



Setting the standard

Reporting Standards

Regional Publications

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INTRODUCTION

This document contains the Reporting Standards for print and digital edition of products registered in the Regional Publications 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 www.abcstandards.org.uk 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 – you can download an Executive Summary containing just these sections from our website.

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 info@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 'arm's-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 publication under the Regional Publication Reporting Standards if it publishes in a defined region of the UK (i.e. not one that is available throughout all or most of the UK). Note: If the majority of its circulation is in the Republic of Ireland it will report under Republic of Ireland Reporting Standards.
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) File or office copies
 - ii) Free publisher employee copies
 - iii) Paid publisher employee copies (unless they qualify under the Paid Employee Copies category or they are purchased as a normal consumer).
3. **Transactions related to the claim must be bona fide 'arm's-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 'arm's-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 arm's-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).
 - v) A copy of each issue and any Editions claimed.
 - vi) Financial records.
- b) Records supporting the claim must be retained:
 - i) If ABC is the auditor, until we have completed the audit of the certificate for the subsequent corresponding Reporting Period. *For example the records supporting the July to December 2012 period must be retained until we have completed the audit for July to December 2013.*
 - ii) If you use non-ABC auditor, until you receive the certificate for the subsequent corresponding Reporting Period.
 - iii) For monthly Reporting Periods 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.
- b) For 6 or 12 month Reporting Periods ending December the Audit Issue is the last issue dated November and for Reporting Periods ending June the last issue dated May.
- c) For monthly Reporting Periods 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.
 - i) If two issues are equidistant from this date then you may choose either as the Audit Issue.
- d) For any other Reporting Periods the Audit Issue is the issue distributed nearest to the first day of the last month in the Reporting Period, which also falls within the Reporting Period.
 - i) If two issues are equidistant from this date then you may choose either as the Audit Issue.

REPORTED DATA

This section sets out the circulation categories and other information that is reported on the ABC Certificate.

1. Total average circulation

- a) You must report the total average circulation per issue. Copies will be reported, broken out by print and Digital Edition (as applicable), as shown in the following summary:

Mandatory Primary categories	Eligible circulation types	Optional Secondary reporting	Optional Tertiary reporting	Additional optional analysis
Paid Single Copies	Retail Sales: Sale or return Limited Sale or Return Firm Sale Single Copy Sales	Breakout into: - Full Rate - Below Full Rate		[Required: Special & Sports Editions as part of editions breakout] Cover Price
Paid Subscriptions	Single Copy Subscriptions Paid Employee Copies Publisher Controlled Direct Delivery Voucher Subscriptions Multiple Subscriptions	Breakout into: - Single Copy Subs (inc employee & Publisher Cont'd Direct Delivery) - Voucher Subscriptions - Multiple Subscriptions - Corporate Subscriptions (Digital only)		
Paid Multiple Copies	Paid Multiple Copies			Analysis of copies by audience type
Free Copies	Free Pick Up Free Letterbox (inc multiple residential) Free Requested Delivery Sample Free Distribution	Breakout into: Regular - Pick Up - Letterbox - Free Requested Sample - Pick Up - Letterbox - Free requested	Breakout into: Pick Up - Net - Capped	Summary description Pick Up – analysis of qty of copies by dist'n point type (last issue) Letterbox - analysis by postcode (last issue)

- b) We will report the percentage of the total average circulation that is 'Paid' by the end user (i.e. including Paid Single Copies and Paid Subscriptions) where this exceeds 50%; otherwise we will report the percentage as 'Free'.

2. Optional analysis of circulation across period

- a) You may opt to report any of the following analyses:

Optional analysis	Optional further analysis
Analysis of total circulation by month	Further analysed by circulation type
[Daily titles]: Analysis of total circulation by Mon-Fri, Sat	Further analysed by circulation type
[Daily titles]: Analysis of total circulation by day of week	Further analysed by circulation type
[Daily titles]: Analysis of day of week averages for each month	Further analysed by circulation type
[Daily titles]: Analysis of groups of daily averages for each month (e.g. Weds/Thurs/Fri)	N / A

3. You may choose to report a Group Certificate

- a) You may choose to report a Group Certificate that combines the circulations from 2 or more publications' Certificates providing:
- i) Each Certificate relates to the same Reporting Standards
 - ii) Each Certificate is for the same Reporting Period

Note:

- You may include publications with different publishing frequencies.
- ABC will produce Group Certificates from the data submitted for the constituent publications and will show circulation to the four primary circulation categories (i.e. Paid Single Copies, Paid Subscriptions, Paid Multiple Copies and Free Copies).

4. Optional analyses

- a) You may request to report additional analyses, derived from (or closely connected with) data reported on the certificate, subject to the following:
- i) The data to be reported on the certificate is, in our opinion:
 - o Auditable
 - o Related to the product being certified
 - o Albeit reporting different information, is in keeping with the requirements for data and evidence in relation to existing relevant Reporting Standards. *For example: If the breakout is an analysis of subscription bundles, we would expect the evidence levels to be in line with that already in place for subscriptions.*
 - ii) We will review the request and confirm whether we agree it can be reported, how it will be reported and any requirements in relation to the audit timing or process.

