



Bellingcat Policy Plan 2022-2024

I. Introduction

This document presents the Policy Plan for the years 2022-2024 of Bellingcat Foundation (Stichting Bellingcat, established on 11 July 2018 in Amsterdam with Chamber of Commerce KvK registration number 72136030, RSIN number 859000515).

The policy plan for 2022 is slightly retroactive. Due to several circumstances (Covid restrictions, designation of Bellingcat as foreign agent and undesirable organization by the Russian authorities, the outbreak of the war in Ukraine, changes in the internal management structure and others¹) the document is written in the second half of the current year. The activities, ambition, policy and strategy for 2023 and 2024 are stated broadly. A detailed Year Plan for 2023 will be developed and published by the end of November 2022.

II. Reflection on Previous Policy Period

In the period which was covered by the previous 3-year Policy Plan (2019-2021), the Foundation's work was primarily focused on achieving the following three aims:

- 1) consolidate (centralize) and professionalize all activities run by Bellingcat internationally
- 2) intensify and grow the international network of partners and contributors
- 3) increase collaboration and cooperation with local and international donors

In the last three years we established multiple processes and policies to improve and professionalize every aspect of the organization's operation, including core administrative and financial functions designed to meet and exceed the requirements of our yearly external audits; organizing a dedicated fundraising team and process to enable the further sustainability and

¹ See details further in down in text

growth. The editorial processes, including emphasis on standards and ethics, were strengthened, as well structures to involve and manage the global team in a distributed operational model. The efforts to consolidate and professionalize, which entail structured processes and solid chains of responsibility without sacrificing the inherent flat, inclusive and decentralized essence of the organization, has allowed us to establish the solid foundation that now enables our future growth, and, in turn, has helped us broaden our networks, both fundraising and collaborative. Challenges remain to develop the right management and leadership structure to address the specific needs of Bellingcat as a unique and non-standard non profit organization. Those will be addressed more closely during 2023.

Bellingcat has also exponentially grown the international network of partners and contributors. We have organized a better system of community management of contributors and volunteers, which resulted in increased joint investigations and publications. Partnerships with national and international justice and accountability systems have intensified, including concrete results in acknowledgement and acceptance of digital investigations as admissible evidence in court (by way of a mock trial with a judge from the International Criminal Court and a court decision in a German jurisdiction). Joint research with prominent international media have also increased, including with new outlets, such as NBC.

The fundraising process has also been strengthened by appointing a dedicated team, developing several policies (for donations acceptance) and setting up a system for individual donations (via a "Donate" button on the website). Much remains to be improved, including enlarging the team and developing a fundraising presence in the US.

III. Mission, Vision and Objectives

The mission and vision of the organization have been revised and sharpened. In 2020, a 10-year general strategy was developed.

Our vision is to build and empower a global community of inventive individuals who use the latest technologies to piece together truth in a transparent way.

Our mission is to be the leader in open source fact-finding, and our strategy is to consolidate that position by delivering top-quality investigations and training, establishing recognized standards, and providing inspiration to other media and civic organizations.

The core values and principles of our work are based on:

Collaboration - we work as a team and believe that the collective is stronger than any individual

Curiosity - we dig through digital data and choose our research topics independently

Tenacity - we value the process in searching for the truth and we persist

Diversity - we attract a variety of people to sharpen our ideas and broaden our investigations

Ingenuity - we connect the dots and develop research methods to benefit all, not just a few

IV. Strategy & Methodology

To achieve our objectives, we produce and publish high quality investigations, train stakeholders and seek cooperation with diverse actors (inter-government and non-government, local and international, media, academia, activists and many others). Bellingcat's strategy to lead the development of open source and social media investigation is built on our unique IVA approach (a three-part process known as "Investigate, Verify, Amplify") and our distributed, collaborative work model.

We research various topics (including war crimes, conflicts, human rights abuses, corruption, corporate misconduct, environmental crimes) using a variety of platforms to collect data online and from publicly available sources. The data and information collected is then rigorously verified by applying strict standards and principles.

In our justice and accountability work, our methodology for verification is developed in cooperation with the Global Legal Action Network (GLAN) and is consistent with the Berkeley School of Law's Berkeley Protocol. This serves to ensure that each Bellingcat investigation follows a quality and consistency process defined by the following structure: identification, collection & preservation, verification, analysis, review & confirmation (including multiple source corroboration & cross referencing) and finally, presentation (publication).

