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1.Overview of the study and objectives

This study, 'A handbook on good practice in countering disinformation at local and regional level' was developed in the context of a contract carried out by Milieu Consulting for the Committee of the Regions CIVEX Commission. Disinformation is a phenomenon that affects all levels of government. Given their proximity to the day-to-day lives of EU citizens, local and regional authorities (LRAs) have a frontline role to play in countering online disinformation. The ultimate objective of the study was to provide concrete recommendations and guidance to LRAs in support of efforts to fight online disinformation.

The study takes the following approach:

- Chapter 2 uses a literature review to describe the specific needs and challenges of LRAs regarding online disinformation
- Chapter 3 reviews the EU framework for countering online disinformation and assesses how this can be used by LRAs
- Chapter 4 provides a typology of different areas of action to combat online disinformation at local and regional level, including examples of actions already taken
- Chapter 5 contains three in-depth case studies of interventions undertaken to counter disinformation; the Chapter identifies lessons that LRAs could use for similar initiatives
- Chapter 6 looks at future trends of online disinformation
- Chapter 7 gathers together lessons learned from the research to provide practical recommendations for LRAs going forward

Research for this study was undertaken through a mixture of literature review and interviews. An initial long-list of literature was drawn up, covering online disinformation as a phenomenon, treatment of online disinformation at European level, and practices to counter online disinformation, with a focus on Europe and the local and regional level. Following the initial literature review, a typology of different practices to fight online disinformation was developed and further research was undertaken to uncover practices. Three examples of good practice were chosen as case studies in agreement with the Committee of the Regions.

In parallel to the general literature review, nine interviews were undertaken with major stakeholders working on online disinformation at European level. A full list of interviewees can be found in the Annex. During research for the case studies, a further six interviews were carried out. Following the research stage, recommendations were developed collectively through an internal workshop involving all team members for the study.

1.1 Online disinformation: an emerging risk, undermining our democracies across the EU

Digital communication technologies and their rapid expansion into all aspects of life continue to profoundly transform our societies. With this unprecedented and high-paced transformation comes a series of challenges and threats on a scale previously unknown to policy makers and societies. Online disinformation is one such threat, and there is growing literature on its production, dissemination, and consumption patterns¹.

Despite its relatively short history, the detrimental impacts of online disinformation on individuals and societies are already well documented. Studies highlight the links between online disinformation and extremism², racial hatred³, violent crimes against vulnerable groups and minorities in society⁴. The use of mass scale disinformation campaigns to influence election processes⁵, destabilise democracies around the world by numerous state and international stakeholders is increasing at an exponential rate⁶. Furthermore, the tools and methods of online disinformation are constantly evolving and incorporating new technologies, raising risks for new types of threats in the future. It is already acknowledged that it is morphing into a 'complex ecosystem' where people are continually exposed to disinformation which then creates narratives 'ready to be weaponised when necessary'. There are indications that disseminating disinformation is becoming a business with private firms and individuals offering their 'services' to state actors or any interested party, allowing their clients to escape responsibility⁸.

These observations point to a complex and fast-changing picture, increasingly escaping public scrutiny. Democratic policy-making processes are struggling to keep up with this fast-paced environment which is constantly evolving into a new unknown. And what is at stake is not to be taken lightly. In a hyper-connected

¹ Guess, A., & Lyons, B., 2020, Misinformation, Disinformation, and Online Propaganda. In N. Persily & J. Tucker (Eds.), Social Media and Democracy: The State of the Field, Prospects for Reform (SSRC Anxieties of Democracy, pp. 10-33). Cambridge: Cambridge University Press.

² Cox K. et al, 2021, RAND Report for the UK Commission for Countering Extremism (CCE), COVID-19, Disinformation and Hateful Extremism'

³ Colomina C.,et al, 2021, European Parliament Study for the DROI Subcommittee, The impact of disinformation on democratic processes and human rights in the world.

⁴ Szakács J., Bognar E, 2021, European Parliament In-depth Studies: The impact of disinformation campaigns about migrants and minority groups in the EU.

⁵ Bessi, A., & Ferrara, E., 2016, Social bots distort the 2016 U.S. Presidential election online discussion. *First Monday*, 21(11). https://doi.org/10.5210/fm.v21i11.7090.

⁶ Consecutive annual reports from the University of Oxford Computational Propaganda Research Project repeatedly find an increasing number of campaigns every year, see for instance: Industrialized Disinformation 2020 Global Inventory of Organized Social Media Manipulation, available at: https://demtech.oii.ox.ac.uk/wp-content/uploads/sites/127/2021/01/CyberTroop-Report-2020-v.2.pdf.

⁷ Flore M et al, JRC Reports, 2019, Understanding Citizens' Vulnerabilities to Disinformation and Data-Driven Propaganda.
⁸ The New York Times, Disinformation for Hire, a Shadow Industry, Is Quietly Booming, by Max Fisher, July 2021, available at: https://www.nytimes.com/2021/07/25/world/europe/disinformation-social-media.html.

world where traditional information sources are replaced by social media platforms, where citizens' perceptions of reality become more and more fragmented and social cohesion seems ever more difficult to achieve, online disinformation threatens the very fabric of our democracy. This comes in a period of complex and inter-related challenges from climate change to racial inequality, all of which necessitate systemic and coherent responses, underpinned with strong citizen engagement. It is, however, increasingly difficult for citizens to identify impartial and verified information that is subject to a series of quality criteria and professional principles, as traditionally offered by news' outlets and journalists⁹. Since this information is crucial to make sense of the world and form coherent opinions on complex developments that impact day-to-day realities of citizens, how policy will respond to this threat will shape the future of our societies.

Definitions: disinformation, misinformation, fake news

The focus of this study is online disinformation. The study uses as a working definition, the definition of disinformation given in the European Commission's Action Plan on Disinformation.

Disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm. Public harm includes threats to democratic processes as well as to public goods such as Union citizens' health, environment or security. Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary¹⁰.

Disinformation should be seen as distinct from other concepts that are sometimes associated, such as **misinformation** or **fake news**.

Fake news is defined as false or misleading information that mimics the form of mainstream news¹¹. The term fake news gained popularity in 2016 during the United States elections and was employed as a tool to discredit political opponents¹². Misinformation describes the sharing of false information without intention to cause harm.

https://www.nato.int/nato_static_fl2014/assets/pdf/2020/5/pdf/2005-deepportal1-fake-news.pdf.

⁹ UNESCO, 2018, Journalism, Fake News and Disinformation.

¹⁰ European Commission, Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, Action plan against Disinformation, JOIN/2018/36 final.

¹¹ Zimbars M., 2020, Fake news: understanding media and misinformation in the digital age.

