

National Counter Disinformation Strategy Public Consultation

Review of Submissions **November 2023**

The content of this review is deliberative in nature and does not necessarily reflect the official views of Government or any participating organisation on the Working Group.

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Background

It is recognised that the disinformation environment evolves rapidly, that it can involve a wide range of policy areas and that initiatives and countermeasures to tackle disinformation take many forms, including, for example, media literacy, fact-checking and content labelling. In their report of July 2022, Ireland's Future of Media Commission recognised the need for more coordinated and strategic action to combat the damaging impact of disinformation on Irish society. Therefore, they recommended the development of a National Counter Disinformation Strategy in consultation with all relevant stakeholders, including Government Departments, industry stakeholders, news organisations, civil society groups and Irish fact-checkers and disinformation researchers.

The multi-stakeholder Working Group tasked with developing the National Counter Disinformation Strategy was established in February 2023. It is independently chaired and has met monthly since its establishment and has heard from a range of experts in different fields related to disinformation.

In developing the Strategy, the Working Group agreed the following terms of reference, aligned with the recommendation of the Future of Media Commission:

- Identify the role of media literacy in supporting, and map media literacy initiatives that can help deliver, a targeted whole-of-Government approach to countering disinformation.
- Provide a comprehensive analysis of existing tools and mechanisms to combat disinformation in Ireland, including international best practice tools, mechanisms and approaches, with a focus on mechanisms to address evolving threats, and on ensuring transparency about content moderation policies that impact people in Ireland.
- Identify measures to support innovation in fact-checking and disinformation research and develop effective long-term monitoring of the application of the Strengthened EU Code of Practice on Disinformation and the Digital Services Act in Ireland.
- Explore ways in which the Strategy can support the important role that free, independent, high-quality journalism plays in countering disinformation, in particular in aligning with efforts to protect the supply of public interest information at local and national level.
- Identify ways to better coordinate national efforts to counter organised campaigns of

manipulation of internet users in Ireland, in particular, on how to facilitate access by researchers to data held by platforms to better inform interventions.

Consultation as part of the process

At the outset, a commitment was given to consultation with the public. The Working Group agreed a two-phase consultation process. The first phase was an online public consultation, conducted from 25 September to 20 October. The second is a stakeholder consultation forum, scheduled for 29 November.

The Working Group agreed a two-phase process in order to ensure that the general public could input into the strategy development process and to allow stakeholders to consider that input as part of developing the recommendations and actions. To aid the public consultation process, the Working Group produced a Scoping Paper. This paper aimed to summarise the issues considered by the Working Group and to share with the public five draft principles, agreed by the Working Group, as a basis around which recommendations and actions to deliver the Strategy could be built.

The survey questions were designed to be open, not closed, to allow respondents latitude in addressing them. The public were invited to submit their views on each of the draft principles. They were then asked to suggest recommendations or actions that could help make them a reality. They were also invited to highlight any gaps or missing elements and if applicable, details of any other counter disinformation measures they are aware of or involved in.

In the same way the Working Group produced the scoping paper to aid the public consultation process, the Group produced this review paper to aid the work of the consultation forum.

The Working Group wish to emphasise that combatting disinformation, including through any agreed Strategy, is not about restricting freedom of expression, censoring views or any Government deciding what is “right” and what is “wrong”. Combatting disinformation is about protecting freedom of expression from censorship by, for example, protecting high quality journalism and media plurality so that people may express views. It is about reducing the availability of harmful online content like disinformation through effective regulation by independent regulators. It is about supporting people in Ireland participate fully in society by giving them opportunities to build media literacy through education and training programmes. The Working Group is committed to a rights-based approach as a key value in any Strategy that is agreed.

Review Methodology

At the conclusion of the consultation window, the Secretariat agreed a basic review methodology. Each submission was individually reviewed. When reviewing each submission, the focus was to gain any insights on the draft principles, to highlight any suggested recommendations or actions under the forthcoming Strategy and to discover any key themes across submissions.

In reviewing the submissions, the Secretariat focused on extracting from each submission views on the principles, suggestions on recommendations and any other information on gaps and disinformation activities. Other views and opinions were expressed, including many responses questioning the need for the Strategy at all. The Secretariat focussed its review on the questions asked but those views and opinions also form part of the review and are set out in this document.

PROFILE OF RESPONDENTS AND SUBMISSIONS

Respondents were invited to self-identify as a particular category and to leave an email address to facilitate follow-up queries (see Appendix One for the survey question form). A total of 470 submissions were received. 455 of these were received through the online survey portal. The remainder were received by email to the Secretariat directly from respondents who contacted the Secretariat by email.

