

Fundación Maldita.es

**Guidelines
for advocacy,
public policy
and lobbying
activities**

January 2022

**Fundación Maldita.es contra la Desinformación:
Periodismo, Educación, Investigación y Datos en Nuevos Formatos**

Avenida del Manzanares 196, Local 2.
28026 - Madrid
SPAIN
CIF: G88519038

Register of Foundations of the Spanish Ministry of Justice: **2330JUS**
EU Transparency Register: **203875243909-78**

Introduction

Maldita.es is a nonprofit media outlet and a foundation that **fights against disinformation** through Journalism, Education, Research and Data in new formats. As part of our core mission, we gather the lessons of our daily job doing fact-checking and share them with lawmakers, institutions and citizens in order to advance public policies that are effective in fighting disinformation and in building a more resilient, informed and critical society.

Engaging with policymakers is critical to those objectives. However, we intend to conduct ourselves according to **scrupulous standards of transparency and accountability**. This is the document that governs our advocacy, public policy and lobbying activities: it sets clear boundaries, do's and don'ts, and serves as a guide for our team and those engaging with us in the policy arena.



We gather the lessons of our daily job doing fact-checking and share them with lawmakers, institutions and citizens in order to advance public policies that are effective in fighting disinformation

The following guidelines have been inspired by the work of others that reflected about those issues long before we did. In all of our activities, including our policy work, we are subject to our commitments as signatories of the [International Fact-checking Network \(IFCN\) Code of Principles](#), in particular those of **non-partisanship, fairness, and organizational and financial transparency**. Another helpful inspiration was the work of several organizations such as Access Info Europe and Transparency [International in the International Standards for Lobbying Regulation](#) (2015).

Some of those works have inspired or are included word-by-word in this document. Other guidelines stem directly from **the lessons we have learned through our journalistic work and from our interest in protecting it**. This is a living document, a starting point that can continue to be improved in the future to better reflect the best practices by Maldita.es and others. This version was last reviewed in January 2022.

Guiding principles

- We believe **advocacy, public policy and lobbying activities** are **legitimate and necessary for the democratic process**, and that Maldita.es must engage in them as part of its mission as long as it conducts itself in accordance with the following principles.
- We are a non-partisan institution and all of our advocacy, public policy and lobbying activities will reflect that. **We will engage with all relevant actors that pursue our opinion on a public debate within our areas of interest**, discriminating none. We will take sides on policies that we deem better suited to fight disinformation, never on political candidates or parties.
- The only areas in which we will engage in advocacy, public policy and lobbying activities are those directly related to our mission: issues related to **disinformation, fact-checking, journalism, media literacy, information technology, transparency, and freedom of speech**.



All our advocacy, public policy and lobbying activities will be pursued in a way that in no way compromises the editorial independence of Maldita.es

Guidelines for advocacy, public policy and lobbying activities

- Any policies we pursue in the form of regulatory measures must be proportionate, fit for purpose, based on quality data and science, and **not impede on the individual rights** of assembly, free speech and petition of government.
- Transparency will be at the heart of all our advocacy, public policy and lobbying activities. When we participate in a policy debate, **we will publicly explain our position, how we intend to communicate it to others and who we are communicating it to.**
- **Information will be the only tool we use** when engaging in advocacy, public policy and lobbying activities. We will make others aware of our position and the reasoning and data behind it, without any kind of quid pro quo.
- All our advocacy, public policy and lobbying activities will be pursued in a way that in no way compromises **the editorial independence of *Maldita.es***. All individuals and institutions that engage with us on policy issues will be advised beforehand that those conversations will have no effect on our coverage of them.

Commitments

To ensure those guiding principles are effectively applied throughout all our advocacy, public policy and lobbying activities, *Fundación Maldita.es* commits to the following actions:

On non-partisanship, substance and relevance:

- Our public policy team will be available through policy@maldita.es to anyone that wants to engage with us on policy issues. Any refusal to engage with an organization or individual will be on the basis of relevance for that particular public debate.
- Any funding obtained by *Maldita.es* from public institutions will be disclosed and accessible through [our website](#). Likewise with any kind of funding we receive for the specific purpose of supporting our advocacy, public policy and lobbying activities.
- *Maldita.es*, as reflected in its [neutrality policy](#), will never endorse a political party or candidate for public office. If members of the public policy team do, they must clarify that they are not acting in the name of the organization.



***Maldita.es* will never endorse a political party or candidate for public office**

- Acceptance of any position within a political party will result in separation from employment at *Maldita.es*, as reflected in its [neutrality policy](#).
- *Maldita.es* will refrain from engaging in advocacy, public policy and lobbying activities on issues unrelated to disinformation, fact-checking, journalism, media literacy, information technology, transparency, and freedom of speech.
- On salient issues where *Maldita.es* takes a stand, we will be careful to engage not only with decision makers but also with experts who can inform our position, as well as those on the other side of the issue to get a better understanding of their reasons.

On transparency

- Every time *Maldita.es* engages in advocacy, public policy and lobbying activities on a given issue, it will explain its position publicly as well as the reasoning and data behind it within a reasonable period of time.
- There will be no discrepancy between *Maldita.es* public position on a given issue and the position expressed to others in private settings. Likewise, any argument we make in private, we will be ready to defend publicly.
- When *Maldita.es* engages in advocacy, public policy or lobbying activities on an issue affecting a company with which it has concluded commercial or funding agreements (i.e. regulation of platforms), we will publicly disclose the existence of said agreements when explaining our position.
- All meetings with political actors or elected officials about public policy issues will be listed on a [public registry accessible through our website](#) within a maximum of 90 days, including information on the date and subject matter.
- Our policy positions will evolve and change in attention to new scientific evidence. Those changes and the reasoning behind them will be then made public.
- The professional background and past relevant partisan engagements of those representing *Maldita.es* in advocacy, public policy and lobbying activities will be publicly available on [our website](#).
- We will abide by the requirements of the [European Union Transparency Register](#) and update our information accordingly on that platform.



Our policy positions will evolve and change in attention to new scientific evidence

On methods:

- The only tool we will use when engaging in advocacy, public policy and lobbying activities is information: sharing our experiences, supporting evidence, expert views on the issue at hand... Nothing else.
- No trade offs will be offered or accepted regarding public policy issues: we will not offer to support others' positions as a way to achieve support for ours, nor the other way around.
- No funding, partnership or material collaboration will be accepted if it depends on taking any kind of public position on policy issues or engaging in advocacy, public policy and lobbying activities unrelated to the mission of *Maldita.es*.
- All individuals and institutions engaging with *Maldita.es* on public policy issues that are usual subjects of our journalistic work (ei. politicians who have their speeches fact-checked) will be assured explicitly that those interactions are off-the-record and will have no effect whatsoever on *Maldita.es* coverage of them.
- All of our advocacy, public policy and lobbying activities will be conducted separately from our editorial activities. Information gathered during the first will be treated, unless otherwise authorized by our interlocutors, as non-attributable for reporting or fact-checking purposes.
- Articles detailing our positions on public policy or referring to our advocacy, public policy and lobbying activities will be clearly marked as so on our website and separated from journalistic content such as fact-checking or explainers.