



Promoting human rights and democracy through the media since 1993  
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3 November 2014

**WRITTEN SUBMISSION BY THE MEDIA MONITORING AFRICA (MMA) ON QUESTIONS SET OUT BY  
THE INDEPENDENT NEWSPAPERS USER-GENERATED CONTENT PANEL**

**1. ABOUT MEDIA MONITORING AFRICA**

**1.1.** Media Monitoring Africa's (MMA) vision is a just and fair society empowered by a free, responsible and quality media. Through a human rights-based approach, MMA aims to promote the development of:

- Media that is transparent, diverse, ethical and accountable to its audiences;
- Critical and constructive communications by the powerful; and;
- Informed, engaged and connected citizenry.

**1.2.** MMA aims to contribute to this vision by being a premier media watchdog in Africa that promotes a free, fair, ethical and critical media culture. The three key areas MMA seeks to address through a human rights framework are media freedom, media ethics and media quality. Established in 1993 to monitor South Africa's first democratic elections, MMA has over 21 years of experience in media monitoring and direct engagement with media, civil society organisations and citizens. MMA is the only independent organisation that analyses and engages with media according to this framework. In all our work, we seek to demonstrate leadership, creativity and progressive approaches to meet the changing needs of the media environment.

## 2. INTRODUCTION

**2.1.** MMA was asked to make a submission to the *Independent Newspapers* User-Generated Content Panel. The main aim of the Panel is to report on and make recommendations concerning hate speech, personal attacks and defamatory statements contained in comments by the public on internet websites controlled by *Independent Newspapers*. In our initial exchange no format for the submission was provided. It was only on the 9<sup>th</sup> of October 2014 that MMA was made aware of the seven questions that were posed to the Right to Know Campaign. We found these to be useful as a means of structure and we have accordingly set out our submission by answering these questions. MMA only answered six of the questions as the seventh question was already answered in some of our responses. The deadline of the submission was dated 31 October 2014.

**2.2.** MMA thanks the *Independent Newspapers* for the opportunity to make this written submission and hereby requests an opportunity to make oral representations at such hearings.

**2.3.** MMA commends the *Independent Newspapers* for opening its processes to civil society and for discussing the hard pressing issue on how to regulate comments made on its online platforms. We hope this process will be exemplary to other media houses in South Africa that have not yet initiated some formal regulation around their online commentators.

**2.4.** We note that despite the questions, the *Independent Newspapers* already has many of the systems in place (**see Annexure A for the Independent Newspapers comment guidelines**). To this extent, we view the current review by the *Independent Newspapers* as a means of strengthening their current processes and systems.

## 3. MMA ANSWERS THE QUESTIONS AS FOLLOWS:

### 3.1. Whether a media organisation should publish user-generated comments on news and other stories published by it?

**3.1.1.** MMA strongly agrees that user-generated comments are published. We believe that this is one of the advantages of digital platforms that need not be ignored. It not only

benefits the publication but the audience as well. For the audience, they go from being a simple reader to being an active 'user'. In that way they have the potential to easily and quickly interact with issues of the day and provide their perspective. For the publication, these comments can be used to track audiences and find out the audiences' perspective on issues. In this way such comments have the potential to help media houses gain some insight as to whether they are meeting the needs and interest of their audiences.

**3.1.2.** MMA research on international good practice reveals that most online publications have space for user-generated comments. MMA looked at France, Germany, Spain, United Kingdom (UK), Argentina, Chile and Mexico (**see Annexure B**), which all have online publications that allow for user-generated comments. Even though there are no clear regulations, most media houses in Africa that we looked at also make provisions for user-generated comments (**see examples of these in Annexure C**).

**3.2. If so, whether as a matter of law and/or ethics such comments should be moderated and vetted before they are published - and if so, what criteria should be used to regulate the moderation?**

**3.2.1.** MMA highly recommends that user-generated comments should be moderated. We also recommend that they are moderated in terms of both law and ethics. These criteria are essential because if comments are not moderated in terms of the law and ethics it could easily be viewed as censorship. The research that MMA undertook revealed a trend among the publications that moderated user-generated comments.

