

Internews Kosova

Editorial Guidelines

CONTENTS

pages

<u>Organisational</u>	<u>3 - 4</u>
<u>Internews Kosova mission</u>	<u>3</u>
<u>Internews Kosova editorial values</u>	<u>3</u>
<u>Internews Kosova organisational structure</u>	<u>3 - 3</u>
<u>Summary of Internews Kosova Code of Conduct</u>	<u>4 - 5</u>
<u>Journalism – Standards and Practice</u>	<u>6 - 42</u>
<u>Accuracy, balance, fairness, record keeping</u>	<u>6-10</u>
<u>Complaints, corrections and clarifications</u>	<u>11-12</u>
<u>Sensitive topics and offensive material</u>	<u>13-14</u>
<u>Cross-border cooperation, editorial management procedures</u>	<u>15-16</u>
<u>Breaking/rolling news coverage</u>	<u>17-18</u>
<u>Vulnerable interviewees</u>	<u>19-23</u>
<u>Pictures</u>	<u>23-25</u>
<u>Sources</u>	<u>26-29</u>
<u>Undercover work, doorstepping and embedded journalism</u>	<u>30-31</u>
<u>Risk assessments and safety procedures</u>	<u>31-34</u>
<u>Elections</u>	<u>35-36</u>
<u>Quotes</u>	<u>36-38</u>
<u>Social media</u>	<u>38-38</u>
<u>Readers' comments</u>	<u>39-41</u>
<u>Media Law and Legal Issues</u>	<u>42 - 49</u>
<u>Use of lawyers</u>	<u>42 - 42</u>
<u>International Standards</u>	<u>42-44</u>
<u>Court reporting – general, minors and sexual assault/rape trials</u>	<u>44-47</u>
<u>Copyright, data protection, privacy</u>	<u>47-48</u>
<u>Launching or facing legal action</u>	<u>48-49</u>

ORGANISATIONAL

Internews Kosova (I/KS) Mission: *Supporting civil society and development of independent and professional media contributing to Kosovo's democratic processes*

As an independent non-governmental organisation, the main mission of Internews Kosova (I/KS) is ***to support civil society and the development of independent and professional media in Kosovo that can contribute to the country's democratic processes***. In doing so, I/KS aims to strengthen transparency and accountability of central and local governments through fact checking and investigative journalism while stimulating citizens' involvement in decision making in local communities. As a part of regional and international consortiums I/KS aims to spread this vision in the region and wider.

Vision: Internews Kosova strives to see Kosovo people sufficiently empowered to know their rights through provision of impartial and accurate information and offering space for them to participate in democratic processes. Internews Kosova expects to contribute in reaching its vision through empowering media and civil society to serve as catalysts of freedom of speech, investigative reporting, fact-checking, ground-based research and grass-roots actions that contribute to the country's democratic transition and development.

Internews Kosova's Editorial Values

I/KS is committed to providing balanced, fair, ethical, and accurate reporting of the highest standards as a service to the public interest. I/KS is fully independent and ensures all staff report with integrity, impartiality and honesty. I/KS is entirely dedicated to serving the public interest and reporting stories of public interest without harming the audience through reckless treatment of sensitive issues. While adhering to the highest editorial standards, I/KS is also committed to being accountable and transparent and will acknowledge mistakes when and if they do happen.

Strategic Partnerships

From day one after its establishment, I/KS has strived on building and cherishing cooperation with other organisations of similar nature, values and interests. Such a cooperation will be strived locally, regionally as well as on an international level.

Membership in professional networks and associations (local, regional and international) in order to enhance the work, support the goals and protect the interests of I/KS will be an ongoing aim of the organisation.

KALLXO.com was subject of a survey conducted in Kosovo for measuring citizens' perceptions on whom they trust in fighting corruption the most, which showed that KALLXO.com is the second most trusted institution in Kosovo, following the Kosovo Police for several consecutive years. The same principles and rules of engagement and behaviour should apply to other partners engaged in joint production and projects.

CODE OF CONDUCT

The core values of I/KS consist of respecting the highest standards of ethics and transparency defined in its code of ethics by ensuring necessary oversight by the board, its implementing partners, donor and financial partners and external certified companies through financial and performance audits and international fact-checking audits.

Transparency, Integrity and Accountability – I/KS is committed to being open, honest, and accountable in relations towards the public and partners. I/KS promotes equal opportunities and values for all by promoting internal and external integrity and by cooperating with partners who share similar values and attributes. I/KS also requires the implementation of the rules of conduct and accountability from the staff of the organisation and its implementing partners.

Independence – All I/KS activities including media production are politically independent and not influenced in any way by politics and potential financiers such as private companies, businesses, donors or other means.

Equality – I/KS treats all employees, partners, and any other party equally, without discrimination or comparisons and favours because of race, gender, cultural background or ethnicity. The organisation promotes and empowers human rights with the aim of providing space for all under-represented, marginalised groups and individuals in Kosovo society.

All I/KS staff will be provided with a copy of the code, and they are required to read and sign the endorsement of this Code of Conduct. As journalists and NGO employees, staff are expected to be non-partisan and refrain from activities - political and commercial - that could or might be perceived as compromising impartiality in news coverage outside appropriate advocacy activities.

All staff are obliged to inform their superiors if they are investigating, fact checking, writing or working in any form for another media outlet, political party, company or any other for profit or non for profit organisations.

All staff are also required to acknowledge links – familial, personal, business etc. - to companies and organisations if working on a story or a project that is linked to these entities that could be seen as constituting a conflict of interest. Disclosure of commercial interests, and potential conflicts of interest, is required and I/KS will not buy services or goods from businesses owned by relatives of I/KS staff.

All staff must disclose all shareholdings and other financial interests in writing to the director of the organisation. If members of a journalist's immediate family have financial interests in products, services or investments related to the organisation they must declare this at once and request the editor or director to assign any investigation, fact check or story about or connected to these to another journalist.

I/KS staff will not endorse nor advise the public to vote for any political parties or candidates for public office.

In addition, prospective employees are required to declare in writing current and past active political affiliations, such as any public involvement in party campaigning or any other form of support or financing of political parties before joining the organisation. Non-active political party membership and prior political activity is not a bar to employment. However, disclosure of past and current active political activity is required so directors can make informed decisions about handling stories and projects where individuals have close links with particular parties and/or where there are legitimate concerns over potential perceived bias.

I/KS will not employ anyone who holds a salaried and/or prominent position in a political party, government, state or public company under the direct control of a political party or government.

Journalists may not accept any form of gift or benefit for themselves, family members or close associates from companies or individuals with whom they might have dealings on I/KS 's behalf. Unacceptable personal benefits include but are not limited to: loans, cash, goods, services, discounts and entertainment outside the boundaries of usual business hospitality.

Promote public interest without prejudice - I/KS staff are expected to reflect the variety of views and interests without promoting or unfairly stressing particular viewpoints. Coverage should be balanced without any form of bias in terms of age, ethnicity, gender, sexual orientation, veteran status, political views, etc. Coverage should give due weight to differing views. I/KS staff are required to promote public awareness and educate a diverse readership on rights and responsibilities.

Professionalism - all staff are expected to behave in a professional manner in all their dealings with internal and external contacts, including adhering to organisational rules and respecting the ranking and reporting lines.

JOURNALISM - STANDARDS AND PRACTICE

ACCURACY, BALANCE, FAIRNESS, RECORD KEEPING

Accuracy

I/KS is committed to producing accurate and reliable output in all of its products. While speed is always important for any fact check and media organisation, IKS considers being first but wrong to be worse than delaying publication slightly to ensure the facts are right.

“It is important to be the first, but it is far more important to be the last to report”!

Journalists are required to be transparent about sources of information – including only using genuine experts and correctly presenting documentation and attributing statistics with links online where and when possible. Interviewees’ credentials – job title, authorship of relevant reports etc. and place of work – should all be clearly stated in all stories so audiences can judge their level of expertise themselves. *See separate guidance on using anonymous sources!*

To avoid being hoaxed, journalists, fact checkers, legal officers, researchers, monitors and editors should consider whether to conduct additional background checks on new contributors/interviewees to ensure they are who they claim to be. These checks might include a simple cross-check with other trusted experts/regular contributors who would be expected to know the potential contributor.

While accuracy and fact-checking are primarily the responsibility of individual journalists, directors and editors must question journalists about new contributors who are offering particularly sensational or controversial comments or statements and note that online verification is not always sufficient – as was the case with the BBC/Bhopal chemical plant explosion hoax interview that was broadcast after a journalist, apparently, relied on verifying the hoaxer’s credentials via the chemical company website. The website has been hacked and the hoaxer’s claims the company had agreed to pay compensation were false.

Likewise it is not sufficient to use sites such as Wikipedia for accuracy checks. Journalists should refer to original sources. Recently published I/KS stories should be consulted, but used with caution and after double-checks. Journalists are expected to alert their editor if they find any form of error in old stories.

I/KS journalists must also assess the value of contributions and measure whether publishing is truly in the public interest. If there are clear signs the would-be contributor has an axe to grind or other motivations that might mean they are merely seeking to encourage I/KS to publish mischievous stories with little public interest value, the journalist and editor/director should consider carrying out additional checks to corroborate information – including cross-checking documentation - (so delaying publication) or even decide not to publish/broadcast at all.

Footage, claims and material distributed online and via social media accounts should also be cross-checked and not merely taken at face value. Most of the time this will involve checking if

the account is genuine, fact-checking, tracking and contacting the original source. The European Centre for Journalism has published a number of useful online guides in several languages on verifying digital content: <http://verificationhandbook.com/>

Journalists must be cautious and disciplined to the I/KS style for preferred spellings and terminology when speaking in public and in writing for publications.

Fact-checking

Fact-checking is obligatory for all investigations. All Fact check publications will be subject to a process of rating starting from the journalist, to editor, fact checking editor and to the legal office.

All contentious investigations involving individuals and organisations known or likely to be highly litigious should be checked by the legal office and assigned editors are responsible for fact-checking the content thoroughly.

Journalists/editors who have not been involved in the story production should fact-check articles. Journalists are expected to keep documents, emails, responses, notes, recordings etc. on file so as to back up story claims and content on the spot in such a manner that the entire investigation and report can be supported and if need arises to be repeated later on.

Journalists and all the staff should be aware that I/KS editors reserve the right to contact interviewees and check quotes, as well as other material.

Highly sensitive or particularly difficult stories should be referred to the director or assigned editors for additional checks before signing off for publication.

“There will be no publication unless previously approved by at least three sets of eyes in at least two different moments of time”!

For day-to-day news coverage such as news and court reporting, the journalist is responsible for ensuring factual accuracy and also fair representation and balance. Note that editors may request further information, including recorded quotes etc. However, the onus is on the editor to get the facts right and both journalists and editors will be held accountable for failures to do so.

Journalists reporting from courts where any form of recording proceedings is not permitted should take advice from their editor on how to ensure quotes from court are 100 percent accurate, especially if they do not have shorthand skills.

I/KS expects journalists to know if they are able to apply to any courts for permission to record for accurate record-keeping purposes (that is, not for broadcast) and to consult with the assigned editor or director on whether to do so.

If working on investigations based on court trials, I/KS journalists must request official court transcripts to ensure accuracy, where they are available depending on local laws.

Journalists are responsible for ensuring accuracy in breaking news, including acknowledging when another news outlet/agency broke the story. Journalists are expected to raise any doubts or concerns with the local duty editor who may also be required to assist with the reporting process for speed and accuracy.

If the story has been broken by another news outlet, initial reports published by I/KS must state that the event happened according to an agency/outlet and directly attribute it. For example: *A passenger plane is believed to have gone missing 20 minutes after leaving Prishtina, according to the XYZ news agency.*

I/KS expects all journalists to attribute all sources accurately. Journalists should be working very quickly to corroborate the facts independently after publishing an initial story crediting other news agencies/outlets. A fresh I/KS produced report should be published as soon as possible.

