Moderation Guide

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Society of Editors
www.societyofeditors.org

Department for
Communities and
Local Government

Foreword

Before the arrival of online news, the space available for content was limited and newspaper editorials and comment pieces were the preserve of the few.

Today there really are no such physical restrictions and together with technological advances and social networking, a much larger group of commentators now have a voice on almost any topic. This opening up of traditional media, with the advent of blog and comment forums has been good for the press, and even better for freedom of speech.

However, not everyone uses these new platforms for lively and respectful debate. There is a darker side to the net, with some abusing the space (often anonymously) to post messages that spread hate.

We need to remain vigilant to these ongoing challenges and improve our understanding of these new threats online. We draw on the insight of communities directly and we know that the posting of offensive and threatening content is an issue of real concern for many. That is why we funded the Society of Editors with input and support from the Press Complaints Commission to carry out research into current moderation of user-generated content and to produce good practice guidance to help on-line moderators in the future.

The majority of online news outlets take the issue of moderation seriously, not least because of the reputational damage that the posting of offensive material can cause. But this is a fast-changing world with many stories often receiving thousands of comments and at the moment there is no uniform approach to moderate them.

This report and its recommendations is one way we can help to keep this world as open and as free as possible, and for everyone, not the few.

Eric Pickles

The Rt Hon Eric Pickles MP
Secretary of State
Department for Communities and Local Government

Department for Communities and Local Government

Introduction

C.P. Scott, Manchester Guardian editor from 1872 to 1929, writing for the 100th anniversary of the paper and his 50th birthday in 1921, said a newspaper's primary office was the gathering of news.

"At the peril of its soul it must see that the supply is not tainted. Neither in what it gives, nor in what it does not give, nor in the mode of presentation must the unclouded face of truth suffer wrong. Comment is free, but facts are sacred."

This most famous quote of the longest serving editor of the newspaper we know today as The Guardian, now provides the title of the comment section of the Guardian's successful website. As any editor of any website inviting comment from its users will confirm, comment is far from free. It may be for those posting the comments, but those who encourage them and host them have come to realise there is much more to it than that. Quite apart from technical development of the comment function of the news website, there is the day-to-day management of comment, protecting it from the inclusion of abuse which may taint the brand of the publisher and offend traditional readers or listeners and viewers of the traditional print or broadcast news publisher.

Long before a site's reader contribution reaches the levels of today's major players – MailOnline with 350,000 comments a week, the Guardian with 190,000, the BBC with 26,250 – new quality control structures have to be in place to eliminate the illegal, the offensive, the tasteless, the profane, the racist, the sexist, the intrusive, all things print and broadcast publishers have always had to avoid. It was the job of sub-editors, duty lawyers, section editors, proof readers, ultimately editors and programme controllers themselves, to take responsibility. But what is different now is the volume of such material and the ease and speed of putting it into the public domain. There are also freedom of expression issues, with different publishers having different attitudes to the boundaries of such freedoms. Comment is free, but how free is free?

Welcome to the world of moderation, a nice, safe (moderate even?) word for the process of editorial engagement or quality control of online comment. That is what this Society of Editors research is all about. It explores the reasons publishers have developed comment on their websites, the systems they have in place for vetting commenters, the systems of moderation they have in place to reduce or eliminate abuse.

The survey questionnaire was sent to members of the Society of Editors, organisations which have added online publishing to their traditional role of gathering and publishing news, comment and opinion on paper, radio or television. We had responses covering five categories of news websites: national newspapers (Mail, Guardian, Times are examples), regional newspaper groups (such as Trinity Mirror and Johnston Press), individual local and regional newspapers (from the Warrington Guardian to the Bournemouth Echo), national broadcasters (BBC, Sky, ITV, ITN) and an assortment of other websites run by magazines, blogs, lobbyists and others (including Good Housekeeping, Guido Fawkes, Hold the Front Page). We are grateful to all of them for their participation. In this report reference to 'newspaper sites' or 'broadcast sites' will mean news websites published by newspapers (such as the Mail) or broadcasters (such as the BBC).

Data was collated for all respondents and for each of the five categories. We also carried out follow-up interviews with some of the bigger publishers: BBC, Sky News, Trinity Mirror Regionals, and The Guardian. We have also spoken to some pressure groups and campaigners who have concerns about online abuse through comments. This has produced a broad picture of comment on mainstream UK news websites.

This report deals only with comment on news websites, reactive comment to stories that have been placed on the website. It does not deal with social media and other websites often in the news for the controversial nature of some of their comment and interaction, such as the disturbing consequences of what has become known as cyber bullying. This report concerns the gatherers and publishers of mainstream news, those who invite users of their news websites to comment on the news stories and blogs they have published online.

WAN-IFRA, the World Association of Newspapers, has recently published 'Online Comment Moderation: emerging best practices', a global report on the same subject as this report. It is a detailed look at worldwide practices, covering 104 news organisations from 63 countries, and provides some valuable comparative information on an area which this Society of Editors report deals with from a purely UK perspective. Some relevant highlights and conclusions from that report are included briefly in this one.

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Conclusions

- Publishers invite user comment on their websites to encourage social participation and engagement, to enhance a story's value, to add to the media consumer's experience, and to include a wide variety of opinions on the website.
- Comment is now well-established on websites, the main publishers having sought comments for publication for more than five years.
- Publishers of news websites do not allow comment on active court cases and are wary about such sensitive issues as race.
- House rules set and make public the parameters for comment. These vary in scope and detail, but all indicate or require a set of standards for commenters to follow.
- Some publishers require registration before comments are accepted for posting. Registration usually requires an email address, new password and other personal details. Most publishers allow users to log in to comment through social media sites, such as Facebook, which themselves require registration.
- Different forms of moderation are employed by publishers, ranging from approval before publication (pre-moderation) to moderation after posting (post-moderation). Most of the major publishers use the hybrid reactive moderation where moderation occurs after a post has been reported by another user, identified by moderators carrying out random checks after posting, or mechanically by filters programmed to spot certain words, terms or phrases, or a combination of these methods.
- Some moderation is carried out entirely in-house, by staff, usually with journalistic experience. Some of the major publishers contract out moderation to specialist firms, while retaining management of moderation. The amount of moderation training is variable, as is record keeping.
- Subjects found most problematical for publishers and moderators include race/immigration, court, crime and politics.
- Most news website publishers take moderation seriously and invest considerable resources in it. They are aware of the reputational and possibly legal implications of unsuitable material being posted on their sites, and of the determination of certain users to post abusive comments. Taking into account the difficulty of identifying and weeding out such comment, particularly for the major publishers who handle, and encourage, the largest volume of comments, moderation appears to be working satisfactorily.

1. Why run comment at all?

Respondents to the questionnaire were asked why they had decided to allow comments from users on their websites. Nearly all said 'to encourage social participation and engagement', 'to enhance a story's value', 'to add to the media consumers' experience' and 'to include a wide range of opinions on the website'. There was less, but some, support for the proposition 'to help set the news agenda and guide editorial policy'.

The news media have always realised the importance of their relationship with their audiences (readers, viewers and listeners). They have recognised the relationship between the quality or intimacy of that relationship and commercial and/or critical success. 'Knowing your readers/viewers/listeners' so that they feel a bond with the publication or programme, understanding what is important to them, sometimes reflecting their prejudices, all help to establish, develop and maintain this relationship.

The development of online media changed the balance of this relationship, making possible a more participatory and reactive relationship between audience and news publisher, allowing for more input from the audience to the news agenda and a less dictatorial, 'we know what you want', approach from editors.

The traditional news media were slow to engage with online journalism, only the BBC, Guardian and to a lesser extent the Telegraph involving themselves at an early stage when most of the rest of the media, national and regional, defiantly opted out, crying 'no revenue from the internet.'

The development of social media, particularly Facebook and then Twitter, changed all that, as did seemingly irreversible circulation decline across the newspaper industry. While social media were initially separate in intention and execution from traditional media, more an extension of friendship and shared experience than a source of traditional news, they grew to include both, to establish 'communities of interest' in issues, campaigns and a news agenda that often differed from the traditional one. It affected politics as well as the traditional media.
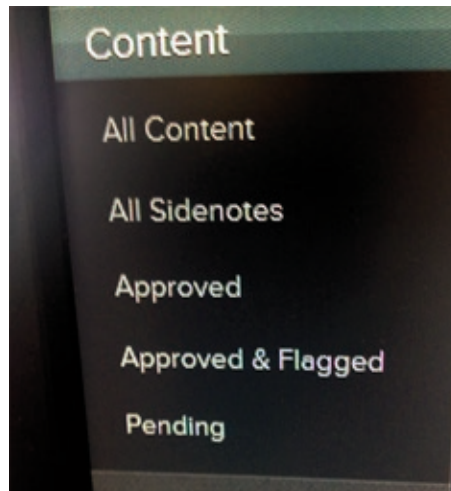
The web redefined community. Traditional media had used the word in a possessive sense – they defined and to an extent owned the community that was their audience. These audiences were 'allowed' to comment on what their news media were doing, but readers' letters and feedback programmes were clunky, less dynamic than online comment. The reader with an opinion to express on a current issue would write 'to the editor', who would not reply. One-way traffic, no dialogue. A few letters would be published; not many, space was tight.

