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National Counter Disinformation Strategy Subgroup 1 Report

Countermeasures

September 2023

The content of this paper is deliberative in nature and not conclusive. It reflects the initial scoping activities of the Working Group in response to the agreed terms of reference. It does not reflect the official views of Government or any participating organisation on the Working Group.

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Introduction

Purpose

To inform the development of the whole of Government national strategy for countering disinformation by mapping existing initiatives, tools and resources, examining any identified evidence gaps. It is anticipated that this work will provide an overview of possible disinformation countermeasures, the evidence to support those measures, the major benefits/issues/challenges, what's been done to date in Ireland, and what needs to be done/could be done to support those areas.

Background

Disinformation is a complex global challenge that threatens human rights and democratic values. Although disinformation has existed in some form throughout history, the rise of digital media has revolutionised how content is created, distributed, and consumed. Today, it is relatively simple to fabricate misleading information, spread rumours and conspiracy theories, amplify social divisions, and make money from these efforts. This issue will intensify as new AI technologies make it even easier to create inauthentic or manipulative content. These developments place a great burden on individuals who must continuously decide what is and is not truthful or trustworthy. At the societal level, they have a corrosive influence across all spheres of life from public health to trust in democratic institutions. Developing effective and democratically appropriate countermeasures is an urgent but challenging goal.

One challenge is that disinformation is an evolving phenomenon that is difficult to define. Many definitions of the problem focus on content (disinformation is false information) and the intentions of those who created the content (disinformation is false information created with the intention to deceive). However, it can be difficult to ascertain whether a piece of information is true or false and whether it was created with the intention of misleading the public. An alternative way to think about the problem is to focus on overall harms. Here, disinformation can be considered harmful when it undermines people’s ability to make informed decisions or leads to adverse outcomes such as damaging public health, causing the integrity of democratic elections to suffer, or scapegoating social groups.

Importantly, this understanding shifts the focus from individual pieces of content (and whether they are true or false) to the role of disinformation in wider trends such as polarisation or

inequality. In other words, willingness to endorse or promote disinformation may be recognised as a symptom of deeper societal issues that need to be addressed.

A second major challenge is that the nature of harmful disinformation campaigns varies considerably in terms of who is responsible (states, foreign actors, ideological groups, or individuals), their motivations, the channels they use, the time frame of their campaigns, and the audiences they target. No single countermeasure is sufficient for all scenarios and specific countermeasures may be more effective for some groups or contexts than others. Therefore, it is necessary to develop multiple countermeasures simultaneously.

Report overview

The major contexts section looks briefly at legal and regulatory issues as well as transnational networks (for more on legal and regulatory issues, please see the report of Subgroup 2). Then the report looks at key issues in countering disinformation, including:

- human rights and democratic values
- funding
- coordination
- environment analysis
- research
- education and lifelong learning
- communication

This is based on a review of research, case studies and best practice. Finally, there is a glossary of key terms and concepts in countering disinformation.

Major Contexts

Legal/regulatory contexts

Legal and regulatory responses to disinformation vary considerably across states. Some authoritarian states have exploited concerns about disinformation to erode freedom of expression, stifle opposition, and increase control over the media. This is achieved through repressive laws (e.g., criminalising the act of sharing disinformation). In democratic states and in the EU, policymakers attempt to balance the harms of disinformation with protections for fundamental rights and freedoms including freedom of expression. In these countries, disinformation is generally not illegal, but is considered to be 'legal but harmful'. Efforts to counteract disinformation tend to focus on increasing the capacity of different actors to prevent, monitor, and correct or debunk disinformation.

At an EU level, there is the EU Digital Services Act (DSA) which has provisions relating to disinformation, requiring regulated entities to take steps to reduce the availability of harmful online content, including disinformation. Alongside the DSA, there is the EU Code of Practice on Disinformation. This voluntary or self-regulatory code outlines a set of commitments for technology companies, including reducing the visibility of disinformation. It is intended that the Code would become a Code of Conduct under the DSA.

In Ireland, important legal and regulatory developments include the Online Safety and Media Regulation Act, and, as provided for under the Act, the establishment of a new national regulator, Coimisiún na Meán (the Media Commission), as well as the Electoral Reform Act 2022. Part 5 of the Act deals with misinformation and disinformation and Part 4 deals with online political advertising. These Parts have yet to be commenced.

Transnational networks

As disinformation is a global phenomenon, transnational networks play an important role in efforts to counter disinformation. Key contexts for Ireland include:

- European Digital Media Observatory (EDMO): a part EU-funded hub for fact-checkers, academics and other relevant stakeholders to collaborate with each other
- European Platform of Regulatory Authorities (EPRA)
- European Regulators Group for Audiovisual Media Services (ERGA)
- European External Action Service (EEAS): the diplomatic service and combined foreign and defence ministry of the European Union.