**3.2.2.** All publications that moderated their user-generated comments placed emphasis on the following:

- Hate speech;
- Discrimination (race, gender, religion and nationality);
- Criminal activities (such as fraud or publication of third party personal data);  
and,
- Personal attacks.

**3.2.3.** We propose the above among other issues to be central to the moderation criteria to be developed by the *Independent Newspapers*. They each need to be clearly defined and

spelled out and they also need to be in line with both media ethics and the law. While freedom of expression is to be promoted and protected we also acknowledge that the media operate within certain clear parameters. There is the law and the Press Council which sets out clearly agreed framework. Accordingly, we do not see any reason why comments and user-generated content should not be subjected to similar parameters, especially given that they are being expressed on media companies' platforms, the content of which they are ultimately responsible for.

**3.3. Regardless of pre-moderation, whether comments should, as a matter of law and/or ethics, be removed after publication following complaints by members of the public - and if so, what criteria should be used to regulate such removal?**

- 3.3.1.** MMA strongly believes that if a comment is extremely offensive or even illegal, or it violates similar parameters mentioned above the removal of such a comment should be unquestionable. MMA notes some of the clauses by *El Pais* (a Spanish publication) and *The Guardian* (a UK publication) – (see **Annexure B**).
- 3.3.2.** The *El Pais* clause states that *“El Prisa [The Media Group] has the right to withdraw any content that would infringe any standard of behaviour on our sites and, specially, those that would violate the respect to personal dignity, that would be discriminatory, xenophobic, racist, pornographic, that would infringe put at risk youth or childhood, public order or public security, or that, according to EL Prisa’s opinion, would not be appropriate to be published”*.
- 3.3.3.** Some elements of the *El Pais* conditions perhaps may, in the wrong hands, be used to silence dissenting voices, and are perhaps a little too broad. For example "any content that would infringe or put at risk public order". This may well not satisfy our own constitutional protections.
- 3.3.4.** However, *The Guardian* has 10 guidelines which one needs to adhere to before posting online comments. Among them includes the following:
- *“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”.*

**3.3.5.** *The Guardian* guidelines seem to be more practical and also seek to prevent extreme comments, rather than focus on action after the event. Clearly however they also set out a path whereby if users do not take the issues they set out into consideration the comments could then be removed.

**3.3.6.** MMA proposes that a combination of the criteria as used by *El Pais* (with some amendments to the public order section) and *The Guardian* be used as a basis for the criteria to be used to determine if a user-generated comment should be removed.

#### **3.4. Whether pre- or post- moderation of comments present any free speech issues?**

**3.4.1.** MMA strongly believes that a publication is responsible for all content published on its website. This does not only open avenues for lawsuits if comments by its readers are seen to be defamatory but it also gives the publication the opportunity to protect those that are using its website. As such, MMA recommends that publications pre- or post-moderated comments. However, the moderation needs to be done based on a strictly adhered to criteria. We recommend that the criteria used to moderate comments is made public and users are completely aware that if their comment meets anything listed on the criteria it will be moderated.

**3.4.2.** MMA also submits that any possible moderation of comments that are critical either of the publication or the author (unless the author is a minor in which case additional criteria must be considered) are strictly limited and if removed are done so either when other creditors are also violated or on an exceptional circumstances basis.

**3.4.3.** We encourage that moderation happens only when or if the content violates the creative noted above or where it is: obscene, threatening, harassing, libellous, deceptive, fraudulent, invasive of another's privacy, offensive, defamatory of any person or illegal. **(Please refer to Annexure B for a list of different publications in France, Spain and the UK and how they moderate comments on their websites).**

**3.5. How one defines the type of speech, if any, that should be impermissible in comments, with particular emphasis on hate speech, personal attacks and defamatory statements?**

**3.5.1.** MMA is aware of the *Independent Newspapers* case where a minor<sup>1</sup> was attacked vigorously by readers after writing about her experience in South Africa. This case is an example of a type of speech that could be construed as hate speech. Based on this example and others, MMA encourages the *Independent Newspapers* to develop a threshold criteria in terms of the type of speech used on its comments.

