-rating the price according to the relative prices of the ABC claimed products.
 - iii) Where the specific terms are not clear and in the absence of a means of pro-rating the price paid, it should be divided equally between the number of ABC claimed products included in the sale.
- c) Where a subscription is sold through a subscription agent:
 - i) Copies can be claimed as sold at Basic Annual Rate unless they are known to be discounted.
 - ii) Linked incentives offered by the agent (with no contribution from the publisher) will be ignored for ABC purposes.
- d) You may treat subscription orders for more than one year as a sale at Basic Annual Rate if the published multi-year subscription rate when pro-rated to 1 year:
 - i) Is at least 90% of the BAR for a two year subscription; or
 - ii) Is at least 85% of the BAR for a three year subscription.
- e) If you do not publish a relevant BAR then those copies must be claimed in the lowest rate band.
 - i) An exception is where no BAR is published because print subscriptions are not available separately. In this case you must determine rate band classification by using an "alternative BAR", which is set at 75% of the annualised print single copy cover price.

For example: If print only subscriptions are not available but the print copy cover price of a daily (6 day a week) publication is £1, then the "alternative BAR" used in lieu of the BAR is 52 weeks x 6 x £1 x 75% = £234.

- f) You must retain details of subscription rates and special offers during the reporting period

REPORTING

You will report Single Copy Subscription Sales combined with Voucher Subscription Sales, which will be broken out on the ABC Certificate as follows:

1. By geographical type:
 - a) United Kingdom
 - b) Scotland - as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
2. By rate band:
 - a) There is only one rate band.
3. By total average circulation over the period.

GUIDANCE

G1. There must be a contractual arrangement between the subscriber and the publisher (or their agent)

- a) If you merge publications or purchase a subscription list from a ceased publication it must be clear that subscribers have made a choice to receive the claimed publication. Examples of how this may be achieved are shown below.

Merger

If you merge publications where there are live subscriptions:

Subscribers to one publication only

- You may continue to fulfil the contractual requirement of the subscription by mailing copies of the 'new' publication until the expiry of the subscription period.

Subscribers to both publications

- You may refund the unexpired portion of one subscription and continue mailing copies until the remaining subscription expires.

OR

- You may net the value of the unfulfilled subscriptions and allocate copies on an issue by issue basis until the value has been subsumed.

Purchase or transfer of subscription lists from a ceased publication

If you purchase or transfer a list of subscribers from a ceased publication, you could claim these as subscriptions if you could demonstrate:

- The amount each subscriber is 'in credit' in terms of the payments for their subscription to the ceased publication
 - How the credit is applied to the subscription to the claimed publication.
 - The subscriber has either
 - i. Elected to continue his subscription to the claimed publication; or
 - ii. Has been given the option to discontinue his subscription to the ceased publication and obtain a refund.
- b) As records for two or three year subscriptions may need to be provided for audit you must ensure these are still available. You may wish to ask us to seal the galley (mailing list) at audit where this might prove difficult going forward.

G2. Single copy per issue, distributed to a known addressee

- a) Distribution evidence: This will usually be from a third party company whose normal business is single copy distribution (such as Royal Mail). Typically the evidence will include testing the payment of invoices and related advice notes sufficient to identify the publication, issue, quantities and date distributed.

G3. Single copy knowingly paid for by the subscriber

- a) Cash means legal tender notes and coins, cheque, credit/debit card, wireless payment systems.

b) Where payment is outstanding you may take into account the following in considering whether there are reasonable grounds to consider the debt to be live, good and collectable:

- i) Publisher's normal credit terms
- ii) Payment history
- iii) Credit control efforts

G4. For a contracted period and for a minimum number of issues (at least two)

a) The contracted period may be a rolling issue by issue (or open ended) arrangement providing the contractual arrangements clearly intend there to be an on-going payment mandate and the sale is not promoted as a single copy purchase.

G5. Standard subscription rates must be published

a) Published does not mean necessarily published in the publication but published so that they are publicly available.

G6. Reported by rate, comparing price paid by subscriber with standard rate

- a) [Requirement 6b showing examples] If a subscription promotion includes a gift or product that is being claimed for ABC purposes (for example a bundled copy of a publication or access to a paid website) then the price paid must be allocated according to the following, moving down the list until one can be applied :
- i) According to the specific terms of the offer. *For example: Buy X magazine get Y free means Y will be treated as free*
 - ii) Where specific terms are not clear, by pro-rating the price according to the relative prices of the ABC claimed products. *For example where the promotion is 'Buy a subscription to X and Y for £50' and X and Y have Basic Annual Subscription rates of £40 and £50 respectively then the £50 paid will be pro-rated in the ratio 40:50.*
 - iii) Where the specific terms are not clear and in the absence of a means of pro-rating the price paid, it should be divided equally between the number of ABC claimed products included in the sale.

Further Examples of Subscription Promotions:

What's in the subscription promotion?	How is it promoted?	Can it be claimed?	How is it claimed?	Criteria applied
Publication A + Handbag	Subscribe today and receive a free handbag	Yes	At price paid (handbag ignored as not ABC claimed)	i
Publication + Handbag	Buy handbag and receive free subscription to Publication A	Not as paid	Publication is free (could be claimed as free if appropriate criteria met).	i
Publication A + Marks & Spencer Vouchers	Subscribe for 3 months and receive vouchers for Marks & Spencer	Yes	At price paid (vouchers ignored as not ABC claimed)	i
Publication A and Publication B (both ABC claimed)	Subscribe to Publication A and receive Publication B free	Publication A Yes. Publication B Not as paid	Publication A at price paid (Publication B treated as free as promoted as free)	i
Publication A and Publication B (both ABC claimed: Publication A sub normally £80 and Publication B sub normally £40)	Subscribe to both Publication A and Publication B for £100	Yes, both.	£100 pro-rated = £67 Publication A and £33 Publication B	ii
Publication A and Publication B (both ABC claimed: Publication A sub normally £80 and	Subscribe to both Publication A and Publication B for £100 and receive a handbag worth £50	Yes, both.	£100 pro-rated = £67 Publication A and £33 Publication B (handbag ignored as not ABC claimed)	ii

Publication B sub normally £40) + Handbag				
Publication A and Website access (both ABC claimed: Publication A sub normally £100 but Website access is only available as a package with the Publication)	Subscribe to Publication A and receive website access – all for £100	Yes, both	£100 divided equally £50 for Publication A and £50 for website access (website access is not available either free or paid so no price can be identified to pro-rate).	iii
Publication A + Digital Edition (not ABC claimed)	Subscribe to Publication A for £100 and receive the Digital Edition worth £80	Yes	Publication A at £100 (Digital Edition ignored as not claimed)	i
Publication A + Digital Edition (both ABC claimed: Publication A sub normally £100 and Digital Edition sub normally £50)	Subscribe to Publication A and the Digital Edition for £120 (normally £150).	Yes, both	£120 pro-rated = Publication A at £80 and Digital Edition at £40	ii

b) Examples of promotional offers that would result in copies being claimed at a discounted rate:

‘Save 25% on your subscription’

‘2 years subscription for the price of one’

‘18 issues for the price of 12’

‘Buy 12 issues get 6 free’ (note: All 18 issues can be claimed as paid, with the price paid being allocated equally across them).

PAID SUBSCRIPTIONS

Voucher Subscription Sales

DEFINITION

A single copy sold to an individual who pays the publisher in advance to obtain the publication via a retailer, by means of a voucher, for a contracted period.