- The European Centre of Excellence for Countering Hybrid Threats (Hybrid COE)
- International Fact-Checking Network (IFCN)
- OECD

Key Issues in Countering Disinformation

A human rights approach

To safeguard democratic values, counter disinformation strategies must be grounded in the protection of fundamental human rights. There are human rights implications to disinformation as it potentially affects people's ability to make free and informed choices. However, there are also human rights implications to countering disinformation as some measures may limit freedom of expression and media freedom. As democracies must balance fundamental freedoms with the mitigation of harms, disinformation is generally described as 'legal but harmful' in democratic states. Internationally, some states have adopted repressive measures and many online platforms have adopted an ad hoc approach often based on developments in their main market, the United States. This is further complicated by the fact that public discussions about fundamental freedoms, such as freedom of expression, are highly contested. Nevertheless, adopting a due diligence approach to human rights is a complex but necessary step to countering disinformation.

Funding

Funding and resources are needed to support different disinformation countermeasures. The major sources of funding are:

- **Public funding:** The EU funds a wide range of initiatives and stakeholders including media literacy programs, research projects, and support for independent journalism. For example, the EU's flagship research funding programmes, H2020 and Horizon Europe, have funded large-scale innovation projects to develop new tools to detect disinformation as well as research into the role of changing media environments. In Ireland, many public bodies similarly provide funding for research, industry, and civil society initiatives.
- **Tech industry funding:** Technology companies, including social media platforms, fund disinformation countermeasures. For example, Meta established a fund to support fact-checking organisations and a programme to fund research on disinformation.
- **Private and Philanthropic Funding:** Organisations such as, for example, the Bill & Melinda Gates Foundation and Open Society Foundations provide funding for disinformation research and countermeasures. Other philanthropic bodies work with tech industry organisations to manage funds. For example, the Calouste Gulbenkian Foundation is currently administering the European Media and Information Fund, and,

to date, comprises of funding entirely from Google, though there are plans to add further donors to the project.

Coordination

Disinformation is a complex and wide-ranging problem that cuts across multiple spheres of society. A whole-of-government approach to countering disinformation similarly cuts across multiple and diverse departments and institutions. An effective strategy will require a significant capacity for coordination including knowledge sharing, the development of best practices and participation in national and transnational networks.

Environment analysis

Developing situational awareness is a fundamental first step for countering disinformation. This means maintaining an up-to-date understanding of disinformation actors, narratives, and tactics across different platforms while also following international trends and developments to better understand the Irish context. For example, it is important to understand how emerging AI technologies, such as ChatGPT, are being used internationally to disseminate disinformation.

Within Ireland, a wide range of actors are engaged in monitoring disinformation. These include, for example, researchers (academic and non-academic), fact-checkers, investigative journalists, and activists. Many of these actors are linked into transnational networks such as the European External Action Service (EEAS)[1], the International Fact-Checking Network (IFCN)[2] and the European Digital Media Observatory[3]. The latter provides a collaborative structure for European stakeholders to exchange knowledge on disinformation trends and threats; EDMO Ireland is currently comprised of four partners[4]. The above actors and organisations utilise a range of methods and resources. They also differ in their funding structures and goals. For future development, it appears important to maintain a consistent set of information sources and to support cooperation and collaboration across a diverse set of information sources.

[1] https://www.eeas.europa.eu/_en
[2] https://www.poynter.org/ifcn/
[3] https://edmo.eu/
[4] https://edmohub.ie/

The major online platforms have committed to providing information about disinformation trends on their services under the voluntary EU Code of Practice on Disinformation[5]. However, research conducted in Ireland indicates that the information provided by the platforms is often vague and unreliable[6] and research on disinformation has been significantly hampered by a lack of access to data. Many platforms have limited or cut off access to data for researchers. For that reason, it is necessary that any data provided by platforms are subject to independent scrutiny and that a diverse range of independent organisations are engaged in monitoring the environment in parallel. The EU Digital Services Act makes provision for vetted researchers to access data from major platforms[7]. As the rules and procedures for data access need to be defined, policymakers have an important role to play in ensuring the process is effective and fair.

Best-practices are also emerging in specific areas, such as electoral disinformation, and for specific authorities. For example, the EU's European Committee of the Regions (2022) published a guide for local and regional authorities on 'Developing a Handbook on Good Practice in Countering Disinformation at Local and Regional Level'. In other areas, such as health communication, there are well-established research-practitioner networks investigating disinformation trends and how to respond.

As disinformation tactics and narratives are constantly evolving and as the disinformation that manifests in Ireland is usually influenced by international trends, it is important to maintain an up-to-date understanding of the latest research, case studies, and recommendations within relevant networks.

