



For accountable journalism

# Guidance on user-generated content



## Key points

- Reader comments fall under IPSO's remit when a publication has had the opportunity to review or moderate them, and the comments remain online.
- Comments beneath a publication's social media posts also fall within IPSO's remit when they are under the publication's editorial control – for example, it is able to hide, delete, or turn off comments.
- It is important for publications to retain any existing monitoring systems.
- All complaints about user-generated comments must be framed under the Editors' Code of Practice.

## What is user-generated content?

User-generated content is created by the users of editorial services operated by a publisher, as opposed to being created by the publisher itself. This most often takes the form of comments left by readers underneath an article or on a publication's social media post, but it can also include other media such as videos and photos.

User-generated content can boost engagement and help to build a community of readers, and provide journalists with leads and contacts. It can also raise potential risks under the Editors' Code of Practice.

## About this guidance

This guidance is designed to increase the confidence of publications in using comments and to promote their responsible application in line with the Editors' Code of Practice.

This guidance explains IPSO's remit in relation to user-generated content and how the [Editors' Code of Practice](#) applies.

It does not replace or supersede the Editors' Code but is designed to support editors and journalists. It includes case studies of relevant decisions by IPSO.

The case studies are summaries of the decisions, and we recommend that you read the decisions in full.

## The Editors' Code

The Editors' Code of Practice sets the framework for the highest professional standards for journalists and the rules that newspapers, magazines and digital sites, which are regulated by IPSO, must follow.

Theoretically, a complaint may be made under any of the Clauses of the Code. The Clauses we see most frequently among complaints are Clause 1 (Accuracy), Clause 2 (Privacy), Clause 4 (Intrusion into grief or shock), Clause 9 (Reporting of Crime), and Clause 12 (Discrimination).

## IPSO's remit

Not all user-generated content falls within IPSO's remit.

For IPSO to be able to consider a complaint about this content, it must:

- Have been reviewed or moderated by the publication:

- This may be in the form of pre-moderation, but more often, this means a complainant has reported the content through a system provided for this purpose or through some other way.
- The publication must then have had a reasonable amount of time to review the content.

- Remain online, after the publication has had the opportunity to moderate it.

Publications do not have to pre-moderate comments; however, they must ensure that they have systems in place to review and remove comments

when concerns are raised that fall under the Editors' Code. If someone

raises a Code complaint about a comment, and it remains online after the publication has had the chance to review the comment, the comment will then be in IPSO's remit. This means it is in the publication's best interests to ensure that comments which may breach the Code are reviewed and – if appropriate – removed.

If a comment on your content has been shared online in a social media post which you do not have editorial control over, this would not fall under IPSO's remit.

In [Wadeson v oxfordmail.co.uk](https://www.oxfordmail.co.uk/news/2018/05/12/wadeson-v-oxfordmail-co-uk/), the publication had been made aware of a comment and had a reasonable amount of time to review it. Therefore, the Complaints Committee considered that the comment was in IPSO's remit.

### [12118-20 Wadeson v oxfordmail.co.uk](https://www.oxfordmail.co.uk/news/2018/05/12/wadeson-v-oxfordmail-co-uk/)

A comment was left beneath an article by an anonymous user which inaccurately connected a stabbing with a Black Lives Matter (BLM) rally. Before complaining to IPSO, the complainant had reported the comment to the publication through several channels but received no response. He then complained to IPSO. IPSO referred the complaint to the publication, but the comment was not removed for another month. The Committee found that the publication had received adequate notice of the complaint and opportunity to post-moderate the comment. It therefore fell within IPSO's remit. The comment was significantly inaccurate and there was a breach of Clause 1.

## Publications' internal policies and comment privileges

How publications enforce their own policies – as distinct from the Editors' Code – is not something that falls within IPSO's remit. However, it is important that you maintain any monitoring systems which you have in place.

left beneath posts by a publication on social media also fall within IPSO's remit when the publication has the ability to exercise control over the comments – for example, the ability to hide, delete, or turn off comments.

If the publication is unable to moderate the comments in some way, they would not fall under IPSO's remit as they would not be considered "editorial content".

## Social media

Social media has become an essential way for publishers to draw attention to their content and to share articles among a wider audience. Comments

For example, in [A woman v cornwalllive.com](#), a comment left beneath the publication's Facebook post identified the complainant's child as someone apparently involved in a criminal incident.