Almost half of the survey respondents (236) did not submit an email address. Over 80% of submissions were received from respondents who self-identified as general public. Based on a review of the submissions of those who identified as “other”, those respondents described themselves as being from libraries (3), medical profession (3), business (2), politics (1), consultancy (1), and radio broadcasting (1).

SUMMARY BREAKDOWN OF RESPONSES

| Submissions | Number | % Share |
|------------------------------|--------|---------|
| General Public | 393 | 83.6 |
| Other | 11 | 2.3 |
| Academia/Research/Think Tank | 30 | 6.6 |
| Government Department/Agency | 13 | 2.7 |
| Civil Society Organisation | 12 | 2.5 |

| | | |
|--|------------|------------|
| Print Journalist / Newspaper | 7 | 1.5 |
| Online Media Service Provider / Online Platform | 4 | 0.8 |
| Total | 470 | 100 |

SUBMISSIONS FROM ORGANISATIONS

| | |
|---|---|
| Adapt Centre | OIDE (Support Service for Teacher & School Leaders) |
| Citizens Information Board | |
| Coimisiún na Meán | Quality and Qualifications Ireland |
| Consortium of National and University Libraries | Queens University Belfast |
| County Public Participation Network | Royal College of Surgeons Ireland |
| Department of Foreign Affairs | Safeguarding Ireland |
| Dublin City University | School Libraries Group |
| European Movement Ireland | Technology Ireland IBEC |
| Family and Media Association | Technological University Dublin |
| Health Service Executive | The Thinking Centre |
| Hope and Courage Collective | University College Cork |
| Irish Council for Civil Liberties | University College Dublin |
| Irish Farmers' Association | University of Galway |
| Journal Media | University of Limerick |
| Leitrim County Council | Webwise |
| Library Association of Ireland | Yes.ie |
| Maynooth University | |

Emerging Themes

NEED FOR THE STRATEGY

While the survey did not pose the question of whether a strategy was required, it was clear from most of the responses from the general public that they did not feel that a strategy was needed. This was also accompanied by a view that the strategy would result in censorship (see below). In contrast to this, the vast majority of responses from organisations supported the principles and the principles based approach to the strategy.

PROTECT FREEDOM OF EXPRESSION

A significant number of responses from the general public expressed concern that the strategy could be a way for the Government to curtail freedom of expression or censor views. A subset of these responses cited the controversy around the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 in the context of freedom of expression.

Many of these responses also called for legislation to be stopped, repealed or not to proceed. The Working Group want to note that proposing new legislation is not part of the terms of reference and the Scoping Paper made no reference to new or additional legislative requirements.

MEDIA LITERACY & CRITICAL THINKING

Across the board, from both the general public and a range of organisations, there was a strong emphasis on the importance of developing critical thinking skills, and embedding media literacy training in school curricula as early as possible. The role of libraries and other public community spaces were also seen as important sources of developing these skills.

REGULATION AND CORPORATE ACCOUNTABILITY

Many of the responses from the general public advocated letting online communities address misinformation and/or disinformation without regulation. They were largely of the view that there should be no regulation or restriction on information, the press or any media outlets.

However, responses from academia and civil society organisations noted the important role of Coimisiún na Meán as an independent regulator¹ under the EU Digital Services Act, and the existing strengthened EU Code of Practice on Disinformation. Alongside this, a significant

¹ When Coimisiún na Meán becomes Ireland's Digital Services Coordinator in February 2024, it will have a joint competence with the European Commission to enforce obligations on disinformation in respect of Very Large Online Platforms

number of submissions from academics, civil society groups and industry were in favour of regulation and understood the need for effective corporate enforcement, as envisaged by the implementation of Digital Services Act.

Some submissions criticised the government for getting involved in industry matters, but many others were of the view that corporate accountability is paramount.

Several submissions from the general public and civil society organisations expressed concern about privacy issues in the context of profiling conducted by platform algorithms. One civil society organisation expressed concern about the polarisation of society fuelled by recommender systems.

PLURALITY OF INFORMATION AND TRUST

The recent situation in RTÉ was mentioned several times in submissions by the general public as shaking their faith in the trustworthiness of public service media. Some submissions from the general public were suspicious of “mainstream media” as a proxy for Government orthodoxy and indicated a higher level of trust in non-mainstream media and citizen journalists.

Many respondents identified a need to facilitate multiple viewpoints (X/Twitter was cited as a way of finding alternative views) not least to enable people make their own decisions on issues.

