

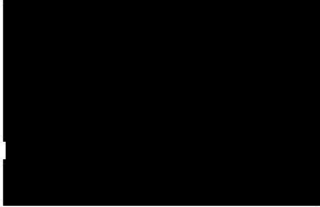
Lit 2023 IPSO REPORT

Introduction:

Our Publisher's title is "Lit", owned by The Germinal Project CIC. Lit is an online-only publication.

Our publisher's responsible person is The Germinal Project CIC Director and Lit Editor Frances Weetman. Her contact details are as follows:

Frances Weetman



Nature of the Publisher and publication: Lit is an online-only publication. We publish articles and videos on our website. Lit is owned by a community interest company limited by guarantee, The Germinal Project CIC.

Lit's circulation area is the UK and worldwide, as it is online-only. It produces articles on current affairs that predominantly relate to UK politics, but sometimes cover international topics.

Audience figures: 1,500 regular readership

Our editorial standards:

All editors working for Lit agree to abide by the IPSO Editors' Code in addition to Lit's Editorial Policy (see Appendix A), and all paid writers agree to abide by Lit's code of conduct policy (see also Appendix A). All volunteers, paid writers, editors and interviewees are made aware of their rights under the IPSO Editors' Code and reminded of their right to whistleblow to IPSO, to complain to us directly or to escalate their complaint to IPSO.

Lit's complaints policy is available to the general public and clearly marked on Lit's site. Members of the public are able to complain via our complaints page if they feel our reporting has been inaccurate or the Editors' Code has been breached.

Complaints handling

Our complaints policy is set out in Appendix B. Available on our website, this makes clear that all complaints to Lit will receive a response within 7 working days, detailing who in our organisation is dealing with the matter and when complainants will receive a reply. We commit to returning final decisions regarding complaints within 21 days of receipt. In communicating our decision, we make clear to any complainant that they have the right to escalate the complaint to IPSO.

Fact-checking of stories & due diligence regarding interviews:

All content on the Lit site is fact-checked pre-publication to verify all stories. Our written explainers are checked pre-publication by expert sources in addition to our editorial team. If necessary, we will seek legal advice prior to the publication of an article. Our legal advice is provided pro bono via the Thompson Reuters Corporation.

When our volunteers or paid writers conduct interviews, they ensure interviewees understand the purpose of the interview, and detailed notes and copies for future reference are maintained.

Public guidance and information:

Our Complaints Policy, Editorial Policy and Code of Conduct are available on our website and are clearly marked. Our complaints page provides the contact details of IPSO alongside our contact details, for those who wish to make a complaint either to us or to IPSO. Our complaints web page contains the IPSO watermark.

All our volunteers, paid writers and editors are provided with the IPSO whistleblowing hotline when they begin work for us and reminded of their right to whistleblow or escalate a complaint to IPSO.

Transparency:

Our complaints procedure is accessible to any member of the public via our website, and is clearly marked. We aim for our complaints procedure to be as transparent as possible. Matters of conflicts of interest and financial transparency are dealt with via our statutory reporting to Companies House. As a Community Interest Company, The Germinal Project CIC is required to publish Lit's full accounts and this information is available on the public record.

Our complaints procedure (Appendix B), available on our website, makes clear that all complaints to Lit will receive a response within 7 working days, detailing who in our organisation is dealing with the matter and when complainants will receive a reply. Our complaints procedure states that we will return final decisions regarding complaints within 21 days of receipt. In communicating our decision, we will make clear to any complainant that they have the right to escalate the complaint to IPSO.

We review compliance failures quarterly in addition to submitting an annual review to IPSO.

Our record on compliance:

No complaints have been made to Lit to date, or to IPSO, regarding our website content or conduct of Lit staff and volunteers. There have been no instances requiring corrections or apologies as a result of our reporting.

Our training process:

We have no permanent staff, but bespoke digital training is offered for our volunteers and paid freelance writers.