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**

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) Back issues up to 12 months old can be claimed against the issue current at the time of sale.
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**
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.
 - c) Cash reimbursements to the consumer must be taken into account
 - d) Sales by retailers will be treated as sales at the cover price unless there is evidence to the contrary.
 - e) You must retain details of promotional or special offers during the reporting period.
5. **There must be an incentive for unsold copies/net sale to be reported to the publisher**
 - a) *For example:* 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 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).

REPORTING

Mandatory	Optional
<p>Average Retail Sales per issue for the period [reported as Paid Single Copies] analysed by:</p> <ul style="list-style-type: none"> i) Print ii) Digital Edition <p>If you include Retail Sales of Special and/or Sports Editions these must be included in the Editions Analysis.</p>	<ul style="list-style-type: none"> 1. Breakout copies (by comparing price paid by the consumer against Basic Cover Price*) into: <ul style="list-style-type: none"> a. Full Rate b. Below Full Rate 2. The cover price published on or within each issue in the last week of the reporting period. <ul style="list-style-type: none"> a. If there was more than one cover price for any of these issues then you must enter the range of lowest to highest cover prices. <p>[*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].</p>

PAID SINGLE COPIES

Retail Sales (Limited Sale or Return)

DEFINITION

A copy sold to a retailer, on a limited sale or return 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 limited 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 the limit) to be reported to the publisher**
6. **If the final net sale and/or rate classification are not known then estimates must be made**

REQUIREMENTS

1. **Single copy made available for purchase by the consumer from the retailer**
 - a) The purchase by the consumer may be in cash or by other means agreed by ABC in writing.
 - b) Back issues up to 12 months old can be claimed against the issue current at the time of sale.
2. **Copies are purchased from the publisher by the retailer, on a limited sale or return basis, either direct or via the distribution chain (typically distributor and/or wholesaler)**
 - a) 'Limited Sale or Return' means unsold copies are returned or reported for credit up to a limit contractually agreed with the retailer. The copies claimed will therefore be the net sale (copies supplied less credited copies).
 - b) 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**
4. **The price paid for the publication by the consumer must be clear and conspicuous**
 - a) If a voucher 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.
 - c) Cash reimbursements to the consumer must be taken into account.
 - d) Sales by retailers will be treated as sales at the cover price unless there is evidence to the contrary.
 - e) You must retain details of promotional or special offers during the reporting period.
5. **There must be an incentive for unsold copies/net sale (to the limit) to be reported to the publisher**
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, taking into account the agreed returns limits with retailers.

- 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 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).

REPORTING

Mandatory	Optional
<p>Average Retail Sales per issue for the period [reported as Paid Single Copies] analysed by:</p> <ul style="list-style-type: none"> i) Print ii) Digital Edition <p>If you include Retail Sales of Special and/or Sports Editions these must be included in the Editions Analysis.</p>	<ol style="list-style-type: none"> 1. Breakout copies (by comparing price paid by the consumer against Basic Cover Price*) into: <ol style="list-style-type: none"> a. Full Rate b. Below Full Rate 2. The cover price published on or within each issue in the last week of the reporting period. <ol style="list-style-type: none"> a. If there was more than one cover price for any of these issues then you must enter the range of lowest to highest cover prices. <p>[*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].</p>

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**

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) The purchase by the consumer may be in cash or by other means agreed by ABC in writing.
 - c) 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. Note - For the avoidance of doubt:
 - i) Copies disposed of by the retailer (not provided to a consumer) do not need to be deducted from the claim
 - ii) Therefore the copies claimed will be the copies sold to the retailer intended for onward sale to consumers.
 - b) The total trade discount must not exceed 60% of Basic Cover Price.
 - 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) 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**
4. **The price paid for the publication by the consumer must be clear and conspicuous**
 - a) If a voucher 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.
 - c) Cash reimbursements to the consumer must be taken into account.

- d) Copies sold to retailers can be claimed as sales at the cover price unless there is evidence to the contrary.
- e) 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

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).

REPORTING

Mandatory	Optional
<p>Average Retail Sales per issue for the period [reported as Paid Single Copies] analysed by:</p> <ul style="list-style-type: none"> i) Print ii) Digital Edition <p>If you include Retail Sales of Special and/or Sports Editions these must be included in the Editions Analysis.</p>	<ol style="list-style-type: none"> 1. Breakout copies (by comparing price paid/assumed to be paid by the consumer against Basic Cover Price*) into: <ul style="list-style-type: none"> a. Full Rate b. Below Full Rate 2. The cover price published on or within each issue in the last week of the reporting period. <ul style="list-style-type: none"> a. If there was more than one cover price for any of these issues then you must enter the range of lowest to highest cover prices. <p>[*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].</p>

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**

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) The consumer must pay at least 10p per copy or 15 eurocents (net of VAT).
 - c) Back issues up to 12 months old can be claimed against the issue current at the time of sale.
2. **Copies are purchased direct from the publisher**
 - a) You must account for sales on an issue by issue basis except:
 - i) As an alternative where a non-daily publication is sold ,those copies sold in a week (Monday to Sunday) can be recorded and claimed as sales against the issue published in that week, regardless of whether the issue might be cover-dated to a different week.
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**
 - a) If a voucher 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.
 - c) Cash reimbursements to the consumer must be taken into account.
 - d) Sales by retailers will be treated as sales at the cover price unless there is evidence to the contrary.
 - e) 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 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).