Comment on the website, in contrast, can be instantaneous, continuous, and, perhaps most importantly, to a degree independent of the website. The 'community' of those who are 'commenting' are thus in 'conversation' with each other, not with the site but through it. The news website gathers and publishes the news stories on which it invites comment, or provides a space for comment. It hosts that space in which users of the site talk to, debate with, each other. They are not always addressing the editor or publisher of the site.

Initially sceptical editors, influenced by digitally more developed colleagues (often younger members of staff or even trainees), finally realised that online comment was part of the new media world, that long-established brands still had a continuing authority and credibility many of the newly arrived websites lacked. If they could locate the debate on their sites, hold on to the constituency which was migrating online for its news but hadn't necessarily changed its allegiances, if they could keep and develop the community that was their audience through the online conversation of comment, then they were still in business. There remained the question of revenue, but happily that does not concern us in this report!

Comments allowed and disallowed

More than 65% of respondents have been accepting comments on their websites for more than five years. This includes all the national newspaper sites, BBC and Sky News, and 86% of the regional newspaper groups. Nobody allows comment on active court cases. Most are wary about 'sensitive stories eg race issues'.

News websites vary greatly over how much comment they allow but agree more on areas where they avoid allowing comment. All (100%) national papers, national broadcasters, regional newspaper groups and individual regional papers do not allow online comment on active court cases. The other category where comment was often not allowed (100% of national papers, two out of three broadcast respondents, 71% of regional groups) was 'sensitive stories (eg race issues).' Story categories listed in the questionnaire but less frequently cited as disallowed for comment were, across all publisher categories: completed court cases (25%) and crime stories (25%). Invited to name 'other' story areas disallowed, these examples were mentioned: stories featuring a vulnerable person, death knocks (reporter visits to bereaved), and 'overwhelming risk of defamation'.

The decision on whether to accept comments on a story (which involves stating this at the end of the story, flagging 'comments', often with number of comments so far, at the top of the story or by the headline on the home page) varies greatly and for different reasons across the range of websites responding to the questionnaire. Some said they allowed comments on 'all stories', while also saying that they disallowed the stories as outlined in the last paragraph. Some sites, like the BBC, are very selective about stories where they welcome comments. MailOnline, on the other hand, takes comments on almost all of the very many stories it posts, as does the Guardian. Since these are the leaders in terms of numbers of visits among UK based websites, this cannot be a result of capacity to handle huge numbers of comments for moderation. The Guardian has about 286,000 comments per week and 100m monthly unique users. The BBC News website receives about 22,700 comments per week, many for its blogs written by its correspondents, and has 187m monthly uniques (March 2014 figures).

BBC News limits the number of stories where the comment function is activated. Meetings of website editors followed by the UGC (user generated content) hub pick between five and ten stories for comment each day, usually nearer the lower figure. This is because of resources, particularly moderation. These threads are closed after 1,500 comments have been posted or at midnight, except in exceptional circumstances. When Lady Thatcher died, 1,500 comments were posted in under two hours, so it was decided to leave the thread open much longer. If threads run slowly, under 100 comments in the first few hours, they will sometimes be closed. Editors regard 600-700 comments on a BBC thread a good healthy average.

The Guardian is predisposed to open most stories to comment. "We endeavour to open comments as a rule, unless the subject is problematic for any reason or we have a lot of comment threads open on that topic already. We try to ask the question: 'What am I hoping to gain by opening comments on this article?" There is, though, caution about some subjects, such as climate science and natural disasters, child abuse, Israel-Palestine. The Guardian sometimes takes the view that it is 'too soon' for comment, or that it 'would not provide a constructive conversation'.

Unlike other websites in the survey group, all of which, by the very nature of the internet, are available globally, the Guardian now has three separate (although with much common content) sites – UK, USA and Australia. This presents cultural variations which affect the nature and expectations of comment and commenters. For example, the very different laws covering courts and criminal cases in the United States mean that the Guardian allows comment on court cases and some sensitive stories on the US site. Unusually, the Guardian, across all its sites, allows comment on multimedia content, such as videos.

Comments allowed and disallowed

Other examples of approximate numbers of comments on stories received each week:

Kent Messenger	700 - 1,000	comments per week.
Group Guido Fawkes	10,000	
Southern Daily Echo	5,000	
HoldTheFrontPage	120 - 150	
Good Housekeeping	32	
Sky News	6 - 7,000	
Manchester Evening News	2,000	
Evening Chronicle, Newcastle	700	

Decisions on whether a story should be open for comment are taken by a variety of people. Different titles are used by different publications, and print and broadcast based sites sometimes use different titles in the digital environment just as they do in their traditional journalism. Survey responses from the broadcast area show that at Sky it will be the digital editor, at ITN the comment editor, and at the BBC either of those two plus other section editors.

Because of the scale of their online operations, national newspaper based news sites allowed a range of editorial staff to take the decision as to whether to open particular stories to comment. In all cases the comment editor had that power. Other publishers allowed the digital editor, section editor, page editor or article sub-editor to take the decision. It should be remembered that different publishers use different job titles in different ways. The Guardian probably gives the widest range of people the authority to decide whether the online item should be opened to comment, including section editor, page editor, article writer and, most frequently, the article sub-editor.

At the regional newspaper sites, both groups and individual titles, the editor, digital editor or comment editor nearly always took the decision on whether a story was open for comment.

Staff comments

More than 80% of respondents said they allowed staff to post comments on their sites.

In the case of national newspaper and broadcast respondents the figure was 100%, with the Guardian, News UK, BBC, Sky and ITV sites clearly denoting staff comments. The Guardian added that it positively encouraged staff to contribute. So far it was a small but growing proportion who did. Among regional groups it was 86% allowing staff comments, 83% clearly denoting the fact. Of the individual regional titles, 69% allowed staff comments, 44% denoted that the commenter was staff.

2. House rules

Most news websites have 'house rules', and tell users registering for comment that they are expected to observe them. They also publish 'terms and conditions', usually lengthy and what the offline world would regard as 'small print', i.e. seldom read. But house rules vary from readable and welcoming to at least concise and comprehensible. They are not always easy to find. Some web publishers include their house rules in FAQs that cover wider ground. House rules usually reflect drop-down menus provided with 'report' facilities beside individual comments.

Here are some examples of house rules, to illustrate similarities and differences of approach and content. They are taken from national newspaper websites (Mirror, Guardian, Mail, Times), broadcast websites (BBC and Sky), and regional newspaper websites (Trinity Mirror, Johnston Press).

The Mirror takes an approach consistent with the style of its hard copy tabloid newspaper, a welcoming start, a clear statement of what is not wanted, and an inclusive request to Mirror contributors to help maintain standards by reporting posts that appear to break the house rules. Here are the Mirror's succinct house rules:

'We want Mirror Online to be an open place for you to read and discuss the news, share your experiences and opinions, and see what other readers have to say. We reserve the right to remove comments, and in the interests of the community we do not want comments that are:

1. libellous or defamatory (bad mouthing others)

2. sweary, pornographic, indecent (dirty)

3. harassing, threatening, harmful, abusive (hurtful)

4. invasive of privacy rights, publishing personal information about yourself or others (mind your own business)

5. inflammatory or otherwise objectionable (going to cause trouble)

6. for any unlawful purpose or activity (illegal)

7. commercial, political or personal promotion which does not relate and contribute to our discussions (spam)

If you think a post breaks these house rules, please flag it as abuse to be reviewed by our moderators. The Mirror is not liable for any content on third party sites. Thanks for being a part of what we do. If you have any concerns please get in touch with us at feedback@mirror.co.uk.'

The Guardian uses rather more words than the Mirror to set out its rules, a word it does not use, preferring 'community standards and participation guidelines.' It provides ten of these guidelines and expects 'all participants in the Guardian's community area to abide by them'.

"Our aim," it says, "is to ensure this platform is inclusive and safe, and that the Guardian website is the place on the net where you will always find lively, entertaining and, above all, intelligent discussions."