Counter Disinformation and protect freedom of speech using a rights based approach

This is a rights-based strategy. Measures to counter disinformation must uphold human rights, including the freedom of expression. In addition, all members of society should be empowered to seek, receive and impart information and ideas, while acknowledging that the right to freedom of expression must respect the rights of others to privacy, protection from discrimination and to data protection under the General Data Protection Regulation (GDPR).

There was support for this principle albeit some pointed to difficulties in balancing rights (for instance, where the DSA requires platforms to remove illegal content, contrasting with the European Media Freedom Act's protections of editorial independence). There was widespread support for freedom of expression. A number of responses identified the need to protect vulnerable and minority groups, while others were of the view that there is no general right to not be offended.

FREEDOM OF EXPRESSION

A major theme among all responses to this principle was the importance of free speech. The vast majority of submissions from the general public raised concerns that the Strategy would negatively affect freedom of speech, and would be used to impose an official narrative on issues.

It was noted by others however, that in Ireland and most other European jurisdictions, common boundaries to freedom of speech and expression include libel, slander, pornography, classified information, copyright violations amongst others. In short, freedom of speech does not equate to freedom of reach in that there is no right to have one's speech amplified. In this regard, online platforms and broadcasters may choose (or be required) to limit the spread of disinformation without breaching freedom of speech principles. The overarching aim of the Code of Programme Standards² operated by Coimisiún na Meán for example is to ensure a balance of rights is afforded to both broadcasters and individuals.

² Coimisiún na Meán Code of Programme Standards

POTENTIAL RECOMMENDATIONS:

- Need to highlight and clarify that the strategy is a recommendation of the Future of Media Commission on a whole of society response to disinformation.
- The Strategy document will also need to address concerns from the general public in particular about combatting disinformation while upholding freedom of speech. Need to clarify the role of Government within disinformation space, particularly to address concerns regarding censorship, and that the Government does not, and will not, decide on individual instances of disinformation.
- In terms of actions that would support this principle, respondents suggested encouraging more views in media by lowering barriers to entry for new media outlets. Some respondents suggested removing all regulation of the media with the aim of enabling people access more (all) views before making a decision.
- Development and implementation of principles-based regulatory tools (already in place) which ensure a balance of rights for citizens.
- Code of Programme Standards overseen by Coimisiún Na Meán was noted as an important component in ensuring the balance between freedom of expression and freedom from existing legally prescribed forms of harm.

SAMPLE QUOTES

“The best response to disinformation is more information, not censorship on any level” (General Public)

“Reaffirm the right to free speech, complimented by rights to be availed of education and tools to help discern what credible and non-credible information is.” (General Public)

“...a rights-based approach (should) be complemented by structured programmes which embed constructive values, develop literacy skills, and ensure lifelong learning.” (Academia)

“John Stuart Mill said "the peculiar evil is silencing the expression of an opinion is that it is robbing the human race those who dissent from the opinion, but still more those who hold it. If the opinion is right , they are deprived of the opportunity of exchanging error for truth, if wrong they lose the clearer perception and livelier (sic) impression of truth produced by collision of error”” (General Public)

“Plurality of opinion is critical to a functioning democracy.” (General Public)

Counter Disinformation by building resilience and trust – at individual and societal levels

It is important to raise awareness and encourage use of supports that enable a trustworthy information environment including:

- **Ensuring public access to trustworthy and reliable public interest information.**
- **Empowering people with the media and data literacy skills and knowledge to be able to make informed choices about the media that they consume, create and disseminate in a critical, creative and responsible manner, including highlighting how digital platforms' algorithms can amplify particular narratives which may promote hate and hysteria.**
- **Promoting diversity and plurality of information and access to high quality ethical journalism by regulating and supporting the media sector.**

The theme of media literacy came through strongly in responses to this principle and several organisations gave feedback on their own existing literacy programmes.

While many submissions from the general public were critical, a few submissions did emphasise the importance of personal autonomy in assessing the accuracy of information that they receive and a responsibility around sharing information that would appear to be wilfully enforcing a particular worldview.

The issue of online anonymity was raised as something to be tackled. Several submissions from organisations, including academics, think tanks, and journalists mentioned the importance of building trust in sources and ensuring the independence of fact-checkers as good ways to counter disinformation.

There was support expressed in submissions from libraries and the general public that academic librarians, public librarians, and librarians from other sectors such as business, law and medicine, be included as important stakeholders and empowered to play a lead role in strategies to counter disinformation in their organisations and in the public realm. Responses from people working in or with libraries recommended, for example, some kind of labelling or

quality mark system for newspapers which could be displayed on websites and newspapers who adhere to Press Council standards.