Research

As online disinformation is a relatively new phenomenon, research on this topic is in its infancy. Although researchers have generated important insights in recent years, there is much more work to be done to understand how disinformation spreads across platforms; the role of algorithms in shaping people's understanding of the world; the impacts or harms associated with disinformation; the effectiveness of different countermeasures; and the capacity to use advanced technologies to detect and mitigate disinformation[8]. To achieve this,

[5] https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation
[6] https://www.bai.ie/en/new-report-recommends-development-of-robust-procedures-for-reporting-and-monitoring-online-disinformation/
[7] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13817-Delegated-Regulation-on-data-access-provided-for-in-the-Digital-Services-Act_en
[8] https://psyarxiv.com/b52um/

research expertise is needed from multiple disciplines including, for example, communication and journalism, computer science; education; psychology; politics and policy, and sociology. As noted, there are many international sources of research funding but international research often overlooks small countries, such as Ireland and/or developing countries beyond North America and Western Europe. Ireland has a potential role to play in ensuring that no regions are left behind and that Ireland itself is adequately represented in research.

Education and lifelong learning

Concerns about disinformation have put renewed emphasis on media literacy and digital literacy. Media literacy is the set of skills and knowledge needed to access, analyse, evaluate and create a variety of media. The overall aim is to empower individuals to understand, analyse and engage with media. However, the concept is often confused with information literacy and digital literacy[9]. In the process, the empowering role of media literacy is often weakened by being reduced to a set of digital skills without a corresponding emphasis on knowledge about the media system. Within education, for example, digital literacy is recognised as an essential skill alongside literacy and numeracy[10]. A more developed concept of media literacy - or digital media literacy - would seem necessary to counter disinformation and equip people with the ability to navigate complex media worlds. Achieving this goal presents further challenges in terms of ensuring teachers are adequately trained, schools access to up-to-date and best-practice resources, and preventing divides in uptake across schools.

Digital literacy and media literacy initiatives tend to focus on children and young people in formal education. Although there are some initiatives and NGOs that support older adults such as Age Action's 'Getting Started' programme, many adults lack fundamental skills. In 2020, Accenture[11] conducted a survey of Irish adults to assess the digital divide. It found that 42 percent of Irish adults describe themselves as being' below average' for digital skills and 40 percent of those with poor digital skills did not see a need to improve. This indicates two challenges. First, it is necessary to increase opportunities for lifelong learning in digital literacy and media literacy. For example, this may include increasing the capacity of further education institutions, public libraries, civil society, and businesses to provide upskilling opportunities. Second, it is necessary to increase awareness of the importance of digital literacy and media

[9] https://digitalcommons.uri.edu/jmle-preprints/20/
[10] https://www.gov.ie/en/consultation/14180-literacy-numeracy-and-digital-literacy-strategy-consultation/#
[11] https://www.accenture.com/ie-en/insights/local/digital-divide

literacy across the population. Regarding disinformation specifically, this is challenging because those most in need of support may be the least likely to seek it out.

Communication

Governments and public bodies need to develop clear communication strategies to both anticipate and respond to disinformation. Arising from the Covid-19 pandemic, a set of best practices is emerging internationally. For example, the OECD (2023) has published guidance on 'Good Practice Principles for Public Communication Responses to Mis- and Disinformation'[12]. It identifies nine common principles underpinning good practices for government engagement with citizens, civil society and the private sector:

- Institutionalisation of approach;
- Public-interest driven communication;
- Future proofing and professionalisation within public institutions;
- Transparency;
- Timeliness in responding to emerging narratives;
- Preempting potential misunderstandings and disinformation;
- Providing trustworthy and reliable data;
- Communicating in an inclusive manner; and
- Collaborating across the whole-of-society.

[12] https://www.oecd.org/governance/good-practice-principles-for-public-communication-responses-to-mis-and-disinformation-6d141b44-en.htm

Appendix I: Glossary

A selective glossary of key terms and concepts in countering disinformation:

- *Algorithm*: A set of instructions a computer performs complete a task. For example, social media algorithms are set of instructions to systematically sort, filter, recommend, and moderate content.
- *Artificial intelligence (AI):* computer programs that 'learn' how to perform tasks by training on sets of data.
- *Bots:* social media accounts operated entirely by computer programs, not real people, to generate posts and/or engage with content.
- *Confirmation bias:* a tendency to accept information unquestioningly when it reinforces some existing belief or attitude.
- *Deep fake:* A piece of synthetic media that uses artificial intelligence to imitate the appearance or voice of real-people.
- *Digital literacy:* The ability to use information and communication technologies.
- *Disinformation:* False information that is created or distributed with the intent to deceive.
- *EU Code of Practice on Disinformation*: a voluntary code for major online platforms, and other companies, to report their actions to counter disinformation.
- *Fact:* A piece of information that can be verified as something that really exists or has occurred.
- *Fact-checking:* the process of evaluating the truthfulness or accuracy of factual claims.
- *Information literacy:* The ability to access and evaluate information.
- *Malinformation:* True information that is created or distributed with the intent to deceive.
- *Media literacy:* The knowledge and skills to access, analyse, evaluate, and create different forms of media.
- *Misinformation:* False information that is created or distributed without the intent to deceive; it is created or shared in error.
- *Post-truth:* circumstances in which objective facts are less influential in shaping public opinion than appeals to emotion and personal beliefs.
- *Pre-bunking:* a strategy for countering disinformation by teaching people about manipulation strategies.