Appendix A: Lit's Editorial Policy (Editors' Code) and Code of Conduct



EDITORIAL POLICY & CODE OF CONDUCT

Summary

The Lit project was established to combat fake news, promote freedom of speech and expression, reduce rates of political radicalisation and promote tolerance in the UK. With this in mind, our editorial policy and code of conduct embody these aims. While these guidelines must be adhered to, we encourage all Lit staff and freelancers working for the project to promote the spirit as well as the letter of the guidelines. Fairness, transparency, accuracy and tolerance are central to the Lit project.

1. PROFESSIONAL PRACTICE

Attribution

- **Anonymous Quotes**

Anonymous quotations should be used sparingly, if at all, and must not be used in the case of pejoratives as this denies the subject the right of reply.

- **Anonymous Contributions: comment articles**

Lit does not publish comment pieces anonymously, unless the life or security of the author is threatened.

- **Anonymous Contributions: explainer articles**

Lit's explainer articles are the subject of collaborative work across entire teams and do not feature a byline for this reason. Lit explainer articles must, if possible, be vetted by an expert in the relevant field prior to publication.

Credits

Lit staff and freelancers must not reproduce other people's material without attribution. Where applicable, all contributors to Lit content will be clearly labelled.

Lit's ethos is concerned with promoting freedom of information and speech. For this reason our content aims to reference work on external sites to encourage end users to read other sources of information (on our site, we refer to this policy as "don't take our word for it"). For this reason we regularly reference the works of other companies and writers. All references to external material must be clearly labelled and attributed.

Bribery and facilitation payments

Lit notes the provisions of The Bribery Act 2010, which creates a number of criminal offences, which

even if committed abroad can be prosecuted in the UK. These include:

- (i) bribery – including offering someone in the UK or abroad a financial or other advantage to improperly perform an activity (whether public or private),
- (ii) being bribed and
- (iii) bribing a foreign public official. In some circumstances, offers or acceptances of hospitality and / or facilitation payments paid to public officials abroad in order to secure or expedite the performance of a routine or necessary action will come within the Act. There is no public interest defence, although where an individual is left with no alternative but to make a facilitation payment in order to protect against loss of life, limb or liberty there may be a defence of duress.

Children

At Lit we do not hire workers who are under the age of 18. Our content must be mindful of the age of some viewers, who maybe under the age of 18, so offensive language and adult topics are avoided in our content when possible. If any member of Lit staff is required to work with any young person under the age of 16 they must be accompanied by a caregiver or other adult, and this must be discussed with the board of directors in advance to ensure safeguarding. When applicable staff must be subject to DBS checks.

Commissioning

At Lit we believe in fairness and individual empowerment. With this in mind we pay our freelancers in a timely manner and treat them with respect. We also aim to ensure all freelancers have relevant insurance cover, when applicable, and support all staff if they wish to unionise.

Copy approval

We do not give the right of copy approval to interviewees.

Copyright

Journalists must not use content from non-authorized third-party sources - whether pictures, text or other media - without obtaining the necessary permissions. All third party sources of information must be clearly marked. Our educational videos will employ the use of UK government session footage under fair use, while clearly signposted, in-line with UK government guidelines.

Direct quotations

Must not be amended to change or distort their context or meaning.

Errors

It is Lit policy to correct significant errors as soon as possible and, when necessary, issue a correction and/or apology.

Grief

People should be treated with sensitivity during periods of grief and trauma. (See also IPSO Editors' Code Section 4)

Legal

We encourage the Lit team and freelancers who work for the project to be familiar with libel law.

As a not-for-profit, legal advice is available to our team via our acceptance onto the competitive Thompson Reuters scheme. This means pro bono legal advice is available for our core team and in rare circumstances freelancers working for us, but there may be a lag-time of several weeks between lodging a query and sourcing a lawyer who is available and qualified to help. For this reason Lit policy is to err on the side of caution in relation to libel and copyright laws and any queries to be forwarded to lawyers should be passed onto the board of directors well in advance of any potential problems.

Payment

Lit does not pay for stories.

Photographs

Digitally enhanced or altered images must be clearly labelled as such. Photographs sourced from third party sources must be labelled as such.

Privacy

We respect individuals' right to privacy and their right to a private and personal life.