Editorial balance and impartiality

I/KS publishes responsible journalism and is committed to the principles of independent and ethical reporting. While I/KS cannot include every single viewpoint possible in every story, journalists are expected to ensure coverage includes all relevant sides of a story and should reasonably reflect a range of opinion and views that give due weight to a range of views.

Impartiality is key to I/KS' reputation as a reliable news outlet and due balance is an absolute requirement, regardless of the editor/journalist's own opinions which should not be expressed at all in news coverage. If interviewees and contributors are associated with particular political parties, viewpoints or any other forms of personal interest, that should also be made clear in all published/broadcast material.

In print, full job titles and employer information should be given and other relevant information – such as whether they are a donor for a particular party – should be written in the text. For broadcast material, editors should decide whether to write information into scripts or present in TV Astons/straps.

Journalists are sometimes required to write comment pieces, political sketches and reviews but they should limit expressing opinions to those of an expert observer and should ensure they do not write and publish opinions that could be seen as compromising their own perceived integrity, as a journalist (such as a piece that is clearly or could be easily interpreted as biased in favour of a particular political party).

Another example could be writing a comment piece about economic conditions. A journalist may comment on the prevailing conditions, failures in implementation/management at political, local governance and general economic policy level, but they should not engage in simply attacking parties to promote one/some over others.

Another example still could be a comment piece on a controversial development project. The journalist might comment on an apparent lack of transparency, public opposition, and likely benefits/disadvantages. However, the journalist should not advocate on behalf of a particular

company or fail to properly cover the range of public opinion and should not just attack the developer for the sake of it.

Very often, these pieces should still reference and include a range of external expert critics. Journalists should really ask themselves if they are genuinely best-placed to comment and consider whether commissioning an external expert to comment might be more appropriate.

Comment pieces should not promote particular companies or products although reviews can fairly assess merits and downsides for products, restaurants, entertainment etc.

Journalists are also required to disclose any potential conflicts of interest – personal, business, political etc. – as noted in the Code of Conduct summary. Refer to the Code of Conduct for full guidance on disclosing personal interests.

Honesty, fairness, right of reply

I/KS journalists must accurately represent interviewees, contributors, experts etc. and should not present or describe them as simply an expert in a particular field but ensure they give their precise job title, credentials and place of work. Journalists are not only required to disclose an interviewee's job title, affiliations, place of work, level and area of expertise, but must also accurately present what they said exactly in relation to which topic or line of questioning. Journalists should never take contributions and quotes out of context, they should always be fairly and honestly used within the context of the interview.

All contributors should be properly briefed as to how their material – photos, reports, statistics and quotes etc. - will be used with journalists making it clear whether it is for a news story, an analysis, a feature or an investigation and name the overall topic. Without this kind of transparency, interviewees and contributors cannot be said to have given their informed consent to the interview etc.

Journalists must provide individuals, organisations and companies mentioned in the article/broadcast item with a fair opportunity to respond to criticism and allegations, including where that criticism is not related to illegal acts specifically. When presented with claims or facts, they may offer corrections or clarifications that should be fairly and properly included. They should be given enough information about the issues/claims to be able to give an informed response. This is to ensure fairness and balance and is commonly referred to as 'right of reply'.

Journalists and editors should look at every person, organisation and company named in a piece of content and ask themselves if they should be given the right of reply. If deemed that they should, these entities should be given reasonable time to reply. As one of I/KS key principles is fairness, companies/people presented in content in a negative light or accused of misdeeds must be given the right of reply. If an individual, organisation or company refuses to reply, the story must contain a line stating they were given the chance to respond to allegations made/issues raised in the story but did not reply or outright declined to comment. Any exceptions to this rule must be assessed on a case-by-case basis and approved by the director or the assigned editor before publication/broadcast.

Record keeping

I/KS promotes keeping records on research, investigation and processing of received reports utilising kallxOS (Kallxo Operating System), which is a software solution, an application and a database that saves not only the initial information and report, but also the entire process of handling such an information and/or its treatment within the organisation's editorial structure and publishing process. All this information and its processing will be considered as confidential and subject to NDA (non-disclosure agreement) between the organisation and each of the employees.

I/KS journalists and staff are required to keep records for a minimum of three years, including notebooks, recordings, documents and other information. This applies to all staff, technical and journalists and includes daily news reporting, features, fact checks and investigations. If a story/item is republished at a later date, the assigned editor and/or director must ensure the journalist is instructed to keep the records for a longer period.

Journalists should ensure all records are dated and properly tagged - this includes notebooks that should bear their name and the dates covered on the outside cover. Journalists must write the date on the relevant page at the start of each day's work. Notes of every interview and phone call should be headed with the name and, if necessary, the address/location, job title/position, phone numbers of everyone spoken to in relation to a story.

Journalists will put a line under notes when finished and will not re-edit notes after being taken as claimants will allege that notes have been altered or inserted to support the story. Journalists are required to record – either in notes, emails, in other written or audio/video form – every attempt to get a response to claims or allegations contained in any stories/items. For some output, for example reports from war crimes, I/KS has decided to keep a permanent archive or longer-term archive. Journalists must, therefore, check with the director before destroying records even if three years have passed since the last publication/broadcast.

If a journalist moves on to another organisation they should submit all their records – electronic, paper, notebooks, emails, audio/video etc. – to the office of Human Resources or to their superior editor or to the director of the organisation. Journalists whose stories are subject to complaints or even legal action are required to assist with any subsequent I/KS investigation into the factual accuracy etc. of their reports even if they have left I/KS. Do note that every single publication can be treated as a fresh/separate actionable claim. I/KS reserves the right to check all records - including journalists' notes and translations – at any time before and after publication/broadcast.

For non-I/KS staff - such as freelance/external contributors, fellows/alumni etc. - records should be reviewed by the editor and a selection should be stored by the relevant editor, programme manager or director for a minimum of three years. I/KS staff are expected to keep their own records but the director and programme managers will be responsible for storing records for sensitive stories and for ALL investigations. Without proper record keeping I/KS would not be in a position to challenge any possible complaints or claims for compensation after publication/broadcast.

COMPLAINTS, CORRECTIONS AND CLARIFICATIONS

Complaints and corrections

If I/KS is found to have published information that is inaccurate, unfair or even fabricated - this will be treated as a serious breach of the editorial policy and rules. Extreme cases, such as where a journalist is found to have fabricated or deliberately altered quotes etc., will be treated as cause for disciplinary action including possible dismissal and other legal actions.

Falsehoods and stories that misrepresent individuals or organisations ruin lives and reputations!

I/KS editor in chief and/or assigned editors will be responsible for assessing whether complaints are valid or not and refer to the director. If a complaint is found to be without grounds and therefore invalid, the editor in chief and the director must decide whether to publish a rebuttal declaring that following an internal investigation they have concluded the facts were correct, and so are standing by the story.

Every complaint that is deemed valid will be published in the Letters to Editors section together with the appropriate reply of the organisation. I/KS reserves the right to avoid publication of inappropriate language, hate speech or statements that breach the ethical code of standards.

Whether the complaint is deemed valid or not, the director, editor in chief and/or assigned editors are responsible for keeping a record of how the complaint was handled and investigated in case they need to produce this at a later date. For more detail, see the following sections: [Standard complaint management procedures](#) and [Crisis management for disputed articles](#).

I/KS will correct mistakes immediately. In cases of serious mistakes, misrepresentation and/or falsehoods, the director will consider whether to publish a separate story correcting the original with the same prominence - such as the front page - if considered so serious as to warrant this. On some occasions, the editor or director may remove a story from the website entirely until an internal investigation is completed.

Each I/KS branded publication will include a complaints and corrections page where major corrections and clarifications are published. These pages will also host summaries of complaints submitted and the result of I/KS's assessments including where complaints have not been upheld because I/KS established the reports were accurate and fair.

Standard complaint management procedures

Journalists should never simply apologise on behalf of I/KS as there might be legal implications.

Junior staff and correspondents should note down complaints and immediately refer them to the appropriate editor (duty or assigned editor), explaining to the complainant that someone from I/KS will be in touch about the issue as soon as possible. The editor should then decide whether to refer up to senior management or whether to deal with directly. Complaints from legal representatives should be automatically referred to the director or senior assigned editor/editor-in-chief.

Journalists may also suggest complainants - only when the complaint is not very serious and is actually more to do with expressing dissatisfaction with coverage generally - can write to the editor and explain that the letter will be published.

Minor corrections - typos, grammar, spelling etc. - should be made immediately. Bigger mistakes - such as serious factual inaccuracies - should be corrected by the duty editor and a note of the correction will be made at the bottom of the text for online stories. The duty editor may decide to refer the complaint up to a senior editor or director who may decide to issue a separate clarification on the site's corrections page.

Crisis management for disputed articles

While all the sign-off and fact-checking procedures should prevent most crisis situations there will be times, albeit hopefully rare, when I/KS has to ensure it can coordinate a rapid, decisive and unified response to crises, including serious complaints of misrepresentation or even falsehoods in stories that cannot be handled within the standard complaint handling procedures.

The director must immediately be informed of such a situation and he/she will follow the 'chain of command' in these situations. An independent team should be put together to verify the story and decide on further steps including possibly informing donors. The director must forward the records kept as set out in the **record keeping** section.

In case of public dispute over I/KS articles or lawsuits, I/KS will publish news informing the public what is currently happening, without bias, prejudice or any kind of a statement.

In the event the story is wrong, I/KS must issue a statement acknowledging that. If the story stands, I/KS must issue a statement saying independent verification proved the findings. I/KS director must ensure 'lessons learned' are shared within the organisation and become part of editorial, complaint and crisis policies and procedures.

Publishing apologies and waivers

Just as staff members must not automatically apologise to complainants and therefore legally accept the existence of and/or responsibility for mistakes or errors before senior management have decided how to investigate or manage the complaint, the director must consider the legal consequences of publishing apologies. It could be that the director insists the complainant signs a waiver to protect I/KS from future legal action.

McNae's suggests the following wording: *I confirm that the publication of an apology in the terms annexed in a position of reasonable prominence in the next available issue of [name publication, programme etc.] will be accepted in full and final satisfaction of any claim I may have in respect of the article/programme/item head [give headline/title] published in / broadcast on [issue number/date etc.]*

The director is responsible for ensuring procedures for publishing or issuing apologies and the use of an equivalent type of waiver is checked for compliance with Kosovo laws. It is vital to check waivers do not inadvertently create additional problems under Kosovo legislation.

SENSITIVE TOPICS AND OFFENSIVE MATERIAL

Sensitive topics, offensive material, graphic images

I/KS is committed to producing hard-hitting investigations to provide news reporting in the public interest and hold those responsible for wrongdoing - and those in power - to account. As such, I/KS output will regularly cover subjects and include material that is highly sensitive. Coverage should be properly sensitive to regional post-conflict sensitivities, should not irresponsibly inflame tensions, disrespect post-war tensions or exploit ethnic discord.

That said, I/KS will not avoid reporting sensitive or contested subjects, it simply undertakes to do so respectfully and with appropriate sensitivity. Journalists should ensure sensitive subjects are treated with due sensitivity and agree to withhold identities or information that could lead to the identification of some vulnerable interviewees, including rape survivors. All language used or promoted by I/KS journalists should be respectful and inclusive in terms of diversity: nationality, gender, sexual orientation, race, disabilities, religion/beliefs etc.