It sums up its ten points thus: "If you **act with maturity and consideration** for other users, you should have no problems. – **Don't be unpleasant.** Demonstrate and share the intelligence, wisdom and humour we know you possess. – **Take some responsibility for the quality of the conversations in which you're participating.** Help make this an intelligent place for discussion and it will be."

The 10 points in full:

1. We welcome debate and dissent, but personal attacks (on authors, other users or any individual), persistent trolling and mindless abuse will not be tolerated. The key to maintaining the Guardian website as an inviting space is to focus on intelligent discussion of topics.

2. We acknowledge criticism of the articles we publish, but will not allow persistent misrepresentation of the Guardian and our journalists to be published on our website. For the sake of robust debate, we will distinguish between constructive, focused argument and smear tactics

3. We understand that people often feel strongly about issues debated on the site, but we will consider removing any content that others might find extremely offensive or threatening. Please respect other people's views and beliefs and consider your impact on others when making your contribution.

4. We reserve the right to redirect or curtail conversations which descend into flame-wars based on ingrained partisanship or generalisations. We don't want to stop people discussing topics they are enthusiastic about, but we do ask users to find ways of sharing their views that do not feel divisive, threatening or toxic to others.

5. We will not tolerate racism, sexism, homophobia or other forms of hate-speech, or contributions that could be interpreted as such. We recognise the difference between criticising a particular government, organisation, community or belief and attacking people on the basis of their race, religion, sex, gender, sexual orientation, disability or age.

6. We will remove any content that may put us in legal jeopardy, such as potentially libellous or defamatory postings, or material posted in potential breach of copyright.

7. We will remove any posts that are obviously commercial or otherwise spam-like. Our aim is that this site should provide a space for people to interact with our content and each other, and we actively discourage commercial entities passing themselves off as individuals, in order to post advertising material or links. This may also apply to people or organisations who frequently post propaganda or external links without adding substantively to the quality of the discussion on the Guardian website.

8. Keep it relevant. We know that some conversations can be wide-ranging, but if you post something which is unrelated to the original topic ("off-topic") then it may be removed, in order to keep the thread on track. This also applies to queries or comments about moderation, which should not be posted as comments.

9. Be aware that you may be misunderstood, so try to be clear about what you are saying, and expect that people may understand your contribution differently than you intended. Remember that text isn't always a great medium for conversation: tone of voice (sarcasm, humour and so on) doesn't always come across when using words on a screen. You can help to keep the Guardian community areas open to all viewpoints by maintaining a reasonable tone, even in unreasonable circumstances.

10. The platform is ours, but the conversation belongs to everybody. We want this to be a welcoming space for intelligent discussion, and we expect participants to help us achieve this by notifying us of potential problems and helping each other to keep conversations inviting and appropriate. If you spot something problematic in community interaction areas, please report it. When we all take responsibility for maintaining an appropriate and constructive environment, the debate itself is improved and everyone benefits.

MailOnline has 13 house rules covering contributions to its website, and these are amplified and supplemented by the much longer 'terms'. While rules in general mirror those for other sites, outlining what the Mail considers 'acceptable and unacceptable comment', this is done in a more narrative way, talking directly to the commenter. This is best illustrated in the first three, fifth and 11th rules, reproduced below. In the case of the other rules, only the titles appear here.

Rule 1: We welcome your opinions. We want our readers to see and understand different points of view. Try to contribute to the thread, rather than just stating if you agree or disagree. Unless you have a witty one-liner, please explain why you hold your opinion.

Rule 2: This is a public forum. Once your comment is online, everyone with Internet access can read it. Please make your comment clear to ensure that it is not misunderstood. Your comment may be rated by other users and categorised e.g. best and worst rated. You can express a strong opinion but please do not go over the top.

Rule 3: Language and relevance. Please be polite. Do not use swear words or crude or sexual language. Only English is allowed. Keep your submissions relevant to the story or topic. Do not insult other contributions or discuss the non-appearance or removal of any content on this Site or the suspension or termination of any users. If you would like to discuss the operation of the Site with us, please email us on community@dailymailonline.co.uk.

Rule 4: Report abuse

Rule 5: No libel or other abuse. You must not make or encourage comments which are:

* defamatory, false or misleading;
* insulting, threatening or abusive;
* obscene or of a sexual nature;
* offensive, racist, sexist, homophobic or discriminatory against any religions or other groups.

Rule 6: Confidentiality, privacy and contempt

Rule 7: No advertising, solicitation or investigations

Rule 8: No impersonation and proper disclosure, service or website

Rule 9: No linking or copyright infringement

Rule 10: Comments on articles v our message boards

Rule 11: Respect the spirit as well as the letter of the House Rules.
In deciding what is acceptable, please also respect the spirit and tone of these rules and the community.

Rule 12: Removal of content

Rule 13: Suspension and termination

The Times although access to commenting on the Times website is restricted through the publisher's use of a 'pay-wall' (access is through subscription), it still has detailed and comprehensive house rules. The Times says it respects its 'users' and asks them to respect each other and to stick to what is legal, tasteful and civil. It also asks the users for their 'participation and vigilance' in reporting 'inappropriate content' posted by other users.

While the Times house rules cover the same ground as other websites, they tend to be more detailed. For example, the paragraph dealing with racist and other forms of abuse goes further than simply a list of categories. It prohibits content that is: "Racist, homophobic, sexist, or demeaning to either sex, abusive, sexually explicit, pornographic, of a disturbing nature or that preaches, encourages or incites religious or ethnic hatred, or links to websites that promotes the same."

TimesOnline makes specific mention of its strict regulation of images of children under the age of 18. "We allow them but must ensure that they comply with strict guidelines, including that they should not be sexualized in any way, and that they are posted by the child's immediate family."

BBC house rules are included among its "Frequently Asked Questions", and explain that they have been established 'to protect you and the BBC from legal and editorial risks. These are intended as a guide to how you should behave and post on bbc.co.uk.'

Breach of the BBC terms of use will result in the removal of your messages. Repeated breaches will result in the restriction of your BBC ID.

The BBC has 12 house rules, headed 'We reserve the right to fail messages which…

- Advertise a product, service or website
- Risk breaching copyright law
- Are not in English
- Risk breaking UK law
- Contain potentially defamatory statements
- Are abusive or disruptive
- Are offensive
- Are off-topic
- Contain personal details
- Risk contempt of court
- Contain spam
- Contain unsuitable URLs.'

In the areas of abusive, disruptive and offensive statements the BBC provides longer and more precise explanation than do some other sites. "Abusive or disruptive behaviour is not allowed… This includes:

- Using swear words (including abbreviations or alternative spellings) or other language likely to offend. Harassing, threatening or causing distress or inconvenience to any person or people.

- Flaming: this means posting something that's angry and mean-spirited.

- Trolling: this means saying deliberately provocative things just to stir up trouble.

- Infringing the rights of, restrict or inhibit anyone else's use and enjoyment of bbc.co.uk.

- Attempting to impersonate somebody.

- Using multiple accounts to disrupt boards, annoy users, or to avoid pre-moderation or restriction of your account.

- Bumping or creating duplicate threads, posting in such a way as to cause technical errors, or any other attempts to disrupt the normal flow of conversation.

- Posts that contain offensive content are not allowed… Racist, sexist, homophobic, disablist, sexually explicit, abusive or otherwise objectionable material will be removed and if extreme will result in immediate and permanent restriction of your account."

Sky News like others has FAQs, terms and conditions, and, most accessibly, house rules. Sky says: "We want you, the users, to enjoy the discussion boards and comments and make them a forum for intelligent and vigorous debate. You must not post messages which:

- Make unfounded or unproved allegations (especially of wrongdoing against a person, organisation or group
- Contain swear words or language which may offend. This may include swear words with asterisks replacing some letters
- Break the law, or encourage/support breaking the law. This includes libel, contempt of court and breach of copyright
- Discuss active UK court cases
- Advertise goods or services
- Are racist, sexist, homophobic, abusive or otherwise objectionable
- Include personal details (yours or someone else's) such as phone numbers and addresses
- Are made to appear as if they have been posted by someone else (impersonation)
- Are repeated more than once (spam)
- Deviate wildly from the topic of the thread."

Trinity Mirror, as well as publishing the national Mirror title, has regional newspapers and associated websites all over Britain. WalesOnline is one of its busier websites and provides a good example of succinct house rules set to apply across a group. A list of seven non-permissibles follow a clear general statement.