Race

We do not publish someone's race or ethnic background or religion unless that information is pertinent to the story.

Sources

Sources promised confidentiality must be protected at all costs. However, where possible, the sources of information should be identified as specifically as possible.

Suicide

The Lit team is asked to exercise particular care in reporting suicide or issues involving suicide, bearing in mind the risk of encouraging others. This should be borne in mind both in presentation, including the use of pictures, and in describing the method of suicide or any motivation that could be attributed to it. (See also: IPSO Editors' Code, section 5).

When appropriate a helpline number should be given, such as the Samaritans (116 123).

Verification

Verifying stories and sources in the age of social media can sometimes be difficult, but trust in the authenticity of Lit's content is essential to the viability of the project. For this reason the Lit team is urged not to share social media stories until they have been verified by a trusted source, including

the Lit team itself. Scepticism should be the starting point when using email and web sources of information.

Lit's explainers are verified by experts in the relevant field where possible, and expert opinions on topics such as STEM and public health are particularly vital.

2. PERSONAL BEHAVIOUR AND CONFLICTS OF INTEREST

Respect & Dignity

The Lit team and freelancers working for the project are expected to treat colleagues, and individuals outside work, with dignity and respect. The Lit team should be mindful that bullying and hateful conduct, including but not limited to social media interactions, reflect negatively on the company and the project. The Lit project aims to promote tolerance between people of differing opinions and backgrounds; social media interactions on the part of Lit staff should reflect this ethos. The Lit team and freelancers working for the project must also respect individuals' right to privacy both during work and elsewhere.

Confidentiality & Data Rights

Individuals' personal data must remain confidential and only be used in relation to normal responsibilities detailed in Lit's privacy policy. As a not-for-profit organisation, Lit is not required to register with the Information Commissioner's Office (ICO), but Lit has registered in any case. Any complaints about misuse of data can be sent to Lit or the ICO. Our privacy policy sets out individuals' data rights in more detail.

Conflicts of interest

The Lit team and freelancers working for the project should be mindful that activities outside work may impact on their (im)partiality when reporting. All conflicts of interest must be reported to the Lit editorial team. Transparency regarding any potential interests relevant to any work commissioned by Lit is of paramount importance.

Declarations of interest

In some circumstances, Lit staff or freelancers may be required to produce content on which they already have a significant connection or vested interest. In this circumstance, the interest must be declared to Lit editorial staff and, when relevant, the personal connection must be signposted in any relevant content. Lit staff and freelancers must not quote relatives or those with whom they have a close interpersonal relationship in their content. Any potential problems arising from such conflicts of interest must be presented as early as possible to the Lit editorial team.

3. GUIDANCE FOR LIT EDITORIAL STAFF

At Lit we expect editorial staff to be guided by the principles of ethics and trust, in addition to our formal guidelines. At the heart of our project is the aim to tackle fake news and promote freedom of

expression and tolerance. These principles must be central to the actions and work of our editors, as well as other staff.

Accuracy

Editors must aim not to publish inaccurate, misleading or distorted information. This includes film and visual content. Significant errors or inaccuracies must be recognised and corrected promptly and, when appropriate, an apology published.

Opportunity to reply

A fair opportunity for reply to inaccuracies must be given when reasonably called for.

Privacy

Editors must respect individuals' rights to a private and family life. It is unacceptable to photograph individuals in private places without their consent, or to continue contact with an individual if requested to stop.

Harassment

The Lit team must not engage in harassment, bullying or intimidation. Workers must cease contact with an individual if they are requested to stop.

Intrusion into grief or shock

Families and loved ones who are grieving or subject to shock should be treated with sympathy and editors must show discretion and sensitivity while publishing during periods of grief or shock. This should not restrict the right to report legal proceedings, such as inquests. Editors must follow the PCC guidelines regarding reporting of suicide, in particular taking care not to report motivations or methods of suicide.

Hospitals

Members of the Lit team must identify themselves and obtain permission from the relevant authorities before recording or entering non-public areas of hospitals. The right to anonymity and privacy of patients must be respected.