I/KS only identifies or stresses a person's nationality, race/ethnicity, gender, sexual orientation or religion if it is relevant to the text - i.e. the story is about nationality, race, gender etc. I/KS uses the term *black* not *coloured* - unless the story is about apartheid where *coloured* was an official racial category. The terms *homosexual* or *gay* or *lesbian* or *LGBT* - depending on context - are preferred to *queer* and *gays*. The only exception being where an interviewee has used those terms and I/KS is directly quoting him/her.

I/KS expects journalists and staff to adhere to these standards at all times, including when posting material on work-branded and/or personal social media accounts as any use of derogatory terms or even posting material that could be perceived as derogatory can adversely affect I/KS reputation as fair, diverse and unbiased.

As a rule, I/KS does not publish offensive terms - swearing or derogatory terms - at all. The only exceptions are again if those terms are used by interviewees, are relevant to the story and are to be used in direct quotes. An example of this could have been President Obama's use of the word *nigger*. This word is highly offensive but the fact the first black US president used it - in the context of an interview about racism in the US - was the story and could be used in his quote and probably the headline. Outside these types of situations, those kinds of terms should never be used.

I/KS does not publish profanities or swearing unless it is the focus of or necessary to the story. Even then, editors reserve the right to use asterisks to avoid causing unnecessary offence. For example: The MP was filmed telling a journalist he 'was a lying f***ing b****ard'. TV and radio programme makers need to consider the time of day their shows will be broadcast and whether they should 'bleep' swearing, omit it or include a pre-opening notice warning viewers/listeners of coarse language and material some might find disturbing or is not considered suitable for children.

I/KS does not publish or broadcast explicit and/or disturbing images – such as dead bodies, severely wounded people, the aftermath of bombings and/or attacks etc. – for shock value alone. Use of these types of images must be assessed on a case-by-case basis and signed off by a senior editor or the director if deemed particularly sensitive/disturbing. There must be a clear and strong editorial justification for use.

Particular care should be taken over unintentionally identifying victims, especially where there is a risk relatives have not yet been informed. Privacy rights should also be respected and the risks of traumatising survivors and relatives should be appropriately weighed against editorial concerns related to exposing the truth and properly conveying the gravity of the event. See *guidance for reporting tragic events/disasters!*

If programmes or stories can be accessed by children, particular care must be taken over deciding whether the images are appropriate and editors should pay attention to whether there are watershed agreements in place that prohibit the use of sexually explicit, violent or otherwise disturbing images before a certain time at night.

Likewise, journalists should refer to senior editors or the director for guidance when reviewing books, plays and films that contain profanities in the title including whether to use asterisks, for example, *Shopping and F***ing* or *The Motherf***er with the Hat*.

In situations of LIVE broadcast or LIVE streaming, the journalist will ensure to follow the regulations of IMC (Independent Media Commission) and Press Council in a manner that if the third party has committed any violation during the LIVE broadcast or streaming, the journalist will insist on making an immediate correction and request for it not to happen again. If an irreparable mistake has happened during the LIVE broadcast or streaming, the material will be deleted and replaced with a properly edited material with a clear explanation as to the reasons why and when this material was replaced.

Newsroom reporting lines, editorial sign-off, cross-border checks

In order to ensure an overall inclusion and full compliance with the Editorial Policy, journalists will ensure to previously have a sign off and approval by relevant editors on all initiatives for fact checking and investigations. Journalists will propose and pitch their ideas and suggestions in writing or other forms to the relevant editors, always having the public interest as a sole guide on preparing the stories. Editors will ensure that any dismissal of such pitches and suggestions will be explained in detail.

All content, whether for TV, radio, Fact Check or publication online or in print, must be signed off and approved by the editor assigned before publication/broadcast. There are no exceptions to this rule and the assigned editor's decision on whether to publish or broadcast is final, although he/she may decide to refer up to the editor in chief or the director if deemed necessary.

Editors and/or editor in chief are expected to test the strength of stories and sources and possible defences to any potential legal action, such as libel cases and always inform the director of such potential situations.

“Even in the case of full agreement to any proposal or idea, it is everyone’s duty to challenge that proposal or idea as harshly as possible with all possible arguments! If the proposal or the idea fails - it will be dismissed. If the idea succeeds in justifying its grounds, it will be pursued by all with equal enthusiasm and energy”!

Editors are expected to judge when to involve the director but ultimate responsibility for publication/broadcast of contentious stories or complex investigations lies with the director who will be required to deal with any complaints/legal issues in tandem with the editor in chief, editor and/or author.

Journalists are expected to fully understand the sign-off procedures and know which editor is responsible for each type of content – news, features, comment and investigations.

All stories will have the author(s) name in the byline. Only where there is a potentially serious risk to journalists' safety if they are named this should be referred to the director to determine whether an 'anonymous' byline such as *I/KS team* or *I/KS staff reporter* should be used. These situations should, however, be few and far between.

In addition, I/KS outlets will usually use the phrase 'told I/KS' or 'told KALLXO' in articles and other materials unless the content was produced as part of a joint project, when outlets must use phrases agreed by the partner organisation(s).

Mandatory senior editorial approval

If journalists are working on material that relies on anonymous sources, particularly if using a sole anonymous source, approval from the editor-in-chief or director is mandatory before publication or broadcast. If the story is particularly sensitive or controversial, the editor assigned must refer to the director for final editorial approval. See the section on anonymous sources.

Any projects involving undercover reporting or covert (secret) filming must be referred to the director before beginning such reporting work.

The director must also advise as to legal restrictions on the use of covert filming and undercover reporting. The director must also be convinced there is a clear editorial and public interest case in doing so and give written consent before such reporting work begins.

Journalists must consult editors if dealing with sources where there are potential legal concerns, this could include potential breaches of whistle-blower or official secrets legislation. Where there are serious concerns, including I/KS's ability to protect sources and cases of potential breaches of laws, the director must have the final say on whether to proceed – perhaps on the basis of obtaining legal advice and/or conducting further research – or to halt reporting work.

Where there is a potential or perceived conflict of interest, the director must decide whether a story should be assigned to another journalist or whether merely disclosing the interest in the material is sufficient. The director's decision is final.

As noted elsewhere, all sensitive stories, every investigation and situations involving potentially difficult sources must be signed off by the director before publication and/or broadcast.

Management alerts over highly sensitive/controversial stories

Stories that will likely provoke a strong reaction from various authorities must be approved and signed-off - for accuracy and balance - by director

Journalists and assigned editor must inform the director before publishing stories that could provoke backlashes or threats of legal action. Director should assess what kind of involvement and support is needed. This is to allow senior management and the legal office of I/KS to prepare responses and for any possible backlash in advance - and to alert donors where deemed necessary.

Fact-checking and signing off controversial and complex stories

Highly controversial stories and complex investigations must only be signed off by the director for publication/broadcast. Fact-checking is obligatory for all controversial and complex stories – including all investigations.

These types of stories must never be signed off by less experienced, day-to-day duty editors. Director must consult the I/KS legal office for advice.

BREAKING/ROLLING NEWS COVERAGE

Managing rolling news (breaking news)

Stories should be updated as more information emerges on rolling or breaking news. However, once a significant 'new angle' is identified, a fresh story should be written and published - with the old version archived.

Initially, breaking news should be put on the 'live blog' or in a similar format, so I/KS can react quickly but only has to produce one paragraph or so. Next, a story with a minimum of four short paragraphs is published - if the breaking news is deemed important enough - using a breaking news graphic if no pictures are available.

The story should be updated with fresh information and pictures added, but as soon as a new line emerges (a reported gun attack turns into a killing spree or officially becomes a suspected terror attack) a fresh story should be published and the old version archived.

I/KS journalists should clearly identify the source of breaking news reports – wires, agencies, other outlets – but be working immediately to independently corroborate the story.

Disasters/tragic events

I/KS expects journalists and editors to report disasters and tragic events – wars, natural disasters, attacks and accidents - with appropriate sensitivity and tone without getting too swept up in the emotion of the moment or over-sanitising the realities of the event in reports. An appropriate balance must be struck in coverage.

Journalists and editors should be careful not to identify those killed, either by name or in picture form, until relatives have been informed. With aeroplane crashes and similar events, journalists and editors can include details such as flight numbers, departure times and so on, in a way that I/KS's coverage does not unnecessarily alarm larger numbers of readers/viewers.

Most commonly, death tolls and names are verified via- and attributed to- official sources such as police and rescue services, government authorities and other reliable sources. Death tolls should be updated regularly and approximations used where totals are not yet available. Approximations such as 'dozens', 'scores', 'hundreds' are acceptable but should often be in quotes – including in headlines – if it is appropriate to underline the number is not yet confirmed and is an estimate that should be attributed to a quoted interviewee or similar.

Do not use the term 'terrorism' without attribution to an authoritative source and do not assume a tragic event is an act of terror until this can be attributed. Even when the authorities declare an event to be an act of terror, I/KS will try to avoid using the term outside of quotes, preferring instead less emotive descriptions such as 'gunman', 'bomber', 'kidnapper' or 'attacker'.

I/KS will not use nor publish materials produced by criminal or terrorist groups without previously encountering the impact and public interest of such a publication. The director has to be consulted, sign off and approve such cases prior to publication.

I/KS expects journalists to seek out eyewitness accounts as quickly as possible both on the scene and via digital platforms. When seeking out survivors or perhaps grieving/concerned relatives and friends, journalists and editors must always consider interviewees best interests and ask if the interview is appropriate and assess whether they are going into shock or are in need of urgent medical attention. It is not acceptable to harass or forcefully coerce those who have witnessed, survived or lost a loved one in a tragic event into giving an interview if they have made it absolutely clear they do not wish to.

Editors and the director may need to alter planned programming or publishing schedules if the event warrants extended coverage. They are also expected to measure whether other coverage planned before the tragic event took place would now be insensitive to publish or broadcast.

If broadcasting live from the scene of ongoing situations – perhaps a siege or hijack – assigned editors and/or director should consider whether the outcome is unpredictable enough to warrant imposing a time delay.

As with all uses of graphic and disturbing images, journalists and editors are expected to judge whether there is a strong enough editorial case for using them and not use images that could distress the audience for shock value alone. Images should properly convey the scale of the event without being gratuitous.

With anniversary coverage of major events, journalists and editors must still consider the impact on survivors and relatives when planning content. Factors to be taken into account include the amount of time that has passed since the event and its scale. I/KS expects journalists and editors to always weigh the editorial justification and public interest for publishing/broadcasting distressing and graphic material.

It may be justifiable to use graphic material in the immediate aftermath of an event or in anniversary coverage to provide historical context and convey the reality of an event. However, the privacy and dignity of the dead must always be respected. It will rarely be acceptable to show the precise moment of death or graphic, close-up images of extreme suffering and senior editorial approval to do so – either from the assigned editor or director – is mandatory.

Where I/KS has obtained exclusive material and interviews for original reporting on large-scale tragedies the editor must decide whether, if planning to re-use this material for anniversary coverage, to notify survivors and relatives of the dead if interviews and footage will be repeated in anniversary coverage.

Include information lines, helpline and support numbers and links in reports if appropriate.

VULNERABLE INTERVIEWEES

Interviewing children

It is rarely acceptable for journalists to directly interview children who have survived traumatic events – including war/conflicts, physical and sexual assault. Instead, journalists will more likely contact professionals working with children recovering from these types of trauma – for example, psychologists, aid/support groups and other reputable NGOs – and talk with experts.

I/KS expects journalists to prioritise the well-being, security and best interests of all vulnerable interviewees and must not question children in such a way as to risk further trauma. As stated above, it is almost always preferable to interview experts instead of children to avoid causing further harm/trauma to minors.

Journalists must ALWAYS seek advice from the assigned editor on how to proceed with such reporting involving minors. The editor may refer the matter up to the director where there are concerns over appropriateness.