To further amplify investigations, we conduct demand-driven and tailor-made training & capacity building to different stakeholders. We also seek cooperation and collaboration with a wide and diverse public, parties and actors with the ultimate aim to service transparency, seek solutions and use hard evidence as the basis for forming opinions and making decisions. Atypically for media organizations, Bellingcat does not strive to be the owner of scoops or take credit for its break-through investigations, but tries to share its findings with partner media in order both to achieve peer review of its findings but also to ensure maximum amplification through multi-channel storytelling.

V. Impact & Recognition

Bellingcat's innovative approach continues to have significant impact on a range of fields, particularly those focused on accountability, and a continued influence on the use of open source investigation by the wider media.

Our work exposing the Russian intelligence operatives involved with the poisoning of Sergei Skripal in 2018 continued throughout 2018 to 2021. Additional findings in the Skripal investigation led us to identify a further poisoning by the same Main Directorate of the General Staff of the Armed Forces of the Russian Federation (GRU) intelligence unit (Unit 29155) in

Bulgaria and led to Czech authorities identifying the involvement of the Skripal suspects in an arms depot explosion. Bellingcat's disclosure of the common GRU suspects and the common targets in the two incidents - a Bulgarian arms manufacturer exporting ammunition to Ukraine - resulted in a joint investigation between law enforcement of Great Britain, Czechia and Bulgaria.

The investigation then allowed Bellingcat to identify a previously unknown chemical weapons facility used by Russia to produce nerve agents used in assassinations, which in turned allowed Bellingcat investigators to establish that prominent Russian opposition figure Alexy Navalny was targeted by a Federal Security Service (FSB) team using nerve agents from that facility. It was then possible to link the same FSB team to the poisonings of other opposition figures, including Vladimir Kara-Murza, Boris Nemtsov's close ally, and demonstrating Nemtsov himself was followed by the same FSB assassination team for nearly a year prior to his own murder.

Bellingcat's investigations into Russian assassinations resulted in the identification of the suspect in the Berlin Teirgarten bicycle assassination case as an individual working with the FSB, and resulted in our lead investigator on the case, Christo Grozev, being a star witness in the court case. As a result of Bellingcat's investigation it was possible for the court to state the suspect was working for the Russian intelligence services, and the suspect was imprisoned for life. Bellingcat has been invited to various forums to present our work on the assassinations, including the Parliament of the Council of Europe, the US House of Representatives Foreign Affairs Subcommittee on Europe, Energy, the Environment, and Cyber, and the public inquiry into the death of Dawn Sturgess, the British citizen killed as a result of the Skripal poisoning attempt.

The investigation into the poisoning of Alexy Navalny became a central part of the documentary *Navalny*, released in 2022, to great critical acclaim, resulting in Bellingcat's profile being raised significantly internationally, particularly in the US. Bellingcat's own production company, Bellingcat Productions BV, is now working on its own documentary projects, with the success of *Navalny* driving a great deal of interest and support for our own documentary work. The production company aims to turn Bellingcat's investigations into documentary, scripted and podcast content, as well as different forms of content.

Bellingcat's Yemen Project began the process of establishing a methodology for archiving and investigating conflict incidents using open source evidence with the intent of use in legal proceedings at national and international level. Working with the Global Legal Action Network (GLAN). Bellingcat produced and implemented a methodology that examined airstrikes by the Saudi-coalition in Yemen that were linked to incidents of civilian harm and damage to civilian infrastructure.

Over the following years, the process was tested and refined and is now a cornerstone for our ongoing justice and accountability efforts in Ukraine. Our work on justice and accountability over the last few years has led to widespread recognition in the accountability community of the value of open source evidence and our own investigative work. We now engage closely with justice and accountability bodies on the current conflict in Ukraine.

We have continued to produce award-winning work on a number of topics, and in collaboration with a variety of partners. We received the European Press Prize, London Press Club award, the Nannen Prize, and two Emmys for our work on Russia's assassinations. Our podcast, examining the downing of Malaysian Airlines Flight MH17 and extrajudicial executions in Cameroon won the Political Studies Association Award for Political Podcast of the Year, the British Podcast Awards Bronze Award for Best True Crime Podcast, ARIAS Bronze for Best Factual Series, ARIAS Silver for Best Independent Podcast in 2020 and the Amnesty Media Award for Radio and Best Independent Podcast of the Year at the UK ARIAS awards the following year. Our partnership with Newsy, producing video content based on our investigation, won The Scripps Howard Award for Innovation, and was nominated for a News Emmy. We also won the Machiavelli Award for public communication.