PRINCIPLES

1. **There must be a contractual arrangement between the individual purchaser and the publisher**
2. **Copies are purchased by an individual in advance**
3. **Copies are supplied to the individual through retailer distribution via the redemption of a voucher**
4. **For a contracted period and for a minimum number of issues (at least two)**
5. **There must be an auditable incentive for vouchers redeemed to be reported to the publisher**
6. **The price paid for the publication by the purchaser must be clear and conspicuous**
7. **Reported by rate, comparing price paid by the purchaser with standard rate**

REQUIREMENTS

1. **There must be a contractual arrangement between the individual purchaser and the publisher**
 - a) You must be able to provide evidence of the contractual arrangements between the individual purchaser and the publisher, including the issues/period, the quantities purchased and the price.
2. **Copies are purchased by an individual in advance.**
 - a) An individual can purchase gift subscriptions (maximum 12 subscriptions per subscriber). The recipient(s) details must be known.
 - b) Payment in arrears is acceptable only where this is due to payment being collected by direct debit or continuous credit card billing arrangements.
3. **Copies are supplied to the individual through retailer distribution via the redemption of a voucher**
 - a) The number of copies claimed should relate to the number of vouchers redeemed in the reporting period.
4. **For a contracted period and for a minimum number of issues (at least two)**
 - a) You cannot claim sales of back issues.
5. **There must be an auditable incentive for vouchers redeemed to be reported to the publisher**

No additional requirements
6. **The price paid for the publication by the purchaser must be clear and conspicuous**

No additional requirements
7. **Reported by rate, comparing price paid by the purchaser with standard rate**

- a) Ignore the value (or perceived value) of gifts or other incentives (including bundled publications or media products that are not claimed for ABC purposes). However cash reimbursements to the consumer must be taken into account.
- b) If a subscription promotion includes a gift or product that is being claimed for ABC purposes (for example a bundled copy of a publication or access to a paid website) then the price paid must be allocated according to the following, moving down the list until one can be applied:
 - i) According to the specific terms of the offer.
 - ii) Where specific terms are not clear, by pro-rating the price according to the relative prices of the ABC claimed products.
 - iii) Where the specific terms are not clear and in the absence of a means of pro-rating the price paid, it should be divided equally between the number of ABC claimed products included in the sale.

REPORTING

You will report Voucher Subscription Sales combined with Single Copy Subscription Sales, which will be broken out on the ABC Certificate as follows:

- 1. By geographical type:
 - a) United Kingdom
 - b) Scotland - as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
- 2. By rate band:
 - a) There is only one rate band.
- 3. By total average circulation over the period.

GUIDANCE

G3. Copies are supplied to the individual through retailer distribution via the redemption of a voucher

- a) Given the possible delay between the redemption of vouchers by individuals and the notification to the publisher it may be appropriate in some circumstances to make an estimate of possible voucher redemptions to reflect a fair and reasonable figure for the number of sales in the reporting period.
- b) Information that may be required for audit might include a record of current subscribers, details of schemes and the total number of vouchers received by or on behalf of publisher.

PAID SUBSCRIPTIONS

Corporate Subscription Sales

DEFINITION

Copies purchased on a contractual basis by an employer for its employees.

PRINCIPLES

1. **There must be a contractual arrangement between the purchaser (a third party employer) and the publisher (or their agent)**
2. **Copies are purchased by the third party employer for its employees**
3. **The copies are distributed to the same fixed pool of employees on an on-going basis**
4. **Claimed quantity should not exceed potential demand**
5. **For a contracted period and for a minimum number of issues (at least two)**
6. **The price paid for the publication by the purchaser must be clear and conspicuous**

REQUIREMENTS

1. **There must be a contractual arrangement between the purchaser (a third party employer) and the publisher (or their agent)**
 - a) You must be able to provide evidence of the contractual arrangements between the purchaser and the publisher, including the issues/period, the quantities to be supplied and the price.
 - b) You must be able to demonstrate the distribution of copies is designed to ensure copies are solely available to employees. *For example: Copies placed in a foyer of a bank will not be allowed as customers of the bank will have access to the publication.*
2. **Copies are purchased by the third party employer for its employees**
 - a) You can claim copies where payment is outstanding as long as there are reasonable grounds to consider them to be live, good and collectable.
3. **The copies are distributed to the same fixed pool of employees on an on-going basis**
 - a) Whilst details of the final recipients need not be known you must be able to demonstrate the copies are distributed to the same fixed pool of employees. *For example: Copies distributed to a particular department or company who are reasonably expected to be present at the same delivery location on an on-going basis.*
4. **Claimed quantity should not exceed potential demand by employees**
 - a) The quantity claimed cannot exceed 50% of the number of employees for any employer location. Evidence of the number of employees for each location should be no more than a year old.
5. **For a contracted period and for a minimum number of issues (at least two)**
 - a) You cannot claim sales of back issues.
6. **The price paid for the publication by the purchaser must be clear and conspicuous**
 - a) The purchaser must pay at least the retail margin per copy.

- b) To determine if the retail margin per copy has been paid:
- i. Ignore the value (or perceived value) of any gifts or other incentives (including bundled publications or media products that are not claimed for ABC purposes).
 - ii) If a subscription promotion includes a gift or product that is being claimed for ABC purposes (for example a bundled copy of a publication or access to a paid website) then the price paid must be allocated according to the following, moving down the list until one can be applied:
 - According to the specific terms of the offer.
 - Where specific terms are not clear, by pro-rating the price according to the relative prices of the ABC claimed products.
 - Where the specific terms are not clear and in the absence of a means of pro-rating the price paid, it should be divided equally between the number of ABC claimed products included in the sale.
- c) You must take into account:
- i) Any reciprocal payments made by the publisher
 - ii) Any reciprocal charges for goods or services made by the purchaser (or the intermediary if applicable) as part of the deal (*for example: for distribution or marketing*).
 - iii) The value of any other goods or services provided free or discounted by the publisher (*for example advertising or promotional messages*).

REPORTING

You will report Corporate Subscription sales as follows, which will be broken out on the ABC Certificate:

1. By geographical type:
 - a) United Kingdom
 - b) Scotland - as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
2. By total average circulation over the period.

GUIDANCE

G2. Copies are purchased by the third party employer for its employees

- a) Where payment is outstanding you may take into account the following in considering whether the debt is live, good and collectable:
 - i) Publisher's normal credit terms
 - ii) Payment history
 - iii) Credit control efforts

G3. The copies are distributed to the same fixed pool of employees on an on-going basis

- a) This will typically require:
 - i) Evidence the copies have been distributed to the employer's location from a third party company whose normal business is distribution

- ii) Details of how the copies are distributed at the employer's location
- iii) The details of a person at the employer who can verify how the copies are distributed.

PAID SUBSCRIPTIONS

All You Can Read Sales (Digital Edition only)

DEFINITION

A Digital Edition copy that a consumer has purchased and viewed as part of a multi-publication package.

PRINCIPLES

1. **Copy is paid for and viewed by the consumer**
2. **There must be a contractual arrangement between any third-party intermediaries/sellers and the publisher to purchase the copies**

REQUIREMENTS

1. **Copy is paid for and viewed by the consumer**
 - a) The consumer has paid for the right to view the copy as part of a multi-publication package. Note: Although the consumer may subscribe to the multi-publication package for a contracted period, the copies are not treated as subscriptions but claimed on a single issue basis when viewed.
 - b) Copies can only be claimed if they have been viewed by a consumer. This will be demonstrated by meeting at least the definition of a Publication Active View (a single copy of a publication actively opened by a device for viewing. See full definition*).
 - c) Only one view per device per issue can be claimed.
 - d) There is no requirement to de-duplicate it against other circulation categories.
 - e) You cannot claim back issues

*Publication Active View:

1. Definition: A single copy of a publication actively opened by a device for viewing.
2. Principles
 - a. A minimum of one page of an issue opened/served on/to a device.
 - b. Distinct action/event by the end user to view.
 - c. The view request must be on an issue by issue basis.

Note: a single action/request which results in both the content being downloaded/made available and the automatic opening of a page of the publication is not considered a distinct action/event. A further distinct action would be required such as opening a second page.

2. **There must be a contractual arrangement between any third-party intermediaries/sellers and the publisher to purchase the copies**
 - a) Where third-parties are used you must be able to provide:
 - i) Evidence of payment to the publisher and between any other intermediaries for the copies claimed

- ii) Evidence of the contractual arrangements between the publisher and any other intermediaries to measure, report and pay publisher for the copies claimed.

REPORTING

All You Can Read Sales will be reported as a single total average per issue over the Reporting Period, broken out as follows:

1. By geographical type:
 - a) United Kingdom
 - b) Republic of Ireland (ROI)
 - c) Other Countries

PAID MULTIPLE COPIES

Multiple Copy Sales

DEFINITION

Copies purchased by a third party from the publisher, delivered and made available for pick up or receipt by consumers.