"We want WalesOnline to be an open place for you to read and discuss the news, share your experiences and opinions, and see what other readers have to say. We reserve the right to remove comments, and in the interests of the community we do not want comments that are:

- Libellous or defamatory
- Sweary, pornographic, indecent
- Harassing, threatening, harmful, abusive
- Invasive of privacy rights, publishing personal information about yourself or others
- Inflammatory or otherwise objectionable
- Any unlawful purpose or activity
- Commercial, political or personal promotion which does not relate and contribute to our discussions."

Johnston Press has generic house rules covering the many websites associated with its regional newspapers. It describes these as: 'Rules for contributing to the forums and principles that you must accept.' There are 22 of these rules and principles, with an additional three-clause 'swear word policy'.

There is a firm tone to the wordy house rules. For example, the following clause, while containing similar material to other sites, brings together in one clause an intention which is often split up on other sites.

"Unlawful, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented, racially offensive or otherwise objectionable material is not acceptable. Hardcore swearing is not allowed on the forums. If you do use language in your posting such as that defined in this paragraph (see also the Swear Word Policy below) the Publisher will remove your posting." (Rule 6)

House
Rules

The Swear Word Policy is presented as an appendix to the 22 house rules, and reads:

"If you see a word that you personally find offensive, please bring it to the attention of the moderator, who will make a decision as to its suitability in the given context. This is a guide only; if words offend, or are used in an offensive way, they may be removed.

"The Publisher insists that you do not use swear words at all. The Forum attracts a wide range of readers and members, in terms of age, culture, nationality and personal attitude and many people are genuinely offended by swear words that others consider perfectly acceptable.

"Minority Groups: Some words are banned not because they are profane or swearing, but because they may offend members of any minority, religious or ethnic group. Any posting or article using a slang word that may be seen to be offensive to any group of people will be removed and the posting may result in the termination of your account."

House
Rules

3. Control: how much and how?

Partially handing over the website to its readers involves risks. Left to their own devices they may pollute it in any number of ways. Bad language, obscene suggestions, extreme forms of prejudice and perversion, all may make it online if uncontrolled. And yet some of the new media purists regard any form of gate-keeping or control as inconsistent with free speech. A balance has to be struck.

Online publishing may be harder to control, but it remains publishing, with potentially the same legal and other restraints that limit the freedom of more traditional forms of publishing. To a point. Because the internet knows no national boundaries it is hard to apply varying national laws to a website. Because content can be read everywhere – save for a few authoritarian regimes which have found technical and negotiated ways of limiting availability of some content in some places – enforcing of national legislation is problematical. The location of the publisher and more importantly the servers distributing online content become the critical issues.

In these early years of global availability of internet publishing, regulators are still working out if they have a role, or the opportunity of carrying it out, while lawyers are still in the early stages of test cases and precedent. What is already clear is that there is no unanimity about limits of acceptability of material available on a screen anywhere. It raises all kinds of issues about pornography, children, terrorism and many other contentious issues.

It impacts too on the narrowly defined area in which our survey has been carried out. This is news and comment on websites run by what we now describe as traditional media: print on paper, or broadcast on radio and television, and published in this country, bound by the laws of this country. Whether libel or defamation, contempt or official secrets, copyright or privacy, these are familiar laws which are established, recognised and handled by publishers no matter their view of them.

Digital publishing on the internet is not only global but does not have to be constrained. No longer are there limits of space on a page, or duration on air; websites allow for as many words and images as anyone chooses to put on them. This gives rise to reader/audience engagement as never before, to communities talking to each other as well as to the website. It allows for comment and opinion to come not only from professional journalists and pundits, but from their readers who can become pundits too.

It frees up opinion to the cranks and the bigots as well as the informed and the passionate, and requires views to be taken over which group various commenters fall into.

So for established titles, or brands, taking no responsibility for content is not an option. The traditional risks to publishers of breaking the law, alienating audiences, damaging the brand or reputation of the publisher, all remain with all the potential commercial consequences. Although online media provides huge opportunities for audience participation and engagement, it also brings a range of new challenges to the publisher. Some control cannot be avoided.

But different publishers will take different views about the degree of control. The true believers, those who consider that opening media space to anyone who wants to comment democratises news, are reluctant to edit, to interfere with lively debate.

But for traditional media now developing online there must be some interference, of whatever degree, and an appropriate word must be found for the process. Editing is old media, censoring is provocative, policing is authoritarian. So publishers have settled for 'moderation', which has both academic and debating resonance. It has the advantage of sounding relatively benign or non-intrusive, even though it has the capacity to take down or 'unpublish'.

The process, in most cases, involves a form of registration for those who wish to post comments, setting out house rules of what is acceptable and not acceptable in comments for posting (see previous house rules section), a **system of moderation,** a means for a registered commenter to report unacceptable content posted by another commenter, a system for the publisher to deal with unacceptable comments and commenters, and **sanctions** that can be imposed on the latter.
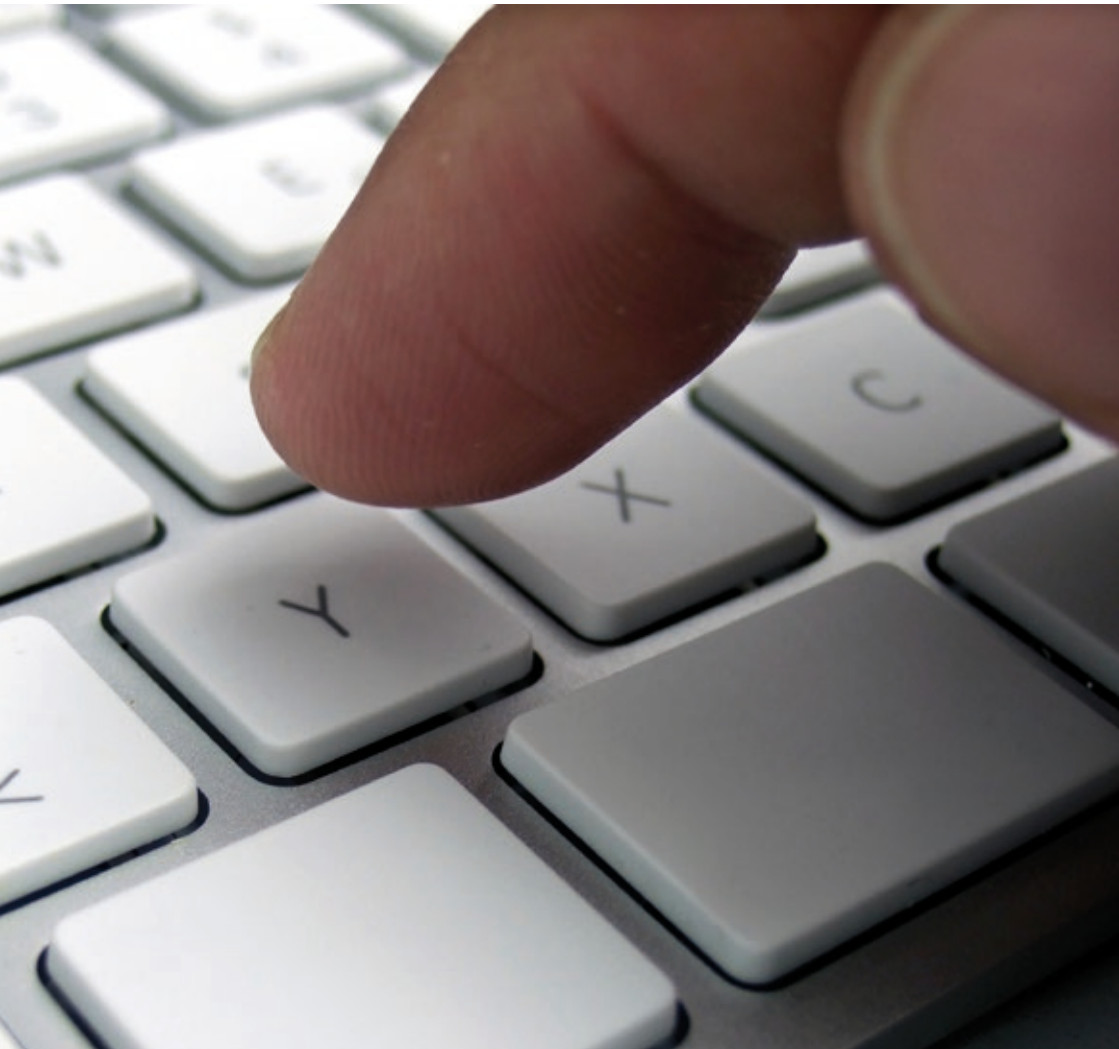
Registration

Among all respondents to the survey 58% allowed comments only from those who had registered with the website. In 25% of cases anyone could contribute.