Reporting of Crime

Relatives or friends of persons convicted or accused of crime should not generally be identified without their consent, unless they are genuinely relevant to the story. Editors must be aware of potentially vulnerable people such as children, who may be victims or have witnessed crime. This should not restrict the right to report legal proceedings.

Victims of sexual assault

The press must not identify victims of sexual assault or publish material likely to contribute to such identification unless there is adequate justification and they are legally free to do so.

Discrimination

Editors and Lit staff must avoid prejudicial or pejorative reference to an individual's race, colour, religion, sex, sexual orientation, gender reassignment or to any physical or mental illness or disability. Details of an individual's race, colour, religion, sex, sexual orientation, gender reassignment or physical or mental illness or disability must be avoided unless genuinely relevant to the story.

Confidential sources

Editors and Lit staff have a moral obligation to protect confidential sources of information.

Appendix B: Lit's Complaints Procedure



COMPLAINTS POLICY

1. The Germinal project CIC, trading as Lit., ('We' or 'Us') view complaints as an opportunity to learn and improve the quality of our journalism and the contents of our publication(s) for the future, as well as a chance to put things right for the person (or organisation) that has made the complaint.
2. Our policy is:
 - To provide a fair complaints procedure that is clear, convenient and easy to use for anyone wishing to make a complaint (in particular those that are vulnerable or who have disabilities)
 - To uphold and adhere to the IPSO Editors' Code ("Code") <https://www.ipso.co.uk/editors-code-of-practice/> set out in the IPSO Regulatory Scheme in our assessment of all complaints
 - To publicise the existence of our complaints procedure so that readers know how to contact us to make a complaint
 - To make sure everyone working for us knows what to do if a complaint is received
 - To make sure all complaints are dealt with promptly and fairly, with decisions based on sufficient investigation of the circumstances and (where appropriate) offer a suitable remedy
 - To make sure that complaints are, wherever possible, resolved and that trust in our journalism and our publication(s) remains strong
 - To gather information about all the complaints we receive to help continually improve the quality of our journalism and our publication(s)
 - To submit an annual report to IPSO of all complaints received and their outcomes
 - To submit any complaint that is not resolved by us in a timely or satisfactory way to IPSO and to comply with directions issued by Ipsos relating to its Regulatory Scheme
 - To make available to all our employees a confidential whistleblowing hotline which is independently operated by IPSO and not to take any action to the detriment of anyone who uses the hotline or declines to breach the Code

Definition of a Complaint

3. A complaint is any expression of dissatisfaction, whether justified or not, about the editorial content, standards of journalism or conduct of employees or contributors involved in production of our publication(s) that engages the standards set out in the Code.

Who Can Complain and How?

4. Complaints may come from any person or organisation who is:
 - personally and directly affected by an alleged breach of the Code
 - a representative group affected by an alleged breach of the Code, where there is public interest in the complaint
 - a third party seeking to ensure accuracy of published information
5. A complaint should be received by email or in writing although complaints are accepted by other reasonable means where it is not convenient or practical for the individual complainant to complain in writing.
6. A complaint should be clearly marked as such. General enquiries and requests for corrections will not normally be dealt with as a complaint under this policy unless the complainant makes it clear that they wish to make a complaint.

Whistleblowing Rights of Employees and Contributors

7. Employees or contributors are encouraged to contact the IPSO confidential whistleblowing hotline (“the Hotline”) if they are being pressurised to breach the standards set out in the Code or if they have concerns that the standards set out in the Code are not being adhered to more generally by Us.
8. We will publicise the contact details of the Hotline to all our employees and contributors.
9. Any employee or contributor of who uses the Hotline does so with Our full support and in the knowledge that they will not be sanctioned as a result of doing so,
10. We guarantee to protect all whistle-blowers from possible reprisals, victimisation or sanction if a disclosure has been made in good faith even if a subsequent independent investigation carried out by IPSO into our journalism finds there to be no breach of the Code or of the IPSO Regulatory Scheme. For the avoidance of doubt, We will not take any action to the detriment of anyone who uses the IPSO whistleblowing hotline or declines to breach the Standards Code adopted by Us as part of our compliance with the IPSO Regulatory Scheme.