ROLE OF MEDIA LITERACY & LIFELONG LEARNING

There was broad support across responses from the general public and from those working in or with libraries for embedding media literacy in schools from the earliest age. The Finnish model of embedding media literacy education from pre-school right the way through to university was cited as a way to develop individual and societal resilience to disinformation. Submissions from people working in and with libraries also recommended targeted supports for collaboration between the academic and public library sector to deliver cross-sectoral approaches to information skills development. It was noted in responses from both the general public and those working with or in libraries, that library programmes on media literacy could enhance social resilience, support a diverse and ethical news and media landscape, which in turn would empower the public in navigating this landscape. Suggested measures to achieve this set out by the Library Association of Ireland are outlined below.

POTENTIAL RECOMMENDATIONS:

- A whole of society approach to media literacy, across all ages, with continued support for Media Literacy Ireland.
- Using trusted institutions such as libraries as a base to promote resilience and trust would be good for consideration. Libraries have a baseline level of trust and have a reputation for their promotion of literacy in society. Libraries already provide ad hoc media literacy but mainstreaming this could ensure consistency across the country.
- Ensuring students, researchers, and others are conversant with the nature and extent of misinformation and disinformation, and that this affects all disciplines, not just media, communications and journalism.
- Describing the attributes of a trustworthy information environment and media sector potentially widening this to “information integrity”. Articulating and defining the continuum of literacies that empower and enable people to make informed choices. For example, information, media, data, and digital literacies are used variously in the scoping document. Including artificial intelligence literacy in that continuum of definitions and in any curricula.
- Funding for the development of open access information literacy resources by libraries which could be developed in a cross sector/cross-institutional in approach, and available to higher education communities and wider society.

- The strategy needs to highlight steps taken by the Government in increasing trust via transparency efforts. For example, through the Freedom of Information legislation, parliamentary questions and through other governance and oversight mechanisms.
- It will also be important that the Strategy support the independence of fact-checkers.

SAMPLE QUOTES

“Ultimately, I believe that the best way to counter disinformation is to build resilience and trust at the individual and societal levels. This can be done by raising awareness of disinformation and supporting independent media and fact-checking organizations” (Academia)

“Empowering people to identify and question information is key. This should start at school. Promoting critical thinking skills is vital in the age of information.” (General Public)

“Who decides what is trustworthy & reliable public interest information & why?” (General Public)

“Introduce politics into primary and secondary education. When someone signs onto register for voting send general international teachings on political science to them so they can figure out their own political way.” (General Public)

“Leveraging the potential of the wider library and information community as a ‘trusted space’ in society to support the development of digital, information and media literacy skills.” (Academia)

Counter Disinformation through increased cooperation, collaboration and coordination

An effective, long-term, sustainable strategy for countering disinformation will require broad stakeholder engagement, shared values, cooperation and alignment of existing countermeasures. This should be happening at national and international levels. Stakeholders include public authorities, researchers, educators, online platforms, advertisers, journalists, media groups, community and voluntary groups and trusted third party intermediaries. Doing these things will help:

- **Sharing of best practice**
- **Horizon scanning**
- **Facilitating new collaborations and projects**
- **Identifying overlap or gaps in provision at national and international levels**
- **Aligning policy and regulatory approaches**
- **Effective prevention and deterrence through strategic communication**
- **Effectively preventing, deterring and responding to Foreign Information Manipulation and Interference (FIMI) utilising the EU's FIMI and Hybrid Toolboxes**
- **Participation in the EU's counter disinformation network, the European Digital Media Observatory (EDMO)**

Those who addressed this in their submissions (mainly academics and think tanks), agreed that this was a key principle, as collaboration between stakeholders means disinformation can be tackled from a number of angles. However, a significant number of responses from the general public on this principle expressed suspicions that cooperation and collaboration would focus on stifling freedom of expression.

It was noted across submissions the important role that free, independent, high-quality journalism plays in countering disinformation, and the importance of aligning this with efforts to protect the supply of public interest information at local and national levels. Some submissions stated that it is important that coordination between online platforms and academic researchers is in place to facilitate access to data that would better inform interventions to

prevent the spread of disinformation. It was noted that the obligations for very large online platforms and online search engines under the Digital Services Act should assist meaningful collaboration and access to data, which can help researchers understand sources and trends in disinformation. There was also support from respondents for developing an ongoing formalised structure around network development and coordination.