**3.5.2.** These criteria should be in line with the pre- and/or post- moderation criteria. The criteria should consider the following:

- Each case and story to be judged on its merits but with the following factors also considered;
- The age group of the author (minors should be more protected, as they are afforded additional protections in the law and constitution);
- The public standing of the author (for politicians or celebrities or people regularly in the public eye, the protection can be more tolerant than the criteria for others, including ordinary citizens. Due to their public standing, politicians and celebrities should be able to handle and expect more critical and possibly aggressive comments); and,
- The topic by the author (the topic of the story should be mostly relevant if the author is a victim or witness to the subject they are discussing. Here the protection of the victim should be prioritised and highly protected). For example if the author is a victim/survivor of abuse and the piece reveals personal content then the level for tolerance should be less.

**3.6. Whether members of the public who post comments have a right to do so anonymously, or whether a media organisation can require them to identify themselves?**

**3.6.1.** The issue around anonymity of people that post comments should not be looked at in isolation to the political atmosphere of any country. In a democratic country where freedom of expression is supported, it is undoubted that people have a right to remain

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<sup>1</sup>Read the full article here: <http://www.iol.co.za/capeargus/black-in-cape-town-brace-yourself-1.1735771#.VFd6szSUdmO>

anonymous. Like most things in any democracy however the right can be limited where reasonable, essential and where the limitation is proportional to the harm it seeks to address.

- 3.6.2.** We submit that the African Internet Rights Declaration (<http://africaninternetrights.org/declaration/>) be considered in this regard to the issue of anonymity. The Declaration firmly argues the importance of privacy and freedom of expression. However, even though people have a right to remain anonymous, like any other right, they have a responsibility to make sure they do not abuse these platforms just because they are anonymous. We believe mechanisms can be employed limit this abuse.
- 3.6.3.** Being able to retain one's anonymity on the internet is vital, but using a recognised media brand to air one's views is a different matter. The question that arises is whether media companies are able to identify a person where, they for example, post racist comments and incite harm. We suspect that there are ways and means of tracking users through their IP address and also their devices.
- 3.6.4.** To track such aspects however would require not only considerable investment in it but it also arguably constitutes greater limitations on the right for most people to be anonymous, precisely because the media company would have to track all users' details on the off chance one of them violates the conditions. Rather if users wish to make their voices heard on the media platform they agree to give their details, like name, email address and contact number of the media houses. Of course they may still lie but there are ways of verifying email address in standard registration processes.
- 3.6.5.** While this may still constitute some limitation on the right to anonymity it would give media houses the means of ensuring a level of accountability for comments. It is also to be considered that media should agree that such information should be used only for the comments purposes and NOT to be used for marketing or other purposes. It should also be noted that while this may limit the right the user is not prohibited from having their say on countless other online platforms. To that extent, we would argue that such limitations are justifiable and desirable.

**3.6.6.** We strongly encourage moderation as one of those tools to be used to minimise abuse.

#### **4. CONCLUSION**

It is clear from our submission that not only do we believe that user-generated comments should be moderated but that there is extensive precedent for doing so in ways that both seek to encourage and stimulate debate and at the same time ensure the interests of the media and the right to freedom of expression are protected.

A further element to be considered is the volume of comments. Depending on the nature of the story, user-generated comments can often run into hundreds. It is also not uncommon for media to shut comments off on stories that may elicit too heated debates or where the line of comments shows a trajectory tending towards the limits we have noted above. Even before this however, there are hundreds of comments and it is not easy for these to be suitably monitored by a media house.

Technology can help in this regard and MMA would be happy to discuss the possibilities of how we could assist in this regard, but the first and best line of defence is often other readers. For this reason many sites employ a report mechanism that alerts a moderator to a potential problem. It is essential that such mechanisms are standardised and applied. We note that this is currently the approach being adopted by the *Independent Newspapers*.