¹² NATO, Media- (Dis)information – security, available at:

1.2 Fighting disinformation at local and regional level and the role of this study

The impacts of online disinformation on society are inevitably felt at local level. This impact ranges from distrust in election processes to violence against local politicians. Furthermore, the systemic approach of social media giants to generate more engagement from users is found to favour controversial local issues, making LRAs particularly vulnerable. For example, in 2019 Facebook introduced a petitions feature allowing users to politically organise on local issues¹³. But the more controversial the local issue, the more engagement there is likely to be with the petition, creating more advertising revenue, thereby creating an incentive to promote further polarising local issues¹⁴.

Yet both the policy framework at EU level and research in general seem to be limited in addressing the local dimension of online disinformation. Whilst legislative measures to improve online safety such as the Digital Services Act or self-regulatory mechanisms with major tech companies such as the Code of Practice on Disinformation are most effective taken at European level, LRAs are ideally placed to make a strong contribution towards other measures. Promotion of media literacy and critical thinking, implementing civic education, supporting quality journalism and fact-checking and increasing transparency with citizens and news media, all action areas listed by the Commission¹⁵, are areas where LRAs can and do act.

The Committee of the Regions has called for greater resources to be given to LRAs, in their roles as holders of public information and incubators of democracy, to improve their capacity, expertise and skills in countering disinformation ¹⁶. The 2020 EU annual regional and local barometer found that LRAs are considered by EU citizens as the most trusted level of authority ¹⁷. A public opinion survey commissioned by the Committee of the Regions during the COVID-19 crisis found that 52 % of Europeans trust LRAs more than EU- and national-level governments ¹⁸. LRAs are able to adapt wider policy objectives to a specific context, making them more relevant to the local population and more effective. In

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¹³ Constine, 2019, Facebook launches petition feature, its next battlefield, Techradar, 20 January 2019, available at: https://tcrn.ch/2W8HHev, viewed 20 May 2022.

¹⁴ House of Commons Digital, Culture, Media and Sport Committee, 2019, Disinformation and 'fake news': Final Report.

¹⁵ European Commission, 2018, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Tackling online disinformation: a European Approach, COM/2018/236 final.

¹⁶ European Committee of the Regions, 2021, Opinion of the European Committee of the Regions — European democracy action plan, COR 2021/01278, OJ C 440.

¹⁷ European Committee of the Regions, 2020, EU annual regional and local barometer: full report, https://cor.europa.eu/en/our-work/Pages/EURegionalBarometer-2020.aspx

¹⁸ European Committee of the Regions, 2020, EU annual regional and local barometer: full report, available at: https://cor.europa.eu/en/our-work/Pages/EURegionalBarometer-2020.aspx

a context of suspicion and mistrust, this is a valuable attribute that could help to increase the legitimacy of actions to counter disinformation in the eyes of the local population. With support at national and EU level, they can raise awareness in local communities about the threat of disinformation and help to foster a healthy democratic climate.

Despite the potential for LRAs to act on disinformation in the communities surrounding them, relatively little attention has been given to identifying the specific challenges facing LRAs in countering disinformation. If LRAs are to successfully contribute, they need not only funding, but also specific tools that are adapted to the local and regional level, and which can be further adapted to the context of specific communities.

This study aims to contribute to closing this gap by studying the role of LRAs in countering disinformation, particularly in the context of elections, and by providing some practical tools for fighting disinformation adapted to the local and regional context. This has been done through a combination of desk research, interviews and case studies looking at the challenges that LRAs face, and have faced, fighting disinformation and the tools that they are using and could use. Research also looks at the relevance for LRAs of the wider EU framework for countering disinformation. From the findings of this research, the study makes concrete recommendations for local and regional stakeholders on countering disinformation, using multiple tools available to them, including collaboration with different stakeholders.

2.Online disinformation at local and regional level: an underexplored perspective

Online disinformation is a phenomenon that affects all levels of government. Given their proximity to EU citizens, LRAs should be at the frontline of responding to online disinformation and building societal resilience to it now and in the future. This chapter explores the challenges and needs of LRAs in the fight against disinformation by reviewing existing literature and through interviews with major European stakeholders.

The volume of research and degree of political focus on online disinformation has expanded greatly over recent years. This has been driven by key voting events such as Brexit or Donald Trump's election, the spread of disinformation around the COVID-19 pandemic and most recently around the war in Ukraine (see the box below on disinformation and the war in Ukraine). The vast majority of this political and academic energy has focused on the targets, impacts and responses to disinformation at national or international level. In most of the debate, the relationship of online disinformation with the local and regional level is generally either not considered or mentioned briefly in passing ¹⁹.

The External Action Service (EEAS) works extensively on the fight against foreign interference by disinformation, notably through its East Strategic Communication Task Force and its website EUvDisinfo.eu²⁰. It defines four areas of action regarding countering disinformation: situational awareness; resilience building; disruption and regulation; and foreign policy tools²¹. The first two of these are particularly relevant for the local and regional level.

Developing a level of **situational awareness** is a specific challenge for the local and regional level. This means improving understanding of strategies, techniques and procedures used for disinformation, interference and information manipulation²². The changing contours of the media landscape seen at national level are often felt sharply at local level, with the decline of local media as advertisers move to online space. This deprives communities of a trusted and quality resource for reporting on and critiquing the work of local government, leaving a gap for disinformation to operate in. LRAs have, by definition, lower capacity to respond to disinformation than national level authorities. The smaller

¹⁹ Jerónimo, P.; Esparza, M.S., 2022, Disinformation at a Local Level: An Emerging Discussion, *Publications*, 10, 15. https://doi.org/10.3390/publications10020015.

²⁰ Available at: www.EUvsDisinfo.eu

²¹ EU Official Interview, 30 March 2022.

²² EEAS, 2021, Tackling disinformation: Information on the work of the EEAS Strategic Communication division and its task forces (SG.STRAT.2), available at: https://www.eeas.europa.eu/countering-disinformation-information-work-eeas-strategic-communication_en.

administration size means that it is more difficult to have specialist expertise on disinformation and human resources capacity for efforts to counter it, leaving LRAs more vulnerable to attacks.

At the same time, the local and regional level is well-placed to **build societal resilience** to disinformation. LRAs are the closest level of government to citizens in terms of physical distance and have consistently proved to be the most trusted level. This puts them in an excellent position to implement resilience actions such as strengthening media ecosystems and improving citizens' media literacy. In order to achieve these aims, LRAs must be supported by being given sufficient human and financial resources.

The war in Ukraine and disinformation

The war in Ukraine highlights the importance of disinformation. From the illegal annexation of the Crimean Peninsula in 2014 and its ongoing invasion of Ukraine, Russia has spread disinformation targeting the Russian population, neighbouring countries, and the rest of world²³. The campaign of disinformation aims to influence public opinion and justify the military aggression against Ukraine²⁴. According to EUvsDisinfo, the flagship project of the European External Action Service's (EEAS) East StratCom Task Force, the Russian state-controlled disinformation strategy, supported by RT and Sputnik, started giving false pretexts for the invasion of Ukraine before the attack on 24 February 2022²⁵. The disinformation campaign regarding Ukraine has included denial of the war, justification of war crimes and false allegations of the use of biological weapons²⁶.