Among all respondents 44% allowed comments to be left anonymously, but the commenter had to be registered with a user name/account/full name; in 14% of cases contributors could post anonymously without a record of who they were; and in 33% of cases comments could be left only if the contributor had a user name/account/full name, and this was published.

The major newspaper and broadcaster based sites all required registration before comments were accepted. User names and full names were required for the account.

Posting a comment on most of the major news websites requires registration. Most sites ask for an email address and a new password. Registering, it is usually stated, with varying degrees of force, represents acceptance of the site's house rules and terms and conditions. Comments on website stories, where invited, are available to be read by any visitor to the site, but new comments, reacting to those already there or making a new point, can only be made by those who are registered.

Some sites, such as the BBC, insist on direct registration and then signing in to comment, rate comments, or complain about comments. All commenters can see an online statement saying that all posts are reactively moderated and commenters must obey the house rules. The BBC allows signing in limited to 30 days through Facebook and Google, but encourages commenters to have their own BBC ID.

Registration

Sky News allows signing in through Facebook, but also has direct Sky registration. Trinity Mirror Regionals with its 40 newspaper based websites, permits signing on only through Facebook. Numbers of Trinity Mirror postings fell when this form of registration was introduced, but have slowly climbed back. The Guardian's sites (UK, USA and Australia) allow direct registration with the site as well as signing on through Facebook, Twitter and Google+.

MailOnline, the Guardian and the BBC all require a user name, a password and an email address. MailOnline also asks for a home town. It offers you the chance to register your full personal details but stresses this is not required. While MailOnline has a 'trusted' status for certain users of its message boards it does not assign such status to any of its commenters.

While registration often requires traceability, anonymity is sometimes offered. The use of meaningless synonyms instead of genuine user names seems a strange form of shelter for those who wish to place comments or opinions at the foot of news reports or debates. It would never have been acceptable to editors of readers' letters columns in newspapers (where checks on authenticity of names and addresses were usually made before publication). Some editors spoken to were unenthusiastic about the reluctance to use genuine names, but suggested, without much explanation, that it came with the internet and was conventional among online communities. The Times says (online): "We like it when users comment under their real names because it makes them accountable for their opinions and improves the level of conversation on the site. However, this is not a requirement."

Some editors pointed out that within discussion groups and the commenting community contributors were often familiar with other contributors despite the absence of published real names. More importantly, the editors emphasised that the 'anonymous' contributors were identifiable to them, through email and IP addresses, even if not identified online. This is important for sanctions against abusers of community rules.

Very few publishers give 'trusted' or 'verified' status to consistently well behaved contributors. The Mail (see above) and Johnston Press with its 197 websites around the country are exceptions. JP's "enhanced status" is based on number of posts and number of 'reported' posts.

Moderation

Nearly half respondents (44%) reactively moderate.

22% pre-moderate comments (before posting online); 17% post-moderate (after publication online) or a mixture of pre-moderation and post-moderation according to type of content.

Why do you moderate comments? Most common reason given by all respondents was to check for libel or defamation (89%). Next came checking for bad language or abuse (83%). Nearly a third of respondents (31%) moderate comments to remove errors of fact.

More than 80% of respondents said they had a formal policy on comment moderation; 19% did not.

Average time aimed for between referral for post or reactive moderation and moderation taking place is within one hour for 31% of all respondents. Average time actually taken is within one hour in 23% of cases.

Average time between reporting abuse and taking down of comment is within 15 minutes in 36% of all cases. Maximum time aimed for between reporting and taking down is within one hour in 25% of cases, and within 15 minutes in 25% of cases.

72% of respondents said it was easy to report abuse because there was a 'report' button by each individual comment.

75% of respondents said users did not have to be registered to report a comment.

Moderation comes in three guises, or stages of proactivity. These are known as 'pre-moderation', 'post-moderation' and 'reactive moderation'.

Pre-moderation is the reading and approving or rejecting of all contributed comment or opinion before it is posted on the website. It also includes automatic, 'mechanical' moderation, the removal of words pre-programmed into filters, to be removed without the moderator ever seeing them. As well as swear words other current sensitive terms, like names that might produce offensive or defamatory comment, can be added to the filter.

Some software now includes advanced filters which can detect aggressive or offensive sentiment as well as words and phrases. The American company Livefyre, for example, produces moderation software called Magic Moderation, which, it claims, finds ten times as many malicious items as regular spam and profanity filters, and two to three times as many as human moderation programmes. This system can be programmed to its own needs and rules by the website publisher.

Post-moderation is the reading of the contributions after they have been posted, either on a comprehensive or sampling basis. Reactive moderation is the consideration of comments after they have been posted and drawn attention to.

The Guardian says it uses a mixture of moderation methods according to the type of content. "For certain topics we watch as we can predict they may be problematic. Otherwise we moderate reactively to abuse reports."

Reactive moderation will usually result from comments being 'reported' or 'flagged' – reacted to – as potentially offensive. It may result from the routine reading of posts by moderators.

Reporting

Look at online news sites that allow comments to be posted on some of its stories and there will very often be a button marked 'report' or 'report abuse' or 'complain.' Use of the button is sometimes restricted to registered users of the site, with those not registered being invited to register at this 'button-pressing' stage. More often you can complain/report even if not registered. Clicking the button reveals a drop-down menu from which the user is invited to select the form of abuse being complained about. These lists reflect the house rules of the particular site. Posters who have read the house rules, as advised, have already been warned where not to go in their comments.

Some examples of drop down lists that appear after the complainer has pressed the report, complaint or flag button:

Guardian: personal abuse, off topic, legal issue, trolling, hate speech, offensive/threatening language, copyright, spam, other.

Trinity Mirror regional sites and Mirror online: obscenity/vulgarity, hate speech, personal attack, advertising/spam, copyright/plagiarism, other.

The BBC is more general and does not list specific areas of abuse in its report box, although its house rules do. Click the button on a BBC comment and you read:

"Complain about a post: This form is only for serious complaints about specific content that breaks the House Rules. If you have a general comment or question please do not use this form, post a message to the discussion. The message you complain about will be sent to a moderator, who will decide whether it breaks the House Rules. You will be informed of their decision by email."

MailOnline is also unspecific. Click on an arrow next to a comment posting and a box reads: "Report abuse. If you would like to make a complaint about someone violating our house rules please complete this form." A box allows the user 550 characters to do this, and the user must provide an email address and interpret a verification code.

The Mail site is unusual too in that it says above the comments on each story either: "The comments below have not been moderated" or: "The comments below have been moderated in advance". It is clear that it is in practice the more sensitive stories that have had advance moderation.

The online Express also does not specify forms of abuse. Its 'report this comment' box states only: "If you think that you've found a comment that violates the terms and conditions of the site, please give us details in the form below and we will look into the matter."

There is considerable variation in the reaction times of the very disparate range of news websites making up our sample. The relatively small number of sites which are pre-moderated might take up to 24 hours to moderate comments in one third of cases. The large majority which used post or more often reactive moderation, spent an average of an hour between referral for moderation and it being assessed and/or removed in 23% of cases. This was the amount of time aimed for by 31% of respondents.

When it came to the separate categories of respondent, two of the broadcast sites reported an average time between abuse reporting and takedown of comment that was 'within 15 minutes', while the other did not have this information. Only the BBC aimed for a maximum 15 minutes between report and takedown. Others were longer. The national newspaper sites aimed for 'within an hour' in two cases, and within half a day in another. They all achieved 'within an hour', one achieving 'within 15 minutes'.

Regional newspaper groups responding to the survey showed 29% saying they aimed at 15 minutes to an hour between reporting and takedown of a comment, and the same percentage achieving this. For individual regional papers the corresponding figure was 38%.

4. The moderators

Moderation is a new branch of the journalistic process, a new form of media employment, and as online comment grows the demand for moderators increases. Some publishers moderate in-house, others sub-contract to specialist firms that have emerged or expanded to move into this area, others have a mix of the two. The demand for moderation varies enormously, with small regional papers able to handle comments in-house with existing editorial staff, while international websites like MailOnline receiving about 350,000 comments a week and the Guardian towards 190,000 must have a more labour-intensive system in place.

Across all respondents to the survey 44% said moderation was carried out by 'duty staff' while 36% said it was carried out by dedicated moderation staff or person. These moderators were 'experienced journalists' in 56% of cases and 'editorial management' in 47%. Moderation was done by 'experienced non-journalists' in 22% of cases and a 'junior or trainee' in 14%.

Some national newspaper and broadcast websites contract out moderation while retaining in-house supervision and some moderation. MailOnline, BBC, Sky News and ITN all have this sort of system in place.