What is therefore worrying is that so many comments were made about the girl in the article<sup>2</sup>, and they were either not reported or allowed to remain. This highlights the need and importance of moderating comments. Perhaps not pre- publication but certainly immediately post publication. The distinction may appear small but it is in fact the difference between moderating all content and moderating content that can be flagged.

In making our submission we have grappled with the reality that in many instances a comment may be stupid, or offensive, or cycle stereotypes, but it is also a comment that we should generally allow. Our submission therefore speaks to those situations where the speech clearly violates the suggested critical guidelines. Where it will be very difficult will be where the content is perhaps offensive but not illegal or bordering on unethical. It is for those situations that it is essential that there is a

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<sup>2</sup> Read the full article here: <http://www.iol.co.za/capeargus/black-in-cape-town-brace-yourself-1.1735771#.VFd6szSUDmO>

process of moderation that is clearly outlined, transparent and fair and that decides on such instances on a case by case basis.

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## **Annexure A – IOL Comment Guidelines - <http://www.iol.co.za/comment-guidelines-1.1238908>**

Our comment service is not moderated, but you do have to register to comment. We do act on complaints from readers – please report any comments you feel are offensive. Those comments will be evaluated in the context of the guidelines below, so please bear them in mind when using our service.

\* Park your flame-thrower at the door. Misunderstandings are possible when we use electronic communication. If you see something that you don't understand please ask questions, rather than accuse or condemn.

\* Refrain from personal attacks, hate speech (see definition below), racism, bigotry, or profanity, or comments that may expose IOL to defamation lawsuits under South African law (see definition below).

\* Your comment should be relevant to the original post and subsequent discussion.

\* IOL reserves the right to close discussion on a particular issue, and to close the entire comments service if necessary.

\* IOL reserves the right not to open comments on specific stories

\* Your email address will not be published with your comment, nor will it be published anywhere else.

7. If you want to make a formal complaint about a comment, hover over the comment to activate the Report facility. However, if you think the story itself is incorrect, PLEASE don't use the comment form to tell us. Rather use our feedback form ((live link to <http://www.iol.co.za/feedback>)).

### **TROLLS**

When you suspect that somebody is a troll (someone who comes online to cause trouble), you might try responding with a polite, mild message, or ignore the comment. However, if the person persists and seems to enjoy being unpleasant, the only effective position is summed up as follows: The only way to deal with trolls is to limit your reaction to reminding others not to respond to trolls.

### **HATE SPEECH**

The South African constitution says (section 16, Chapter 2 – Bill of Rights):

#### 16. Freedom of expression

\* Everyone has the right to freedom of expression, which includes

- freedom of the press and other media;
- freedom to receive or impart information or ideas;
- freedom of artistic creativity; and
- academic freedom and freedom of scientific research.

\* The right in subsection (1) does not extend to:

- propaganda for war
- incitement of imminent violence; or
- advocacy of hatred that is based on race, ethnicity, gender or religion, and that constitutes incitement to cause harm.

## **DEFAMATION**

"The publication of words or behaviour concerning a person that tend to injure the good name of that person, with the intention of injuring that person and without grounds of justification." - Source: Reporting the Courts by Kevin Ritchie.

## **THE LEGALITIES**

In terms of the user agreement, Independent Online, its subsidiaries, employees, contractors and officers and its editor take no responsibility for the accuracy or appropriateness of any comments on the site. Any opinion expressed by IOL staffers does not necessarily reflect the opinions of Independent Online, its editor, subsidiaries, contractors and officers.