It was also noted across submissions that there are a number of important collaboration networks already involved in helping to combat disinformation, including;

- The European Digital Media Observatory (EDMO Ireland includes Journal.ie, DCU Institute of Future Media, Democracy and Society (FuJo)
- The European Platform of Regulatory Authorities (EPRA)
- The European Regulators Group for Audio-visual Services (ERGA)
- The Global Online Safety Regulators network (including Canada, Australia, Fiji and UK)
- The Finnish Centre of Excellence for countering hybrid threats and actions³
- The European External Action Service (EEAS)

It is clear from a range of respondents that they think there is a need to deepen networks and partnerships that already exist, perhaps with some permanent overarching structure that assists in ongoing cooperation with due regard to the need for transparency and data.

POTENTIAL RECOMMENDATIONS:

- Sharing of best practice is key to the success of the strategy. This is a rapidly developing area and requires the rapid communication of advances as well as an alerting system of developing threats. Alliance building is crucial to ensure that there are no overlaps or gaps in provision.

³ Hybrid action is characterised by ambiguity as hybrid actors blur the usual borders of international politics and operate in the interfaces between external and internal, legal and illegal, and peace and war. The ambiguity is created by combining conventional and unconventional means – disinformation and interference in political debate or elections, critical infrastructure disturbances or attacks, cyber operations, different forms of criminal activities and, finally, an asymmetric use of military means and warfare. [Hybrid threats as a concept - Hybrid CoE - The European Centre of Excellence for Countering Hybrid Threats](#)

- Development of an ongoing formalised structure around network development and coordination, where best practices and learnings can be shared on local, national, and international level.
- The creation of the NCDS Working Group has generated cross-sectoral, multi-disciplinary discussions that have been very beneficial in capturing both the scale and scope of the disinformation problem in Ireland, as well as socialising initiatives, which foster a better understanding of the issues amongst all stakeholders.
- It was recommended establishing the NCDS Working Group as a permanent fixture that would facilitate the sharing of information including new research, pool resources where appropriate, align regulatory and legislative efforts to fight disinformation, and overall, positively contribute to the implementation of this principle.
- Support across all stakeholders for open-source approaches. Open source, user based information providing context and links where people can see for themselves why the original posts are untrue.

SAMPLE QUOTES

“Ireland needs to form its own approaches and not simply mirror the strategies implemented by the EU toward disinformation.” (Print Journalist/Newspaper)

“The most important thing in the whole of this is "who guards the guards" i.e. can the public trust the people operating the system, will it be politicised, will it be biased, will it be used to actually prevent the truth coming out, will it be used to prevent dissent and questioning regulations etc.” (General Public)

“Strategic communications should lead the entire programme, as the incoming and outgoing information management and stakeholder engagement is at the heart of this issue.” (General Public)

“I dispute the premise entirely of shared values. Freedom of expression and with innovation are hampered, limited and constrained by the notion of shared values. Some of the greatest steps forward for the human race came about because of competing values clashing conversing and ultimately arriving at a better outcome.” (General Public)

“The principle's call for "horizon scanning" and "sharing of best practice" is particularly noteworthy. In a rapidly evolving information landscape, staying ahead of trends and technologies is essential. Including a diverse range of stakeholders—educators, researchers, media groups, and even advertisers—acknowledges that countering disinformation isn't solely the remit of governments or tech platforms.” (Civil Society Organisation)

Counter Disinformation through corporate accountability and regulatory enforcement

New digital media and platforms can help to spread disinformation more quickly than ever before. Measures to counter this should incentivise the ethical use of data, ethical business models, and consider digital platforms' recommender algorithms, which can deliberately amplify hate and hysteria in people's video and social feeds for commercial gain. Measures should also consider addressing data leakage that exposes everybody to profiling, and the role this plays in creating a business model for disinformation media, undermining journalism, and exposing citizens to intrusive and intimate profiling. Legal obligations, including those in the GDPR, Digital Services Act, and Digital Markets Act must be respected and enforced. Companies should respect the law, and independent regulatory authorities should be adequately resourced to enforce it.

This principle generated a range of responses with suggestions for more and less regulation and accountability. For example, online anonymity was seen by those who responded as an enabler of false or misleading content while others suggested restricting access to social media platforms (in the context of schools addressing access to smartphones by students). The role of recommender systems/algorithms in the amplification of polarising and often incorrect information is seen as something that needs to be addressed by very large online platforms. The X (Twitter) community notes model was frequently mentioned by the general public as a way to counter disinformation, and that nothing else was needed.

ALGORITHM TRANSPARENCY

Several respondents mentioned the negative role of social media algorithms in stymying open debate and sharing of information and that, given the volume of disinformation in circulation, it is impossible that it can all be countered by personal resilience alone and that it is important to act against algorithmic amplification and unlawful data processing. This includes real time bidding systems and the sale of advertising based on data profiling which helps to monetise

disinformation. It was noted across submissions that platforms should provide open access⁴ to algorithms for scrutiny.