REPORTING

Mandatory	Optional
<p>Average Single Copy Sales per issue for the period [reported as Paid Single Copies] analysed by:</p> <ul style="list-style-type: none"> i) Print ii) Digital Edition <p>If you include Single Copy Sales of Special and/or Sports Editions these must be included in the Editions Analysis</p>	<ol style="list-style-type: none"> 1. Breakout copies (by comparing price paid by the consumer against Basic Cover Price*) into: <ol style="list-style-type: none"> a. Full Rate b. Below Full Rate 2. The cover price published on or within each issue in the last week of the reporting period. <ol style="list-style-type: none"> a. If there was more than one cover price for any of these issues then you must enter the range of lowest to highest cover prices. <p>[*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].</p>

PAID SUBSCRIPTIONS

Single Copy Subscriptions

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)**

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. The value (or perceived value) of gifts or cover mounts to the consumer have no effect on the price paid for ABC purposes
 - 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) Back issues up to 12 months old supplied as part of a subscription agreement can be claimed against the issue current at the time of sale.

REPORTING

Mandatory	Optional
Average Single Copy Subscriptions per issue for the period [reported as Paid Subscription Copies] analysed by: <ul style="list-style-type: none"> i) Print ii) Digital Edition 	Breakout copies into: <ul style="list-style-type: none"> (i) Single Copy Subscriptions, comprising: <ul style="list-style-type: none"> - Single Copy Subscriptions - Paid Employee Copies - Publisher Controlled Direct Delivery (print only) (ii) Voucher Subscriptions (print only) (iii) Multiple Subscriptions (print only) (iv) Corporate Subscriptions (Digital Edition only)

PAID SUBSCRIPTIONS

Paid Employee Copies

DEFINITION

A single copy sold by a publisher to a current employee of the publisher under an ABC approved purchase scheme.

PRINCIPLES

1. **Single copy knowingly paid for by current employee**
2. **Copies are purchased direct from the publisher under an ABC pre-approved purchase scheme**

REQUIREMENTS

1. **Single copy knowingly paid for by current employee**
 - a) The purchase by the employee may be directly deducted from their salary or by other means agreed by ABC in writing.
 - b) You can only claim one copy of one edition for each issue purchased by an employee under the scheme.
 - c) You cannot claim sales of back issues.
2. **Copies are purchased direct from the publisher under an ABC pre-approved purchase scheme**
 - a) You must obtain ABC's approval of the purchase scheme before copies can be claimed.
 - b) You must be able to demonstrate the employee has opted to purchase the claimed copies.
 - c) You must account for sales on an issue by issue basis.

REPORTING

Mandatory	Optional
Average Paid Employee Copies per issue for the period [reported as Paid Subscription Copies] analysed by: <ol style="list-style-type: none"> i) Print ii) Digital Edition 	Breakout copies into: <ol style="list-style-type: none"> (i) Single Copy Subscriptions, comprising: <ul style="list-style-type: none"> - Single Copy Subscriptions - Paid Employee Copies - Publisher Controlled Direct Delivery (print only) (ii) Voucher Subscriptions (print only) (iii) Multiple Subscriptions (print only) (iv) Corporate Subscriptions (Digital Edition only)

PAID SUBSCRIPTIONS

Publisher Controlled Direct Delivery

DEFINITION

A single copy purchased by a consumer directly from the publisher for a contracted period, delivered to the consumer.

PRINCIPLES

1. **There must be a contractual arrangement between the consumer and the publisher**
2. **Single copy per issue, distributed to the consumer**
3. **Single copy knowingly paid for by the consumer**
4. **For a contracted period for a minimum number of issues (at least two).**

REQUIREMENTS

1. **There must be a contractual arrangement between the consumer and the publisher**
2. **Single copy per issue, distributed to the consumer**
 - a) You must be able to demonstrate the copy is distributed to the consumer.
3. **Single copy knowingly paid for by the consumer**
 - 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.
 - b) Where you offer an incentive that has a value equal to or greater than the full cover price of the publication over the offer period, you can only claim these copies if you do not make the refund directly or indirectly through a retailer or group of retailers who provide a publication home delivery service.
 - c) Where you make an incentive offer through the newstrade that refunds less than the full cover price of the publication you can only claim these copies if the refund is made directly from you to the consumer and not through any part of the supply chain (i.e. not through any home delivery agent, wholesaler or retailer). *Note: The sale can originate either via direct publisher home delivery or through the retail trade.*
 - d) Where you supply goods as part of an offer, the terms of that offer must:
 - i) Not offer a cash alternative to the goods
 - ii) Not allow the consumer to redeem/obtain the goods from a retailer or group of retailers who provide a publication home delivery service.
4. **For a contracted period for a minimum number of issues (at least two).**
 - a) You cannot claim sales of back issues.