News UK and the Guardian's moderators are in-house. All three Guardian sites (UK, USA and Australia) are moderated in London by the same team. Some Guardian moderators have a journalistic background, most have worked for the Guardian for two years or more and are in the 20s and 30s age group.

All relevant respondents stressed that they had good relations with the contractors, and regular contact. The in-house team and those who managed them discussed with the contracted outside team particular themes and trends emerging from complaints. They identify trolls and persistent offenders. The BBC and MailOnline produce weekly reports on moderation performance.

Among the regional groups, where comment traffic is very substantially smaller than that of the major national and international sites, 57% of respondents said that moderation was undertaken by 'duty staff', and 71% of these were described as 'experienced journalists.' Among individual regional titles, 62% said moderation was carried out by 'duty staff', most of whom were described as 'editorial management' or 'experienced journalist.'

Training of moderators

Only 50% of respondents to the survey questions said that their moderators underwent training, and 70% said they had no review/feedback process in place for training; 28% said no procedures were in place for checking moderators' work, while 33% claimed 'occasional on-screen checking' of moderators' work by a superior.

When these figures are broken down, the national print and broadcast websites clearly take training of moderators more seriously. All said they had training programmes for their moderators, which included some legal content. All had access to in-house legal advice when required. All were made familiar with house rules and terms.

Respondents representing regional newspaper groups had moderator training in place in 57% of cases, while individual regional papers reported a figure of 39%.

Most Troublesome Stories

News website publishers were asked which kinds of stories caused moderators most problems. Across all respondents there was a clear pattern with comments on race/immigration stories most prevalent (53% of respondents), followed by court, crime and politics. It should be noted though that most respondents also said they did not allow comments on court stories.

Very few legal complaints are made about online comments, suggesting that moderation weeds out the libellous and defamatory, that decisions taken about which stories should not be open to comments are the right ones, that comments are not read by the sort of person who threatens or takes legal action against a publisher. Among the survey respondents 64% had not received complaints about any comments, while 36% had.

5. Sanctions

All respondents: over the previous year more than 25% had been forced to remove in excess of 150 comments because of 'abusive language', 'libel or defamation', or 'uninformed of inappropriate'.

This figure is hardly surprising in view of the number of comments posted on national newspaper and broadcast websites. Even regional newspaper groups and some individual titles easily exceeded 150. Most respondents were reluctant to give 'block' or 'remove' or 'fail' (all terms used by editors of sites for comments deemed to contravene house rules) figures. Not all keep records, although the large national newspaper/ broadcaster sites do. An indication of the proportion of comments found by moderation not to meet site standards is provided by the similarity of rough figures provided by one of the largest newspaper-based sites and one of the largest broadcast based sites. Both said the figure was less than 2%.

The big regional newspaper group Johnston Press, however, provided three successive 2013 months figures for reported, removed and published comments across all its 197 websites and specifically for the Scotsman because it provides such a large proportion of the overall numbers. For all titles an average of about 11,300 comments were

reported each month of which about 720 or 5.8% were removed. On the Scotsman about 7,400 comments were reported with about 6.7% being removed.

Johnston Press explained: "We post-moderate all comments across all our 197 regional news properties. Some comments are stopped at submission stage because our automated system deems them spam or containing words that we have pre-determined cannot be included in comments eg swearing, hate language. All those which pass successfully through this filter then appear on screen."

The Kent Messenger Group data shows that the number of comments removed after being reported was small, 'probably less than 1%' of total comments, although it did point out that in common with many other sites, filters blocked a number of comments for profanity and racist words, probably around 5%.

Some comments are removed automatically by filters, others after report and consideration by moderators. In many cases an email will automatically be generated to tell the poster his or her comment has been taken down. In some cases this is recorded among comments on the site.

Most sites (75%) have a policy in place to deal with posters who repeatedly abuse the comment function (by breaking house rules) by banning them. The major national newspaper and broadcast based sites that responded to the survey all have such a policy, as do the large regional groups. Some issued warnings first with a ban following repeated offences. Bans ranged from two weeks to permanent. Where a post had been removed and a warning issued the poster would often have future posts pre-moderated; they were on a 'watch list.'

This is how some of the major websites summarised how they dealt with users who abused the comment function:

MailOnline: "We reserve the right to ban any user breaching the house rules."

Guardian: "We warn, pre-moderate and if needs be ban abusive commenters for a short period or permanently if needed."

News UK sites (Times, Sunday Times, Sun): "For extreme repeat offenders we place users on 14-day bans or deletion."

Across all respondents these were the most popular means of banning abusive users or trolls:

Banning by IP address: 51%

Issuing warning to user: 50%

Banning user for limited period of time: 39%

Two thirds of respondents had no appeal process against a ban from commenting, although the major sites such as the BBC, Sky, Guardian and News UK, and 71% of the big regional groups did.

MailOnline and ITN do not have an appeal process flagged on their sites, although MailOnline points out that it does have a contacts page which allows readers to get in touch directly over any matter. The site does receive appeals by phone and email, and deals with them on a case by case basis.

6. Legal view of comments on news websites

In the five years or so that have witnessed the huge growth of comments on news websites publishers have been aware of the lack of clarity over where they stand in terms of the law. Moderation was necessary to protect the reputation of the brand, the publisher of the site, which in the area we are concerned with in this report is mainly a well-established newspaper or broadcaster whose credibility and trustworthiness are essential to its reputation. Moderation, it was hoped, would eliminate many forms of abuse set out in house rules and reportable through drop-down lists behind report buttons. There was a further concern, one publishers were well used to dealing with through their traditional publications, that of breaking the law, be it defamation, libel, contempt, or other.

Traditional publishers were used to traditional methods. When concerned, or even a bit worried, about words or pictures they planned to put on paper or on air, they would refer the material to senior editorial staff in the first instance or to an in-house or external lawyer if the matter was complex or high risk. In the early days of online comment that system remained feasible. Make sure the comment is read before it is put up, or published.

That is pre-moderation. It works for small numbers of comments arriving at a steady rate. But it was not long before the big national and international publishers were receiving comments on their news websites at a rate they could never have predicted. Their audiences were potentially global and thus their comments could come from anywhere and be published everywhere. We have seen already the size of audience and quantity of comments from publishers like the Mail, Guardian and BBC.

Pre-moderation of all these comments was impossible. It would take unaffordable numbers of moderators. Publishers could, and did, seek the help of their own commenters, asking them to report material that ignored house rules or otherwise offended, effectively, through the report mechanism, asking their own community of commenters to alert the moderators to the need to intervene. Thus reactive moderation was, for the bigger publishers, born of necessity.

There was however no real certainty that this would 'wash' in the face of a legal challenge. There was a widespread belief that the world of the internet was uncontrolled and uncontrollable, anarchic, but equally there were few legal precedents or case law on whether material on the website could be susceptible to legal action. Such uncertainty does not put publishers at their ease.

There were plenty of examples of successful applicants for super-injunctions, minors and rape victims not allowed to be named, unsubstantiated allegations against public figures, all being revealed on the internet and no legal action following. It was accepted, however, that it might be a different matter if such information was posted on a website owned by an established publisher. Equally, the traditional platforms run by these traditional publishers did not take the view that it was safe or right to publish this information because it was already public knowledge if you knew where to find it online.

So sticking to the narrow area with which we are dealing, comments on established news websites, there was a variety of views about how to guard against litigation. Essentially, this came down to a belief that if you made some effort to identify actionable material in comments before they were posted that put you in a stronger position than waiting until it had been posted and identified as possibly actionable and doing something about it then. Clearly the latter course was realistically the only one available to publishers of thousands of comments daily, although some thought the former the only convincing way to mitigate the offence.

As it has turned out the new Defamation Act 2013 has solved the problem in the view of legal experts. Cleland Thom's e-book Using the Defamation Act 2013 says that 'website operators no longer have to pre-moderate reader comments'. Section 5 of the Act provides a 'report and remove' system that people can use if they believe they have been defamed on a website message board or comment area.

Thom sets out guidelines for website operators, who should:

- Have a robust written complaints policy

- Designate and train staff to deal with complaints promptly

- Give website users clear instructions on how to complain and who to

- Update website terms and conditions to reflect the new arrangements

- Register users before they are allowed to make a post, taking names and contact details

- Tell users that the operator may divulge their details if they post anything defamatory

- Keep proper written records of complaints with dates and times of actions taken

However, Tony Jaffa, a partner with solicitors Foot Anstey, told a Society of Editors conference in April 2014 that this approach was bureaucratic and time-consuming. "It does provide a defence in certain circumstances–but why bother?" Whilst recognising that his approach is legalistic and ignores the possibility of unpleasant User Generated Content remaining on a website for longer than might be desirable, Jaffa prefers to leave aside Section 5 of the new Defamation Act and rely on Regulation 19 of the E-Commerce Regulations 2002. "Regulation 19 says that if you do not pre-moderate, if you exercise no editorial control, if you get a complaint that specified UGC is defamatory, and if you respond by taking it down, then you have a defence."