**ANNEXURE B – International approach to regulation of user-generated comments**

Country	Newspaper	Pre-Moderation	Post-Moderation	Free speech	Identification	Chat option (answer)	Users commenting on other comments	Report abuse	Limited age
Spain	Eldiario.es	✓	✓	✓ As long as user respects conditions of participation	✓ Previous register Subscribers have special consideration: stands out with special feature	✓ Considered as a virtual community: you can follow and be follow by other users	✓	✓	
	El Pais	✓	✓	✓ As long as user respects conditions of participation	✓ Previous register: Use of an encrypted code to avoid intruders	✓ Considered as a virtual community: follow users and stories and be followed			14
	El Mundo	✓	✓	✓ As long as user respects conditions of participation To boost conversation and exchange of ideas and opinions	✓ Previous register	✓ Considered as a virtual community: you can follow and be follow by other users	✓ By a system of taps, you can see the ones that get best evaluations and the ones that mention your own comments	✓	16

Country	Newspaper	Pre-Moderation	Post-Moderation	Free speech	Identification <sup>3</sup>	Chat option (answer)	Users commenting on other comments	Report abuse	Limited age
Germany	Die Zeit	✓	✓	✓ As long as user respects conditions of participation	✓ Previous register	✓	✓ By a system of taps, you can see: All comments/ Staffrecomm./ Usersrecomm		
UK	The Guardian	✓	✓	✓ As long as user respects conditions of participation	✓ Previous register	✓	✓ By a system of taps, you can see: All comments/ Staffreplies/ Guardian picks	✓	16
France	Le Monde	Since it only allows to comment after having subscribed to the newspaper and paid, the users' activity is extremely scant							
Argentina	Clarín	No specifications			✓ Previous register	✓	✓	✓	
Chile	La tercera	No specifications			✓ Previous register	✓	✓	✓	
Mexico	El universal	No specifications			✓ Through Facebook account	✓	✓	✓	

<sup>3</sup>Usually, previous **register** asks for: Nick name / Real name / Gender / Year of birth / Region / Email / Password. The user of most online newspapers creates a **personal account** from where he/she can track his/her comments, follow other users or even follow specific stories).

## Criteria to moderate comments before being published:

### SPAIN:

#### **Eldiario.es / El mundo**

1. *It will never be allowed to publish comments that demonstrably boost hate, disdain or discrimination for facts of birth, race, gender, religion, nationality, opinion or any other personal or social issue. The attempts to alter fraudulently the identity and publish personal data of a third person won't be either tolerated regardless their intentions.*
2. *Messages including spam or links to sites having no relation to the article commented and the conversation going on won't be published.*
3. *Personal attacks and messages with no rapport to the conversation won't be allowed.*
4. *To avoid duplicate comments, we recommend to read the conversation before participating.*
5. *The user is responsible of all the manifestations on the internet and any other place.*
6. *The user's messages don't have to fit the editorial opinion of this newspaper.*
7. *The website has the right to delete, for any reason and without previous warning, any information or content created on the open participation spaces.*
8. *The website offers an accessible tool to complaint about inappropriate messages and contents.*
9. *The website declines any responsibility derived from the user's contents. Being able to interrupt at any moment and without previous warning, temporary or permanently, the right to participate to any user whose contents could be considered as illegal, banned or simply inappropriate.*

#### **El Pais**

- *The user will be able to withdraw, change the content created by her/himself on Prisa (the media group) sites.*
- *Prisa has the right to publish these contents, as well as to change or edit them.*
- *Prisa has the right to withdraw any content that would infringe any standard of behavior on our sites and, specially, those that would violate the respect to personal dignity, that would be discriminatory, xenophobic, racist, pornographic, that would infringe put at risk youth or childhood, public order or public security, or that, according to Prisa's opinion, would not be appropriate to be published.*
- *Prisa has the right to deny or withdraw the access to any of its sites and services without the need to prevent to those users that infringe the general conditions of use.*

### UK:

#### **The Guardian**

- *We, or authorised third parties, reserve the right to cut, crop, edit or refuse to publish, your content at our or their sole discretion.*
- *We may remove your content from use at any time.*
- *You warrant that the content you submit to us is not obscene, threatening, harassing, libellous, deceptive, fraudulent, invasive of another's privacy, offensive, defamatory of any person or illegal.*
- *You warrant that the content you submit to us does not infringe any patent, trademark, trade secret, copyright, or other intellectual or proprietary or privacy right of any party or individual.*
- *You agree not to:*
  - *Post content which is deliberately intended to upset or harm other users;*
  - *Use the Guardian Site to post or otherwise transmit content that victimises, harasses, degrades, or intimidates an individual or group of individuals on the basis of any impermissible classification, including, without limitation, religion, gender, sexual orientation, race, colour, creed, ethnicity, national origin, citizenship, age, marital status, military status or disability;*