REPORTING

Mandatory	Optional
Average Publisher Controlled Direct Delivery per issue for the period [reported as Paid Subscription Copies] analysed by: i) Print	Breakout copies into: (i) Single Copy Subscriptions, comprising: - Single Copy Subscriptions - Paid Employee Copies - Publisher Controlled Direct Delivery (print only) (ii) Voucher Subscriptions (print only) (iii) Multiple Subscriptions (print only) (iv) Corporate Subscriptions (Digital Edition only)

PAID SUBSCRIPTIONS

Voucher Subscriptions

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**
5. **There must be an auditable incentive for vouchers redeemed to be reported to the publisher**

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**
 - a) The contracted period must include issues for a minimum period of four weeks.
 - b) You cannot claim sales of back issues.
5. **There must be an auditable incentive for vouchers redeemed to be reported to the publisher**

REPORTING

Mandatory	Optional
Average Voucher Subscription Sales per issue for the period [reported as Paid Subscription Copies] analysed by: <ol style="list-style-type: none"> i) Print 	Breakout copies into: <ol style="list-style-type: none"> (i) Single Copy Subscriptions, comprising: <ul style="list-style-type: none"> - Single Copy Subscriptions - Paid Employee Copies - Publisher Controlled Direct Delivery (print only) (ii) Voucher Subscriptions (print only) (iii) Multiple Subscriptions (print only) (iv) Corporate Subscriptions (Digital Edition only)

PAID SUBSCRIPTIONS

Multiple Subscriptions

DEFINITION

More than one copy purchased by a known subscriber for a contracted period with the intention to distribute to the same group of, but unknown, individuals over the term of the subscription.

PRINCIPLES

1. **There must be a contractual arrangement between the subscriber and the publisher (or their agent)**
2. **Must be likely copies are received by the same individual(s) over the term of the subscription**
3. **Copies are paid for by the subscriber**
4. **For a contracted period and for a minimum number of issues (at least two)**

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, the quantities to be supplied and the price.
2. **Must be likely copies are received by the same individual(s) over the term of the subscription**
 - a) You must be able to demonstrate, through the distribution method, that the copies are likely to be distributed to the same individual(s) over the subscription term.
3. **Copies are paid for by the subscriber**
 - 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.
4. **For a contracted period and for a minimum number of issues (at least two)**
 - a) You cannot claim distribution of back issues.

REPORTING

Mandatory	Optional
Average Multiple Subscriptions per issue for the period [reported as Paid Subscription Copies] analysed by: <ol style="list-style-type: none"> i) Print 	Breakout copies into: <ol style="list-style-type: none"> (i) Single Copy Subscriptions, comprising: <ul style="list-style-type: none"> - Single Copy Subscriptions - Paid Employee Copies - Publisher Controlled Direct Delivery (print only) (ii) Voucher Subscriptions (print only) (iii) Multiple Subscriptions (print only) (iv) Corporate Subscriptions (Digital Edition only)

PAID MULTIPLE COPIES

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.**

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

REPORTING

Mandatory	Optional
<p>Average Paid Multiple Copies per issue for the period analysed by:</p> <ul style="list-style-type: none"> i) Print <p>If you include Paid Multiple Copies of Sports Editions these must be included in the Editions Analysis</p>	<p>1. A verifiable overview description of the Paid Multiple Copies claim</p> <p>2. Analysis by audience type:</p> <ul style="list-style-type: none"> - Airside & International Rail - Hotels - Trains - Sports Events - Leisure Centres - Food/ Beverage Outlets - Other

FREE COPIES

Free Pick Up

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 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 to ABC**
 - a) You must inform ABC before the distribution of the first issue for which you intend to claim pick up copies, including the following information.
 - i) Details of how, when and where the copies will be distributed
 - ii) A list of all distribution points
 - b) You must, on an on-going basis, be able to provide ABC, on request, details of current and historical distribution points, quantities and distribution dates.
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) 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.*
 - ii) Only distribution points in the UK or Republic of Ireland can be claimed.
 - iii) The distribution points claimed must be consistent with any optional overview description or analysis reported.
 - iv) ABC must have the right to visit or contact distribution points for verification purposes.
 - 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 include details of the seasonal change within any optional overview description for 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

	Mon	Tues	Weds	Thurs	Fri
Free Pick Up Circulation Qty	10,000	0	5,000	0	20,000
Dist'n points	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 non-daily publications, all copies must be delivered and made available within 24 hours of the majority of the rest of the distribution (with the exception of top-up copies – see below).
- d) You can make 'top- up' supplies of an issue after the initial supply at a distribution point, as long as:
 - i) They are delivered before the distribution of the subsequent issue.
 - ii) For non-daily publications:
 - The initial supply to a distribution point is made within 24 hours of the majority of the rest of the distribution

- Any top-up supplies to a particular distribution point beyond the initial supply are not individually greater than the initial supply.

e) 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 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) Non-daily publications, and all publications distributed airside and on trains, must be reported on a capped basis. This means the number of copies claimed will be limited to designated caps – see Caps by Supply Type section for details.
- b) As an option you can report copies of non-daily publications distributed in a public place (either by hand merchandiser or via distribution bins) on a net basis as long as:
 - i) There are 1 or more distinct distribution cycles, each cycle being completed within 24 hours.
 - ii) For each distinct distribution cycle you have third party evidence of the net distribution (i.e. those made available and actually collected/handed out).

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

Mandatory	Optional
Average Free Pick Up per issue for the period [reported as Free Copies] analysed by: <ul style="list-style-type: none"> i) Print 	1. A verifiable overview description of the Free Pick Up claim 2. The average Free Copies claim analysed into: <ul style="list-style-type: none"> a. Regular: <ul style="list-style-type: none"> i. Free Pick Up (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free Requested b. Sample: <ul style="list-style-type: none"> i. Free Pick Up (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free requested 3. Analysis of Free Pick Up for the last issue in the period (ignoring excluded issues) showing for each distribution point type (e.g. hotels, train stations): <ul style="list-style-type: none"> a. the number of distribution points; and b. The number of copies claimed

FREE COPIES

FREE LETTERBOX

DEFINITION:

Copies delivered on a regular and consistent basis to round level intended for onward letterbox distribution to known addresses.