Child survivors of physical and sexual assault should never be identified – even if an aid agency/NGO advises they can. I/KS must always protect vulnerable subjects.

If filming/reporting from a school, children's residential home or similar establishment for children, I/KS journalists must first obtain written or recorded permission from the principal, head teacher, or manager. Where possible, this should be done in advance to give the principal/manager time to contact parents/guardians/carers/governing boards etc. to obtain permission if necessary. When seeking permission, the purpose and subject of the report must be absolutely clear so the principal/manager can give informed consent or – if necessary - contact parents/guardians/carers to request informed consent.

School buildings and facilities are not usually considered public places, therefore permission to film is required. Journalists and editors usually have more freedom to take photographs and film in public places – such as a concert or event held at a public square – but must be familiar with privacy legislation, particularly laws that pertain to protecting children. In any event, decisions to use images of children should be judged on a case-by-case basis by the assigned editor.

Filming/reporting from schools is not suitable for highly sensitive subjects but rather for less sensitive projects where children are not likely to be subjected to insensitive questioning or asked to speak about difficult personal issues. Examples for appropriate topics could include a school project on the environment or citizen engagement or youth councils etc.

Journalists must respect the terms of filming/reporting and undertake not to identify children if parents have declined to consent – or where the principal knows a child must not be identified as attending a particular school. The school management will advise as to acceptable/non-acceptable filming and interviewing. I/KS journalists may be required to submit question areas in advance of filming/reporting. Those with little experience of interviewing children must seek guidance from assigned editors and/or directors.

If filming/reporting on run-down conditions in a school from within the premises, the journalist must still apply for permission from the principal/head teacher in good time for parental permission and respect the wishes of parents who did not consent for their child to be filmed/identified. I/KS staff will not identify children, they will blur faces, film backs of heads but not faces etc. – if filming from outside the school premises. These standards will be complied in other places where according to the law individuals rightfully expect to have a right to privacy according to the law, such as hospitals, medical centres etc..

If publishing/broadcasting across multiple platforms, journalists/editors should also ensure faces are blurred etc. in all content, including promotional material such as TV and online trails.

It is never acceptable to ‘doorstep’ children. I/KS journalists must never use photographs or interview children without first obtaining consent. *See consent forms for parents/guardians of minors and Section on reporting court cases involving children.*

Interviewing adult rape and sexual assault survivors

Interviewing of victims and survivors of any form of assault or publication of information regarding these cases will be done solely on the basis of “do not harm”, meaning that the protection of integrity and dignity of the victim is the basic principle.

I/KS expects journalists to adhere to the following procedures when seeking or conducting interviews with adult rape, sexual violence and sexual assault victims/alleged victims.

Get senior editorial approval first: Even before contacting or confirming interviewees consult the assigned editor and/or director to ensure the interview is appropriate. Human interest is never sufficient grounds for these types of interviews.

Research factual information before interviewing: I/KS expects journalists to understand the key facts and allegations before interviewing victims/alleged victims to avoid putting interviewees through unnecessary questioning and distress. Journalists should be fully prepared and be fully aware of potential legal issues. Ensure you have independently researched reliable background information and statistics that puts the specific incident/alleged incident into context and gives the reader the wider picture – which should be core to why journalists conduct these types of interviews in the first place. Is the story about a long-standing or persistent social problem, armed conflict, judicial issues/failures? Have all the information to hand so your question areas are clear and sensitively framed.

Ensure victims/alleged victims’ interests are prioritised: I/KS journalists are expected to interview in such a way that the dignity of victims/alleged victims is preserved. I/KS must always ensure his/her safety, treat him/her with respect and protect him/her from reprisals or retribution.

Arrange methods of contact that do not compromise anonymity or safety: This may mean only contacting individuals on certain telephone numbers at certain times, never calling a home number or no contact via email. Ensure the victim/alleged victim is entirely comfortable with pre-arranged methods of contact and that those chosen do not expose the interviewee to any danger or identification if contributing on condition of anonymity.

Be transparent, agree terms: I/KS journalists are expected to be entirely honest and transparent about how, when and where the interview will be used and what the purpose of the report is. Terms stipulating confidentiality, anonymity, interview scope and other limits should be discussed and agreed before interviewing.

Arrange a safe, secure interview location: Interviews should take place at safe locations at a time of day the interviewee is comfortable with. I/KS expects journalists to take measures to ensure safety and anonymity where stipulated that could mean interviewing victims/alleged victims at certain times of day and at locations some distance from home towns or villages. Interviewees should be able to suggest locations they prefer and feel able to bring someone they trust to the interview if they wish. Interview locations should be private with no risk of interruptions.

Ensure anonymity: I/KS must always respect requests for anonymity and ensure reports do not reveal details that could potentially identify victims/alleged victims. Even when adult victims/alleged victims waive anonymity, I/KS expects journalists to make decisions in the victim/alleged victim's best interest and will conceal identities where there is a risk of harm/reprisals.

Assess whether the victim/alleged victim is able to give informed consent: Journalists are required to assess if interviewees are in a position to give informed consent to be interviewed (even if anonymous) and also to be identified (if they have indicated they are willing). Journalists must consult with the assigned editor/director if there are concerns whether a victim/alleged victim is competent to give informed consent. These concerns include, but are not limited to, the following: those with learning difficulties, those suffering from PTSD, those attacked very recently, other vulnerabilities in terms of media awareness. If there are sufficient concerns the assigned editor/director may decide against proceeding with the interview at all or insist on absolute anonymity.

Get informed consent: I/KS journalists must obtain 'informed consent' either by way of a written form or video consent. Where the interviewee is speaking on condition of anonymity, consent must be recorded on video without identifying the interviewee (filmed in silhouette, back of head etc.).

Ensure video consent or written consent forms are completed. The following is a brief overview of what constitutes informed consent:

1. Ensure you have disclosed the purpose and use of the interview, including where and how the interview will be published and/or broadcast.

2. Interviewees must state they understand participation is entirely voluntary and that participation will not influence the provision of services or outcome of any official procedures.
3. Interviewees must clearly state if they are willing or not to be identified. If they are not willing to be identified, the way they are anonymised on film must be agreed (silhouette only, hands only, blurred face, distorted voice, use of voice-over etc.)
4. Interviewees must demonstrate by answering questions that they understand the implications of participating, particularly if the material will be placed online. They should understand they have the right to rescind or limit future use of the footage but must fully understand that it is not usually possible to permanently remove material from the internet.
5. Ensure that interviewees understand they can refuse to answer any questions, can stop for a break at any time and are not under pressure to discuss anything they are not comfortable discussing.

Refer to I/KS's written consent form and video consent script for interviewing rape/sexual assault survivors

Use appropriate language: Most victims of rape or sexual assault prefer to be referred to as survivors rather than victims. Use accurate, non-judgemental language and never phrase anything in such a way that implies or suggests survivors may be in any way to blame for the violence/assault.

Non-aggressive but critical questioning: While some critical questioning may be appropriate in certain circumstances, never subject interviewees to aggressive interviewing techniques. For example, it might be appropriate to carefully ask why a complainant is coming forward a considerable time after an incident is alleged to have taken place but it is unlikely to be appropriate to aggressively question their credibility *per se*. Agree interview scope and question framing with the assigned editor and/or director in advance to ensure they are appropriate for the planned report.

Don't weaken or sensationalise the story: I/KS expects its journalists to strike an appropriate balance when it comes to including graphic details of an attack etc. Too much detail can be simply exploitative, sensationalist and gratuitous. Too little detail can undermine or devalue the efforts made by the survivor to divulge what he/she experienced and could also end up undermining the interviewee's credibility.

Ensure interviewees have editorial team contact information: Victims/alleged victims must be able to contact the editorial team, including the interviewing journalist, if they have any concerns, questions or if they need to urgently inform I/KS about changes in circumstances. Interviewees may want or even need to reverse consent to be identified, or rescind permission to use the interview, and they must be able to reach the editorial team with ease – and speak to those they trust/know.

Helplines and support information: Provide users, viewers and listeners with useful contact information for help and support organisations, networks and charities in their area. Journalists and editors should consider whether interviewees have access to these organisations and decide whether it is appropriate to provide this information.

In cases when the victims have disclosed feeling uncomfortable after the publication or if and when the publication has caused any form of trauma and other discomfort for the victim, the editor and the director will decide whether to completely delete the publication in order to ensure proper protection for the victim.

PICTURES

Complaints, privacy and compensation claims

Using images that unfairly associate people with criminal or underhand, morally dubious activity is a very common source of complaints and compensation claims (picture libel). There are also some considerations regarding privacy to take into account.

Photography featuring children is also highly contentious and release forms are required for all images taken by I/KS staff - signed by children's parents or guardians. Breaches of copyright law and using, or altering, photographs in inappropriate contexts are also the source of many complaints.

Using pictures featuring professional models – so not 'real' people - does not necessarily protect you from picture libel complaints (see the next section on picture libel) if they can reasonably object to the context in which they were used. For example, if a 'stock image' featuring a professional model or actor is used in a story about paedophilia, the actor can still complain that their reputation has been damaged because of the context it was used in.

Journalists are responsible for sourcing images either by photographing interviewees themselves, obtaining official photographs or sourcing images from picture agencies or free-to-use (royalty free) sources. Editors are responsible for checking the source of photographs with journalists if these have not been stated. For day-to-day news, journalists are responsible for checking copyright restrictions and avoiding picture libel, but ultimate responsibility lies with the editor.

Picture libel

One of the most frequent sources of complaints. Be aware particularly of how images next to headlines and trails/summary paragraphs alleging criminal, underhand or morally dubious behaviour could be perceived and ask if the person/people - if easy to identify by face - could reasonably complain.

One example that led to a successful claim for compensation was a story where the main picture was placed next to a headline alleging sharp practices among estate agents generally - none were named in the text. The picture in question featured the logo of one estate agent rather than a general picture of houses or unbranded for sale signs etc.

Another included a picture of a person incorrectly placed next to a headline about a criminal. She was a witness, not the accused. Pictures of people who can be identified - showing faces etc. - should not be placed next to headlines that make allegations they are not officially accused or found guilty of by a court. Remember that sometimes individuals accused of committing crimes cannot be identified by court decision, so always check reporting restrictions.

Headlines and main images

Be aware that using captions for a big main image does not necessarily protect I/KS from these types of complaints.

Film/video

Care should be taken in the editing and voice-over of footage in films and video items. Allegations and statements in voice-overs placed across unconnected images – especially of companies and individuals who can be identified by face or other characteristics – could also be the source of libel and unfair use complaints.

Copyright

Journalists and editors are responsible for selecting images that can be used by I/KS that are either covered by licensing agreements with picture agencies (so no charges or fees), or are free to use (royalty free). After ensuring I/KS can use the photograph without breaching copyright law, journalists are responsible for noting who owns the copyright according to style requirements.

I/KS expects journalists and editors to adhere to the latest version of the I/KS style when appropriate and use correct spelling and caption formats, including for photo and video credits.

Video fact check

Prior to any publication of non in-house photo or video material, I/KS journalists and editors will ensure that the material is genuine and they have not been altered in any way, nor are they a product of AI or deep fake production.

Release forms (consent forms)

All I/KS journalists including non-staff journalists selected or commissioned to work on specific programmes or projects must obtain consent to use photographs of interviewees and contributors.

If contributors are known to be illiterate, journalists should ensure, using translators if necessary, understanding (informed consent) and record video consent.

Journalists must ask for consent from parents/guardians in order to demonstrate *informed consent* for children who are not normally considered able to give informed consent if aged under 18. I/KS journalists and editors will make sure to use the adult and/or guardian/parent release forms in the appropriate language.