Following the displacements of millions of Ukrainian refugees to Poland, several city news accounts were used to publish disinformation about refugees and their links with the increasing number of crimes. The analysis of sources revealed that the accounts were set-up by email addresses with a Russian domain²⁷. Discrediting the military and territorial defence at the local level is also part of the Russian disinformation. For example, false stories about the "huge salaries" of territorial defence in Western Ukraine circulated on social media²⁸.

²³ EEAS, 2022, Disinformation About Russia's invasion of Ukraine - Debunking Seven Myths spread by Russia, available at: Disinformation About Russia's invasion of Ukraine - Debunking Seven Myths spread by Russia | EEAS Website (europa.eu)

²⁵ EUvsDisinfo, 24 March 2022, Russian aggression and disinformation in Ukraine, available at: Russian aggression and disinformation in Ukraine - EU vs DISINFORMATION
²⁶ Ibid

²⁷ EDMO, 5 April 2022, Ukrainian refugees and disinformation: situation in Poland, Hungary, Slovakia and Romania, available at: https://edmo.eu/2022/04/05/ukrainian-refugees-and-disinformation-situation-in-poland-hungary-slovakia-and-romania/, viewed 31 May 2022.

²⁸ EUvsDisinfo, 19 May 2022, What to expect from Russia on the information war front?, available at: https://euvsdisinfo.eu/what-to-expect-from-russia-on-the-information-war-front/?highlight=%22local%22

The war in Ukraine and disinformation

The EU is supporting Ukraine though measures fostering the resilience of the communications' infrastructure and countering of disinformation. Within a week of the invasion, the EU suspended broadcasting activities of the stateowned Russia Today and Sputnik²⁹. Věra Jourová, Vice-President of the European Commission for Values and Transparency, stressed the need to finalise the revision of the Code of Practice against disinformation swiftly to implement sustainable solutions and mitigate the risk of disinformation³⁰. In addition, the European Digital Media Observatory (EDMO) is contributing to detecting disinformation related to the situation in Ukraine. It has established a to support European fact-checkers in the fight disinformation³¹. The news taskforce members are collaborating with national and regional EDMO hubs via small-scale media projects³². The United States also launched the European Democratic Resilience Initiative (EDRI) intended to provide 370 million dollars to support resilience, support media freedom and counter disinformation³³. EDRI will cooperate closely with the European Union.

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²⁹ Council of the European Union, 2022, EU imposes sanctions on state-owned outlets RT/Russia Today and Sputnik's broadcasting in the EU, press release, https://www.consilium.europa.eu/en/press/press-releases/2022/03/02/eu-imposes-sanctions-on-state-owned-outlets-rt-russia-today-and-sputnik-s-broadcasting-in-the-eu/

³⁰ European Commission, 31 March 2022, Disinformation: online platforms continue the Code of Practice revision in light of the war in Ukraine and report on first 2022 actions to fight COVID-19 disinformation, available at: Disinformation: online platforms continue the Code of Practice revision in light of the war in Ukraine and report on first 2022 actions to fight COVID-19 disinformation (europa.eu)

³¹ EDMO, 4 March 2022, EDMO establishes a taskforce on disinformation about the war in Ukraine, available at: https://edmo.eu/2022/03/04/ledmo-establishes-a-taskforce-on-disinformation-about-the-war-in-ukraine/ ³² Ibid.

³³ The White House, 24 March 2022, Briefing Room: The Biden Administration Announces New Humanitarian, Development, and Democracy Assistance to Ukraine and the Surrounding Region, available at: <u>FACT SHEET: The Biden Administration Announces New Humanitarian, Development, and Democracy Assistance to Ukraine and the Surrounding Region | The White House.</u>

2.1 Specific challenges for LRAs

Disinformation is becoming more and more sophisticated. More recent developments in disinformation tactics suggest that smaller-scale local operations are being prioritised, and that these are harder to identify³⁴. In the case of the 2019 European Parliament elections, studies have suggested that a majority of identified sources of disinformation were internal (that is, located within the EU) rather than external stakeholders³⁵. For LRAs with limited resources, developing sufficient defences of the democratic space from disinformation can be extremely challenging.

2.1.1 Changing media landscape

Recent years have seen dramatic changes in the way that people access information. The hegemony of the internet and social media has contributed to a reduced circulation of newspapers and ratings figures for television, as people have sought news online. Whilst many traditional news media have established an online presence, news also circulates by other means. The ubiquity of social media in many people's lives has given people the opportunity to consume news through social media platforms, diminishing the monopoly of traditional media on dissemination of news.

The sharing and accessing of information on social networks is done through publicly-viewable posts, but also through closed groups such as Facebook groups, Telegram or WhatsApp groups. When information is shared in private it is particularly open to the introduction of bias because the level of scrutiny is reduced; closed groups are conducive to the circulation and amplification of disinformation. Messages are shared between people with homogenous views, hardening and reinforcing existing opinions. This creates a fragmented media landscape where citizens can become isolated within their own version of reality.

Changes in the way that media is consumed also affects the local level. Local newspapers have been hit by shortages in revenue both from reduced sales and reduced advertising. This has brought many local newspapers to the point of

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³⁴ European Commission and High Representative of the Union for Foreign Affairs and Security Policy, 2019, Joint Communication: Report on the implementation of the Action Plan Against Disinformation, JOIN/2019/12 final

³⁵ See, for example, Chloe Colliver et al., 2020, 'Click Here for Outrage: Disinformation in the European Parliamentary Elections 2019', Institute for Strategic Dialogue.

For further discussion of this see p. 31 of Bayer, Lubianiec, Pintea et al., 2021, Disinformation and propaganda: impact on the functioning of the rule of law and democratic processes in the EU and its Member States -2021 update -, EPRS.

closure³⁶. Whilst some local newspapers have developed their online presence and gained revenue from online advertising, often this has not enabled them to recover the lost revenue which has transferred to their online competitors, big-tech companies.

Local media are an important part of the fabric of local communities. They provide news that more deeply concerns readers' day-to-day experience. Quality local media promote transparency and accountability from local government and therefore trust in local politics. As an illustration, a 2020 American study found a causal link between the closure of local newspapers and the finances of local authorities. Borrowing costs increased because of an association between the reduced scrutiny and accountability from the lack of local media with higher public spending³⁷.

Another consequence of the decline of local media is a greater reliance on national news sources. Reporting on politics in national news sources often emphasises competition and conflict between parties, whereas local newspapers can serve as a "source of shared information", building attachment to the community³⁸. A lack of access to local media also pushes people towards getting news through social media and messaging app groups, the latter of which are very hard to monitor because of their encrypted nature.