Bellingcat also continues to have its work covered by a wide range of national and international media, including features on CBS 60 Minutes, and heavy coverage in Japanese media that has greatly increased the knowledge and understanding of open source investigation in Japan. The book *We Are Bellingcat* by Bellingcat founder Eliot Higgins was a Sunday Times bestseller and has been published in multiple markets and languages, including the UK, US, Netherlands, Japan, Finland, Germany, Poland, and Ukraine.

VI. Beneficiaries & Partners

The core of Bellingcat's work is to search and assist others in developing methodologies for searching for truth and evidence to advance transparency and accountability with the purpose to encourage action for positive change (be it in the form of uncovering crimes, demanding justice for wrong-doing or building capacity of citizens to contribute meaningfully for solutions to local problems). In that sense, the beneficiaries of what Bellingcat delivers and shares are on a numerous and global scale – scholars, practitioners, experts, media, lawyers, researchers, activists, human rights defenders, non-government and intergovernmental organizations as well as institutions from North and Latin America, Europe, Central Asia, the Middle East and Australia.

A wide range of organizations, individuals, companies and different entities, both in the Netherlands and globally, were drawn to the work of Bellingcat, especially after the breakthrough work on the downing of Malaysia Airlines Flight 17, our work exposing Russia's assassination programmes, and our justice and accountability work in Ukraine. We have continued to be a trusted source of information, something that has led to ever increasing requests to Bellingcat for training and capacity building on the use of online open source investigations.

Bellingcat has continued to train a wide variety of individuals and organizations, spreading the use of open source investigation to an ever-growing community applying Bellingcat's open source investigative techniques to their own work. Our partnerships have also continued,

including organizations like Der Spiegel, The Insider (Russia), OCCRP, TAmmedia (Switzerland), 070, Forensic Architecture, CNN, NBC, the BBC, Newsy, Lighthouse Reports, and many more.

We believe that collaborative partnerships are one of the most effective ways to ensure impact and accountability, with one of the best examples of this being our work with Lighthouse Reports, Spiegel, TV Asahi and others investigating border pushbacks involving Frontex. These partnerships, and the continued investigative efforts by organizations involved, eventually resulted in the resignation of the director of Frontex, and a serious investigation in the European Parliament that led to many of Frontex's failings being exposed for the first time.

VII. Activities & Ambition

The current activities of Bellingcat can be categorized in three major areas: **conducting investigations, training open source research practitioners, and establishing open source research standards.**

Investigations

Since its founding, the core work of Bellingcat has been to conduct in-depth research, primarily based on open source online sources and publicly available data), focusing mainly on conflicts (in Syria, Yemen, Iraq and more recently Ukraine). Our thematic range of investigations has widened over the past five years, with a large portion of our work now focusing on environmental issues, far-right movements in the United States and Europe, and pedagogical guides that teach investigative methods and techniques to our readers. Our research is not unique in terms of topics and areas, but is unique in terms of approach in our use of the IVA method, depth, transparency of process and evidence. We have developed our own tools and methodologies, which distinguishes the work we do from current and potential competitors in the field.

Our investigators identify publicly available information and collect data from a variety of different media and in different formats, including pictures, videos, maps, satellite imagery, reports, articles, blogs and other text forms. Subsequently, the identified data is archived, analyzed and verified. Data is shared among the collaborative Bellingcat community, where investigators, experts and volunteers jointly verify authenticity. A variety of software tools and supporting data are also used to triangulate and further corroborate the information. In the last stage (amplification), the verified data is disseminated by publishing (articles or investigations on Bellingcat's website, distributing specific datasets or reports) and directly sharing with audiences.

In addition, we have now developed an investigative methodology designed specifically for justice and accountability with the aim of using our investigative work in a legal setting. Due to the requirements of these investigations they are part of a separate research and investigation process. Our goal is to start teaching this process to other organizations who want to work on justice and accountability, increasing the number of high quality accountability focused investigations being performed on any given topic.

In 2022, most of our investigative work has been focused on the war in Ukraine. Already prior to the Russian invasion of Ukraine, we've seen the enormous value of open source data to investigate incidents and verify the waves of disinformation campaigns and war propaganda evolving around conflicts. In this regard, the war in Ukraine is probably one of the best-documented conflicts, with photos and videos depicting the war in almost real time as it has progressed.

Bellingcat's work since the start of the war in February 2022, is aimed to capture, authenticate and preserve this digital memory in order to offer verified information about incidents to the public and support efforts seeking accountability for human rights violations by providing information that could be admissible evidence in court. We do that by scaling up monitoring and investigative work (including incidents of civilian harm), setting up specific workflows to distinguish the awareness raising and publications from the justice and accountability work, and finally working towards establishing an index of accountability.