Identifying children in picture form generally

I/Ks staff will take extra care before using any pictures that identify children or show their face, even if there are no criminal allegations. Children should not necessarily be identified and certainly not in picture form simply because their parents are accused of wrongdoing.

Journalists should also be responsible when considering how identifying children could negatively impact public opinion of them or even expose them to ridicule or hate.

Ask yourself, would you like to be known, and online is usually forever, as the brother or sister of a child that was sold, abused or allowed to watch pornography online? If in any doubt, use images that do not identify children or show their faces and get senior editorial advice if you cannot before publishing/broadcasting.

Captions

Journalists and editors often closely examine headlines and text but either don't see or forget to check photo captions are not a) defamatory (libellous) or b) inaccurate. Note that adding a caption does not likely protect you against picture libel if it is used as a large image next to a strong headline alleging illegal, underhand or morally dubious behaviour. This is absolutely true of images used on pages where the caption is not visible.

Images within the story body - not next to the headline but further down the story - must have appropriate captions that make it clear if the photographed person is an expert etc. rather than one of the accused. If there is more than one person in the picture, the caption must identify where they are [left, right, centre, first row, second row, sitting, standing, etc.] and journalists/editors should consider if it would be better to use a different image.

Disturbing/graphic images

These should never be used for shock value alone. I/KS journalists are expected to adhere to the guidance set out in the section on sensitive subjects, offensive material, explicit/disturbing images.

Images obtained via social media accounts

State the source/credit for the image(s) in captions. Cross-check and verify digital content. Most of the time this will involve checking if the account is genuine, fact-checking, tracking and contacting the original source. The European Centre for Journalism has published a number of useful online guides to verifying digital content: <http://verificationhandbook.com/>

SOURCES

Paying for interviewee/source expenses

I/KS does not pay for interviews but does occasionally cover reasonable costs - travel and accommodation - for contributors and sources.

Experts/contributors

I/KS journalists are expected to maintain a broad network of expert contributors who can provide insightful comment on news stories etc. Journalists should check contributors' credentials to ensure they are never hoaxed and that any political affiliations or other interests are referenced in any published or broadcast material. When checking contributor credentials, journalists must cross-check against existing reliable sources and not solely rely on checks with individuals named by the potential contributor.

Keeping a solid and broad network of contacts relies on journalists adhering to the journalistic standards set down by I/KS covering accuracy, impartiality and transparency. I/KS journalists should not overuse the same experts. Constantly quoting one or two experts undermines I/KS's output and calls the journalist's credibility into question.

All contributions from experts should be accurately presented and included on the basis they offer fresh and useful insights into a particular story. Journalists are expected to keep thorough records – including recordings – of interviews to ensure accuracy and that they do not miss the key points made by the contributor. Without accurate quote-taking in either recorded or written form journalists risk over-simplifying expert quotes and even missing the most important and insightful points made.

I/KS expects journalists to ensure that all contributors clearly understand they will be quoted and named in a published/broadcast item. Contributors should be informed as to when and where the item will be published/broadcast and the topic(s) that will be covered.

Journalists must ensure contributors' full names, accurate job titles and place of work are included in all material. Viewers/readers have the right to judge contributors' credibility and status for themselves.

Off-the-record tip offs

I/KS expects journalists to corroborate off-the record tip offs about potential stories as quickly as possible. Journalists must assess the source, a well known and reliable expert or anonymous member of the public, and work out how best to investigate the matter. Journalists are expected to seek advice from assigned editors and/or directors according to the gravity of the claims. I/KS does not offer cash rewards for story tips.

Anonymous sources

The general rule for using anonymous sources is that at least two independent sources are required to confirm the fact/information before publication. Note, however, the assigned editor or director may insist on three if the story is highly controversial or sensitive.

As with all stories, the editor assigned must approve publication or refer the story to the director. I/KS journalists must be prepared to describe each source's position, status, credibility and involvement with the story in detail.

For single source stories the informant must be an actual policymaker or participant involved in the action or negotiation with first-hand knowledge, or an official representative or spokesperson speaking about background. Such information should be subject to particular scrutiny to ensure there is sufficient public interest in publishing the story and that I/KS is not being manipulated into publishing purely disruptive or even false stories. The director or assigned editor is obliged to approve the copy in written form.

Journalists must disclose the identity of their sources at the director/editor's request.

Stories based on a single anonymous source should be the exception and require approval by the director and factors to be taken into account include the source's and the reporter's track record. In cases where the author is a senior correspondent with a solid track record who is citing a reliable source, approval to publish/broadcast may be given by a senior editor assigned by the director to ensure I/KS remains competitive on publication time/speed.

However, the assigned editor and/or director may decide to hold the story for further checks.

I/KS journalists must never promise anonymous sources that a story will be published. Where anonymous sources will not allow journalists to disclose their identity under any circumstances – including only to the director - the journalist must clearly state the director will not publish or broadcast.

While journalists must protect identities when using anonymous sources they should ensure they tell readers/viewers as much as they can about their level of authority/expertise. They should not mislead audiences, however, about the source's status.

Journalists must clearly agree the extent of anonymity to be provided and determine whether the source should be rendered unidentifiable to the general public or also to close friends and family. Journalists should keep accurate notes about anonymity terms and must not promise it if I/KS will not be in a position to honour the terms agreed – as could be the case if subject to a court order demanding disclosure of unused material.

Journalists must consult with editors and/or the director about security and record-keeping in relation to material obtained from anonymous sources. There may be highly sensitive cases where the I/KS director, in order to protect legitimate and sometimes vulnerable sources, will insist on no records – documents, electronic files, or anything else – identify a contributor or source. This might also include notebooks, audio/video material and administrative paperwork.

Intelligence sources

When receiving information or reports from Intelligence sources, they will always be properly evaluated based on the trustworthiness of the source, relevance and public interest. In all such

cases when the information is not verifiable it will be subject to approval and sign off from the editorial chain and the director. A proper notification will be published to explain that this information is based on Intelligence sources.

Sourcing statistics/factual information

I/KS journalists are expected to attribute key statistics that might be contested to reputable sources. For example, UN estimates for refugee numbers, government statistics for unemployment figures (perhaps compared against other reputable estimates from recognised institutions where there is a difference). Wikipedia is not an acceptable source for facts.

Once statistics are confirmed and non-contentious – for example the number of fatalities in a past incident such as the Paris terror attacks in November 2015 or uncontested population sizes – journalists are not usually required to directly attribute them.

If figures are contested – examples include population size where territory is disputed, contribution totals for EU states or total aid figures for disaster relief appeals where different calculations can be used – list the size/amount range and note why the numbers are disputed.

Journalists are required to state where factual information, such as company profits/losses, planned job cuts, company ownership, children living in poverty etc., has been obtained, such as from company annual reports, court papers legally obtained or already read out in court, respected institution reports (Amnesty International, UN, MSF, universities etc.).

I/KS expects journalists – particularly when working on longer form journalism – to cross-check any claims made by interviewees. If someone states only 0.5 per cent of rape and sexual assault complaints result in a conviction, journalists are required to assess the credibility of the source and judge whether to conduct cross-checks to establish the facts with reliable institutions including reputable NGOs, court/prosecution documentation etc.

Crediting other news outlets

I/KS expects journalists to credit other news outlets for their material if used in I/KS stories. Only credible and known reliable sources previously approved by editors will be used for citation.

Plagiarism will not be tolerated! I/KS journalists must be transparent about whether material – an event, quote or any other material – is taken from another news outlet. Failure to do so will be treated as plagiarism and could lead to disciplinary action.

While it is acceptable to quote a news agency or other outlet for important breaking news, I/KS journalists must be working immediately to independently verify the information (for example, of an explosion, plane crash, terror attack, etc.) with the authorities or on the ground if possible.

Journalists should also be working to get their own quotes from witnesses, the authorities, emergency services and other legitimate sources that are relevant to the story.

So, if using another outlet as a source, the initial story should credit the source – that could be something like ‘five dead according to the XYZ news agency’ or similar. After I/KS has verified the story using I/KS journalists’ own material the original text should be archived and replaced with a story credited entirely to I/KS.

If a story mostly uses I/KS sources – that is material I/KS journalists have gathered themselves – but includes some elements from another news outlet, each element taken from the outside source should be credited within the story (including quotes, facts, pictures etc.). I/KS journalists are expected to consider copyright law when using third-party material.

Journalists and editors are expected to understand limits to usage re: agreements with agencies and to ensure anti-plagiarism measures are enforced in I/KS newsrooms.

Cross-checking digital content (user generated, social media)

Footage, claims and material distributed online and via social media accounts should also be cross-checked and not merely taken on face value. Most of the time this will involve checking if the account is genuine, fact-checking, tracking and contacting the original source. The European Centre for Journalism has published a number of useful online guides to verifying digital content: <http://verificationhandbook.com/>

Requests for comment, declines to comment

Journalists should include frank and fair accounts of attempts to get responses to criticism or specific allegations in stories. This means journalists must always include where individuals or organisations/companies ‘declined to comment’ or ‘failed to respond’. When publishing a specific response to specific criticism or allegation, it is preferable to name the person giving the response and if they are speaking on behalf of an individual or organisation/company.

When publishing a simple reaction to a claim or criticism - not an interview or similar - responses from government departments should be published with the name of the press spokesperson who gave you the response. However, if they insist the quote be attributed to the press office only, I/KS will permit this but generally discourage the practice on the grounds that official media officers are paid to speak to the media. Journalists should also clearly state if spokespeople responded in writing/issued a statement.

Note that it is often best to back up verbal requests for comment in writing (by email). This is hugely helpful in terms of record keeping. Remember to keep all written requests for quick response, comment and/or interview on file so I/KS is able to prove that the journalist in question approached all sides for comment/responses.

UNDERCOVER WORK, DOORSTEPPING, EMBEDDED JOURNALISM

Secret filming/undercover reporting

Deciding to secretly film or go undercover is a serious undertaking. The director must be consulted and issue a written consent before any I/KS journalist embarks on either to determine that the story warrants use of these techniques, there is sufficient public interest and that the organisation cannot be accused of going on unwarranted ‘fishing expeditions’ or, indeed, even inciting another/others to commit crimes.

The director is responsible for checking compliance with the laws and regulations covering secret filming and undercover reporting and also for determining whether legal advice is necessary. Editors will request the final sign off from the Director before publishing or broadcast.

Journalists and editors should protect the privacy of those who happen to be present during filming and are not directly involved in the story/allegations etc.

Refer to the section on mandatory senior editorial approval.

Doorstepping (confronting) individuals at work or at home

Before doorstepping (confronting) individuals, journalists must obtain written approval from the assigned senior editor who may need to refer the issue to the director for final sign off. The senior editor and/or director must consider privacy concerns – both of the target interviewee and bystanders/others who just happen to be present and also consider proportionate use.

Doorstepping should only be approved in cases where key individuals have failed to respond to requests for responses to serious allegations and should not be used indiscriminately. There should be solid evidence of serious criminal activity and appropriate risk assessment procedures should be followed. *Refer to the section on risk assessment and safety.*

For everyday news rather than investigations, journalists may acceptably question public figures at public places and/or events without first requesting an appointment. However, hounding people, including public figures, at their home or office is not usually appropriate or warranted for everyday news stories.

Accompanying raids, embedded or ‘tag along’ journalism

Journalists are required to obtain permission from the director to accompany or tag along on operations such as police raids. The terms, boundaries and rules should be clearly defined and in some cases be governed by formal agreement between I/KS and the official body (police, prosecution etc.).

A risk assessment should be carried out where appropriate and journalists should be clearly briefed by senior editorial management – the director or senior editor assigned – as to respecting privacy rights (those who happen to be present), concealing identities, obtaining

consent, stopping filming on request and whether they are able to enter premises including private homes.