### **09339-22 A woman v cornwalllive.com**

The complaint regarded two comments posted by members of the public on social media under a post by the publication sharing an article about an alleged offence. These comments appeared to identify the complainant's son as someone arrested in connection with the offence.

When IPSO informed the publication of the complaint, it removed one of the comments. The deleted comment, therefore, was not within IPSO's remit. The publication said it had not understood that the second comment was also under complaint until it received a subsequent email from IPSO. The comment was removed by the publication a couple of weeks later.

The Committee considered that the publication had been given ample opportunity to review and moderate the comment. Therefore, the second comment was within IPSO's remit.

There was a breach of Clause 6 (Children) as identifying the complainant's son had intruded into his time at school. There was no breach of Clause 9 (Reporting of crime) as the complainant's son had been identified as someone involved with the crime elsewhere on social media.

## Being aware of complaints about a comment

Being able to demonstrate when a publication became aware of a comment is essential to helping IPSO establish whether a comment is in remit, and means publications do not have to constantly monitor comment sections.

It is useful to think about how the reader can report individual comments:

- If there is a report function and, if so, is it monitored?
- If someone has made a complaint, have they also mentioned a concern about a comment?

If the publication does usually pre-moderate or moderate comments as

they are posted, it is worth considering whether this can be maintained full-time. Some publications turn off the ability to comment overnight, for example.

Being aware of the role comments can play in a complaint ensures a publication can act efficiently in responding to concerns raised. It also speeds up any IPSO investigation if this information is readily to hand.

The complaint [Edwards v gazette-news.co.uk](https://www.ipsos.co.uk/10769-22-Edwards-v-gazette-news.co.uk) concerned the publication of a reader's comment which made a serious criminal allegation about the complainant. The complainant emailed the publication, but the comment had remained online for nearly three weeks after it had been reported. While the report was not made through the designated reporting channels, the publication appeared to accept having received it.

### [10769-22 Edwards v gazette-news.co.uk](https://www.ipsos.co.uk/10769-22-Edwards-v-gazette-news.co.uk)

A comment left beneath an article about the complainant's conviction made a serious criminal allegation about the complainant. The complainant emailed the editor with his complaint about the article and reported the comment to the publication as part of his complaint. However, while the publication responded to other parts of the complaint set out in the email, the comment remained online for almost three weeks after it received this email. The publication said this was due to human error and because the comment had been reported outside of the usual pathways. The publication removed the comment once it received the complaint from IPSO. It added a correction which stated the comment was unsubstantiated and had been deleted.

The Committee found a breach of Clause 1 (i) and Clause 1 (ii) as the correction was not published promptly.

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## General considerations about comments

### What else does IPSO need to know to consider a complaint about user-generated content?

Just as we require complainants to specify what article or social media post is under complaint, we also need them to set out exactly which comments are under complaint.

This is often done through screenshots, but occasionally complainants link to or type out the comments that have caused them concern.

We also ask that complainants set out when and how they reported the comments to the publication. For example, did they use a “report comment” function, or did they write to the publication? If they have correspondence, we ask for a copy.

### Should an article have the option to comment?

Publications are free to decide whether to turn off comments on certain articles. There are often legal reasons for disabling the ability to comment (not wanting to influence an ongoing trial, for example). You should also consider the risk to the publication in allowing comments on some types of articles, for example, about sexual offences.

### When to delete a comment?

IPSO cannot require publications to delete a comment, however, you may choose to once a complaint is received which may raise a possible breach of the Code.

If deleted as soon as the publication is made aware of it, the comment is unlikely to fall within IPSO’s remit. IPSO will consider whether a publication has had a reasonable opportunity to review or moderate a comment in the event of a complaint.

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## Best practice for editors

Before publishing:

- Decide whether comments should be enabled on higher-risk stories (e.g., deaths, children, court cases).
- Ensure reporting mechanisms for comments are easy to use and monitored.

When a complaint arises:

- Log when the publication became aware of the comment. Consider taking a screenshot of the comment.
- Act quickly to take a decision on whether the comment should remain. Removing content early may keep it outside IPSO’s remit.

- Consider whether deleting comments or disabling commenting could resolve concerns.

General approach:

- Balance community engagement with potential risks.
- Record moderation actions to demonstrate good practice.

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## Checklist for editors and journalists

- Is there a clear way for users to report comments?
- Do you log when and how you became aware of a flagged comment?
- Have you reviewed and acted on reported user-generated content promptly?
- Do you have a process in place to consider whether comments should be switched off for higher-risk stories?

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## Contact us

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