PRINCIPLES

1. **There must be a contractual arrangement between the final purchaser (third party) and the publisher or an intermediary**
2. **Copies are paid for by the final purchaser**
3. **The publisher must receive a positive financial contribution per copy from the final purchaser**
4. **Copies distributed and made available for pick up or receipt by consumers**
5. **Claimed quantity should not exceed potential demand by the intended consumers**
6. **Reported by consumer type/location**
7. **The price paid for the publication by the final purchaser (and the intermediary if applicable) must be clear and conspicuous**

REQUIREMENTS

1. **There must be a contractual arrangement between the final purchaser (third party) and the publisher or an intermediary**
 - a) You must be able to provide evidence of the contractual arrangements between the final purchaser and the publisher and/or the intermediary (if applicable) including the issues, quantities to be supplied and price per copy.
 - b) You cannot claim sales of back issues.
2. **Copies are paid for by the final purchaser**

No additional requirements.
3. **The publisher must receive a positive financial contribution per copy from the final purchaser**
 - a) Either the final purchaser or intermediary (if applicable) must pay the publisher a net amount for the copies:
 - i) When calculating what price has been paid you must take into account:
 - Any reciprocal payments made by the publisher
 - Any reciprocal charges for goods or services made by the purchaser (or the intermediary if applicable) as part of the deal (*for example: for distribution or marketing*).
 - The value of any other goods or services provided free or discounted by the publisher (*for example advertising or promotional messages*).
 - ii) In the case of airline and international rail copies, sold for distribution in secure areas airside and trackside, it is recognised that an authorised distribution company must be used. In this scenario:
 - If that distribution company is used as an intermediary to sell to the final purchaser, the publisher may not receive a net payment for the copies from the distribution company due to the payment of distribution charges.

- If a distributor pays a contractual entry fee to the final purchaser which is of a general basis and not specific to any specified group of publications or publishers then this will not be considered a reciprocal payment to be taken into account for ABC purposes.

4. Copies distributed and made available for pick up or receipt by consumers

- a) You must be able to demonstrate that the copies are distributed and made available for pick up or receipt by the intended consumers.

5. Claimed quantity should not exceed potential demand by the intended consumers

- a) Unless copies are accounted for on a sale or return basis (where each outlet/location must declare returns even if zero) then the number of copies claimed must be limited to a designated cap - see Caps by Supply Type section for details.
- b) Copies purchased by a consumer, wholly or in part by coupon(s) obtained via a promotion controlled by a party independent of the publisher, can be claimed (on a sale or return basis) providing:
 - i) The Publisher has no control over the conversion of coupons into cash, (i.e. coupon redemption must be direct between the retailer of the Publication and the independent promoter or their agent)
 - ii) The final number of copies that may be claimed will be based upon the number of copies that can be proven by the redemption of vouchers and amount paid. Note: As the copies may have been initially supplied via the newstrade, care must be taken not to double count these copies in the circulation claim.

6. Reported by consumer type/location

No additional requirements.

7. The price paid for the publication by the final purchaser (and the intermediary if applicable) must be clear and conspicuous.

- a) The net price paid must be at least minimum legal tender per copy.

B4 REPORTING

You will report multiple copy sales as follows, which will be broken out on the ABC Certificate:

1. By geographical type:
 - a) United Kingdom
 - b) Scotland - as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
2. By total average circulation over the period.
3. By total average multiple copy sale analysed by the following categories according to consumer type:
 - a) Airside & International Rail
 - b) Hotels
 - c) Trains
 - d) Other Publication Insert
 - e) Voucher Redemption
 - f) Sports Events
 - g) Leisure Centres
 - h) Food/Beverage Outlets
 - i) Others.

GUIDANCE

G1. There must be a contractual arrangement between the final purchaser (third party) and the publisher or an intermediary

- a) In relation to airside and trackside copies:
 - i) It is the publisher's responsibility to ensure their distribution company will:
 - Provide evidence of distribution of the copies airside/trackside as detailed below
 - Understand and keep up to date with the requirements of the ABC Reporting Standards
 - Report the number of sold copies by issue for each ABC reporting period to the publisher
 - Provide access to the publisher's circulation auditor to any records requested for the purpose of checking the accuracy of any claim or compliance with the Reporting Standards and byelaws
 - ii) The publisher can appoint a circulation auditor other than their main circulation auditor to audit airside or international rail copies but this appointment must be separate from the appointment of the main circulation auditor. This means that the airside/trackside copy auditor must report separately to the publisher and ABC, and will not report to the main circulation auditor.
 - iii) The publisher's circulation auditor must have access to documentary evidence relevant to the deal between the final purchaser and any intermediary (if applicable).

G4. Copies distributed and made available for pick up or receipt by consumers

- a) Evidence of distribution of the copies to the distribution company and onward to airside/trackside must be available. This will typically involve the distribution company maintaining a goods inwards and goods outwards recording system, with clearly documented management controls that:
 - Is updated daily for planned and unplanned changes
 - Is reconciled on a regular basis to resolve differences between goods in and goods out
 - Identifies the newspapers and number of copies supplied to every distribution point
 - Operates appropriate and effective quality assurance processes for ensuring that the newspapers and number of copies supplied to every point is correctly stated.
 - If weaknesses in management controls are found during the audit work, the publication's circulation auditor/ABC will inform the distributor and the publisher of defined improvements to be implemented and a timescale to ensure copies are still eligible for ABC purposes.

G7. The price paid for the publication by the final purchaser (and the intermediary if applicable) must be clear and conspicuous

- a) Averaging or bundling by issue/publication/customer is not permitted regardless of what the contractual arrangements state. For example: If an invoice states 5,000 copies at 2p and 5,000 copies at 0p then only the 5,000 copies at 2p are allowable, they cannot be averaged out at 1p.

PAID MULTIPLE COPIES

Multiple Copy Business Sales (Digital Edition only)

DEFINITION

A Digital Edition copy that has been purchased by a third-party and viewed by a consumer.

PRINCIPLES

1. **Copy is purchased by a third-party**
2. **Copy is viewed by the consumer**

REQUIREMENTS

1. **Copy is purchased by a third-party**
 - a) A third-party must pay the publisher at least minimum legal tender per copy (net) for copies claimed
 - i) Where a third-party generates and provides the information on copies viewed for the claim then the requirement is that they must pay the publisher for the copies
 - ii) When calculating what price has been paid by the third party you must take into account:
 - o Any reciprocal payments made by the publisher
 - o Any reciprocal charges for goods or services made by the third-party as part of the deal (for example: for distribution or marketing).
 - o The value of any other goods or services provided free or discounted by the publisher (for example advertising or promotional messages).
 - b) You must be able to provide evidence of the contractual arrangements between third parties and the publisher to measure, report and pay the publisher for the copies viewed.
2. **Copy is viewed by the consumer**
 - a) Copies can only be claimed if they have been viewed by a consumer. This will be demonstrated by meeting at least the definition of a Publication Active View (a single copy of a publication actively opened by a device for viewing. See full definition*).
 - b) Only one view per device per issue can be claimed
 - c) There is no requirement to de-duplicate it against other circulation categories
 - d) You cannot claim back issues

*Publication Active View:

1. Definition: A single copy of a publication actively opened by a device for viewing.
2. Principles
 - a) A minimum of one page of an issue opened/served on/to a device.
 - b) Distinct action/event by the end user to view.

- c) The view request must be on an issue by issue basis.

Note: a single action/request which results in both the content being downloaded/made available and the automatic opening of a page of the publication is not considered a distinct action/event. A further distinct action would be required such as opening a second page.

REPORTING

Multiple Copy Business Sales will be reported as a single total average per issue over the Reporting Period, broken out as follows:

1. By geographical type:
 - a) United Kingdom
 - b) Republic of Ireland (ROI)
 - c) Other Countries
2. As an option by the following categories according to the audience type:
 - a) Airside & International Rail
 - b) Hotels
 - c) Trains
 - d) Sports Events
 - e) Leisure Centres
 - f) Food/Beverage Outlets
 - g) Other/Not Analysed

FREE COPIES

Free Pick Up Copies (Regular)

DEFINITION

Copies distributed on a regular and consistent basis to known distribution points for pick up or receipt by consumers.