The Director and assigned editors should take precautions to ensure they are not being manipulated and seriously consider the public interest argument in tagging along at all.

Following the average police officer on the beat, conditions in a busy but underfunded accident and emergency hospital ward, conditions for border police and other 'day in the life' reportage have a much clearer public interest benefit but should still be carefully considered in terms of privacy - and not identifying individuals who do not or are not in a position to grant informed consent to be filmed or interviewed - while I/KS must also maintain full rights over use.

RISK ASSESSMENT AND SAFETY PROCEDURES

Risk assessment

Journalists and editors must undertake full risk assessments including the potential for immediate or future harm to individual staff or the organisation. Journalists must notify editors when they are visiting a potentially dangerous location or conducting a potentially risky interview - including location, times and expected length of interview. Ordinarily, interviews should be conducted at work locations (offices - the subjects or I/KS 's) or in public places such as hotel lobbies, coffee shops or similar and not in remote, isolated areas.

If meeting a source deemed potentially difficult and dangerous, the assigned editor/director and the journalist must determine whether backup is needed - either by reporting in pairs or arranging to have someone nearby who is ready to step in or call for help on the journalist's behalf. This might include reporting in pairs and having a third, nearby, observer recording and ready to intervene directly or call for help. Journalists are required to regularly check in with assigned editors to confirm their safety.

In high-risk situations - such as doorstepping potentially dangerous individuals - the assigned editor must determine whether a trained 'minder' is needed (much like a bodyguard) or whether a colleague is trained enough or skillful to do that job. Transport options and exit plans should be part of the risk assessment, with appropriate backup measures in place.

If the conversation turns sour and things take a turn for the worse, journalists should be clear that they must obey their gut instinct and not put themselves and others at risk. Journalists covering protests and major public events - parades etc. - should be aware of what they are and are not expected to do and be advised on how to deal with potential flare-ups. This includes wearing clear identification that they are a reporter, staying safe in violent protests, protection against and procedures to follow in the event of the use of tear gas, water-cannon etc. and withdrawing to a safe distance. These should be detailed in risk assessments.

Risk assessments should also take source's safety into consideration - particularly where speaking to a journalist could put them at risk. This should include information storage of

personal details that could jeopardise a source's safety - and that of the journalist. In certain circumstances, electronic communications should be encrypted. All of these assessments should be in writing and signed by the journalist(s) and assigned editor/director.

Journalists, editors and the director should complete the risk assessment forms and follow the procedures set down. If there are any incidents, journalists and editors/director should complete an incident report form. *See the general risk assessment and incident report forms.*

Procedures if I/KS staff are under threat/attack

Any staff member at any level who finds themselves on the receiving end of any threats/attacks or threatening behaviour must immediately inform their line manager - no matter how trivial you may consider the threat to be and regardless of whether you have been threatened by email, social media posting or any other way. The line manager must then notify senior management and the Director and probably assist with submitting a police complaint - perhaps with legal assistance if deemed necessary at that point.

Director must make a note of such threats and ensure records are archived in I/KS office documentation.

The same procedure should be followed where individual I/KS journalists are subject to written attacks in other media outlets.

This kind of support should be offered to regular I/KS staff and non-staff journalists such as participants and alumni.

I/KS Kosovo has drawn up the following procedures, which must be implemented in such cases:

Step 1: Open a file/folder and store all material related to the case, your complaints, printouts and photocopies of all documentation that exists such as threatening articles, telephone calls, audio recordings of these threats, photos of injuries (if it was a physical attack), emails and messages. This should serve as a diary of events that the organisation should keep for use if the case goes to court.

Step 2: In cases of immediate physical threat – immediately report the case to the police. Discuss with the police whether a request for a restraining order is needed to keep the attacker/threatening person away from the journalist. Journalists should also file a report with the police if they are on the receiving end of attacks - including defamatory ones where applicable - by media outlets, whether in the form of an article, note, Facebook status or reports and/or calling for violence and/or inciting hate speech.

Do this as follows:

- a) In person in the police station. If this is done in person make sure you take a stamped copy of the filed report;
- b) It is preferred that the police report is written down in advance in the office and proofread by the Legal Office and the Director.

Step 3: File a complaint with the relevant media watchdog, broadcasting council or press council if the attack includes defamatory (libellous) media reports, Facebook postings etc. that puts you at risk or ruins your reputation as a journalist with the Press Council and/or Media Regulatory Body. For this step keep in mind that:

- a) The decisions of these institutions will be used in court and by other international organisations that will want to help the journalist.
- b) Be careful to file the complaint within the deadlines set down by each institution.
- c) Complaints should be written in advance in the office, signed and stamped.
- d) I/KS staff should ensure that both institutions, press council or regulatory body, issue a protocolled copy of the complaint, and take it along with them to file it in the office.
- e) No international organisation will take an attacked journalist seriously if they do not exhaust all available local remedies such as press councils, regulatory bodies/watchdogs, police, courts etc.

Step 4: File a request to the newspaper that attacked you to remove the article and if they don't – check whether you can file for an interim injunction. If you can - file a request for an interim injunction. If the article is online, file a request at the basic court for an interim injunction, which would oblige them to remove the article/material if successful.

Step 5: File a lawsuit for libel against the newspaper that attacked I/KS journalists. After you report the case to the police, lodge a claim for libel with the relevant court. If the press council rules before the lawsuit is filed, enclose their decision. If not, the decision can be submitted in court as an additional document at a later date. Be careful to file the lawsuit within the deadline of the respective court.

Step 6: The Director will write a public letter to relevant stakeholders and funders and inform them about the campaign against IKS . The letter, which should describe what happened and calls for reaction should be sent to all local and international organisations concerned with media freedom. Below is the list of important institutions that should be contacted as soon as the campaign starts:

- a) European Commission (office in the respective country and in Brussels);
- b) Relevant embassies working on freedom of expression or those whose ambassadors have shown support for I/KS and its work such as the Swiss Embassy, Dutch Embassy, German Embassy, Norwegian Embassy, British Embassy and US Embassy;
- c) SEEMO;
- d) Freedom House;
- e) Article 19;
- f) OSCE Representative on Freedom of the Media;
- g) UN Office of the High Commissioner for Human Rights;
- h) Reporters without Borders, Index on Censorship;
- i) Media Legal Defense Initiative;
- j) Youth Initiative for Human Rights.

Step 7: Follow up with all these institutions, have informal meetings with them and ask them what has happened since the letter was written. Also, make sure to follow up generally on the case by sending requests for information from all the institutions mentioned above.

Additional advice:

- Be careful to file documents within deadlines.
- Translate criminal reports and complaints in English and send them to international organisations to show that you are pursuing all the legal remedies.
- Save a copy (hard copy and electronic) of each document as you will need it for court.
- If journalists are threatened and they cannot work as a result, the human resources department should issue a decision saying that the person is not working due to threats. This will be used in court.
- If you receive threats online or in any format, report them to police stations and save a copy (hard copy and electronic version) as possible proof/evidence for the court(s).

The Director should keep a record of all these types of incidents and outcomes in both their own and organisation's archives.

ELECTIONS

Balanced reporting during elections

I/KS should not give undue coverage - or weight their coverage - in favour of political parties at any time but during an election period this is particularly important. I/KS is an independent outlet and must not appear to support or unduly criticise or target parties.

During an election I/KS will share with relevant political parties the rules and conditions of participating on TV debates, the distribution of the air time and other details of ensuring presence within I/KS media production. Assigned editors are responsible for ensuring reporting is fair or has not unduly favoured or excluded particular parties. Leaders of the key parties must be given 'equal' coverage over the course of the election with assigned editors recording due balance in reporting over the campaign period.

Factual election reporting versus comment and opinion

While journalists may share opinions in review or comment pieces, be careful not to compromise perceived neutrality in election coverage. Sharing an expert opinion on how a party is doing in a current election campaign is very different to sharing your opinion on the party itself. As a rule, journalists should limit opinion sharing to 'expert opinion' within comment pieces measuring public approval only to avoid being seen as biased or having a particular interest.

News stories or any other factual report should never contain any personal opinions held by the journalist or editor.

Elections and voter polls

Journalists must state which organisation carried out the poll(s), include the exact poll questions as put to participants and make clear the dates during which the poll(s) was carried out when using surveys measuring voter approval of candidates etc. Where more than one poll delivers different or even conflicting results include those but be sure these can be fairly compared or list separately if the polls cover different topics.

I/KS expects journalists and editors assigned to oversee elections to familiarise themselves with local laws governing the reporting of elections and voter polls, including whether opinion polls cannot be published on polling day itself until after voting closes (exit polls).

Polls and surveys (general)

Always include information on the sample if writing a story based on a poll or a survey - do not describe a report or research as a poll/survey if it is not or did not include a poll. Say who commissioned the poll, who carried it out, how many people participated and if it was representative - reflected the relevant demographic(s); were participants checked by pollsters or was it anonymous and online.

It is important to know if the results are *indicative* or *representative*.

If the poll includes a margin of error, include that in the story. Question yourself if the poll is worthy of a news story - does a 'poll' on the best hotels have news value or is it more an opportunity for self-promotion by whoever commissioned the poll? Round figures and percentages up and down where appropriate, ensure percentages add up to 100 and use terms such as *suggest* and *indicate* rather than *show* or *prove*.

QUOTES

Copy approval

I/KS does not grant story approval to interviewees and contributors. Journalists are expected to accurately record quotes first time round but, in exceptional circumstances, a journalist may need to check quotes with an interviewee and can do so by sending the quotes over email. This is permitted if the interviewee has insisted on approving his/her quotes prior to publication or the journalist needs to check the quotes for accuracy or clarifications. Interviewees do not ever get copy approval of an entire story, just their quotes in exceptional circumstances.

External contributors who have been commissioned to write entire stories - comment, blogs analyses or other material - for publication can and should always sign off on the final product. The author must always sign off the final copy for longer pieces, such as analysis, blogs, comment and investigations.

Accuracy: Getting quotes wrong is one of the cardinal sins of journalism. Never misquote an interviewee, it brings the entire news organisation's reputation into doubt. Never attribute a quote to the wrong person or confuse a statement issued by an office with direct quotes. Ensure you record (preferable) or write down quotes word-for-word (verbatim) and read them back to your interviewee. If necessary, double check them over email. Notebooks and recordings should be kept for a minimum of three years *See record keeping chapter*.

Equipment: I/KS expects journalists to be able to accurately record quotes and to use the appropriate equipment to do so, including smartphones, recorders, Go-Pros, and other devices. If in any doubt, journalists should consult with the assigned editor.

Translations: If translating a quote from another language to English, ensure the translation is absolutely accurate and does not alter the speaker's intended meaning. Go back to the original quote(s) as they were given in the original language and use that version to ensure accuracy.

Sources: If you use quotes from another news outlet, only use the quotes as they were originally used by the outlet that actually got the quotes. Avoid using 'second-hand' versions of quotes from other news outlets – always try to use the original.

Direct and indirect (paraphrased) quotes: An indirect quote is an accurate summary of something that someone has said. Use indirect quotes (paraphrase) if the original quote is too long or it contains information that could be more clearly explained. Never mix direct and indirect quotes up.

Never paraphrase a quote and then present it as a direct quote. A direct quote should be exactly what the person said.

Partial quotes and ellipses are used to shorten quotes.

An ellipsis (...) indicates some words have been removed from the quote. Ellipses are used if an interviewee repeats themselves or digresses then returns to the original subject. In those situations, cut out pointless repetition or any irrelevant digressions.

Make sure quotes accurately convey the speaker's original, intended meaning.

Add context or an explanation: If the original quote wasn't complete or the reader might not understand the significance of what someone has said, add an explanation or use square brackets inside a quote.