PRINCIPLES

1. **Prior notification of distribution details and any changes to ABC**
2. **Distribution follows a regular and consistent pattern**
3. **Copies are delivered to round level intended for onward distribution as single copies through letterboxes in the round.**
4. **There will be effective management controls over distribution.**

REQUIREMENTS

1. **Prior notification of distribution details and any changes to ABC**
 - a) You must inform ABC before the distribution of the first issue for which you intend to claim free letterbox, including the following information:
 - i) A list of all distribution rounds, with the number and details of addresses intended for free letterbox distribution.
 - ii) Details of how the distribution will take place, including the type of distributors employed and the basis, i.e. individual distributors; third party teams etc.
 - iii) The controls over the distribution, including processes for complaints of non-delivery.
 - b) You must, on an on-going basis, be able to provide ABC, on request, details of current and historical distribution rounds and the distributors used.
 - c) You cannot claim distribution of back issues.
2. **Distribution follows a regular and consistent pattern**
 - a) The quantity of copies distributed and rounds distributed to must be broadly the same for all issues. Note:
 - Only for publications published more frequently than weekly (e.g. daily) the distribution may be varied without limit between each issue. *For example: Mondays 10,000 copies, Tuesdays no copies, Wednesdays 5,000 copies etc.*
 - It is accepted that there will be some change in the distribution between issues. However you cannot include in your free letterbox claim any rounds where planned rotational or planned intermittent delivery has occurred during the audit period (note: rounds uncovered due to unavailability of distributors are not deemed to be intermittent). *Note: Rotational or intermittent delivery can be claimed as Sample Free Distribution.*
 - b) Only distribution in the UK or Republic of Ireland can be claimed.
 - c) You may deliver your publication using distributors, teams or a contract distribution company.
3. **Copies are delivered to round level intended for onward distribution as single copies through letterboxes in the round.**
 - a) Distribution should be made to the known addresses within a round.

- b) Copies can be distributed to multiple-residential units (e.g. A single building converted into two or more flats) providing:
- i) Distribution is made to an area where access is restricted to residents of the multiple residential unit. *For example through a communal or secure letterbox as opposed to distribution to a lobby area accessible by the general public.*
 - ii) The number of copies claimed for a multiple residential unit is the number of copies distributed into that unit limited to the number of households, up to a maximum of 10.
- c) ABC must have the right to contact addresses and distributors for verification purposes.
- d) You must be able to provide evidence of the number of copies of the publication that has been received by the distributor, team leader or contract distributor who is engaged to deliver them to the addressees in the round(s). If the receipt is for more than one round, then it must be clear that this is the case, and each round identified.
- e) You may use different types of distributors, as follows;

Distributors: A distributor is a named individual who is allocated a round or rounds and delivers the publication in person to the addresses.

You must keep:

- i) A list of the names and addresses of all distributors involved in the delivery of each issue that identifies for each distributor:
 - The rounds they have covered
 - The number of copies they have delivered
 - The amount(s) they have been paid
 - The method of payment
- ii) Financial records that support individual and total payments to each distributor (for example purchase ledger records and bank statements). In addition:
 - Cash payments must be evidenced by a signature of the person handing the payment over (e.g. Driver, Team Leader)
 - Payments for leaflet deliveries and other expenses must be shown separately

Teams: A team is two or more people who deliver the publication under the control of a Team Leader. Teams are used to deliver to a group of rounds which have not been allocated an identifiable distributor.

You must:

- i) Verify the identity of Team Leaders
- ii) Identify for each issue those rounds delivered by teams
- iii) For each issue:
 - Keep a list of the names and addresses of team leaders and team members
 - The rounds they have covered
 - The total papers delivered
 - The amount(s) they have been paid
- iv) Have financial records (for example purchase ledger records, invoices and bank statements) that show you have paid for the team deliveries

Contract distributors: A contract distributor is an external company that you have contracted to deliver the publication. *If you use a contract distribution company that is a subsidiary or associated company of your company (or your publishing group) then this section does not apply, instead you should refer to either distributor or teams whichever is appropriate.*

You must:

- i) Retain responsibility to report the distribution figures and make sure the required records to support the distribution claim are available (whether at your offices or those of your contractor).
- ii) Be able to provide invoices from the contract distributor and evidence that these have been paid.

4. There will be effective management controls over distribution.

- a) If your systems and controls indicate any apparent failure in the scheduled distribution then the copies affected must not be claimed.
- b) You must keep up to date records for each and every round. The records must detail the addresses that you plan to deliver to. You should ensure that historical records are available for each issue in the Reporting Period.

The records must:

- Clearly define the boundaries of the distribution area
 - Identify which postcode sectors are covered
 - Identify any areas within the boundaries that are not delivered to
 - Detail the streets and roads covered by individual distribution rounds and any exceptions.
 - Contain instructions to identify any households within the round that are not to be delivered to
 - Allow the distribution rounds to be referenced to the appropriate payment records
 - Be updated within a month of any change to the distribution area, postcodes covered or distribution rounds. The dates and detail of any changes to rounds must be recorded.
- c) It is good practice to maintain a record of complaints of distribution failings. These can arise from a variety of sources ranging from addressees not receiving a publication to discrepancies identified from your own processes. Your records should be kept in a uniform way, noting the complainant the nature of the complaint, and the actions taken, including any amendments to your claim.
 - d) If you use a contract distributor we will require them to have effective distribution controls and reporting in place. Scrutiny of these should be available to your auditor and ABC.