In Europe, the Committee of the Regions as well as the Council of Europe in Strasbourg have called for local media to be better supported by both local and national authorities to ensure that the public has access to quality information about the area in which they live³⁹. The Council of Europe called for financial support of local media⁴⁰. The Committee of the Regions highlights the difficulties faced by local media in many Member States related to loss of advertising to social media and consequent threats to media pluralism. Weakened local media are less able to counteract disinformation. Thus, the Committee of the Regions calls for a debate on both support for the development of viable business models and subsidies that LRAs can use to aid local media.

³⁶ Jerónimo, P.; Esparza, M.S., 2022, Disinformation at a Local Level: An Emerging Discussion, *Publications*, 10:15. https://doi.org/10.3390/publications10020015.

³⁷ Gao, Lee and Murphy, 2020, Financing Dies in Darkness? The Impact of Newspaper Closures on Public Finance, *Journal of Financial Economics*, 135 (2), https://doi.org/10.1016/j.jfineco.2019.06.003.

³⁸ Hitt et al., 2019, Why Losing Our Newspapers Is Breaking Our Politics, *Scientific American*, 26 March 2019, available at: https://www.scientificamerican.com/article/why-losing-our-newspapers-is-breaking-our-politics/, viewed 20 May 2022.

³⁹ European Committee of the Regions, 2019, Opinion of the European Committee of the Regions on – Tackling online disinformation: a European Approach, COR 2018/03908, OJ C 168, 16.5.2019, p. 19, and Leendert Veebeck, quoted in Committee of the Regions, 2021, <u>Hate speech against local politicians has "worsened significantly"</u>, press release. See, in general: Council of Europe, Congress of Local and Regional Authorities, available at: https://www.coe.int/en/web/congress

⁴⁰ Leendert Verbeek, quoted in Committee of the Regions, 2021, <u>Hate speech against local politicians has "worsened significantly"</u>, press release.

2.1.2 Capacity needs

Much of the debate at the national and European level about countering disinformation, centres around working with the social networks that are being used to convey disinformation. Some social networks have signed up to the Code of Practice on Disinformation, a voluntary set of self-regulatory standards to counter disinformation (see Chapter 3 of this study). A Strengthened Code of Practice was signed and presented on the 16 June 2022⁴¹. The new Code was published after the conduct of the study. Some EU Member States have taken a regulatory approach. Germany has introduced laws to extend journalistic due diligence obligations to companies regularly offering news or political information online, as well as making it necessary to label political microtargeting⁴². France's 2018 law against information manipulation targets disinformation in the context of elections, creating the possibility of a fast-tracked legal injunction to prevent the spread of disinformation and a transparency obligation for sponsored content⁴³.

However, at regional and local level, the opportunity to effectively regulate social networks is likely to be non-existent. Therefore, any legal action to counter disinformation would depend on European and national frameworks. It may be possible for some of the larger regional authorities to maintain a relationship with representatives of social media companies in order to counter disinformation events, but this is unlikely to be feasible for smaller authorities.

Another major problem for LRAs countering disinformation is the relative lack of resources. Online disinformation has become a major problem relatively recently; many LRAS may have little or no specialist knowledge on the topic within the staff of their administration. A recent survey⁴⁴ of local and regional politicians in Europe found that whilst the vast majority considered their institution to have experienced "fake news"⁴⁵, there was significant variation in understanding what constitutes "fake information"⁴⁶. The study also found that many of those who replied were not aware of what may or may not be technically

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⁴¹ European Commission, 2022, The Strengthened Code of Practice on Disinformation.

⁴² Stulz-Herrnstadt, M., 2020, New German State Media Treaty enters into force, Lexology, https://www.lexology.com/library/detail.aspx?g=1eedc228-d45a-4333-9236-634340a8f43d.

⁴³ LOI n° 2018-1202 du 22 décembre 2018 relative à la lutte contre la manipulation de l'information (1), https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000037847559.

⁴⁴ Müller-Török et al., 2022, Counterfake: A scientific basis for a policy fighting fake news and hate speech, study for the Council of Europe Congress of Local and Regional Authorities https://ocgitservice.com/demo/counterfake2022/index.html.

⁴⁵ The survey used the terminology "fake news" rather than disinformation – see the introduction of this study for discussion on these different terms.

⁴⁶ Definitions approved by at least 40% of respondents included 'Verifiably false information that is disseminated with malign intent'; 'Verifiably false information that is disseminated bona fide'; 'Verifiably true information that is presented out of context or disproportionately'; 'Verifiably true information that is disseminated with malign intent'; 'Dissemination of information that can neither be verified nor falsified at the time of dissemination'.

possible in combatting fake news online, with many calling for measures that are incompatible with how the internet functions. This suggests that whilst LRAs are aware of disinformation being a problem at local level, there is a clear knowledge gap regarding how to go about countering it, and therefore a need for LRAs to receive training on the functioning of disinformation and potential scope of technical remedies.

2.1.3 Developing situational awareness

Developing good situational awareness around online disinformation also requires authorities to maintain up-to-date knowledge on current trends and narratives. Monitoring of disinformation can be very resource intensive, given the sheer quantity of information online and shared on social networks. With many LRAs already struggling to sufficiently cover human resources, it is unrealistic to expect them to be able to allocate significant resources to monitoring.

LRAs must therefore be provided with sufficient resources in order to build situational awareness around disinformation.

2.2 Building resilience: LRAs countering disinformation

Whilst there may be limits to LRAs' capacity to act directly to remove disinformation, they are well-placed to contribute to the construction of a bottom-up **societal resilience** to disinformation. Strengthening media ecosystems, by promoting media literacy, supporting local media and communicating transparently with the public, will help to make local communities less susceptible to the threat of disinformation.

2.2.1 Improving media literacy in the community

Media literacy training helps to distinguish between reliable and unreliable information. Research has shown that people who have undergone media literacy education are more likely to be able to identify misleading information⁴⁷. LRAs can have an impact in this area as they often have competencies related to education. Some LRAs have a role in deciding this curriculum, whereas others do not, so this may be an area where only some LRAs are able to act. Media literacy training can and should be included in school curricula in order to train digital citizens capable of making informed decisions. The European Commission and the Council of Europe have produced handbooks to aid the development of media literacy classes in schools, the latter of which encourages teachers to involve local government representatives in classes where possible⁴⁸. The Conference on the Future of Europe proposes that media literacy training should be mandatory in schools⁴⁹.

⁴⁷ Adjin-Tettey, T., 2022, Combating fake news, disinformation, and misinformation: Experimental evidence for media literacy education, *Cogent Arts & Humanities*, 9:1, 2037229, https://doi.org/10.1080/23311983.2022.2037229.

⁴⁸ European Commission, 2021, Teaching Media Literacy and fighting Disinformation with eTwinning, Luxembourg: Publications Office of the European Union https://op.europa.eu/en/publication-detail/-/publication/b851cd16-3d1c-11ec-89db-01aa75ed71a1 and Council of Europe, 2019, Digital citizenship education handbook, https://rm.coe.int/16809382f9.