Jaffa said this was the best way of dealing with readers who post comments on websites. "You don't have any control over them; you don't have any influence; and you don't know what they are going to do. If you take down immediately, you are home and dry–you will have a full defence if you are sued for libel. If you pre-moderate, the Regulation 19 defence will not be available, which is why I favour post-moderation, despite its disadvantages."

7. The influence of comments on editorial and policy

70% of all respondents used comments to inform and influence future editorial content.

Many respondents thought that comments contributed enhanced the website itself, perhaps in initiating other stories. The comments might, in the same way, help to generate content for the host newspaper or broadcaster responsible for the site, in the former case perhaps providing quotes for a story. Among the regional press groups 86% said online comments were fed back into the newspaper, to be used as content on an ad hoc basis. In 50% of cases they were used as comment/content to publish.

Among the broadcast sites, BBC and ITN agreed online comments were used to inform and influence future editorial content. The BBC said they were used as one measure of audience interest/concern/opinion, and to identify future story opportunities. ITN said issues raised in comments might be followed up by the editorial teams.

Among national newspapers comments were felt to be useful to editorial, in providing reader feedback and contributing to future stories. Examples were feeding comments into stories about the cuts to providing specific examples. One respondent said: "When we solicit comments we might follow up on particularly interesting submissions."

The BBC will sometimes place a form at the end of an online news story, in place of an invitation to comment, asking users for personal experiences of a particular issue or subject. This way they find subjects for interview or case studies.

8. Standards

Overall standard of comments on websites compared, for example, to readers' letters columns in newspapers.

A majority of respondents, 58%, thought online news comments were of a lower standard than, say, readers' letters.

So what did the editors/managers of all these news websites think of their commenters? Respect for the 'clients' in whom they invest so much energy, time and money is not overwhelming and across all respondents there was a majority who thought quality was inferior to that found in readers' letters in newspapers. Among national newspaper sites the Guardian and News UK websites found online comment 'more variable'. The Guardian pointed out that online comments are not edited for quality; the unedited postbag of the letters desk would of course also contain letters of varying quality. The broadcasters ranged from 'lower standard' to 'about the same'; 57% of the regional groups, thought online comment of a 'lower standard' while the individual regional titles were the most critical of comments on news websites; 76% of respondents considering them of a lower standard than readers' letters on a printed page.

9. Record keeping

- 28% of respondents keep a record of the 'percentage of comments which are removed following another reader reporting them'
- 44% keep a record of 'details of the reasons why comments have raised problems online'
- 47% record the 'number of comments made by a particular commenter'
- 47% keep the 'details of all comments from a particular contributor'
- More than 40% of respondents keep no record of any of these:

  - The number of comments not published because they do not meet in-house requirements
  - Details of the reasons why comments have raised problems online
  - Number of comments raised by a particular contributor
  - Number of comments made with a particular stance or opinion
  - Details of all comments made by a particular contributor

10. Technology and functionality

Half of all respondents, including BBC, Guardian, Mail Online, reported that their comment facility was developed in-house, while 20% had a bespoke system built by external developers. 25%, including Sky News, News UK, Trinity Mirror and Johnston Press sites, used a 'generally available' blogging or messaging system such as those supplied by Pluck and Disqus, and 6% employed the system of a social network like Facebook or Twitter.

Nearly 80% of all respondents said their comment facility did not include a search capability.

Just under 90% do not use linguistic analytics to study common factors across comments and identify emerging trends through words and phrases, but 8% are considering using such tools in the future.

11. Blogs, magazines, others

A small proportion of respondents to the Society of Editors comment moderation survey fall outside the majority dealt with in this report and are therefore dealt with separately here. They are not mainstream news websites run by traditional publishers of national and regional newspaper and broadcast news providers, but provide a small but useful snapshot of a disparate, and possibly unrepresentative (possibly not) set of those who invite user comment on their website. It is worth listing them to indicate their variety:

Guido Fawkes, HoldTheFrontPage, Press Gazette, Good Housekeeping, Sallramage. net, Northumberland Disability and Deaf Network, WikiFestivals, Sellmystory.com and Falkland Islands News Network.

The data is collated from all these nine, although it is accepted that they differ widely in nature and scale of operation and quantity of comments received. 67% of them allowed comments on their websites 'to encourage participation and engagement, 56% 'to add to the media consumers' experience.' Two thirds, 67%, allowed comments on all stories on their sites, one third on opinion material such as columns and letters. The FI News Network also allowed comments on 'Falklands sovereignty issues.

The most popular form of moderation was post-publication, 44%, with one third saying they employed reactive moderation. Guido Fawkes, the high profile political blog/website which receives about 10,000 comments a week, undertakes some pre-moderation with automated, keyword driven software to remove some unacceptable content, such as racist words.

Moderation was usually undertaken by staff, with the total number of moderators available at any one time either one or two in almost all cases. These moderators were 'experienced journalists' or 'editorial management' in one third of cases. One third of respondents said that moderators received specific moderation training.

Registration with the website was required in 22% of cases and registration through a social network in 33% of cases. Anonymous comments were allowed to be posted by 33% of respondents in this group, while 44% required and published a full name. Complaints were taken from non-registered users in 89% of cases. No legal complaints about comments had been received by 78% of respondents.

Respondents reported most troublesome comments came in the area of crime stories, 33%, court stories, 22%, with health/lifestyle, international, celebrity, race/immigration and politics all mentioned by 11%.

Two thirds of these sites had a policy in place to ban users who posted abusive comments repeatedly, by blocking an email or IP address. Trolls were combated by issuing a warning to a user (44% of cases), keeping a record of IP addresses (33%), banning the user by IP address (44%).

Website staff members were allowed to comment on their own sites by 89% of respondents, and all clearly denoted staff comments.

Asked: 'How do you consider moderation to affect the quality of online comments?' responses varied from: 'Regular users get to know what we will and won't allow' to: 'It reduces malicious and abusive comments' and: 'My customers don't like angry comments and I do my best to delete them or tone them down'.

44% of respondents in this group used a generally available service like Pluck or Disqus for its comment facility; the same percentage used a system developed in-house.

12. Interested parties
Pressure groups for victims of abuse

Some pressure groups representing particular communities or interest groups take an increasing interest in online comment because they are aware that it can be a place where prejudice, such as racial or gender or sexual orientation prejudice, can be demonstrated. They monitor appearance of such prejudice, usually described by the site publishers as 'abusive language' and by the pressure groups as 'hate language' which in more extreme form amounts to 'hate crime'.

Three groups were consulted about this: Stonewall which campaigns for gay, lesbian and transgender rights; the Community Security Trust which monitors antisemitic prejudice and behaviour; and the Cross-Government Working Group which monitors and acts against anti-Muslim prejudice and behaviour. All these groups are represented on cross-government committees through civil service departments.

The Community Security Trust, which has many other activities apart from fighting anti-semitism on websites, does not trawl sites itself but takes up complaints and reports it receives. It accepts that the news websites surveyed in this report all have clear and explicit standards enforced by moderation, but does on occasion take up cases where abusive comments have found their way into published comments.

It sees this as holding sites to their own codes of conduct, and encourages direct complaint rather than taking up cases itself. Of these there are 'dozens rather than hundreds a year'. CST said that offensive or abusive material was more likely to be found on social media such as Twitter where offensive or controversial, but not hate, material is allowed, or on specific chat rooms and message boards. Comments on mainstream news websites seemed less of a problem. CST seeks more ease of reporting abuse, more transparency of moderation rules and how they are applied, and more training for moderators.

Stonewall is one of the bigger campaigning groups and works on many fronts, collecting data, lobbying for changes in the law, and more broadly fighting prejudice displayed in language and bullying in schools. It is particularly concerned about 'cyber-bullying' and hate crimes practised through the internet. Again it finds social media such as Twitter more of a problem than comment on news websites. Newspaper websites are 'better policed' than social media, it says.

These views on news websites are shared by Muslims represented on the cross-government working group. The member interviewed worked particularly in the area of youth and ran a helpline for young Muslims who were victims of abuse or hate crimes. She felt she was constantly facing lack of understanding of the Muslim communities which was often manifested in a negative tone in the media. This Muslim group ran its own online forum which was moderated by volunteers. Victims of abuse were more likely to use the help line than the forum. On occasion the group would contact a site considered guilty of abuse and ask for the offending post to be taken down. There was much Muslim abuse on some websites but these were not the mainstream news websites.