REPORTING

Mandatory	Optional
<p>Average Free Letterbox per issue for the period for the period [reported as Free Copies] analysed by:</p> <ul style="list-style-type: none"> i) Print 	<ul style="list-style-type: none"> 1. A verifiable overview description of the Free Copies claim 2. The average Free Copies claim analysed into: <ul style="list-style-type: none"> a. Regular: <ul style="list-style-type: none"> i. Free Pick Up Copies (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free requested b. Sample: <ul style="list-style-type: none"> i. Free Pick Up Copies (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free requested 3. Analysis of Free Letterbox for the last issue in the period (ignoring excluded issues) by postcode sector <ul style="list-style-type: none"> a. Daily publications may report this for each issue in the last week of the period

FREE COPIES

FREE REQUESTED COPIES

DEFINITION

A single free copy requested by and distributed to a known individual.

PRINCIPLES

1. **Single copy per issue, distributed to a known individual**
2. **Individual has personally requested to receive the publication**

REQUIREMENTS

1. **Single copy per issue, distributed to a known individual**
 - a) You must be able to demonstrate the copy is distributed to the individual.
 - b) You do not need to deliver to the same addresses from issue to issue. However in terms of total free requested copies claimed:
 - Daily publications: may vary the number of copies delivered to on different days of the week, but the number of copies delivered must be consistent and regular in quantity by day of week. I.e. Mondays must all be broadly the same; Tuesdays must all be broadly the same etc.
 - Non-daily publications: the number of copies delivered per issue must be consistent and regular in quantity.
 - c) You must retain a list of individual recipients (including address details) for each issue in the reporting period.
 - d) You cannot claim distribution of back issues.
2. **Individual has personally requested to receive the publication**
 - a) You must have third party evidence that the individual has, within the last three years, made a clear request to receive the publication before you send it to them.

REPORTING

Mandatory	Optional
Average Free Requested Copies per issue for the period [reported as Free Copies] analysed by: <ol style="list-style-type: none"> i) Print ii) Digital Edition 	<ol style="list-style-type: none"> 1. A verifiable overview description of the Free Copies claim 2. The average Free Copies claim analysed into: <ol style="list-style-type: none"> a. Regular: <ol style="list-style-type: none"> i. Free Pick Up Copies (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free requested b. Sample: <ol style="list-style-type: none"> i. Free Pick Up Copies (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free requested

FREE COPIES

SAMPLE FREE

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 Regional Publication 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
 - o Free Letterbox
 - o Free Requested
 - b) All Sample Free Distribution copies must be delivered and made available within 24 hours of the majority of the rest of the distribution of the relevant issue.
 - c) 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. This is to enable audit work to be conducted at the appropriate time, including real time testing where appropriate.
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

Mandatory	Optional
Average Sample Free Copies per issue for the period [reported as Free Copies] analysed by: <ol style="list-style-type: none"> i) Print ii) Digital Edition 	1. A verifiable overview description of the Free Copies claim 2. The average Free Copies claim analysed into: <ol style="list-style-type: none"> a. Regular: <ol style="list-style-type: none"> i. Free Pick Up Copies (print only), optionally broken out by: <ul style="list-style-type: none"> o Capped distribution o Net Distribution ii. Free Letterbox (print only) iii. Free requested

	<ul style="list-style-type: none">b. Sample:<ul style="list-style-type: none">i. Free Pick Up Copies (print only), optionally broken out by:<ul style="list-style-type: none">o Capped distributiono Net Distributionii. Free Letterbox (print only)iii. Free requested
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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. **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.**

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) If an individual receives the Digital Edition free:
 - i) You must capture their name and email address.
 - ii) You can only claim one Digital Edition copy per individual
 - iii) You cannot claim the copy if you have provided a paid or free print copy to the same individual (where known).
 - iv) You must send an email alert to the individual informing them that the issue is available for view/download.
 - v) You must exclude copies where the email alert generates a Hard Bounceback measured at least 24 hours after the email was sent. A Hard Bounceback is where an NDN (Non-Delivery-Notice) such as an SMTP 550 error or other hard bounceback error message is received.
 - vi) You must be able to provide evidence of the emails sent and Hard Bouncebacks received.
 - vii) Recipients may be contacted as part of the audit process.
- d) For Corporate Subscription Digital Editions:
 - There must be a contractual arrangement between the purchaser (a third party employer) and the publisher for at least two issues.
 - The copies are purchased by the third party employer for its employees
 - 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.*
- e) 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.
- f) You must retain and supply us on an issue by issue basis (or as otherwise agreed) a list of individual recipients for each issue (the 'Total Distribution List' (TDL)) which includes details of all the recipients of individually distributed print copies and all free Digital Edition copies. We must be able to identify the circulation category/type each copy is claimed in. As referred to above, this list should exclude:
 - i) Duplicate records (i.e. each individual on the list can only be claimed once - the print copy takes precedence).

- ii) Individuals where Hard Bouncebacks have arisen from email notifications for free Digital Editions.
- g) You must supply us the claim for Digital Edition copies on an issue by issue basis (or as otherwise agreed).