- O Post or otherwise transmit any content that contains software viruses or any other computer code, files, or programs designed to interrupt, destroy, or limit the functionality of the Guardian Site or any computer software or hardware or telecommunications equipment;
- O Upload or otherwise transmit any content, or take any other actions with respect to your use of the Guardian Site, that would constitute, or would otherwise encourage, criminal conduct or give rise to civil liability; or,
- O Use the Guardian Site for commercial purposes, including, without limitation, submitting any material to solicit funds or to promote, advertise or solicit the sale of any goods or services.

The Guardian states more concretely:

### Community standards

There are 10 simple guidelines which we expect all participants in the community areas of the Guardian website to abide by, all of which directly inform our approach to community moderation (detailed below). These apply across the site, while moderation decisions are also informed by the context in which comments are made.

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.***

**ANNEXURE C – African approach to regulation of user-generated comments**

Country	Newspaper	Pre-Moderation	Post-Moderation	Free speech	Identification	Chat option (reply)	Users commenting on other comments	Report abuse	Limited age
Kenya	Daily Nation / Standard / The Star / The Sub-Saharan Informer	Although Disqus* affirms that it doesn't moderate or censure any comment, it has a list of forbidden behaviors. Besides, the newspaper can do it. Yet there is no appreciation relating to this on the comment's interface		✓	✓ Previous register / You can also get in through social media: FB/Tw/ G+  Name / email / password/avatar	✓	✓ Any reader can vote up, but to vote down you have to be registered	✓	13
	Ruled by Disqus, a networked community platform, specialized in the design of a comment system for sites								
	At one tap you can comment a specific story and at the other, you get the top commenters and top discussions on the whole newspaper								
Egypt	Daily News Egypt	Ruled by Disqus							
	Egypt Today	X	X	✓	✓ Identification every time you comment  Name / email	✓ You can be notified by email if s.o. replies your comment or posts a new one	X	X	
	Al-Ahram Weekly	X	X	✓	✓ Identification every time you comment  Name / email	X	X	X	
Nigeria	The Guardian	X	X	✓	✓ Previous register (Although currently not working)	Since it is not working properly, there are no comments and it is not possible to check the features			
	The Nation	Ruled by Disqus*							
	Tribune	Ruled by Disqus*							
	Punch	Ruled by Disqus*							
South Africa	M&G	Ruled by Disqus*							
	Timeslive	To comment on a story you have to send an email to the newspaper. This method may discourage public participation							
	City Press	Ruled by Disqus*							

***\*International platform Disqus <https://help.disqus.com/customer/portal/topics/215159-terms-and-policies/articles>***

Disqus enables online discussion communities, and in doing so, freedom of expression and identity are core values of the Service. There are a number of categories of content and behavior, however that jeopardize the Service by posing risk to users, publishers or third party services utilizing the Disqus platform. Websites or website representatives publishing inappropriate content or exhibiting inappropriate behaviors in connection with their use of the Service, including from the following categories, may have their Disqus account suspended or terminated:

- Blackmail or extortion
- Copyright or trademark Infringement
- Deceitful data collection
- Harm to minors or animals
- Impersonation
- Intimidation of users of the Disqus Service
- Malware
- Privacy violations
- Spam
- Unlawful activities

The above list may be modified or expanded at any time, and individual account deactivation decisions remain at the sole discretion of Disqus.

**Yet, they won't take any action on:**

- Trolling (when not otherwise breaking our TOS)
- Annoying commenters
- Comments that you disagree with
- Harsh or absent moderation

We recommend flagging inappropriate comments and reporting these sorts of behaviors to the site moderator. If you're having trouble with the moderation practices of a site, you may consider commenting elsewhere.

**They also protect themselves from any potential infraction on copyright.**