PRINCIPLES

1. **Prior notification of distribution details and any changes to ABC**
2. **Distribution follows a regular and consistent pattern to known distribution points**
3. **Copies are made available at the known distribution points for pick up or receipt by consumers**
4. **Quantity claimed should not exceed potential demand by the intended consumers**
5. **Effective management controls over distribution**

REQUIREMENTS

1. **Prior notification of distribution details and any changes to ABC**
 - a) You must obtain ABC's agreement that your distribution system is capable of being compliant and verifiable to ABC standards before the distribution of the first issue for which you intend to claim pick up copies, including providing the following information with at least 14 days' notice in advance of the planned distribution:
 - i) Details of how, when and where the copies will be distributed
 - ii) A list of all distribution points.
 - b) After initial approval of the distribution system, you must, on an on-going basis, notify ABC of any changes to the method of distribution or details on the master list of distribution points (such as changes in distribution quantities, distribution dates, new or ceased distribution points) as and when they occur.
2. **Distribution follows a regular and consistent pattern to known distribution points**
 - a) A distribution point is defined as an agreed location at which copies are handed to or left for pick up by the consumer.
Note:
 - i) You must be able to provide the auditor with access to distribution points for verification purposes.
 - ii) A distribution point is defined at the micro level. For example: a single dispensing bin or single hand merchandiser as opposed to say a group of dispensing bins at a particular location.
 - iii) Only distribution points in the UK or Republic of Ireland can be claimed.
 - iv) The distribution points claimed must be consistent with the description or analysis reported.
 - b) Gross distribution (i.e. supply) quantities must be broadly the same and to the same Distribution Points for all issues (except for permitted variations detailed in (c) below).
 - c) The permitted temporary* variations in gross distribution (i.e. supply) quantities for an issue are as follows:

When compared to the previous ABC Reporting Period's total average gross Free Pick Up distribution, an issue may be varied:
 - For all titles:

- i) By up to 25%, without any stipulation or notification requirements.
 - ii) By greater than 25%, on an ad hoc basis as long as it is due to exceptional circumstances (for example due to tube strikes, severe weather) and ABC is notified within one month of the issue or before the claim is submitted to ABC (whichever is the sooner).
 - iii) By greater than 25% on a planned and regular basis to account for seasonal variations in the audience (for example a two week reduction in gross pick up copy distribution due to a holiday period). In this instance the publisher must notify ABC and obtain our agreement in advance, and include details of the seasonal change within the description on the affected Certificate.
- Only for publications published more frequently than weekly (e.g. daily):
 - i) The gross distribution (i.e. supply quantity) may be varied without limit between different publication days/issues. For example: Mondays 10,000 copies, Tuesdays no copies, Wednesdays 5,000 copies etc.
 - ii) If applying the permitted variation under points i) to iii) above you must compare the gross distribution for a Monday issue compared against the previous ABC reporting Period’s total average Monday gross pick up distribution, same for Tuesdays, Wednesdays etc.

*If a change in distribution is permanent (i.e. will continue at that level for the foreseeable future) then these limits do not apply.

For example: Daily title with different distributions on different days

	<i>Mon</i>	<i>Tues</i>	<i>Weds</i>	<i>Thurs</i>	<i>Fri</i>
<i>Free Pick Up Circulation Qty</i>	10,000	0	5,000	0	20,000
<i>Dist'n points</i>	City Centre	-	City Centre	-	City and Suburbs

In this case, with the exception of ad hoc or seasonal variations:

*10,000 for Mondays must be within 25% of total average free pick up for Mondays for previous ABC reporting period.
 5,000 for Wednesdays must be within 25% of total average free pick up for Wednesdays on previous ABC reporting period.
 20,000 for Fridays must be within 25% of total average free pick up for Fridays on previous ABC reporting period.*

3. Copies are made available at the known distribution points for pick up or receipt by consumers

- a) You must be able to provide evidence, from the third party responsible, of the number of copies of the publication made available for pick up or receipt at each distribution point by consumers. Note:
 - i) Where the copies are made available for pick up or receipt at distribution points by drivers/distributors that are not 3rd party to the publisher (such as in-house distributors or from a joint venture), it may be possible to include these in the claim as long as:
 - It can be demonstrated that the drivers/distributors have sufficient independence and are specifically contracted to deliver/distribute the publication.
 - The auditor/ABC has full and unrestricted access to the relevant parties’ documentation and financial records.
 - ABC has specifically agreed this distribution method.
- b) Where your ABC pick up claim is for the net number of copies picked up or received by consumers at a distribution point, you must be able to provide evidence of the number of copies returned/not picked up at each relevant distribution point.
- c) For publications other than dailies or Sundays, all copies must be delivered and made available within 24 hours of the majority of the rest of the distribution

- d) You cannot claim distribution of back issues.

4. Quantity claimed should not exceed potential demand by the intended consumers

- a) Your ABC pick up claim must be reported as a minimum as follows:
 - i) Daily and Sunday publications (except copies distributed airside and on trains): must be reported on a net basis (i.e. those made available less copies not picked up by consumers);
 - ii) Publications other than dailies or Sundays, and copies distributed airside and on trains: must be reported on a capped basis. (A capped basis means the number of copies claimed will be limited to designated caps at a particular location – see Caps by Supply Type section for details).

5. Effective management controls over distribution

- a) The publisher is responsible for ensuring that the copies they claim have been delivered and if applicable returns/copies not picked up are accounted for. This requires a publisher to have appropriate management controls and processes in place to ensure that this is happening.

REPORTING

You will report pick up copies as follows, which will be broken out on the ABC Certificate:

1. By geographical type:
 - a) United Kingdom
 - b) Scotland – as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
2. By total average pick-up copies per issue for the period, analysed as ‘Regular’ and broken into:
 - a) Net distribution
 - b) Capped distribution
3. By issue/type, including for each:
 - a) Description of distribution location/type and issue(s). Additional detail, such as number of distribution points, can be added as required.
 - b) Quantity

Note: Overall free circulation (regular and sample combined) in the Reporting Period cannot exceed the higher of:

- 25,000 copies (average per issue); **or**
- 5% of the total average circulation

FREE COPIES

Free Pick Up Copies (Sample)

DEFINITION

Free copies distributed, on an irregular basis, using an existing ABC Free Distribution method.

PRINCIPLES

1. **Distribution uses an existing ABC Free Distribution category, without the need for a regular and consistent basis.**
2. **Prior notification of distribution details to ABC**
3. **Distribution must be of an existing edition claimed on the certificate**

REQUIREMENTS

1. **Distribution uses an existing ABC Free Distribution category, without the need for a regular and consistent basis.**
 - a) The requirements of the relevant National Newspaper Free Distribution category apply, with the exception that distribution may be of a single issue.
 - i) The Free Distribution categories eligible for reporting as Sample Free Distribution are:
 - o Free Pick Up
 - b) Requirements relating to distribution across issues being on a regular and consistent basis and changes from previous certificates are ignored.
2. **Prior notification of distribution details to ABC**
 - a) You must obtain ABC's agreement in advance of the distribution, having provided full details of timings, delivery locations etc with at least 14 days' notice in advance of the planned distribution. This is to enable audit work to be conducted at the appropriate time, including real time testing where appropriate.
 - b) You must be able to provide the auditor with access to distribution points for verification purposes.
3. **Distribution must be of an existing edition claimed on the certificate**
 - a) The copies must be broadly similar to an existing edition being claimed on the certificate. Therefore a certificate cannot comprise copies claimed in the Sample Free Distribution category alone.