REPORTING

See specific circulation categories for mandatory and optional reporting of Digital Editions. Note:

1. Corporate Subscriptions (which can only be claimed for Digital Editions) will be reported as Paid Subscription Copies.
2. If you are breaking out Paid Single Copies into Full Rate and Below Full rate then Digital Edition sales must be claimed in the appropriate rate band by comparing the price paid with the UK print copy Basic Cover Price

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.

Special and Sports Editions are particular types of edition with specific requirements.

PRINCIPLES

1. An Edition must be in keeping with the overall issue to be reported on the same ABC Certificate
2. A Special Edition must be in keeping with the parent edition to be reported on the same ABC Certificate
3. A Sports Edition must be in keeping with the parent edition to be reported on the same 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.

2. A Special Edition must be in keeping with the parent edition to be reported on the same ABC Certificate

A Special Edition is defined as a stand-alone edition, sold as a single copy, in which the subject matter differs from the normal edition(s).

To be included in an ABC claim a Special Edition:

- a) Must carry at least 70% of the ROP (display) advertisements from the parent edition of which at least 70% of the individual advertisers must be represented. Any advertisers or agencies whose advertisement(s) is/are included in the Special Edition must have agreed in writing their inclusion in the Special Edition before it is published. Note:
 - Ignore any supplement (published in any Edition) which is published on 3 or less occasions in a 6 month period.
 - ROP (display) advertising does not include house advertisements, advertorials, advertisement/classified features (where advertisements for two or more advertisers are grouped under a common theme with or without editorial *for example 'Eating Out' or 'Spring Brides'*), reader offers, reader holiday advertisements
- b) Must carry those advertisements also included in the parent edition in the same size and in the same colour (unless evidenced as agreed otherwise with the advertiser or agency).
- c) Must comprise at least 25% editorial by volume.
- d) Must carry a logotype/masthead on the front page incorporating the generic name of the parent publication.
- e) Must be the same format as the parent edition, *for example tabloid, broadsheet* and use similar paper quality.
- f) Must carry the same cover date/issue identification as the parent edition on a majority of its pages.
- g) Must have commenced distribution within 7 days of the date of issue of the parent edition. The on-sale period may differ from that for the parent edition.

- h) Must carry a cover price that is the same or higher than that for the parent edition.
- i) Be purchased, solus, by the consumer at the cover price. This means a Special Edition cannot be distributed with or inside the parent edition or sold as a package with other products or publications.

3. A Sports Edition must be in keeping with the parent edition to be reported on the same ABC Certificate

A Sports Edition is defined as an extra edition sold in addition to the normal edition(s) of the parent publication to cover sports.

To be included in an ABC claim a Sports Edition:

- a) Must carry at least 50% of the ROP (display) advertisements from the parent edition of which at least 50% of the individual advertisers must be represented. Any advertisers or agencies whose advertisement(s) is/are excluded from the Sports Edition must have agreed in writing their exclusion from the Sports Edition. Note:
 - Ignore any supplement (published in any Edition) which is published on 3 or less occasions in a 6 month period.
 - ROP (display) advertising does not include house advertisements, advertorials, advertisement/classified features (where advertisements for two or more advertisers are grouped under a common theme with or without editorial *for example 'Eating Out' or 'Spring Brides'*), reader offers, reader holiday advertisements
- b) Must either:
 - carry a logotype/masthead on the front page incorporating the generic name of the parent publication, consistent with the general appearance of the parent publication; or
 - carry a strapline which clearly and prominently indicates on the masthead that it is an edition of the parent publication.
- c) Must carry the same cover date/issue identification as the parent edition on a majority of its pages.
- d) Be either be purchased:
 - i) As a Retail or Single Copy Sale by the consumer; or
 - ii) As a Paid Multiple Copy.

REPORTING

Mandatory	Optional
Average total circulation per issue for the period broken out by: a) Each edition b) Total for all Special Editions c) Total for all Sports Editions	For each Special Edition claimed: a) Its cover date b) Its cover price c) The number of copies claimed

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 average circulation. The circumstances and information surrounding any exclusion are subject to audit.
 - b) **Daily Publications (Paid Single Copies & Paid Subscription Copies are 75% or more of the total average circulation of previous 4 issues):** You may exclude an issue if:
 - i) Due to circumstances outside your control:
 - The planned level of distribution is achieved but is severely delayed or withdrawn prematurely from sale resulting in a shortfall in the Normal Net Sale* greater than 5%.
 - ii) You can demonstrate there is a shortfall in the Normal Net Sale* greater than 5% because of the occurrence of a local public holiday, that is evidenced either:
 - By publication on an official local authority website; or
 - By virtue of a long-standing custom/tradition previously recognised by ABC
 - c) **Daily Publications (Paid Single Copies & Paid Subscription Copies are less than 75% of the total average circulation of previous 4 issues):** You may exclude an issue if:
 - i) Due to circumstances outside your control:
 - The distribution of an issue fails to achieve the planned level of distribution and that shortfall is greater than 10% of the planned distribution.