⁴⁹ Conference on the Future of Europe, 2022, Report on the final outcome, p.70, available at: https://futureu.europa.eu/pages/reporting?format=html&locale=en, viewed 20 May 2022.

But media literacy training must also reach out to adults. Research has found that older adults are those most likely to have difficulty in identifying the source of articles, and that older people and those with lower education levels have more trouble discerning fact from opinion⁵⁰. Another study found that over-65s were seven times as likely to share news from a domain known to spread disinformation than 30-44 year olds⁵¹. The Conference on the Future of Europe proposes that free training on media literacy should be made available in the workplace⁵². LRAs can use local outreach programmes such as digital literacy classes as well as fostering links with local media that older people may be particularly likely to access.

2.2.2 Establishing trust

LRAs have the advantage that they enjoy greater levels of trust from citizens than other levels of government. They are physically closer to citizens and their work and influence can have a more immediate and visual impact on citizens' day-to-day life. As confidence and trust in governments and politicians is eroding at national level, local and regional levels can be a foundation for rebuilding the public's confidence in government. Greater trust can be a major counterweight to attempts to cause societal fragmentation through disinformation.

By following open government principles of transparency, integrity, accountability and stakeholder participation, LRAs will leave less space for disinformation to flourish, contributing to improving public trust⁵³. One important aspect of this is making communication with the public interesting, easy to access and clear, ensuring that the public are well-informed about decision-making and opportunities to participate⁵⁴. By establishing well-known channels of communication that respond quickly to events, LRAs can become trusted and reliable sources of information and minimise the opportunity for disinformation regarding the locality or region to spread. Making information and data quickly and easily accessible to the public, and making public officials available to answer questions honestly and transparently, can also support local journalists to better do their job of reporting on local issues and holding LRAs to account.

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⁵⁰ Full Fact, Africa Check and Chequeado, 2020, Who is most likely to believe and share misinformation?, https://fullfact.org/media/uploads/who-believes-shares-misinformation.pdf.

⁵¹ This is calculated after controlling for partisanship and ideology. Guess, Nagler and Tucker, 2019, Less than you think: Prevalence and predictors of fake news dissemination on Facebook, *Science Advances*, Vol 5 no 1, https://www.science.org/doi/10.1126/sciadv.aau4586.

Conference on the Future of Europe, 2022, Report on the final outcome, p.88, available at: https://futureu.europa.eu/pages/reporting?format=html&locale=en, viewed 20 May 2022.

Matasick C., et al., 2020, OECD Working Papers, Governance responses to disinformation: How open government principles can inform policy options.
54 Ibid.

Physical proximity with citizens also provides an opportunity to engage directly with them on a scale that is not possible for national governments. Participatory governance initiatives can help to empower citizens and make them feel more included in the democratic political process, by asking them to engage with decision-making not only at election times⁵⁵ (an example of this is described in Case Study I). Engagement with local NGOs and other civil society organisations, for example through cooperation on projects or through multi-stakeholder platforms, can be a means of strategic outreach which opens government to scrutiny with organisations representing members of local communities.

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⁵⁵ Russon Gilman and Schmitt, 2022, Building Public Trust Through Collaborative Governance, Stanford Social Innovation Review, 17/03/2022,

https://ssir.org/articles/entry/building_public_trust_through_collaborative_governance.

3.EU Framework to fight online disinformation and implementing it at local and regional level

As demonstrated in the previous chapter, online disinformation impacts all levels of government, including the local and regional level. The European framework includes a variety of tools for countering online disinformation. This Chapter provides an overview of relevant EU-level initiatives and tools and then analyses whether and how these instruments can be implemented by LRAs.

Major EU efforts to tackle online disinformation as a foreign interference issue date back to March 2015, when the European Council stressed the need to challenge Russia's ongoing disinformation campaigns⁵⁶. This led to the foundation of the East Strategic Communication (StratCom) Task Force, which is part of the Strategic Communication, Task Forces and Information Analysis Division of the European External Action Service (EEAS), followed by the creation of the Western Balkans Task Force and the Task Force South⁵⁷.

However, it became evident that online disinformation was also (and perhaps mostly) a domestic problem that "undermines the trust of citizens in democracy and democratic institutions" and "interferes in the democratic decision-making processes"⁵⁸. Disinformation actors no longer conduct large-scale operations on digital platforms but prefer to opt for smaller-scale, localised operations that are harder to detect and expose⁵⁹. It is therefore clear that the interconnections between the European framework and LRA action against disinformation should be explored.

⁵⁶ European Council, 2015, European Council Conclusions on External Relations (19 March 2015), point 3.

⁵⁷ The organigramme can be found here: EEAS, 2021 StratCom activity report - Strategic Communication Task Forces and Information Analysis Division, available at: https://www.eeas.europa.eu/eeas/2021-stratcom-activity-report-strategic-communication-task-forces-and-information-analysis_en, viewed 30 March 2022. Since then, the East Strategic Communication Task Force has been an essential tool to promote and effectively communicate the EU policies towards the Eastern Neighbourhood. To find out more see EEAS, Questions and Answers about the East StratCom Task Force, available at: https://eeas.europa.eu/headquarters/headquarters-homepage/2116/-questions-and-answers-about-the-east-, viewed 23 March 2022.

⁵⁸ European Commission, 2018, Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, Action Plan against Disinformation, JOIN/2018/36 final.

⁵⁹ JOIN/2019/12 final.

3.1 An overview of the EU instruments

One of the main documents of the EU Framework is the **Communication on tackling Online disinformation**⁶⁰. Here, the European Commission provides the overarching principles to fight online disinformation. According to the Commission, the European response has to be built on transparency, diversity, credibility and inclusivity of information⁶¹. With these axes in mind, the Commission lays out a list of actions that it intends to put into practice.

First of all, in order to create a more transparent, trustworthy and accountable ecosystem it stresses the need to promote adequate changes in platforms' conduct and enhance fact-checking capabilities and collective knowledge on disinformation⁶². The election process could also benefit from these changes⁶³. From another perspective, considering that educating and empowering users to better access and use online information has a strong impact on preventing the spread of disinformation, the Commission encourages the Member States to mobilise resources to foster digital education and media literacy⁶⁴ (a need raised already in 2018 through the Digital Education Action Plan of the European Commission⁶⁵, reviewed in 2020⁶⁶; and in 2019 through the Council of Europe Digital Citizenship Education Handbook⁶⁷). Moreover, it calls for a need to invest in high-quality journalism, considered "an essential element of a democratic society", as a means to uncover, counterbalance, and dilute disinformation⁶⁸. Finally, strategic communication is also indicated as an essential action to counter internal and external disinformation⁶⁹.

⁶⁰ European Commission, 2018, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Tackling online disinformation: a European Approach, COM/2018/236 final.