The Editors' Code of Practice

The PCC, deals with complaints about the editorial content of newspapers and magazines (and their websites). It considered itself not much involved with news website comment but was keeping a watching brief. The Editors' Code is not directly applicable, or applied, to comment on websites. The PCC deals with complaints it receives and has not received complaints about comments on news websites.

The replacement body for the PCC, the Independent Press Standards Organisation (IPSO), was preparing to take over regulation as this report went to press. It would be surprising if it offered no views on online publishing of news, but it remains to be seen whether there will be any regulatory implications for comments on news websites.

13. Global perspective

The report of the World Editors Forum of WAN-IFRA, the World Association of Newspapers and News Publishers, published in late 2013, was based on interviews with online editors and community managers at 104 news organisations from 63 countries, as well as corporate and academic experts, 'to identify key trends, opportunities and best practices'. Five of the news organisations were UK-based: The Economist, Reuters, The Guardian, The Times and the BBC. Three of these also contributed to the Society of Editors' survey which covered publishers of around 300 UK websites. Seven of the news websites WAN-IFRA consulted did not allow comments at all, usually for reasons of cost. The majority that invited comments saw this as 'an essential element in fostering a real community' around their publications and increasing reader engagement.

WAN-IFRA's report found that 'it's not all a happy tale of considerate readers offering wisdom and useful information during a democratic debate on the top issues of the day.' The report remarked that 'it is impossible to limit commenting to those who do have something constructive to say and discussions frequently descend into torrents of insults that are utterly irrelevant to the original article.' Comment threads on websites could frequently shock due to abusive, uninformed, not to mention badly written contributions.

Among conclusions in the WAN-IFRA global report relevant or covering similar ground to the Society of Editors' purely UK report are these, included here for comparison with our own:

- An even split between news organisations using pre and post-publication moderation (38 to 42 respectively) with 16 adopting a mixed approach.
- News organisations across the world delete an average of 11% of comments because they are generally offensive, contain hate speech or bad language.
- Editors generally did not believe that moderating comments limited readers' freedom of speech.
- No consensus about which was preferable of real name registration versus allowing anonymity.
- Notable lack of awareness about precise legal situation surrounding online comment and who is responsible for what is being said where, what exactly is illegal, and the best way to deal with this.
- More than half of respondents (61 out of 97) allowed comments on all or almost all articles. Exceptions were ongoing court cases, accidents and violence against minors.

The worldwide news organisations consulted by WAN-IFRA generally agreed that politics attracted far and away the most comments.

There is widespread support for online guidelines for commenters over what is acceptable. Reflecting UK practice, there is variation of emphasis between rules about what you can't do and constructive advice to help readers produce appropriate comments. There is also widespread agreement that staff participation in comment threads improves the quality of discussion.

Outsourcing of moderation is at present restricted to a minority of websites across the world. WAN-IFRA found just 13 news organisations, all but one in Europe that outsourced their moderation to separate specialised companies.

WAN-IFRA concludes that 'as journalism increasingly tends towards becoming a dialogue between reporters and readers online comments… will only become more important.' It sees news organisations going through three stages in their approach to tackling online comments: the first challenge is to avoid offensive content appearing on the website; the second is how to cultivate a robust, constructive dialogue on their sites that is a draw in itself; the third is to focus on how to make comments a 'truly valuable, integrated element of their publication'.

On the evidence of the Society of Editors' survey of comment on news websites in the UK, good progress is being made on all three fronts.

Global perspective

14. Possible action points

1.   Some clarification in the defamation law following new legislation suggests that robust reactive moderation presents the best protection for publishers against actionable comments.

This puts the onus on publishers to provide:

- Prominent, accessible and easy to use reporting systems, including 'report' buttons beside unmoderated published comments Rapid reaction times in terms of moderators becoming aware of a report, examining the reported comment and taking action, which may be taking down the comment

- Recording times and actions in every case

- Reactive moderation should not exclude filters set to remove offensive words or phrases before posting, simultaneously bringing such automatic action to the attention of moderators.

However, it should be noted that not all publishers are relaxed about reactive moderation, despite the view of some lawyers that it provides the best defence against legal action. As one senior editor on a major news website put it:

''There is one very big downside to reactive moderation, which is that for a period you may have unpleasant stuff on your site. That's why I am very nervous about abandoning pre-moderation.''

2.   In some cases there is clearly a lack of systematic record keeping, some publishers not maintaining any record of material they remove from their sites. Aside from wondering how such companies reassure themselves that they are keeping on top of the problem, transparent monitoring (probably with periodic published reports) goes a long wayto reassuring the public of publishers' determination to do all they can to combat abuse.

3.   Takedown times (of offensive comments) are generally good, but should become an industry standard, not limited to some.

4. It is often hard to locate House Rules and Terms and Conditions relating to standards expected of those commenting on news websites. It would be helpful if the link to these was clearly visible without the need for a long search. There is inconsistency in the distinction between House Rules and Terms and Conditions. There is inconsistency in the accessibility of the language used to set out the publishers' expectations of their commenting communities. It varies from the very accessible to the impenetrable.

5. It is probably too late to address the issue of unrecognisable names used by commenters online. Many website community editors seem relaxed about this form of anonymity, particularly when real names are known to publishers through registration. Commenters themselves seem to prefer not to identify themselves. Some would say that diminishes the value of their comments. Is there any appetite from any publishers for a 'real name campaign'?

6. Moderator training is variable across the range of online news publishers, from minimal to thorough. There is clearly room for more attention to training in the case of the former.

7. Overwhelmingly, the major publishers in terms of scale of operation, number of comments published, size of audience etc have the most sophisticated systems of registration, moderation and dealing with offenders. But good practice does not depend on size of operation, and many of the smaller publishers could tighten their operations.

This guide is the latest in a series of Society of Editors publications designed to help both journalists and the wider public understand current issues affecting the news media and their audiences.

The rise in digital technologies, social networking and media convergence has meant that more and more readers, listeners and viewers are consuming content online. As newspapers use digital platforms to increase their readership alongside maximising the power of social networking, moderation has never been so important. That also applies to broadcast and other media, some of which work purely digitally. A rise in the reporting of internet trolls, spamming and online hate crime has meant that media sites have found themselves obliged to take a firmer grip of what users publish on their websites.

It is a matter of self-interest for highly valued brands that have earned the credibility so necessary for building audiences only after huge investment often over many years. It is also of great public interest. That is why our partners at the Department for Communities and Local Government asked us to embark on the research behind the guide and encouraged its publication.

The survey, was designed with input and support from the Press Complaints Commission, and the board of the Society of Editors. It aims to aid understanding of the new threat of online hate crime and other unfortunate consequences of the digital age and enable moderators to address this.

At a local level, the survey will assist local partners to continue to lead on controlling access to harmful and inappropriate content in places such as schools.

While the focus of the guide is on websites associated with traditional news media outlets, it draws on the lessons learned and applied, providing a wealth of practical experience useful to anyone publishing material on any platform - even those which are as yet only a twinkle in the eyes of digital innovators.

We have been fortunate indeed to have benefitted from the wisdom, understanding and communications skills of Professor Peter Cole in the preparation of the guide. He was supported by Simon Bucks, a member of the Society of Editors' board and Associate Editor of Sky News, ably assisted by our research officer, Claire Meadows, a much more recent graduate whose education was topped off with a National Council for the Training of Journalists course. And we are of course grateful to all those in the media, government and non-government organisations who have played their part.

We hope the guide will make an important contribution to understanding how vulnerable people can be protected without interfering with freedom of expression. While it is not for an organisation that fights for media freedom, freedom of expression and the public's right to know, to lay down rules and regulations, we are happy to shine a light on good practice born of experience behind some of the most followed websites.

Bob Satchwell
Executive Director
Society of Editors

The Society of Editors was formed by a merger of the Guild of Editors and the Association of British Editors in April 1999.

It has members made up of editors, managing editors, editorial directors, training editors, editors-in-chief and deputy editors in national, regional and local newspapers, magazines, radio, television and online media, media lawyers and academics in journalism education.

They are as different as the publications, programmes and websites they create and the communities and audiences they serve.

But they share the values that matter:

The universal right to freedom of expression
The importance of the vitality of the news media in a democratic society
The promotion of press and broadcasting freedom and the public's right to know
The commitment to high editorial standards

These values give the society the integrity and authority to influence debate on press and broadcasting freedom, ethics and the culture and business of news media.

To keep up to date with the society's work visit our website www.societyofeditors.co.uk

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