VIII. Training

As part of Bellingcat's vision to inspire and build a global community that can produce high-quality open source investigations, we conduct extensive capacity building and training with partners, stakeholders and interested individuals and groups. Our training is offered both in a public and private format, with open workshops taking screened applicants from public announcements and tailor-made workshops for specific organizations.

The participants of both public and private workshops come from a diverse set of professions: legacy and online media outlets, corporate security and intelligence departments, human rights organizations, university students and professors, tech companies, law firms, think tanks and many more. In the past three years, the demand for our expertise in the IVA approach and the "*Bellingcat Method*" has increased significantly, far outstripping our available capacity. The open application training courses (announced on our Patreon, newsletter, and website) usually sell out within days of publication, resulting in lengthy waiting lists.

Bellingcat's training courses consist of modules ranging from one to five days and are conducted by our own trainers and investigators. These workshops range in length between a single four-hour day to a full week, conducted either in-person or through a webinar. The income received is invested back into the organization to cover operational costs (including salaries of researchers around the world) and fund various initiatives to advance transparency and accountability. In the last year, we have offered training courses in five different languages (English, Dutch, Arabic, Spanish and Russian) and the workshops are generally divided into profit (the income of which we reinvest in the organization) and non-profit (costs for which are covered by grants). For the training courses we offer we partner with a wide range of organizations, including the UC Berkeley School of Law, University of Toronto, University of Amsterdam, Agence France Presse, The New York Times, Süddeutsche Zeitung and numerous others.

IX. Standards

The field of online open source investigations is an emerging one and as such represents a largely unknown (and still unused) area for many stakeholders. At the same time, the potential is significant, especially in the legal and judicial arena, human rights monitoring & accountability, law enforcement, formal education and even general media literacy.

As a pioneer and trend-setter, Bellingcat aims to establish both informal and formal technical (including quality, verification and evidentiary), ethical and privacy standards for the use of open source data, investigation and analysis – especially as evidence in legal cases. Our collaboration with the Global Legal Action Network on justice and accountability projects has allowed us to establish standards for open source work in relation to legal investigations.

The growing importance of online open source investigations in the area of education, journalism, intelligence, legal, and even politics necessitates that strict standards are established. In that way, Bellingcat can ensure that its work is credible and legitimized. To that end, Bellingcat has set up strict editorial guidelines that help ensure that our investigations adhere to the highest standards in the field.

X. Ambition

We pledge allegiance to facts, completeness and transparency. We consider this essential in the current realities of fact-free politics and fake news, which are increasingly on the march around the globe. In many countries, an era of post-truth is gaining ground with an all-out war on transparency and an armed conflict against accountability, where justice & solidarity are pushed to the margins.

Drawing on our unique approach and collaborative global community model, our ambition is to make open source investigation a **mainstream discipline** that can be employed by educators, politicians, lawmakers, law enforcers, media and the general public to advance transparency, accountability and justice.

To achieve our ambition, we will work on three main areas in the coming two years:

1) Organization scale up and further professionalization

The historic background and strength of Bellingcat lies partly in its closely connected virtual network of online-based contributors and volunteers, as well as its lean management and administrative structure. However, the increased demand for our expertise and the broadening of size and scope of our activities (necessitates further **professionalization and formalization**. This process has already started in the last years and will continue in the future (expanding and hiring of key management, financial and research/training staff, setting up of procedures and processes, improved structure and physical infrastructure, defining policies on grant acceptance, HR, safety protocols, financial guidelines etc). Additionally, efforts and investment are needed to strengthen the business management, fundraising, compliance, technology, as well as monitoring and evaluation.

The objective is to continue building a strong core team without losing the strength and uniqueness of the wide community of contributors, volunteers and content providers.

2) Strategic focus and alliances

Bellingcat has built strong credibility with the quality, depth and transparency of its investigations. To maintain our leadership position in an increasingly competitive environment, we need to define a **sharper focus** and engage in strategic alliances to advance our products and expertise and further legitimize the field of open source investigation. We will revisit both the thematic boundaries of our investigations, as well as the balance between providing training/capacity building and efforts in setting (international) standards for conducting evidentiary open source investigations (for use in judicial litigation, for example). But as these specific focuses and subjects might change, common and constant is Bellingcat's commitment to open source investigation's potential to pursue justice for those affected by conflict or human rights abuses, and to lift up the voices of those underserved by more conventional investigative methods.

In terms of strategic alliances, partnerships will be sought not only in the investigative activity area of Bellingcat, but especially in setting standards and advancing open source investigations from a marginal field to mainstream discipline, and that can maximize the potential of this work for real-world impact.