Judge how best to treat quotes - direct, indirect (paraphrased), shortened, with an explanation – on a case-by-case basis but ensure they are 100 percent accurate.

SOCIAL MEDIA

Social media - professional use

Official I/KS accounts, using social media to source contributors or as part of journalist's research, should adhere to usual journalistic standards.

Using 'fake' accounts (as part of undercover investigations into serious issues - paedophiles etc.) must only be done with approval from editorial management and would normally only be approved if there is a sufficient public interest case for doing so.

Much of the following is based on existing I/KS guidelines.

Basic principles include:

- Identify yourself as a I/KS employee when you would do so in similar situations offline;
- Do not write or post anything that would embarrass I/KS or compromise your ability to do your job;
- Use common sense, act nice and be honest;
- Assume your professional and personal life will merge online regardless of how much care you take separating them;
- Even if you activate privacy tools determining who can view your page or profile, assume everything you write, exchange or receive on a social media site is public;
- Refrain from writing, tweeting or posting anything - including photographs or video - that could be perceived as reflecting political, racist, sexist, religious or other bias or favouritism that could be used to destroy I/KS' journalistic credibility.

Using social media as a reporting tool: *This applies to individual accounts on online social networks, when used for reporting and for personal use.*

- Making connections is good. It is acceptable to extend and accept Facebook friend requests from sources, politicians and newsmakers if necessary for reporting purposes and to follow them on Twitter (consider however that ‘friending’ or following a professional contact may publicly identify that person as one of your sources);
- Information gathered online should be independently confirmed offline. Interview sources in person or over the phone and verify statements and claims;
- Ensure informed consent - it is very easy for sources to misunderstand your intentions. It is your responsibility to tell them who you are, what you are doing and where your work will be published/broadcast;
- Be transparent with the audience and the sources;
- Editorial staff should not use their positions at I/KS to promote personal agendas or causes.

Using social media to promote stories/work:

- **Be accurate** and do not sensationalise or oversimplify;
- **Be clear** - if you need help to write a headline, get help;
- **Include the story link** and make sure the link works;
- **Social media editors** are responsible for designing strategies to promote ongoing issues and stories and overall branding for I/KS output;
- **Editors and online production staff** should identify pieces that should be branded and promoted across I/KS’s social networks;
- **Use suitable hashtags** to promote work (#Elections, #Protests etc.);
- **Check grammar and spelling;**
- **Manage friends and their comments** - delete comments and ‘unfriend’ people who damage your reputation;
- **Don’t post** information that could embarrass you or your newsroom;
- **Get advice**, when in doubt talk to colleagues, your editor and/or your supervisor.

Social media - personal accounts

While your personal account is yours, there are considerations re: confidentiality, I/KS’s reputation, perceived bias, offensive content etc. even if you do not use your personal account for work.

As a journalist, publishing is your trade and how you manage your personal accounts can impact your reputation. You will be expected to remove content that damages I/KS (your employer) and breaches the CODE OF CONDUCT. The publication of racist, homophobic, and sexist opinions is considered contrary to I/KS’s values and will be referred to senior management.

READERS' COMMENTS

Pre-moderation and post-moderation

I/KS journalists and assigned social media editors are required to pre-moderate (check) comments and other user-generated content before publishing on I/KS branded websites. Moderators must ensure all interactive sections on I/KS websites are safe and welcoming places for readers to comment and engage in constructive debates.

Moderators must ensure comments do not break laws or breach editorial standards. They must also ensure debates remain respectful, safe and relevant.

Comments published on I/KS's social media outlets are post-moderated and will be removed if they breach standards or break publishing laws. I/KS has activated profanity filters so comments containing offensive language may be automatically marked as spam and therefore not published. I/KS moderators do not edit or remove parts of comments on social networks so if a comment fails to meet standards it will be deleted.

Guidelines for moderators

Moderators should adhere to the rules and standards set out for commenting that are published on I/KS websites for users to read. *See the section entitled: Rules and standards for I/KS comment pages (next section).*

All moderators are expected to remove offensive words before publishing or decline to publish a comment altogether if the language used is highly offensive. Moderators must judge whether an offensive term can simply be removed or if the entire comment is intended to be offensive and should not be published at all.

I/KS will never publish strong, coarse and offensive terms including *wh*re, sh*t, f**k, c**t, mother***ker etc.* Terms such as *bloody, damn* or *BS* (but not *bulls**it*) should not be automatically removed but moderators must still judge the overall tone of and intent behind the comment before deciding whether to publish. If moderators are in any doubt they should ask for advice from editors before publishing or deleting.

Moderators are expected to stay up to date with commenting rules and standards as the social media editor, senior editors and the director will regularly add updates.

Rules and standards for I/KS comment pages

Every I/KS branded website must publish community rules and standards for readers posting or submitting comments for publication on I/KS websites and social media platforms. These should contain the following:

- 1) Instructions on how to submit comments;
- 2) A note clearly stating whether comments will be checked before or after publishing (moderation) as applies to the platform (website or social media);
- 3) The rules and standards applied by I/KS moderators to readers' comments;
- 4) Instructions on how to complain about or report other comments.

Pre-moderation and post-moderation

Comments published on I/KS 's social media outlets are post-moderated and will be removed if they breach standards or break publishing laws.

I/KS has activated profanity filters so comments containing offensive language may be automatically marked as spam. I/KS moderators do not edit or remove parts of comments on social networks so if a comment fails to meet standards it will be deleted.

I/KS regularly updates its commenting standards and rules to ensure its debate and comment pages are properly managed.

Rules and standards

I/KS reserves the right to edit, remove part of a comment or even decline to publish a comment altogether if the comment does or is any of the following:

Advertises products and services – this includes personal websites, details of charity and/or fundraising events, surveys/polls, company/commercial websites and non-I/KS forums and/or message boards.

Abusive, offensive, designed to disrupt coverage – this includes nationalistic, sexist, racist, homophobic, sexually-explicit and otherwise offensive, discriminatory and objectionable material. Moderators do not publish comments that feature swear words, language or terms likely to offend or threaten others, attempts to impersonate others or attempts to cause technical problems or errors, trolling (deliberately offensive and provocative comments that do not add to the debate in a meaningful way) or flaming (comments designed to hurt others).

Contains inappropriate links – if posting links to related content make sure that content is from a reputable and free-to-use site. I/KS moderators will not publish comments with links to unsuitable and unrelated sites, such as pay-to-use sites, unlawful sites, sexually explicit sites or any other spam-like content.

Off-topic – moderators will only publish comments that relate to the story content and will cease to publish comments if they stray off-topic.

Election campaigning – moderators will not publish comments submitted by official campaigners for candidates standing for election, specifically where these are attempts to smear or support particular candidates. If candidate's campaign teams wish to contribute or question content they should contact the senior editorial team.

Protests/activists/lobbyists – I/KS reserves the right to remove comments posted by protest, lobbyist or activist campaigns if deemed inappropriate for publication on a debate page.

Defamatory – I/KS is a responsible news provider and will not publish material that includes unwarranted or unproven allegations that damage a person or company's reputation.

Breaches court reporting restrictions – moderators must ensure that all material it publishes, including readers' comments, does not breach reporting restrictions imposed by judges on specific cases or generally in law. These restrictions vary from case to case but may include identifying defendants, complainants, witnesses, children and other particulars of the case.

Infringes copyright laws – moderators will not publish comments containing material that might infringe copyright laws.

Contains personal details – moderators do not publish comments that include personal information about the user or another person. Personal details include addresses, telephone numbers, or any other information that might put someone at risk.

Inappropriate tone – readers submitting comments that contain sarcasm or ironic observations should carefully check that their meaning could not be misinterpreted by other readers and that the tone remains suitable to the subject. Moderators might not publish or delete comments if there is any doubt about meaning and tone.

Quoting other comments – readers should be careful when quoting other readers' comments. If readers quote a comment that has been removed by moderators because it did not comply with commenting standards, that comment will also be removed.

Clarity in language – moderators will make every effort to publish comments including making very minor adjustments to spellings and grammar where absolutely necessary. However, moderators will not risk unintentionally altering the meaning of comments that cannot clearly be understood in the form they were submitted. In these cases, the comment will not be published.

200-word limit – I/KS is committed to ensuring debates are lively and enjoyable for everyone taking part. This means enabling fast publication to keep reader comments timely. To this end, moderators will only consider publishing comments that do not exceed 200 words.

How to submit complaints about readers' comments

Readers can submit complaints regarding moderation or any comments they deem offensive or inappropriate to I/KS by email to: info@kallxo.com or by submitting their complaint as another comment. The latter will not be published but will be read by moderators.

MEDIA LAW/LEGAL ISSUES

The following section on media law and legal issues is not a replacement for legal advice. It is merely a summary of a few of the key issues journalists and editors need to be mindful of while reporting and before publishing. Assigned editors are expected to refer material they have any doubts over to the editor in chief or director who are responsible for determining whether legal advice from IKS approved lawyers should be sought.

USE OF LAWYERS

I/KS legal office will sign off on all publications and broadcasts. For any content deemed legally difficult the Director will be required to obtain advice from a IKS approved lawyer before publication and/or broadcast. This is standard procedure in most news organisations. Examples include, but are not limited to, complex investigations involving difficult sources, concerns about how information has been obtained, allegations of high-level corruption, and allegations in connection to highly-litigious individuals and corporations, etc..

Also note that while many editors are used to making judgement calls on these types of stories there are times when a lawyer must be used and responsibility for deciding when to consult a local lawyer(s) lies with the Director.

INTERNATIONAL STANDARDS

People and companies can sue news organisations for damages on the grounds their reputation has been unjustly tarnished by news content (TV, radio, online etc.). Libel is one of the most serious challenges facing journalists. I/KS journalists and editors are expected to familiarise themselves with defamation laws.

The Director should be part of the process of drawing up local media law guides – including local defamation legislation, reporting restrictions and regulations, and privacy/data protection laws. Journalists are expected to refer to those guidelines once they are made available.

Definition of libel and slander: Libel can be explained as a defamatory statement in written form or in any other permanent form (including broadcasting, theatre etc.). A spoken defamatory statement is slander – an example could be if a person is publicly accused by a shop worker of shoplifting.

It is almost always defamatory to state a person is a liar, is insolvent or is in financial difficulties – whether the statement is libellous depends on whether the publisher/broadcaster can defend the statement (usually because it can prove it is true).

Defences: There are a number of defences to libel claims and these include the following: truth, honest opinion, public interest (Reynolds Defence) absolute privilege and qualified privilege. Whether each applies depends on the nature of the published/broadcast item.

I/KS expects journalists and editors to understand the definitions and defences to libel actions.

Common issues: There are a number of situations that frequently trip journalists and editors up when it comes to libel. These include the following:

An interviewee makes a defamatory statement during a live broadcast: In this instance, the presenter and/or assigned editor should act quickly to cut off or halt the statement and ensure the presenter clearly states that I/KS or the programme has no evidence to support the claims made by the interviewee.

Picture libel: Publishing inappropriate pictures or wrong captions that imply or suggest someone has been involved in morally dubious or illegal activity. *See the section on Pictures for further guidance.*

Group libel: If someone is not identified but is referred to as a member of a group all members of the group, if the group is small enough, may be able to sue.

Not fully identifying individuals: Journalists must ask if they do not fully identify an individual, could another person be mistakenly identified by readers as that person.

Unintentional identification: Journalists must also ask if they have included details in reports that would allow readers – including relatives and friends – to identify individuals if they cannot or should not reveal their identity. This is also particularly important for those contributing on condition of anonymity, children and for sexual assault victims/alleged victims. *See the sections on children, sexual assault cases and sources.*

Confusing opinions with allegations: An opinion can usually be safely published but an allegation that something happened is not an opinion, it is a claim that an event took place.