⁶¹ Ibid., p. 6.

⁶² Ibid., p. 7.

⁶³ Ibid., p. 11.

⁶⁴ Ibid., p. 12-13.

⁶⁵ European Commission, 2018, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Digital Education Action Plan, COM/2018/022 final.

⁶⁶ European Commission, 2020, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Digital Education Action Plan 2021-2027 Resetting education and training for the digital age, COM/2020/624 final.

⁶⁷ Council of Europe, 2019, Digital Citizenship Education Handbook.

⁶⁸ COM/2018/236 final., p. 14.

⁶⁹ Ibid., p. 15.

The East StratCom Task Force in EEAS, in cooperation with other EU institutions and with Member States, published an Action Plan on Strategic Communication ⁷⁰. In order to increase the EU's strategic communication capacity, the Task Force communicates proactively EU policies and activities, develops dedicated communication material on priority issues and creates communication campaigns aimed at key audiences and focused on specific problems that matter to them, including local issues⁷¹. The Task Force put in place integrated communication campaigns such as 'Moving Forward Together' (Ukraine), 'Stronger Together' (Moldova) or 'EU for Georgia'; when relevant, it creates partnerships with and gives support to government strategic communication offices and contributes to a needs-calibrated support for independent media at regional level, to strengthen the overall media environment in the Eastern Neighbourhood⁷².

Based on the Communication on tackling Online disinformation, the Commission published an **EU Action plan against disinformation** in December 2018 (second foundational document; hereafter: the "EU action plan")⁷³. It can be considered a key pillar of the EU policy and it is based on four areas: improving the capabilities of EU institutions to detect, analyse, and expose disinformation; strengthening coordinated and joint responses to disinformation; mobilising the private sector to tackle disinformation; and raising awareness and improving societal resilience.

Following the EU Action Plan, the European Digital Media Observatory (hereafter: "EDMO") and the Rapid Alert System were created. EDMO is a hub for fact-checkers, academics and other relevant stakeholders to collaborate with each other. It helps to coordinate actions in the fight against disinformation by mapping fact-checking organisations, coordinating research activities and supporting public authorities⁷⁴. For instance, they organise trainings aimed at policymakers⁷⁵ and support national authorities through national hubs on digital media that monitor online platforms' policies and produce content to expose harmful disinformation campaigns⁷⁶. Regarding the Rapid Alert System, it is a platform that facilitates EU authorities and Member States to share information on a variety of cases and trends connected to disinformation daily, to "enable common situational awareness, coordinated attribution and response and ensure

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⁷⁰ EEAS, 2015, Action plan on strategic communication,

https://eeas.europa.eu/sites/default/files/action_plan_on_strategic_communication.docx_eeas_web.pdf.

⁷¹ İbid., p. 1.

⁷² EEAS, 2021, Tackling disinformation: Information on the work of the EEAS Strategic Communication division and its task forces (SG.STRAT.2), available at: https://www.eeas.europa.eu/countering-disinformation/tackling-disinformation-work-eeas-strategic-communication_en, viewed 19 May 2022.

⁷³ JOIN/2018/36 final.

⁷⁴ To find out more see EDMO webpage available at: https://edmo.eu/.

⁷⁵ E.g. EDMO, 12 April 2021, EDMO Training: "The ABC of Fact-checking" (11-12 May 2021), available at: https://edmo.eu/2021/04/12/edmo-training-the-abc-of-factchecking/, viewed 18 May 2022.

⁷⁶ EDMO, 26 May 2021, National EDMO hubs announced, available at: https://edmo.eu/2021/05/26/national-edmo-hubs-announced/, viewed 18 May 2022.

time and resource efficiency"⁷⁷. It has been described by High Representative Josep Borrell as having developed beyond a system that principally issues alerts in special cases into a "community of experts" that develop a shared situational awareness and common approach to responding to disinformation⁷⁸.

Moreover, the EU Action Plan gets back on some points made in the Tackling Disinformation Communication. It stresses that "Union institutions and Member States need to improve their ability to react and communicate effectively" to prevent and react to disinformation⁷⁹. About raising awareness and improving resilience, it reiterates the essentiality of improving "citizens' media literacy to understand how to spot and fend off disinformation"⁸⁰, stressing that Article 33a(1) of the revised Audio Visual Media Service Directive requires Member States to promote measures that develop media literacy skills⁸¹. The need to support independent media and investigative journalists and create a dialogue with fact-checkers is also highlighted⁸².

In addition to these two fundamental documents, others have been adopted to strengthen the Union's commitment to tackling disinformation. September 2018 marked the beginning of a collaboration with private companies through the **EU Code of Practice on Disinformation**. It is a self-regulatory act through which main platforms, including Facebook, Google, Twitter, along with software companies and bodies representing the advertising industry made commitments in five areas (online advertisements, political advertising, integrity of services, transparency for consumers, and transparency for researchers) in order to improve the transparency, accountability and trustworthiness of their services. The new and Strengthened Code, published on 16 June 2022, is focused on setting "coregulatory measures, aimed at addressing systemic risks by the Very Large Online Platforms, including those linked to Disinformation". This is important because the European Parliament, commenting the ancient Code, recently affirmed that it "deplores the continued self-regulatory nature of the Code of Practice, since self-regulation is insufficient when it comes to protecting the public from interference

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⁷⁷ JOIN/2018/36 final, p. 7.

⁷⁸ Borrell, J., 2021, Answer given by High Representative/Vice-President Borrell on behalf of the European Commission to a Parliamentary question, 19 April 2021, <u>Question reference</u>: E-006819/2020.

⁷⁹ JOIN/2018/36 final, p. 7.

⁸⁰ Ibid., p. 10.

⁸¹ Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive). OJ L 95, 15.4.2010, p. 1–24.

⁸² Ibid., p. 10-11.

⁸³ European Commission, 2022, The Strengthened Code of Practice on Disinformation. See also European Commission, 2021, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, European Commission Guidance on Strengthening the Code of Practice on Disinformation, COM/2021/262 final, p. 2.

and manipulation attempts"; it also criticised the lack of transparency of the revision⁸⁴.

2019 was the year of the European elections. On that occasion, the European Commission created and managed the **European cooperation network on elections** This network brings together officials from Member States' electoral authorities and enables for concrete and practical interactions on a variety of themes related to ensuring free and fair elections, including data protection, cybersecurity, transparency, and awareness raising. Its work is still ongoing and contributes to building more resilient electoral and democratic systems across the European Union⁸⁵.

The **EU Democracy Action Plan** devotes an entire Chapter to disinformation⁸⁶. Again, empowering citizens through education and training to make informed decisions is seen as an essential tool to counter disinformation and ensure effective participation in society and democratic processes⁸⁷. It also announces the **Digital Services Act**⁸⁸, a horizontal framework for regulatory oversight, accountability and transparency of the online space in response to the emerging risks. Trilogue meetings took place between January and April 2022 and a provisional agreement was reached on 22 April 2022⁸⁹. The EU Democracy Action Plan has recently been complemented by the **Media Action Plan**⁹⁰, the first policy document explicitly setting out a vision and dedicated initiatives for the news media sector.