REPORTING

You will report sample free copies as follows, which will be broken out on the ABC Certificate:

1. By geographical type:
 - a) United Kingdom
 - b) Scotland – as a subset of UK
 - c) England, Wales & N. Ireland – as a subset of UK
 - d) Republic of Ireland (ROI)
2. By total average pick-up copies per issue for the period, analysed as 'Sample' and broken into:

- a) Net distribution
 - b) Capped distribution
3. By issue/type, including for each:
- a) Description of distribution location/type and issue(s)
 - b) Quantity (total not average)

Note: Overall free circulation (regular and sample combined) in the Reporting Period cannot exceed the higher of:

- 25,000 copies (average per issue); **or**
- 5% of the total average circulation

OTHER COUNTRIES

DEFINITION

Copies sold for distribution outside the UK and Republic of Ireland.

PRINCIPLES

1. **Copies are purchased from the publisher on a contractual basis by a third party for distribution outside the UK and Republic of Ireland**
2. **Copies may be sold on a Sale or Return or Firm Sale basis**

REQUIREMENTS

1. **Copies are purchased from the publisher on a contractual basis by a third party for distribution outside the UK and Republic of Ireland**

No additional requirements.

2. **Copies may be sold on a Sale or Return or Firm Sale basis**

a) If copies are sold on a sale or return basis and at the time you submit your circulation claim unsold copies could still be returned or reported you must make an estimate of final sales. If an estimate is made:

- i) You must adjust your claim in the following period to reflect any difference between the estimated net sale and actual net sale
 - ii) You may account for unsold copies on a transactional basis (i.e. when they are reported for credit). This must be done on a monthly basis as a minimum.
- b) You cannot claim sales of back issues.

REPORTING

You will report Other Countries sales as one figure, which will be broken out on the ABC Certificate.

GUIDANCE

- G1. **Copies are purchased from the publisher on a contractual basis by a third party for distribution outside the UK and Republic of Ireland**

a) The third party may be an organisation or an individual.

DIGITAL EDITIONS

DEFINITION

A digital edition is an edition of the print publication published electronically as a unit.

PRINCIPLES

1. **Prior notification of Digital Edition claims and plans are required**
2. **A Digital Edition is sufficiently similar to be considered the same product as the print parent edition**
3. **Digital Edition copies are opted in**
4. **A Digital Edition is published and available to the consumer**
5. **Digital Edition copies must meet requirements of the relevant print category except where varied by this section.**
6. **Reported by rate, comparing price paid with the print copy price**
7. **Optional metrics/breakdowns can be reported.**

REQUIREMENTS

1. **Prior notification of Digital Edition claims and plans are required**
 - a) Digital Edition claims must be audited by ABC Staff Auditors
 - b) You must register your intention to claim in advance of the publication of the issues as part of the audit is carried out during the reporting period.
 - c) You must provide planned distribution dates in advance and notify us of any changes.
2. **Digital Edition is sufficiently similar to be considered the same product as the print parent edition**
 - a) A Digital Edition must be identified as an edition of a publication reported on the ABC Certificate (the Parent Edition). This means it must carry a logotype/masthead incorporating the generic name of the Parent Edition and be consistent with the general appearance of the Parent Edition.
 - b) A Digital Edition is published electronically as a unit.
 - c) It may be reformatted to suit the different delivery medium. *For example: changes in page size or order.*
 - d) Editorial or advertising may include electronic enhancements or be adapted to take advantage of the medium. *For example: pictures replaced with video*
 - e) Compared to the print parent edition you can change editorial content, providing at any point in time:
 - i) A minimum of about 75% of the editorial in the print parent edition is present in the Digital Edition.
 - ii) Additional editorial, not in the print edition, can be added to the digital edition up to about 25% of the total editorial by volume in the print edition.

You must declare editorial changes when submitting your claim to ABC and be able to demonstrate they fall within the permitted parameters.
 - f) A Digital Edition may include live social media feeds, news feeds and/or video feeds. These will be ignored in relation to the editorial change requirements.

- g) A digital edition must carry all of the ROP (not classified) advertisements (by number and advertisers) that appear in the parent edition unless agreed otherwise with the advertiser/agency.
- h) You can sell advertisements for inclusion in the digital edition only.
- i) If editorial or advertising renders the digital edition illegal for publication the specific advertising/editorial may be removed. In this instance you can ignore the relevant editorial/advertising from your calculations of changes.
- j) Digital editions and their parent edition must be published on or about a common distribution date.

3. Digital Edition copies are opted in

- a) The individual must have either specifically purchased the Digital Edition, or requested to receive/view it.

4. A Digital Edition is published and available to the consumer

- a) You must provide ABC with free access to the digital edition for every issue.

5. Digital Edition copies must meet requirements of the relevant print category except where varied by this section.

- a) Digital Edition copies can be claimed only for specified circulation categories depending on the sector. The requirements of those categories in relation to print copies apply to Digital Edition copies except as varied by this section.
- b) In relation to all paid categories you must be able to demonstrate the copy has been sold and at what price.
- c) For Corporate Subscription Digital Editions:
 - i) There must be a contractual arrangement between the purchaser (a third party employer) and the publisher for at least two issues.
 - ii) The copies are purchased by the third party employer for its employees
 - iii) The claimed quantity must be restricted to those employees that have personally opted to receive/view the Digital Edition. *For example: A company takes out a subscription for each of its 100 employees. If only 40 of those employees personally register to receive/view the digital edition then only those 40 copies may be included on the ABC Certificate.*
- d) Gift subscriptions, where the recipient receives a subscription as a gift from a paying subscriber (up to a maximum of 12 gift subscriptions per subscriber), can be claimed as Digital Edition Single Copy Subscription Sales as follows:
 - i) The recipient's email address must be provided.
 - ii) The recipient is deemed (for ABC purposes) as having paid for the subscription.
 - iii) The recipient's geographical location for reporting purposes will be treated as being the same as that of the purchaser making the gift.
- e) You must supply us the claim for Digital Edition copies on an issue by issue basis (or as otherwise agreed).

6. Reported by rate, comparing price paid with the print copy price

- a) Paid digital edition copies must be claimed in the appropriate rate band by comparing the price paid with the UK print copy Basic Cover Price (single copy sales) and the UK print copy Basic Annual Rate (subscriptions). Note:
 - i) Relevant price means the UK print price unless you must use the alternative BAR (see Single Copy Subscriptions section 6e).
 - ii) You can ignore the value (or perceived value) of any gifts, or other incentives (including bundled publications or media products that are not claimed for ABC purposes). However cash reimbursements to the consumer must be taken into account (excluding limited low chance lottery style promotions).

- b) If a subscription promotion includes a gift or product that is being claimed for ABC purposes (for example a bundled copy of a publication or access to a paid website) then the price paid must be allocated according to the following, moving down the list until one can be applied:
 - i) According to the specific terms of the offer.
 - ii) Where specific terms are not clear, by pro-rating the price according to the relative prices of the ABC claimed products.
 - iii) Where the specific terms are not clear and in the absence of a means of pro-rating the price paid, it should be divided equally between the number of ABC claimed products included in the sale.
- c) If a publication's digital edition copy is sold bundled as a package with the print copy (whether for a single issue or a subscription) then the treatment is as follows:
 - i) Both the digital edition and the print copy can be included in the ABC claim if the price paid for the package exceeds the UK print copy Basic Cover Price (single copy sale) or UK Basic Annual Rate (subscriptions) by at least 20%
 - ii) If the price paid for a package bundling a publication's print and a digital edition is less than 20% above the UK print copy Basic Cover Price (single copy sale) or the UK print copy Basic Annual Rate (subscriptions) then only the print copy can be included in the ABC claim.

7. Optional metrics/breakdowns can be reported.

- a) You may make a statement on the Certificate of the average number of additional digital edition copies per issue that have been paid for or requested free (where applicable) by individuals, but which are not included in the ABC claim because a print copy to those individuals has been claimed. Note: Only one additional digital edition copy per issue per individual can be claimed.
- b) You may report a breakdown of Digital Editions by browser, device or other identifiable and auditable metric.
- c) You may report circulation and/or Publication Active Views for the Digital Edition. The definition and requirements for Publication Active View are detailed in the ABC Digital Publication Reporting Standards. *The definition is reproduced below for your convenience:*

Publication Active View:

- 1. Definition: A single copy of a publication actively opened by a device for viewing.
- 2. Principles:
 - a. A minimum of one page of an issue (or a day) opened/served on/to a device.
 - b. Distinct action/event by the end user to view.
Note: a single action/request which results in both the content being downloaded/made available and the automatic opening of a page of the publication is not considered a distinct action/event. A further distinct action would be required such as opening a second page.
 - c. The view request must be on an issue by issue (or daily) basis.