For example, using a quote from an expert who says that a new law banning publication of some types of information is tantamount to censorship is an opinion. Using a quote from an expert who says an identifiable person is censoring information is an allegation. The fact an interviewee made the allegation and that it was used in an attributed quote does not provide any protection to the journalist from legal action.

I/KS expects journalists and editors to fully understand the difference between the two. If there is any doubt, both should refer up for advice from assigned editors and/or the Director. *See the News Writing Manual for further guidance on the difference between opinion and allegation*

Republishing libellous material from another news outlet: There is no protection for news organisations who republish or take excerpts from libellous material published by other websites, newspapers, broadcasters etc.. This also applies to libellous press releases. Journalists and editors must judge whether the material is libellous and seek advice if unsure whether to publish.

Witnesses – signed statements: It is good practice for journalists engaged in investigative journalism to persuade witnesses to make a signed statement and date it before the story is published. In some circumstances, it may be better to have them sign an affidavit. Journalists and editors should be aware that in the event of legal cases, complainants will normally seek to undermine the credibility of both the journalist and witnesses.

COURT REPORTING

Local court reporting restrictions

I/KS journalists should also familiarise themselves with standards and procedures for court reporting.

Reporting arrests: Journalists must ensure they are aware of any reporting restrictions related to publishing information about arrests or when people are questioned as part of an investigation – including whether they can be named or not. Where it is legally safe to name those arrested, questioned and/or charged, journalists must accurately report the name of the person/people arrested and whether they have or have not been charged.

In exceptional cases, I/KS may want to name individuals but the Director and/or the assigned editor must approve naming individuals before publishing/broadcasting. If they have not been charged, journalists must check with the police if they are ‘helping with police inquiries’. Journalists must contact the arrested person/people’s lawyer(s) to get a response to the arrest/charge, such as whether they deny the charges if named/identifiable.

Photography/recording in court: Journalists must know if they are able to take pictures, film or record in all courts. They should also know if they are able to request permission to record proceedings in audio form for the purpose of accurate record keeping only. They should also know whether they are able to take mobile phones etc. into court.

Texting, tweeting, mobiles/laptops: Journalists must know if they can, or can’t, text, tweet, use phones and laptops – in silent mode – during some or all court hearings. Ordinarily journalists are banned from making or receiving calls during court hearings.

Identifying minors and victims of sexual assault: I/KS does not identify any children – defined as aged under 18 – involved in court trials in any way. Victims/alleged victims of sexual assault are also given automatic anonymity. *See the sections on reporting court trials involving minors and sexual assault/rape cases.*

Court documents: Journalists can only safely quote from court documents if the material has been read out in open court. I/KS expects journalists to understand local laws and restrictions on the use of court documents.

Correctly name the court: I/KS expects journalists and editors to correctly identify the court and use its official title and explain, if necessary, whether the court is a criminal, civil, family, youth, high or appeal court.

Accurately describe the charges: Journalists must describe all charges and case stages accurately. This means determining whether an individual has merely been detained, is helping the authorities/police with an investigation, has been questioned, has been arrested, has been charged, what the exact charge(s) is, or has entered a plea (guilty, not guilty, no contest).

Name all the accused/defendants: Stories must name all the accused, unless there are reporting restrictions. Journalists are responsible for checking with the courts.

State whether the accused denies the charges: All reports covering charges and court trials should state whether the accused denies the charges. I/KS expects journalists to contact the accused and/or legal representative if pleas have not already been entered in court.

State whether the trial continues: When covering ongoing trials, I/KS expects journalists and editors to ensure stories include a final sentence noting the trial has not yet concluded. This should be something along the lines of: The case continues/The trial continues.

Court bans on publication of identities or other details: I/KS expects journalists to comply with court orders that ban the publication of identities or specifics. Cases might include blackmail, protected witnesses, undercover police officer testimony, commercially sensitive material, national security and state secrets. It is the journalist's responsibility to check all restrictions that apply to individual cases.

Challenging court restrictions: I/KS expects journalists to consult senior editorial management before challenging court reporting restrictions imposed by judges.

Historical witness testimony: I/KS expects journalists and editors to fully understand what, if any, restrictions apply to publishing historical court reports/witness testimony. The Director must determine whether historical court reports should be removed from online archives.

Verdicts and sentencing: Journalists must ensure all reports containing verdicts and/or sentencing must be absolutely accurate, including where more than one individual stood trial.

Appeals: Where courts have ruled in favour of complainants or guilty verdicts have been handed down by a court, journalists should include whether they intend to appeal.

Reporting court trials involving minors (under 18s)

Children – victims, witnesses and defendants – must never be identified in any reports. I/KS defines children/minors as being under the age of 18.

In very rare cases where minors are identified by the courts (perhaps because they are being tried as adults in court), journalists must consult with the assigned editor – who may refer the matter up to the director – about how to proceed.

I/KS journalists should be fully aware of all local legislation relating to court reporting and restrictions that apply to children involved in court trials, whether criminal (adult and/or youth) or family courts.

Journalists and editors must pay attention to any risk of ‘jigsaw’ identification. This is where someone’s identity is unintentionally revealed as a result of too much detail in one or more reports published by a single outlet or by different media outlets publishing different details that, when put together, enable readers/viewers to identify victims/alleged victims.

The risk of ‘jigsaw’ identification is particularly difficult when reporting incest cases. To avoid ‘jigsaw’ identification.

In court trials involving the death of a child or children, the victim(s) and the adult perpetrator(s) or suspect(s) are usually identified. Note, however, that on some occasions the courts will prohibit identification of one or both if there are concerns, including prejudicing the outcome of other pending trials or identifying other minors. Always check restrictions with the court.

Reporting sexual assault and rape court trials

Automatic anonymity is granted to victims/alleged victims of rape, sexual assault and sexual violence regardless of age, gender or whether they have been identified by other media outlets. Simply appearing in court is not sufficient grounds to identify.

Minors, defined by I/KS as under the age of 18, must never be identified. Under 18s are never deemed competent to waive rights to anonymity.

I/KS journalists must be absolutely clear about whether the court has ruled the victim/alleged victim can be identified and seek advice from the assigned editor and/or the Director before publishing/broadcasting any material that identifies the victim/alleged victim. Note, in some cases editors or the director may still decide not to name the victim/alleged victim.

While adult defendants (accused) are usually named, I/KS journalists are also required to check whether any reporting restrictions have been imposed by the court relating to identifying or revealing particularly information about the adult defendant.

If in any doubt, journalists must contact the court and the assigned editor/director for immediate guidance.

There is also a risk of 'jigsaw' identification when reporting rape/sexual assault trials. Journalists are expected to measure whether revealing specific details, including the complainant's profession, place of work, home town, the exact location an offence is alleged to have taken place, distinctive marks/injuries, hair colour, appearance and clothing, should be reported at all.

I/KS expects journalists to pay particular heed to the tone of reports. It is never acceptable to report cases of rape/sexual assault in such a way that the victim/alleged victim is portrayed as partly or fully responsible for the attack, just as guilt on the part of the accused should not be assumed. Ask yourself if a description of the complainant's clothing, sexual relationship history and alcohol consumption is truly relevant to the report or merely possibly judgemental.

As a rule, journalists reporting from court should limit the content to the information put in front of the judges and/or jury if reporting a jury trial.

As with all court cases, journalists are expected to report the exact charges with absolute accuracy. For ongoing cases, reports should be contemporaneous (that is published at the same time, usually within 24 hours of the particular hearing). A note explaining the trial is ongoing or continues should be added at the end of each report. This can be as simple as adding the following to the end of stories: *The trial continues.*

See guidance on interviewing rape and sexual assault survivors.

COPYRIGHT, DATA PROTECTION, PRIVACY

Copyright/Intellectual property/plagiarism

Journalists cannot appropriate or pass off other people's or company's material as their own - including written, photographic, and video content. The copyright owner must be acknowledged. Even with wire copy (AP etc.), you might need to acknowledge the source and there are rules about how much material you can use without paying a fee - even for reviews. Journalists and editors must be aware of the terms of use governing agency material etc.

I/KS will not tolerate plagiarism and journalists are expected to be transparent about whether material - such as quotes, statements, background information and any other material - has been taken from another news outlet or source. Failure to acknowledge sources will be treated as plagiarism and could lead to disciplinary action.

Data protection

Data protection laws affect journalists in three key ways:

- 1) If a journalist uses underhand methods to gain access to people's personal data, he/she may be prosecuted unless there is a sound public interest defence.
- 2) Institutions - government, police etc. - sometimes 'misinterpret' data protection laws when claiming they cannot release information because of data protection.

3) Journalists generate and store information about people – footage, stories, research material – so media organisations must lawfully process and publish data.

Secure storage: Media organisations and freelance journalists are obliged to securely store personal data, such as names, emails, dates of birth, addresses etc. The Director is expected to set down local rules for storage, including computer security, locked filing areas and cabinets etc.

Leaks/posing: If a journalist persuades someone to leak material they may in some circumstances face legal proceedings – the same goes for posing as someone else to gain personal information. Journalists and assigned editors are expected to seek advice from the director if unsure of local laws governing potential breaches of official secrets legislation, and procedures for handling leaked material, hacking and posing as others.

The Director must be informed of these situations immediately. In addition, the Director must include these issues in the local legal guides that will be commissioned.

Challenging institutional refusals to release information: I/KS expects journalists to notify assigned editors in cases where institutions are believed to have improperly cited data protection and/or privacy laws to justify refusing to release information. The Director may decide to directly challenge the refusal, including possibly taking legal action to compel them to do so.

Privacy

The Director is responsible for clearly setting out local legislation regarding the right to privacy for individuals, lawful reporting techniques, public interest and state security. The Director is responsible for obtaining legal advice and guidance on privacy laws – including how to challenge injunctions. This information should be shared at network level to assist with cross-border reporting.

LAUNCHING OR FACING LEGAL ACTION

Facing Lawsuits: IKS procedures

Sometimes I/KS as an organisation, or individual reporters, may be the subject of a lawsuit. In such situations, I/KS Assembly should be informed immediately.

Immediately engage specialist legal representation including for non-staff contributors such as fellowship alumni and so on.

Decline to release any documentation, detailed comment on or information relating to the matter until legal advice has been sought and the Director is clear about what can be said and released at that stage of the case without harming the case.

The Director and the editor-in-chief must consider whether to remove – even temporarily – the contested material, perhaps after taking legal advice on how that could potentially impact a prospective legal case. Only the Director has the authority to remove stories. Each incident will be judged on a case-by-case basis.

Obtain the complaint and identify the exact nature of the complaint – what is being contested, who is targeted (the individual journalist, I/KS or both?), and will the matter be referred to a media watchdog first.

Compile a dossier of evidence to defend the claim/complaint – this should be done by both the journalist(s) and editor involved.

Establish whether the journalist could be compelled to reveal sources and whether refusal to do so could lead to imprisonment.

Consider whether international monitors could help, perhaps to raise the profile of the case if there are concerns about corruption/fair trials etc.

Consider whether to report the incident to other organisations – including human rights and journalist associations – if it may be necessary to mount a campaign.

If successfully defended but IKS and/or individual journalists were subjected to defamatory statements and coverage during the lifetime of the complaint/case, directors and/or the hub director should consider whether to launch legal proceedings.

The Director must ensure ‘lessons learned’ should be included in editorial guidelines regardless of the outcome of the case. As well as following the crisis procedures set out in the crisis management for disputed articles section. The Director must ensure all documentation relating to lawsuits is archived by I/KS.

Launching legal action

I/KS will at times take legal action itself when appropriate including possibly challenging reporting restrictions and/or injunctions, pressing charges in relation to intimidation/threats or defending the I/KS’s or individual journalist’s reputations.