⁸⁴ European Parliament, 2022, REPORT on foreign interference in all democratic processes in the European Union, including disinformation, (2020/2268(INI)).

⁸⁵ European Commission, European cooperation network on elections, available at: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/eu-citizenship/democracy-and-electoral-rights/european-cooperation-network-elections_en_viewed_27_May 2022.

⁸⁶ European Commission, 2020, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions On the European democracy action plan, COM/2020/790 final, Chapter 4.

⁸⁷ Ibid., p. 24.

⁸⁸ European Commission, 2020, Proposal for a Regulation of the European Parliament and of the Council on a Single Market For Digital Services (Digital Services Act) and amending Directive 2000/31/EC, COM/2020/825 final.

⁸⁹ To find out more see 'Legislative Train Schedule of the Proposal', available at: https://www.europarl.europa.eu/legislative-train/theme-a-europe-fit-for-the-digital-age/file-digital-services-act, viewed 14 March 2022.

⁹⁰ European Commission, 2020, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions' Europe's Media in the Digital Decade: An Action Plan to Support Recovery and Transformation, COM/2020/784 final.

"A strategic compass for security and defence", which proposes stronger security and defence actions in the areas of crisis management, resilience, capability development, and partnerships for the 2025-2030 time horizon⁹¹. Regarding disinformation, a Foreign Information Manipulation and Interference Toolbox will be created, in order to strengthen the European ability to detect, analyse and respond to this threat⁹². Moreover, the EEAS will set up a dedicated Data Space to develop a common understanding of foreign information manipulation and interference that will further enhance the EU's strategic communication and counter disinformation capabilities⁹³.

It is important to note that there are funding opportunities aimed at supporting the fight against disinformation and to promote citizen's participation in the civic life. For example, the CERV programme support the European democracy action plan, the HERoS project to improve the efficiency of the response to the virus outbreak, the Co-Inform project to foster critical thinking and digital literacy and the FARE project developing a theoretical for making testable predictions.

The EU policy on disinformation has not been exempt from criticism. Part of the doctrine affirmed that it is based on "a variety of instruments that have developed in an organic rather than a systematic manner" and that "the limited successes the EU has achieved so far (...) have been hard earned"94. Even according to other Institutions, more could be done. In its Special Report published in 2020, the European Court of Auditors affirmed that overall "the EU action plan was relevant but incomplete, and even though its implementation is broadly on track and there is evidence of positive developments, some results have not been delivered as intended"95. The European Parliament raised the issue of a lack of direct involvement of local and regional decision-makers. It affirmed "that local and regional politicians and authorities can often identify concerning developments at an early stage" and stressed "that local knowledge is often needed to identify and implement adequate countermeasures"96. This position is shared by the Committee of Regions which regrets the secondary role played by the regional and local level in combating the spreading of false information and calls for a holistic response⁹⁷. In April 2022, the Committee of Regions stressed again its

⁹¹ EEAS, A strategic compass for security and defence, available at: https://www.eeas.europa.eu/eeas/strategic-compass-security-and-defence-0 en, viewed 5 April 2022.

⁹² Ibid., p. 40.

⁹³ Ibid.

⁹⁴ Pamment, J., 2020, The EU's Role in Fighting Disinformation: Taking Back the Initiative, Carnegie Endowment for International Peace, p. 5.

⁹⁵ European Court of Auditors, 2020, Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed.

⁹⁶ European Parliament, 2022, REPORT on foreign interference in all democratic processes in the European Union, including disinformation, (2020/2268(INI)), p. 27.

⁹⁷ European Committee of the Regions, 2020, Opinion of the European Committee of the Regions – Action Plan against Disinformation, OJ C 79, 10.3.2020, p. 50–51.

position by affirming that "resolute efforts are needed to counter disinformation which can erode the very foundations of our democratic societies, and undermine free and fair elections"; it also called "for related initiatives to be accompanied by capacity building of public authorities to address disinformation at all levels in a targeted manner" and noted "that there is a lack of recognition that local and regional authorities, being closest to the citizens, can be a valuable asset in fighting disinformation"⁹⁸.

The lack of direct mention of LRAs in the EU Framework should not, however, discourage these authorities from taking ownership in the fight against disinformation. There are lessons to be learnt from the European tools and concrete actions that could be taken to create a holistic disinformation policy capable of adapting to local and regional conditions.

⁹⁸ European Committee of the Regions, 2022, Opinion of the European Committee of the Regions – Reinforcing democracy and integrity of elections, CIVEX-VII/013, 27-28.4.2022

3.2 Implementing the EU Framework at local and regional level

As pointed out by the Committee of Regions "the fight against disinformation must be rooted in cooperation among many different institutions"⁹⁹. LRAs can thus step in, show initiative and effectively make efforts to counteract current online disinformation. Three main areas highlighted in the EU Action Plan against disinformation are particularly relevant for LRAs: digital education and media literacy, support to journalists and fact-checkers and strategic communication. These domains are anything but minor, given that they were indicated as fields of action since the Commission Communication on tackling disinformation in 2018¹⁰⁰. Moreover, as mentioned below, the election processes – often target of disinformation attacks which cause a dangerous threat to democracy – could benefit from a proactivity of LRAs in the cited areas.

3.2.1 Fostering digital education and media literacy

Digital education is how we engage with all of the existent technology while media literacy is how we think (critical thinking) about all of the media around us¹⁰¹. It is essential to improve digital education and media literacy skills considering that people are exposed to technology and its risks, such as the dissemination of false information, from a very young age. Moreover, as global access to information and communication grows, the risk of fake news and the dissemination of disinformation will expand significantly¹⁰². Digital education and media literacy skills are regarded as crucial in enabling European individuals to make informed decisions and develop critical thinking abilities in connection to the media content they consume, generate, and promote, thereby raising awareness of disinformation¹⁰³. This process will strengthen their societal resilience.

The most efficient way to make people aware of this problem and increase their awareness is through education in schools. Schools are the "training grounds for critical thinking"¹⁰⁴ and often fall within the competences of LRAs. These authorities could therefore take the appropriate steps to enhance digital education and media literacy in schools. As rightfully pointed out by the European

⁹⁹ European Committee of the Regions, 2019, Opinion of the European Committee of the Regions on – Tackling online disinformation: a European Approach, COR 2018/03908, OJ C 168, 16.5.2019, p. 18.

¹⁰⁰ COM/2018/236 final.

¹⁰¹ Council of Europe, 2019, Digital Citizenship Education Handbook.

¹⁰² Ibid.

¹⁰³ Council of the European Union, 2019, Report of the Presidency to the European Council on 20-21 June 2019, on countering disinformation and the lessons learnt from the European elections.