REPORTING

You will report total average Digital Edition copies as follows, which will be broken out on the ABC Certificate:

- 1. At your option:
 - a) By circulation only
 - b) By Publication Active Views only
 - c) By circulation and Publication Active Views

If reporting by circulation and Publication Active Views you must choose which metric is reported on the front page of the ABC certificate.

2. Circulation broken out by geographical type:
 - a) United Kingdom
 - b) Republic of Ireland (ROI)
 - c) Other Countries
3. Circulation broken out by circulation type:
 - a) As for print copies, in the same rate bands but separate to print copies (i.e. not combined or in the total average circulation figure):
 - i) Single copy sales
 - ii) Single Copy Subscription Sales
 - iii) Corporate Subscriptions
4. A list of the Digital Edition products included in the claim

GUIDANCE

G5. Digital Edition copies must meet requirements of the relevant print category except where varied by this section.

- a) Single copy retail sales of Digital Editions via a third party retailer (*for example Apple Newsstand, Google, Amazon etc*) will be reported in the category Retail Sales (Sale or Return). Single copy sales of Digital Editions direct to a consumer by the publisher will be claimed in the category Single Copy Sales.

G6. Reported by rate, comparing price paid with the print copy price

- a) The rate band in which single copy sales of digital editions are claimed will be calculated by comparing the price paid against the UK print copy Basic Cover Price. The rate band in which digital edition subscriptions are claimed will be calculated by comparing the price paid against the UK print copy BAR for subscriptions. *For example the BAR for a print subscription is £200. Its digital edition is marketed for a subscription rate of £80. For rate band reporting purposes an £80 subscription to the digital edition must be reported according to $80/200 = 40\%$*
- b) Both the digital edition and the print copy can be included in the ABC claim if the price paid for the package exceeds the UK print copy Basic Cover Price (single copy sale) or UK Basic Annual Rate (subscriptions) by at least 20%. *For example: If the BAR for a print subscription is £100, then to claim both the print and digital edition copy sold together in a subscription package, the package must be sold for at least £120.*

BASIC COVER PRICE

DEFINITION

The Basic Cover Price is the standard published price for an issue against which circulation is reported.

PRINCIPLES

1. **The Basic Cover Price is a recognised standard price**
2. **A cover price must be published to claim certain categories of paid circulation**
3. **Copies reported by rate, comparing price paid with Basic Cover Price**

REQUIREMENTS

1. **The Basic Cover Price is a recognised standard price**
 - a) The Basic Cover Price is the published cover price at which a single copy of the publication may be purchased without limitation and for an on-going duration, in contrast to a short-term price or special price only available to a limited class or under limited conditions.
 - b) For UK copies where multiple cover prices by edition or by territory (England/Wales/Northern Ireland and Scotland) exist, the Basic Cover Price will be the price at which at least 80% of the circulation is sold at or below.
2. **A cover price must be published to claim certain categories of paid circulation**
 - a) The relevant circulation section of these Reporting Standards will stipulate if a cover price must be published for copies to be included in the ABC claim. Where a cover price must be published it must be published on or inside the front or back cover of the publication.
 - b) If you fail to publish a cover price for an issue (that includes circulation that requires a cover price to be published) then:
 - i) You must notify ABC's Group Executive Director, Standards, Operations & Compliance before the return submission deadline explaining the reasons why it happened and what steps are being taken to prevent a recurrence.
 - ii) We may request further information or documentation surrounding the omission.
 - iii) We will review the circumstances surrounding the omission and if it is decided the occurrence is exceptional and the claim verifiable then the copies may be claimed.
3. **Copies reported by rate, comparing price paid with Basic Cover Price**
 - a) Circulation sections will stipulate if copies are reported by rate.
 - b) A reduction in cover price will not be accepted as a Basic Cover Price until it has been in place for a minimum of two complete consecutive ABC monthly reporting periods. Note:
 - i) A change in the cover price will be ignored for this purpose where:
 - The monetary amount of the change (increase or decrease) wholly reflects the change in a purchase tax (e.g. VAT) levied on the publication; and
 - The change is made in a timescale that is consistent with it reflecting the tax change.

REPORTING

You will report the following, which will be broken out on the ABC Certificate:

1. The Basic Cover Price for the last issue included in the reporting period for:
 - a) UK
 - b) Republic of Ireland

Note: If there are different cover prices by day of week then these will be shown.

EDITIONS

DEFINITION

An Edition is a version of an issue of the publication that varies from the Main Edition (the UK and/or ROI version that has the largest circulation), usually for reasons of geography, timing or content. How it has varied from the Main Edition will affect how or whether it can be included on the same ABC Certificate.

PRINCIPLES

1. **An Edition must be in keeping with the overall issue to be reported on the same ABC Certificate**
2. **Changes to an Edition may require a breakout on the ABC Certificate**

REQUIREMENTS

1. **An Edition must be in keeping with the overall issue to be reported on the same ABC Certificate**
 - a) The Edition must carry a logotype/masthead incorporating the generic name of the Main Edition.
 - b) The branding and appearance of the Edition must not give the impression that it is a different publication than the Main Edition. For the avoidance of doubt a change in format alone (such as a change in publication size) will not infringe this requirement.
 - c) The Edition must carry the same cover date/issue identification as the Main Edition.
 - d) The Edition must be published and distributed on or about the same date as the Main Edition.
 - e) The number of display advertisements in an Edition can change up to 100% from the Main Edition (Main Edition excludes separate surveys or magazines).
2. **Changes to an Edition may require a breakout on the ABC Certificate**
 - a) Where the number of display advertisements changes by 30% or more from the Main Edition, you must report the average monthly circulation geographically and the UK/Scotland/ROI breakout by circulation type for that Edition, which will appear on the Certificate.
 - b) Advertising changes are ignored for ABC purposes if:
 - i) They are made solely because their inclusion would, in the opinion of the publisher, the advertiser or their agency render the publication illegal in a particular territory. Note: This opinion must be judged reasonable by the auditor and ABC.
 - ii) The advertisement has changed but it is the same advertiser.
 - c) Where the Edition is in a different format than the Main Edition, *for example tabloid rather than broadsheet*, you must report the average monthly circulation geographically and the UK/Scotland/ROI breakout by circulation type for that Edition, which will appear on the Certificate.
 - d) If you do need to breakout an Edition then the Main Edition will be broken out as well.

GUIDANCE

None.

ISSUES TO BE INCLUDED/EXCLUDED

DEFINITION

All published issues for which the majority of the distribution took place within the Reporting Period must be included except for any issues allowed to be excluded according to this section.

PRINCIPLES

1. All issues published in the Reporting Period must be included
2. Published issues that are allowed to be excluded according to this section may be removed from the average circulation figure
3. Issues allowed to be excluded from the average circulation figure will be reported

REQUIREMENTS

1. All issues published in the Reporting Period must be included
 - a) Whether an issue is included in the Reporting Period is determined by the date by which 50% of the claimed distribution is distributed/made available. For each component of distribution the date distributed/made available is determined as follows:
 - i) Mailed copies: The date the copies enter the distribution chain, i.e. when they are posted or delivered to a courier.
 - ii) Paid copies: The first date the copies are made available to the consumer, i.e. for retail sales the first official on sale date.
 - iii) Copies made available for pick up by consumer: The date the copies are made available/handed out to the consumer.
 - iv) Free Digital Edition copies: The date email notifications are sent.
2. Published issues that are allowed to be excluded according to this section may be removed from the average circulation
 - a) There are certain circumstances under which you may exclude an issue from the reported circulation. The circumstances and information surrounding any exclusion are subject to audit.
 - b) **ABC granted exclusion:** You may exclude an issue for which we have issued an exclusion note. You can apply for an ABC granted exclusion if:
 - i) Due to circumstances outside your control:
 - You can demonstrate a shortfall in the UK and ROI normal net sale (i.e. excluding Multiple Copy Sales) and that shortfall is at least 5% or more of the average normal net sale of the previous four equivalent issues (e.g. for a Monday compare to Mondays etc). Note:
 - o The shortfall must have arisen because the exceptional circumstances outside of your control resulted in the planned level of distribution not being achieved, or the planned level of distribution being achieved but it was severely delayed or withdrawn from sale prematurely. *For example: machinery breakdown or severe adverse weather significantly reducing or delaying distribution.*
 - o If one or more of the last four issues are excluded because of an official National Public Holiday or Christmas/New year trading period exclusions then do not use this as one of the four comparable issue but go back one further issue.
 - o If one or more of the last four issues are excluded because of an ABC Granted Exclusion then it will be counted as one of the four comparable issues.