- The planned level of distribution is achieved but is severely delayed or withdrawn prematurely resulting in a shortfall that is greater than 10% of the average of the previous 4 issues' total average circulations.
- d) **Daily Publications (all) – Optional exclusion:** You may optionally exclude the following issues without the need to demonstrate a shortfall in circulation:
- i) Any issue published on an Official National Public Holiday (England, Scotland, NI or Wales as appropriate).
 - ii) Issues published during the Christmas/New Year trading period, which is defined as from Christmas Eve to the second official working day after 1st January (inclusive).
- Note: If the fall of days renders these dates inappropriate ABC reserves the right to amend the dates for any particular year.
- e) **Weekly Publications or less frequent (Paid Single Copies & Paid Subscription Copies are 75% or more of the total average circulation of previous 4 issues):** You may exclude an issue if:
- i) Due to circumstances outside your control:
 - The planned level of distribution is achieved but is severely delayed or withdrawn prematurely from sale resulting in a shortfall in the Normal Net Sale* greater than 5%.
 - ii) You can demonstrate there is a shortfall in the Normal Net Sale* greater than 5% because of the occurrence of a local public holiday, that is evidenced either:
 - By publication on an official local authority website; or
 - By virtue of a long-standing custom/tradition previously recognised by ABC
 - iii) You can demonstrate there is a shortfall in the Normal Net Sale* greater than 5% because of the occurrence of an official National Public Holiday (England, Scotland, NI or Wales as appropriate). Note: Does not apply to Easter holidays - see below.
- f) **Weekly Publications or less frequent (Paid Single Copies & Paid Subscription Copies are less than 75% of the total average circulation of previous 4 issues):** You may exclude an issue if:
- i) Due to circumstances outside your control:
 - The distribution of an issue fails to achieve the planned level of distribution and that shortfall is greater than 10% of the planned distribution.
 - The planned level of distribution is achieved but is severely delayed or withdrawn prematurely resulting in a shortfall that is greater than 10% of the average of the previous 4 issues' total average circulations.
- g) **Weekly Publications (all) – Optional exclusion:** You may optionally exclude the following issues without the need to demonstrate in shortfall in circulation:
- i) An issue published on Easter Sunday
 - ii) In England, Northern Ireland or Wales either the issue published in the week containing Good Friday or the issue published in the week containing Easter Monday
 - iii) In Scotland the issue published in the week containing Good Friday.
 - iv) Any two of the three issues published in the three week period ending on the first Sunday after New Year's Day.
- h) ***Normal Net Sale:** The Normal Net Sale used in the above calculations must:
- i) Be the average normal net sale of the previous four equivalent issues (e.g. for a Monday compare to Mondays etc.). Note:
 - 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 due to reasons outside of your control then it will be counted as one of the four comparable issues.
 - o Only include Paid Single Copies & Paid Subscription Copies.

REPORTING

Mandatory	Optional
1. Number of issues included in the average circulation for the period. 2. Details of any issues excluded from the circulation claim, including for each: a) The general reason for exclusion. b) The total net circulation.	N/A

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 reporting 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 either be:
 - i) Monthly - a four or five week period commencing on a Monday and ending on a Sunday.
 - ii) 6 months, broadly January to June and 6 months, July to December each year.
 - iii) 12 months, broadly January to December each year.

The exact dates for mandatory Reporting Periods will be based on reporting weeks commencing on a Monday and ending on a Sunday. These dates will be set out in a published ABC Accounting Calendar.

- c) Changing the mandatory frequency 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 in addition to mandatory Reporting Periods.
 - i) You can report in report in units of whole weeks (with a minimum of four consecutive weeks).
 - Note: A week is a 7 day period commencing on a Monday and ending on a Sunday.
- b) For newly registered publications only:
 - i) 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

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 Return system.* 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 publish the certified data on our website subject to any timing criteria applicable to the sector. We may also make arrangements to provide our data to be published via commercial data providers and to those who subscribe to our data services.
 - b) We first release the circulation figures for publications reporting on the 1 or 6 month mandatory reporting cycles in an ABC concurrent release of data. We publicise the date and time of this release and you must not issue or publicise any figures before this release.
 - c) We will confirm when circulation figures not in a concurrent release will become publicly available, normally 5 working days after a draft Certificate has been sent to you.
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 reporting on a mandatory basis every month may opt for a quarterly audit. Publications reporting 6 monthly may opt to defer the audit of the January to June period anytime up until the audit of the July to December period. Known as 'consolidated auditing' this enables the audit work for more than one certificate to be carried out at the same time. Note:
 - i) You must tell us in writing if you wish to use these options.
 - 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 revised Certificate, if applicable.
 - v) We publish details of updated certificates on our website.

CAPS BY SUPPLY TYPE – FREE PICK UP COPIES

DEFINITION

The caps in this section set the maximum number of copies that you can claim for designated supply types for Free Pick Up Copies (for non-daily publications and for daily publications distributed airside and on trains).

PRINCIPLES

1. **Copies must meet the requirements of the Free Pick Up Copy 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 unless you have appropriate evidence of demand**
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

3. **You cannot claim copies supplied over and above the cap unless you have appropriate evidence of demand**
 - a) 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 at 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 (e.g. airside/airline, train, ferry, cruise ship, coach, bus)	Number of seats (based on 1 journey per issue per transport method/location)
Train/Bus Station / Park & Ride	150 copies
Hotel/Apartment block	Number of rooms
Sports Event / Exhibition	33% of attendance
Business / School / College	33% of no. of staff/students
Hospital / Residential home / Prison	50% of no. of beds
Supermarket / Major store / Petrol station / Motorway Services	250 copies
Managed shopping centre / retail park	Sum of individual outlet caps
Other general retail / customer service location	50 copies



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