The need for strong collaboration between the Digital Services Commissioner and the Online Safety Commissioner was also cited as important in developing the new regulatory regime for online safety in Ireland. This is important as the regulatory framework for broadcasting, content moderation and holding publishers of disinformation to account is changing rapidly. There has been a significant increase in regulation, such as the Electoral Reform Act, the Digital Service Act (DSA) and the strengthened Code of Practice on Disinformation – expected to become a binding Code of Conduct under the DSA.

POTENTIAL RECOMMENDATIONS:

- Important that platforms provide open access to algorithms for scrutiny by independent tech experts who can advise the public what information is being suppressed and why. More community involvement in digital platforms is important, allowing some form of feedback loop for posts that rewards accurate and penalises false information.
- Implementation of all Digital Services Act provisions including the conversion of the Strengthened Code of Practice on Disinformation into a Code of Conduct. Need for strong collaboration between the Digital Services Commissioner and the Online Safety Commissioner that would be important in developing the new regulatory regime for online safety in Ireland, and monitoring the implementation of DSA obligations on disinformation and the potential code of conduct on disinformation.
- Social media platforms can adhere to the voluntary code of practice on disinformation, until the binding requirements under the DSA take full effect. Some kind of ‘digital health certificate’ was recommended. This certificate would reflect ethical policies within companies and institutions, going beyond social media platforms.
- Content is systematically labelled/watermarked to identify disinformation on online platforms – particularly AI generated content.
- Both the Digital Services Act and the proposed European Media Freedom Act require enforcement tailored to the Irish market in order to bolster indigenous journalistic sources. The protection of journalists in a real way, giving increased protection to their

⁴ The European Centre for Algorithmic Transparency (ECAT) contributes with scientific and technical expertise to the European Commission's exclusive supervisory and enforcement role of the systemic obligations on designated Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) provided for under the Digital Services Act

activities on and offline when in pursuit of their work, is vital, and needs support at the security level, such as the work evidenced by the relatively new Media Engagement Group between An Garda Síochána and publishers. Also through elevated requirements for online platforms to protect journalists from abuse.

SAMPLE QUOTES

“Acting against algorithmic amplification, and against unlawful data processing that undermines journalism (Real Time Bidding - RTB) rather than attempting to identify and un-publish harmful content is likely to be more effective, and avoids intrusion upon the right to freedom of expression” (Civil Society Organisation)

“Big tech companies should be held to account over what data they hold and how they use it.” (General Public)

“The IT industry including social media should regulate itself. The government should not subsidize nor try to regulate it.” (General Public)

“If this meant holding big corporate companies accountable I'd be all for it but it won't.” (General Public)

“There is also 'fact checking' which has a role to play and is similar such as community notes on X - "Community Notes aim to create a better informed world by empowering people on X to collaboratively add context to potentially misleading posts. Contributors can leave notes on any post and if enough contributors from different points of view rate that note as helpful, the note will be publicly shown on a post". When this was done by 'fact checkers' (employees) however it didn't seem to be as effective.” (Academia)

Counter Disinformation through evidence based counter measures and interventions

The disinformation environment is constantly evolving, and countermeasures should be based on robust research evidence. Key stakeholders need access to a well-maintained evidence base to provide in-depth awareness of disinformation trends (i.e. bad actors, narratives and tactics across different platforms as well as international developments).

Evidence could take the form of:

- **Research insights (e.g. research on susceptibility, current and developing disinformation narratives, changing tactics)**
- **Multi-disciplinary academic research, including quantitative and qualitative research, from a number of disciplines relevant to the area**
- **Evaluation, risk and impact assessments**
- **Sector expertise (fact-checkers, disinformation experts, communications experts, regulators) that would enable effective information sharing between experts and platforms**
- **Publications and notifications by international partners and bodies, such as the European External Action Service (EEAS), the EU Rapid Alert System and European Centre of Excellence for Countering Hybrid Threats**

A number of submissions appeared to be suspicious and critical about research, its funding and the potential biases of fact checkers. Pro-active identification of disinformation campaigns is critical, but responses may need to go beyond fact checking, as this may not be persuasive to those who find the disinformation appealing. Some respondents urged consideration of the means of reaching and caring for those disaffected, most importantly, "meet them where they're at" and identify their values and implement values-based informative campaigns, particularly for under-represented groups. This may have an impact in deescalating harmful disinformation campaigns targeting vulnerable communities.