- ii) You submit your application to us using an ABC Exclusion Note Request Form within 7 days of the end of the relevant Reporting Period.

If we do not issue an exclusion note we will issue a rejection notice detailing the reason for rejection

- c) **Optional exclusion:** You may optionally exclude the following issues without applying for an exclusion note:

- i) Issues published during the Christmas/New Year trading period, which is defined as from Christmas Eve to the first Sunday after New Year's Day (inclusive). Note:
 - o If the fall of days renders these dates inappropriate ABC reserves the right to amend the dates for any particular year.
- ii) Issues published on official National Public Holidays for the publication's Core Country, as notified to ABC. The official National Public Holidays accepted by ABC without further need for referral to ABC are as follows (may be varied in a particular year if changes are officially announced):

England, Wales and Scotland

1. New Years Day – January 1st *
2. Good Friday – March/April
3. Easter Sunday – March/April
4. Easter Monday – March/April
5. Early May Bank Holiday – First Monday in May
6. Spring Bank Holiday – Last Monday in May
7. Summer Bank Holiday – Last Monday in August
8. Christmas Day – December 25th *
9. Boxing Day – December 26th *

Northern Ireland Only

1. News Years Day – January 1st *
2. St Patrick's Day – March 17th *
3. Good Friday – March/April
4. Easter Sunday – March/April
5. Easter Monday – March/April
6. Early May Bank Holiday – First Monday in May
7. Spring Bank Holiday – Last Monday in May
8. Battle of the Boyne – July 12th *
9. Summer Bank Holiday – Last Monday in August
10. Christmas Day – December 25th *
11. Boxing Day – December 26th *

Republic of Ireland Only

1. News Years Day – January 1st *
2. St Patrick's Day – March 17th *
3. Easter Sunday – March/April
4. Easter Monday – March/April
5. First Monday in May
6. First Monday in June
7. First Monday in August
8. Last Monday in October
9. Christmas Day – December 25th *
10. Boxing Day – December 26th *

*or next available working day if falls on a weekend

3. Issues allowed to be excluded from the average circulation figure will be reported

- a) Any issues excluded from the reported circulation will be reported on the Certificate.

REPORTING

You will report the following which will be reported on the ABC Certificate:

1. Number of issues included in the circulation claim.
2. Details of any issues excluded from the circulation claim, including for each:
 - a) The general reason for exclusion.
 - b) The total of the UK and Republic of Ireland circulation, broken down into
 - United Kingdom
 - Scotland - as a subset of UK
 - England, Wales & N. Ireland – as a subset of UK
 - Republic of Ireland (ROI)

GUIDANCE

None.

REPORTING PERIODS

DEFINITION

Each ABC Certificate has a defined Reporting Period which identifies the date or dates it covers.

PRINCIPLES

1. You must report a continuous series of Reporting Periods on a mandatory frequency
2. You can report optional shorter Reporting Periods

REQUIREMENTS

1. You must report a continuous series of Reporting Periods on a mandatory frequency
 - a) Once we have issued a publication's first ABC Certificate for a mandatory period we must continue to issue Certificates for subsequent consecutive mandatory Reporting Periods (i.e. so there is no gap in certification) while the publication remains registered.
 - b) The mandatory Reporting Period will be monthly. Note: a month is a four or five week period commencing on a Monday and ending on a Sunday. The exact dates to be included in each Reporting Period will be set out in a published ABC Accounting Calendar.
 - c) Changing the mandatory frequency, if possible, is expected to be infrequent. We reserve the right to reject or impose conditions on requests to change frequency if in our view this might affect transparency or comparability.
 - d) If in our opinion there are exceptional changes to a publication during the Reporting Period that mean issuing a Certificate for the mandatory Reporting Period in full might lead to confusion or a lack of transparency in the data certified, then we may agree or require the issue of more than one Certificate covering the mandatory period. *For example if a publication changes from a daily to a weekly publishing frequency during the period then one Certificate could be issued up until the point of change and one from that point to the end of the mandatory Reporting Period.*
2. You can report optional shorter Reporting Periods
 - a) Optional Reporting Periods are whole months or any number of whole months in addition to mandatory Reporting Periods. Note: A month is a four or five week period commencing on a Monday and ending on a Sunday. The exact dates to be included in each Reporting Period will be set out in a published ABC Accounting Calendar.
 - b) For newly registered publications only:
 - i) You can report single issues until the start of the next month.
 - ii) You can report one or more consecutive optional Reporting Periods. I.e. there is no gap in certification) before reporting your first mandatory Reporting Period.

GUIDANCE

G2. You can report optional shorter Reporting Periods

- a) Please contact us regarding any additional optional periods as early as possible in order that we can discuss fees and scheduling of audits.

CERTIFICATE TYPES

DEFINITION

The ABC Certificate is issued by ABC for a specific period and contains the data and information that is subject to audit.

PRINCIPLES

1. You must report using a standard Certificate type
2. You may choose to report using an optional Certificate type

REQUIREMENTS

1. You must report using a standard Certificate type
 - a) The key feature of the standard Certificate is that publications must report this as a minimum, presenting set information in a standardised format.
 - b) The mandatory Certificate may be either:
 - i) A Standard Certificate.
 - ii) A Cross-Platform Certificate that reports the same information as a Standard Certificate but with the addition of Digital Edition copies.
2. You may choose to report using an optional Certificate type
 - a) The key feature of optional Certificates is that they offer the reporting of additional information. They usually incorporate all the information that would be reported on a mandatory Certificate.
 - b) The optional Certificate available is:
 - i) A Group Certificate that combines the circulations from 2 or more publications' Certificates providing:
 - Each Certificate relates to the same Reporting Standards
 - Each Certificate is for the same Reporting Period
 - Each publication has the same publishing frequency

ABC will produce Group Certificates from the data submitted for the constituent publications.

GUIDANCE

None.

RETURN FORM SUBMISSION, AUDIT, CERTIFICATION

DEFINITION

The Return Form is a submission in which the circulation claim is reported to ABC for certification. Each circulation claim is subject to audit.

PRINCIPLES

1. **A Return Form must be submitted for the registered product for every applicable Reporting Period**
2. **The Return Form must be submitted by the Submission Deadline**
3. **ABC will issue a Certificate based on the Return Form**
4. **Each circulation claim is audited to verify it is in accordance with the applicable Reporting Standards**

REQUIREMENTS

1. **A Return Form must be submitted for the registered product for every applicable Reporting Period**
 - a) You must submit a Return Form for the applicable mandatory and optional Reporting Periods you have chosen to report.
 - b) We will advise you how to submit your Return Form. *For example online via the ABC eReturn website.* However if you have not heard from us at the appropriate time please contact us.
 - c) If you use ABC Staff Auditors you will submit your Return Form to us, authorised by an appropriate individual representing your organisation.
 - d) If you use a non-ABC Auditor then they must submit the Return Form to us, authorised both by an appropriate individual representing your organisation and your Approved Auditor.
 - e) Whilst our systems contain some arithmetic and logic validation processes, the accuracy of the Return Form remains your responsibility.
 - f) Estimates and assumptions must not be made on the Return Form unless the Reporting Standards allow for them, or we have authorised them.
2. **The Return Form must be submitted by the Submission Deadline**
 - a) We will publicise the applicable Submission Deadline.
 - b) It is your responsibility to ensure Return Forms are submitted by the Submission Deadline. Failure to do so can result in a penalty and/or cancellation of your product's ABC registration under the ABC Byelaws.
3. **ABC will issue a Certificate based on the Return Form**
 - a) We will issue the certificate to you and make the certificate and/or data available in accordance with agreed timings and to the agreed eligible recipients for the sector.
 - b) You may opt for public or private reporting. If you opt for private reporting:
 - i) The publication of your circulation figures is under your control
 - ii) We will not publish the certificate on our website, but will show that that the publication is certified, the date of the most recent certificate issued, that you have chosen to manage the data yourselves and your contact from whom your certificate may be requested.