Confidentiality

11. All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Compliance Records

12. In respect of each title We will maintain a written record of all complaints, to include the name and contact details of the complainant, the material or conduct in respect of which the complaint is made and the alleged Code breach.
13. For each complaint record, We will include any steps taken by Us to address the complaint, and the outcome of the complaint. This record will be made available to IPSO and to the public (in a redacted form, where necessary), for publication by IPSO in its annual report.
14. We will report to IPSO all compliance failures of which We become aware (whether complained about or not)
15. Monitoring and learning from complaints are reviewed quarterly by Us to identify any trends which may indicate a need to take further action.

Responsibility

16. Overall responsibility for this policy and its implementation lies with our Board of Directors.
17. Responsibility for ensuring that complaints are managed in accordance with this policy lies with a nominated senior legal and compliance standards individual for each title.
18. Each title shall include a statement of arrangements which includes details of the internal authority structure, where responsibilities for Code compliance lie, to whom notice of failure in compliance would be reported (whether complained about or not), together with steps to deal with any failures in compliance.

PROCEDURE

Stage One: Making a Complaint

1. Information on how to make a complaint is clearly publicised in the Privacy section of our website.
2. Complaints may be sent in by e-mail at info@wearelit.co.uk, or other reasonable means where this is more convenient and practical for the complainant.
3. Complainants should provide the following information before their complaint will be considered:
 - The complainant's name, address, e-mail address and telephone number
 - If the complaint is about a news article it must include:

- the name and date of the publication and page reference of the specific article being complained about plus the URL
 - URL/Link to any visual or audio element of the complaint
 - a written account of what is being complained about with clear reference made to (i) any specific words or phrases in the article that are relevant to the complaint; and (ii) any clauses of the Standards Code adopted by IPSO (“Code”) that the complainant believes to have been breached
 - The desired outcome or remedy sought by the complainant
- If the complaint is about the conduct or behaviour of an employee or contributor it must include:
 - the name(s) of the individual(s) being complained about (if known) or any other information which may identify the individual(s)
 - a written account of what is being complained about with clear
 - reference made to (i) the nature of the behaviour or conduct being complained about including any relevant times, dates, correspondence or other evidence to support the complaint; and (ii) any clauses of the Code that the complainant believes to have been breached
 - The desired outcome or remedy sought by the complainant
4. We will make reasonable efforts to contact a complainant by telephone, e-mail or in writing to ensure that sufficient information is provided to respond to the complaint.

Stage Two – Recording, Investigating and Resolving the Complaint

5. The complaint information should be passed to the person we have nominated as being responsible for legal standards and compliance. They will record it in the complaints log and will acknowledge receipt of the complaint by e-mail or in writing within 7 calendar days of receipt of the complaint.
6. The acknowledgement of receipt of a complaint should say who is dealing with the complaint and when the person complaining can expect a reply. Any conflicts of interest should also be declared at this point. A copy of this complaints policy should be attached.
7. The legal standards and compliance contact is responsible for ensuring that the circumstances of the complaint are investigated fairly and that any conflicts of interest are managed. This may require the complainant to provide additional information, documents or other evidence to support their complaint.
8. Complainants should receive a final decision letter within 21 calendar days from the date of the receipt of the complaint.

9. The final decision letter will inform complainants that they have the right to refer their complaint to IPSO, stating the applicable time limits, and how to contact IPSO.
10. Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

Stage Three – Escalating the Complaint to IPSO

11. If the complainant feels that the problem has not been satisfactorily resolved by Us at Stage Two or if the complainant feels that there are justifiable reasons why the complaint is so urgent that they cannot wait for Us to respond, they can request that the complaint is reviewed by IPSO in accordance with its Regulatory Scheme, by contacting IPSO using the following details:

Phone: 0300 123 22 20

Email: inquiries@ipso.co.uk

Address:

Independent Press Standards Organisation

Gate House

1 Farringdon Street

London

EC4M 7LG

Review

19. This policy is reviewed regularly and updated as required.

Adopted on: 24th April 2020

Last reviewed: 27th March 2024