RESEARCH COORDINATION

Submissions highlighted the importance of coordination between academic researchers, fact-checkers, platforms, government agencies, regulators, citizen groups and other experts in

sharing best practices and insights on evolving disinformation trends. This could be supported by a national database, which could document known disinformation narratives, tactics and actors to inform the public and other stakeholders.

It was noted from a few responses that Coimisiún na Meán, the Institute for Future Media and Democracy, and the European Digital Media Observatory in DCU have contributed significantly to international monitoring of the EU Code of Practice on Disinformation.

TRANSPARENCY

Submissions from the general public expressed concern at attempts by the EU to place restrictions on social media platforms given that social media can sometimes provide information that is lacking in 'mainstream media'. Some respondents called for more community involvement in digital platforms - allowing some form of feedback loop for posts that rewards accurate and penalises false information. Once again, in terms of potential ways to address disinformation, the role of community notes on X was frequently cited by the general public as an example. It was also deemed important by both the general public and organisations alike that platforms provide open access to algorithms for scrutiny by independent tech experts who can advise the public what information is being suppressed and why.

Countering disinformation is most effective when it is evidence based. An ongoing and increased multi-disciplinary research approach is required to help understand the origin, trends and impacts of disinformation.

POTENTIAL RECOMMENDATIONS:

- The extent to which the Strengthened Code of Practice on Disinformation is being implemented is unclear. It refers to demonetising the dissemination of disinformation; guaranteeing transparency of political advertising; enhancing cooperation with fact-checkers; and facilitating researchers' access to data. The strategy should build in mechanisms for monitoring the implementation of these provisions.
- In order to support the work of the National Counter Disinformation Strategy, a research strategy should also be developed. The purpose of such a research strategy could provide a structured and centralised approach to understanding the extent of the problem of disinformation, as well as data gathering approaches and impact assessment.
- Design and provision of teacher professional learning courses and other supports, supporting students' digital literacy and digital citizenship generally. Support long-term,

multi-disciplinary research projects that track the evolution of disinformation trends and assess the effectiveness of countermeasures over time. Facilitate dialogue between researchers, policymakers and practitioners to ensure that research findings inform evidence-based policies and counter-disinformation strategies.

- Foster collaborations where businesses and tech platforms can discuss best practices for combating disinformation without government imposition. Prioritize open dialogue about disinformation, fostering a culture of shared responsibility.

SAMPLE QUOTES

“The role of academic research on disinformation from diverse disciplines, including – communication studies, political science, cyber psychology, computer science, etc. for the development of insights into narratives, tactics, and audience behaviour.” (Civil Society Organisation)

“Utilise state agencies better such as ESRI, CSO and Department and Local Government and HSE data. Ensure data produced quick enough.” (General Public)

“I recommend establishing an integrated Disinformation Research Network to facilitate greater collaboration between academia and the news industry. This network would connect journalists to leading disinformation experts across disciplines, including media studies, political science, psychology, computer science, and more. Through regular exchanges, researchers would share insights on emerging manipulation tactics, viral narratives, platform vulnerabilities, and effective countermeasures. In return, journalists would inform research agendas by conveying their real-world obstacles and priority knowledge gaps.” (Academia)

“I would recommend that these activities be limited to checking of facts and identification of organisations providing identified false information.” (General Public)

“Who is the arbitor (sic) of 'truth' in this principle? Once again we have a closed loop where only trusted government sources are seen as truthful.” (General Public)

Appendix One: Public Consultation Form

COUNTER DISINFORMATION AND PROTECT FREEDOM OF SPEECH USING A RIGHTS BASED APPROACH

This is a rights-based strategy. Measures to counter disinformation must uphold human rights, including the freedom of expression.

In addition, all members of society should be empowered to seek, receive and impart information and ideas, while acknowledging that the right to freedom of expression must acknowledge the rights of others to privacy, protection from discrimination and to data protection under the GDPR.

Question: Please tell us what you think about this principle.

1250 character(s) maximum

Question: What recommendations would help make this principle a reality?

1250 character(s) maximum

COUNTER DISINFORMATION BY BUILDING RESILIENCE AND TRUST – AT INDIVIDUAL AND SOCIETAL LEVELS

It is important to raise awareness and encourage the use of supports that enable a trustworthy information environment including:

- Ensuring public access to trustworthy and reliable public interest information.
- Empowering people with the media and data literacy skills and knowledge to be able to make informed choices about the media that they consume, create and disseminate in a critical, creative, and responsible manner, including highlighting how digital platforms' algorithms can amplify particular narratives which may promote hate and hysteria.
- Promoting diversity and plurality of information and access to high quality ethical journalism by supporting the media sector.