3) Diversification of geographic focus

Historically, Bellingcat has acquired a set of thematic competences that are slanted towards an Eurocentric focus, with human rights issues in the Middle East, Russian government-linked crime, and risks posed by far-right groups in Europe taking a large part of the investigative space. While these competences were developed as the result of addressing serious issues on the news agenda at the time of investigations, Bellingcat's credo is that we should not just follow the news agenda but bring underserved issues to it, too.

In pursuing this goal, in the next three-year period we will seek to develop competences, including by recruiting researchers with the respective language and cultural-understanding skills, that would enable us to investigate human rights related issues in East Asia and Africa. We will also expand our existing coverage of Latin America.

3) Growing & sustaining our audience

The audience is the lifeline of Bellingcat. We depend on it to maintain the high-standards in our investigations, to **stay independent** from corporate or government influence, yet to be able to monetize certain products and expertise to be able to run a professional organization and increasingly large network. In the coming period, we will work to create a membership system (creating more added value to readers and users of our output), while reaching out to expand both the current end-user community (media, journalists, governments, investigative committees, courts, lawyers, academic institutions) and the wider audience (general public, academia, educators, certain media and government entities, etc)

Bellingcat

Revenue and Expenses

Base currency: EUR

	Budget 2022	% of Total	Budget 2023	% of Total	Budget 2024	% of Total
	Total		Total		Total	
Revenue						
Restricted funds (project funding)	630,000	22%	575,667	20%	500,000	16%
Restricted funds Ukraine	475,921	17%	400,000	14%	400,000	13%
Unrestricted funds (core funding)	940,000	33%	993,333	35%	1,223,000	40%
Individual giving, crowdfunding specific projects	125,000	4%	200,000	7%	225,000	7%
Individual giving Ukraine	330,000	12%	0	0%	0	0%
Memberships (Patreon etc)	110,000	4%	180,000	6%	200,000	7%
Own income (training fees, presentations)	250,000	9%	525,000	18%	525,000	17%
Income from media productions	0	0%	0	0%	0	0%
Total revenue	2,860,921		2,874,000		3,073,000	
Expenses						
Staff						
Salaries & benefits (Incl. Ukraine staff)	1,700,000		2,242,500		2,331,500	
Staff relocation costs						
Health insurance staff	10,000		11,000		11,000	
Staff training & development	20,000		50,000		55,000	
<i>subtotal staff</i>	1,730,000	62%	2,303,500	81%	2,397,500	81%
Direct costs income generation activities						
Project training costs (travel, accommodation, organization, rental space)	136,000		50,000		50,000	
Paid workshops/keynotes costs (travel, accommodation, organisation, rental space)	50,000		0		0	
Costs fundraising events	48,500		48,500		49,000	
<i>subtotal costs income generation</i>	234,500	8%	98,500	3%	99,000	3%
Operational costs						
Operational costs Ukraine	475,921		0		0	
Payroll, legal costs, other financial/HR advice	5,000		21,640		22,000	
Occupancy (rent, utilities, office supplies)	24,000		47,360		48,192	
Office costs	9,000		9,000		9,500	
Travel costs (local, international, meetings)	15,000		40,000		45,000	
Subscriptions, IT, consumables, system admin, safety&security, equipment (laptops), website	70,000		90,000		97,100	
Volunteers' section/virtual newsroom, website	15,000		0		0	
3rd party insurances, other insurance	5,500		5,500		7,000	

Bellingcat

Revenue and Expenses

Base currency: EUR

	Budget 2022	% of Total	Budget 2023	% of Total	Budget 2024	% of Total
Depreciation on investments	18,000		21,000		23,000	
Other costs (audit, bank costs)	25,000		46,000		49,500	
<i>subtotal operational costs</i>	662,421	24%	280,500	10%	301,292	10%
Miscellaneous						
Editorial budget (fees commissions,	48,950		55,000		55,000	
Tech/tool development budget	11,000		0		0	
Consultancies, freelancers, other advice	35,000		35,000		35,000	
Annual staff retreat	45,000		52,000		55,000	
Licences (including for satellite software),	32,000		23,000		32,000	
<i>subtotal miscellaneous</i>	171,950	6%	165,000	6%	177,000	6%
Total expenses	2,798,871		2,847,500		2,974,792	
Growth to year before			1.74%		4.47%	
Revenue	62,050		26,500		98,208	

Proposal on reserves

The positive balance is meant to build a minimum reserve to make sure the organization is financially sustainable.

Proposal on investments	Budget 2022	Budget 2023	Budget 2024
Investment in website and equipment (laptops, of	18,000	20,000	20,000