4. Each circulation claim is audited to verify it is in accordance with the applicable Reporting Standards

- a) The audit must be carried out either by ABC Staff Auditors or, unless stipulated otherwise, an Approved Auditor appointed by you and approved by us.
- b) Requirements in relation to the auditor and audits will be covered by the ABC Byelaws, ABC Audit Programmes and contractual arrangements.
- c) Publications may opt to have their monthly certificates audited on a quarterly cycle. Known as 'consolidated auditing' this helps provide efficiencies through changing the timing of audit work across a set of certificates. Note:
 - i) You must tell us in writing if you wish to use this option.
 - ii) As certificates are issued based on the member's claim any subsequent material errors identified at audit will require an updated certificate be issued that identifies the changes. This replaces the member's original Certificate and must be used in its place.
 - iii) We may withdraw the option to utilise consolidated auditing if certificates are repeatedly re-issued to correct material errors in claims.
- d) We carry out inspections on all publications that are not audited by ABC Staff Auditors. The inspections are carried out by ABC Staff Auditors and all publications will be inspected at least once every two years on average and those publications with a publishing frequency of more than once a week will be inspected annually on average.
- e) If following an audit or inspection we identify material problems with the Return Form or Certificate then we will propose to revise the claim. If a Certificate has already been issued we will issue an updated certificate that identifies the changes. This replaces your original Certificate and must be used in its place. The process is as follows:
 - i) We will send you a letter detailing the reason/problem giving rise to the amendment.
 - ii) You will have 10 working days from the receipt of this letter to provide any further information to us, or object to the revision of the claim.
 - iii) If you wish to object to the revision of the claim you must do this in writing to the Director of Audit who will investigate and provide a decision within 10 working days. If the objection is to a decision by the Director of Audit or the Chief Executive then the first level of appeal will be in accordance with the Review Procedure detailed in the ABC Byelaws.
 - iv) Subsequent Certificates may not be issued until we have resolved all queries on a previous audit and issued the updated Certificate, if applicable.
 - v) We identify updated certificates.

GUIDANCE

G4. Each circulation claim is audited to verify it is in accordance with the applicable Reporting Standards

Consolidated auditing:

- a) The publisher can opt to have audits of their monthly certificates conducted on a quarterly cycle (retrospectively, after certification)
 - i) Circulation claims are submitted via the Return system and certificates are issued every month.
 - ii) Each month's circulation claims will be analysed by the ABC auditor and any unusual changes, or new information about areas of high risk that have come to light, are followed up with the publisher at that point.
 - iii) Every three months a final audit will be conducted, rounding up the quarterly cycle of work. This will include an on-site visit by the ABC auditor and a management letter on completion.
 - iv) Not all publishers will be audited on the same quarterly cycle.

- v) Audit work at third parties (e.g. Dawsons/Media on the Move) will be conducted with a similar quarterly cycle, and the conclusions fed into the formal audit.
 - vi) The quarterly final audit must be concluded before the issue of the following monthly certificate (subject to the provisions of the appeal process explained below).
- b) There will be no change to our established materiality levels for all audit testing. These are the thresholds which determine the level of detail to which we conduct elements of work, and the cumulative error that might require certificate data to be restated.
- c) If the audit work reveals any material misstatement, this is raised with the publisher before certificate is updated.
- i) We will follow the standard procedures set out in the ABC Reporting Standards, which requires the ABC auditor to set out the proposed changes, followed by a 10 day period to agree to the changes, provide further information, or lodge an appeal with the Director of Audit.
 - ii) As with all ABC audit decisions, members have the right to request a review of the decision, internally within ABC and ultimately to an independent panel of ABC Board Members under certain grounds. These procedures are set out in the Reporting Standards and ABC Byelaws (section 13).
- d) We envisage restatements to be very rare based on the history of data revisions.
- i) Where audits are conducted prior to formal submission of the return to ABC, publishers will sometimes take the opportunity to make minor changes to circulation claims following feedback from the ABC auditor. Such non-material changes would not be made in the case of retrospective audits.
 - ii) If the publisher is concerned there is an increased risk of their reported figures being inaccurate then they should contact ABC as soon as possible, and may opt to have a full monthly audit, prior to certificate issue.
 - iii) If there are continuing issues that ABC considers may increase the likelihood of reported figures being inaccurate then we would need to revert to monthly full audits, possibly prior to certificate issue, to ensure that materially inaccurate figures are not certified by ABC for an extended period of time.
- e) We will identify where data is revised as a result of an updated certificate. The certificate will include a statement summarising the changes made on the revised certificate. Data in available tables will also be updated.
- f) Audit fees for retrospective audits on a quarterly cycle are intended to be lower than for monthly audits prior to certificate issue, as efficiencies can be made such that costs will be lower.
- g) Publishers who use external auditors rather than ABC auditors may make similar arrangements. The publisher's auditor should contact ABC if issued certificates require amendment following their audit.

CAPS BY SUPPLY TYPE – MULTIPLE COPY SALES & FREE COPIES

DEFINITION

The caps in this section set the maximum number of Paid Multiple Copies or Free Copies that you can claim for designated supply types.

Caps are expressed as a percentage of the ‘total potential penetration’ or other quantifiable measure.

PRINCIPLES

1. **Copies must meet the requirements of the Multiple Copy Sales or Free Copies category.**
2. **If the number of copies supplied is less than the cap then you must claim the actual supply**
3. **You cannot claim copies supplied over and above the cap**
4. **Caps cannot be ‘double-counted’ at a particular location already subject to its own cap**
5. **Caps are set by the Reporting Standards Group**

REQUIREMENTS

1. **Copies must meet the requirements of the Multiple Copy Sales or Free Copies category.**

No additional requirements.

2. **If the number of copies supplied is less than the cap then you must claim the actual supply**

No additional requirements.

3. **You cannot claim copies supplied over and above the cap**

If demand exceeds the cap at a particular location you may claim a greater number of copies than the caps below if you have documentary evidence demonstrating a commensurate level of demand. Note: You may ask us for advice before claiming a copy count higher than the cap.

4. **Caps cannot be ‘double-counted’ at a particular location already subject to its own cap**

- a) *For example if you distribute copies to a distinct betting shop outlet within an hotel then you cannot claim distribution up to the permitted cap for a betting shop and in addition up to the permitted cap for an hotel. However if you distribute at two different points in this environment you can claim up to the quantity of the largest cap at that location.*

5. **Caps are set by the Reporting Standards Group**

- a) You may ask us or any member of the Reporting Standards Group to table a proposed cap to be considered for inclusion.

CAPS

Where caps refer to a quantifiable measurement for a location e.g. seats, rooms, attendance etc. then you must have evidence to support this.

Description/Category	Cap
Transport (airside/airline, train, ferry, cruise ship, coach)	No. of seats (based on 1 journey per issue per transport method/location)
Train/Bus Station/ Park & Ride [new]	150 copies
Hotel/Apartment block [new]	No. of rooms
Events / Exhibitions	33% of attendance
Business [new] / School / College	33% of no. of staff/students
Hospital / Residential Home [new] / Prison [new]	50% of no. of beds
Conferences	50% of attendance
Direct Mailshots	No. of addressees
Supermarket / Major store / Petrol station / Motorway Services [new]	250 copies
Managed shopping centre / retail park [new]	Sum of individual outlet caps
Other general retail / customer service location [new]	50 copies



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