Question: Please tell us what you think about this principle.

1250 character(s) maximum

Question: What recommendations would help make this principle a reality?

1250 character(s) maximum

COUNTER DISINFORMATION THROUGH INCREASED COOPERATION, COLLABORATION AND COORDINATION

An effective, long-term, sustainable strategy for countering disinformation will require broad stakeholder engagement, shared values, cooperation and alignment of existing countermeasures.

This should be happening at national and international levels. Stakeholders include public authorities, researchers, educators, online platforms, advertisers, journalists, media groups, community and voluntary groups and trusted third party intermediaries. Doing these things will help:

- Sharing of best practice
- Horizon scanning
- Facilitating new collaborations and projects
- Identifying overlap or gaps in provision at national and international levels
- Aligning policy and regulatory approaches
- Effective prevention and deterrence through strategic communication
- Effectively preventing, deterring and responding to Foreign Information Manipulation and Interference (FIMI) utilising the EU's FIMI and Hybrid Toolboxes
- Participation in the EU's counter disinformation network, the European Digital Media Observatory (EDMO)

Question: Please tell us what you think of this principle.

1250 character(s) maximum

Question: What recommendations would help make this principle a reality?

1250 character(s) maximum

COUNTER DISINFORMATION THROUGH CORPORATE ACCOUNTABILITY AND REGULATORY ENFORCEMENT

New digital media and platforms can help to spread disinformation more quickly than ever before. Measures to counter this should incentivise the ethical use of data, ethical business models, and consider digital platforms' recommender algorithms which can deliberately amplify hate and hysteria in people's video and social feeds for commercial gain.

Measures should also consider addressing data leakage that exposes everybody to profiling, and the role this plays in creating a business model for disinformation media, undermining journalism, and exposing citizens to intrusive and intimate profiling.

Legal obligations, including those in the GDPR, Digital Services Act, and Digital Markets Act must be respected and enforced. Companies should respect the law, and independent regulatory authorities should be adequately resourced to enforce it.

Question: Please tell us what you think of this principle

1250 character(s) maximum

Question: What recommendations would help make this principle a reality?

1250 character(s) maximum

COUNTER DISINFORMATION THROUGH EVIDENCE BASED COUNTER MEASURES AND INTERVENTIONS

The disinformation environment is constantly evolving, and counter measures should be based on robust research evidence. Key stakeholders need access to a well-maintained evidence base to provide in-depth awareness of disinformation trends (i.e. bad actors, narratives and tactics across different platforms as well as international developments).

Evidence could take the form of:

- Research insights (e.g. research on susceptibility, current and developing disinformation narratives, changing tactics)
- Multi-disciplinary academic research, including quantitative and qualitative research, from a number of disciplines relevant to the area
- Evaluation, risk and impact assessments
- Sector expertise (fact-checkers, disinformation experts, communications experts, regulators) that would enable effective information sharing between experts and platforms
- Publications and notifications by international partners and bodies, such as the European External Action Service (EEAS), the EU Rapid Alert System and European Center of Excellence for Countering Hybrid Threats

Question: Please tell us what you think of this principle.

1250 character(s) maximum

Question: What recommendations would help make this principle a reality?

1250 character(s) maximum

Question: We are interested in finding out about any and all existing activities or interventions that you might be involved in, or know of, that could help to counter disinformation. Please give details.

1500 character(s) maximum

Question: What sort of organisation do you represent?

- ☐ Government Department / Agency
- ☐ Eagraíocht na SoCívil Society Organisation
- ☐ Online Media Service Provider / Online Platform
- ☐ Print Journalist / Newspaper
- ☐ Academia / Research / Think tank
- ☐ General Public
- ☐ Other

Email confirmation:

☐ Any personal information submitted will be treated strictly in accordance with the General Data Protection Regulation 2016/679 and the Data Protection Act 2018. In accordance with Article 26, GDPR, the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media are Controllers in respect of the data collected. In order to exercise your rights under the GDPR for the purpose of any personal data submitted, you may contact the Department. Access the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Medias' Privacy Policy. All submissions will be retained until such time as they are appraised by the National Archives to determine whether they warrant permanent retention as archives in accordance with the department's obligations under the terms of the National Archives Act, 1986 (as amended).

Please note people can request to see the submissions we receive under the Freedom of Information (FOI) Act 2014 and therefore submissions may be released in response to an FOI request. This is more likely to happen for submissions from organisations. This means that the request or might get your answers to the questionnaire, however, any personal information included in submissions would be redacted prior to release.

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