¹⁰⁴ Council of Europe, 2019, Digital Citizenship Education Handbook.

Parliament, these curricula should be included from early years to adult education in order to reach a wider audience and as many age groups as possible 105. LRAs should bear in mind this wide-ranging strategy: on one side, it is important to reach young people given that technology has found its way into children's hands; on the other side, effective media literacy actions for the elderly must be created because they often 'suffer' more the negative consequences of disinformation, being vulnerable to and unprepared for technology changes.

Schools can also be used as a bridge between students and LRAs. The Council of Europe's Digital citizenship education handbook¹⁰⁶ suggests organising meetings and interviews as a means of building a connection and trust in local representatives. Students could also be encouraged by the authorities to follow local elections more closely and analyse the veracity of online messaging around the election. A connection could also be created with journalists. In the European Democracy Action Plan, the Commission supports the involvement of journalists in media literacy activities¹⁰⁷. LRAs are thus encouraged to organise 'back-to-school' initiatives that will enable journalists to discuss their work, the role of the media and the risks linked to disinformation. They could also organise awareness campaigns with the help of local newspapers and local media¹⁰⁸.

LRAs could also produce a set of digital education and media literacy classroom activity sheets that can be downloaded and printed by teachers. It could be a useful tool to adapt the educational activities to the local reality¹⁰⁹.

3.2.2 Supporting journalists and fact-checkers

The importance of local and regional journalists, media organisations and fact-checkers is stressed several times in the EU Framework. According to the European Parliament, they "are key structures for the promotion, production and dissemination of information and facts" related to local realities¹¹⁰. The Committee of Regions added that they should be involved in the fight against disinformation as fully as possible, given that thanks to their professional experience and day-to-day work in recognising disinformation, they are trained

¹⁰⁵ European Parliament resolution of 25 November 2020 on strengthening media freedom: the protection of journalists in Europe, hate speech, disinformation and the role of platforms (2020/2009(INI)) and European Parliament, 2022, REPORT on foreign interference in all democratic processes in the European Union, including disinformation, (2020/2268(INI)).

¹⁰⁶ Council of Europe, 2019, Digital Citizenship Education Handbook.

¹⁰⁷ COM/2020/790 final, p. 25.

¹⁰⁸ Lauri Tierala, Programme Director of the European Digital Media Observatory interview, 8 March 2022.

¹⁰⁹ See for example: CLEMI Le centre pour l'éducation aux médias et à l'information, 2020, Media and Information Literacy – Classroom Activity Sheets for Teachers, available at: https://pedagogie.ac-reunion.fr/emi/ressources/boite-a-outils/news/detail/News/media-and-information-literacy-classroom-activity-sheets-for-teachers.html, viewed 16 March 2022.

¹¹⁰ European Parliament resolution of 25 November 2020 on strengthening media freedom: the protection of journalists in Europe, hate speech, disinformation and the role of platforms (2020/2009(INI)), p. 42.

and more aware and attentive than others¹¹¹. For this reason, it is essential to equip them with adequate support, to ensure they fulfil their educational and cultural roles. The effective presence of these stakeholders can really make the difference in how well the population is ready to respond to the risks of disinformation¹¹².

LRAs should involve civil society actors and build networks of fact-checkers at a local level in order to increase transparency and provide knowledge about local circumstances¹¹³. Effective and productive dialogue with these actors would help LRAs to know more about disinformation at a local level by learning from the daily work of fact-checkers. They could share their findings on important topics, such as what makes a claim go viral and what are the most challenging claims to debunk in a specific geographical area¹¹⁴.

Regarding other forms of support, while it is quite rare for fact-checkers to receive direct state funding, the same cannot be said for journalists. Since the first EU Communication on tackling online disinformation, the Institutions called for a need to invest in journalism in order to provide high-quality information and protect journalism in the public interest¹¹⁵. As suggested by the Committee of Regions, LRAs should provide such support at a local level in various forms, such as competitions for grants, preferential lets of premises and/or other forms of aid¹¹⁶. This support has to be given in compliance with the EU single market scheme, in particular with the rules on State aid. In this regard, it should be noted that, as affirmed by Commission Decisions on media aid¹¹⁷, Member States' support measures aimed at attaining common EU objectives and interests such as media freedom and pluralism have been declared compatible with EU State aid rules.

The financial support at issue should be given in the most transparent way, in order to avoid a negative impact on the independence of media. A healthy democracy in the EU requires truly independent, sufficiently funded public service media operating across multiple platforms. The European Parliament suggests disclosing information on who owns, donates to, controls, or provides content to media in order to protect media pluralism and assure transparency and independence.

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¹¹¹ European Committee of the Regions, 2020, Opinion of the European Committee of the Regions – Action Plan against Disinformation, OJ C 79, 10.3.2020, p. 52.

¹¹² Lauri Tierala, Programme Director of the European Digital Media Observatory interview, 8 March 2022.

¹¹³ European Committee of the Regions, 2020, Opinion of the European Committee of the Regions – Action Plan against Disinformation, OJ C 79, 10.3.2020, p. 52 and Ľuboš Kukliš, Chief Executive of Slovak Media Auhtority, Chair of EPRA, Chair of Subgroup on Disinformation at ERGA interview, 14 February 2022.

¹¹⁴ Lucas Graves, Associate Professor, University of Wisconsin–Madison interview, 8 March 2022.

¹¹⁵ COM/2018/236 final, p. 14.

¹¹⁶ European Committee of the Regions, 2019, Opinion of the European Committee of the Regions on – Tackling online disinformation: a European Approach, COR 2018/03908, OJ C 168, 16.5.2019, p. 19.

¹¹⁷ The Commission has approved aid for news agencies (e.g. SA.30481, State Aid in favour of Agence France-Press (AFP), France, http://ec.europa.eu/competition/elojade/isef/case_details.cfm?proc_code=3_SA_30481)

3.2.3 Increasing transparency and communicating clearly

Strategic communication is a valuable tool apt to reinforce democratic values and rebuild institutional trust¹¹⁸. This is true for every level of governance, from the European level to the LRAs. LRAs could aid people in distinguishing between true and false information by making their own work more open and transparent and hosting live and online citizen dialogues and public discussions ¹¹⁹. They could also collaborate with local and regional journalists and civil society in general, thus making efforts more efficient, and/or hiring more communication professionals to create a communication strategy able to mitigate the impact of disinformation¹²⁰. Tools that enable citizens to access information and to participate directly in the exercise of power, such as open data, citizens' budgets and citizens' panels should be improved¹²¹. This is even more important considering that the recent Conference on the Future of Europe called for an increase of citizens' participation and youth involvement in the democracy to develop a full civic experience by "improving the effectiveness of existing and developing new citizens' participation mechanisms", that should be inclusive and characterised by a communication able to reach a diverse public¹²². The Conference's Recommendations state: "We propose direct citizens' involvement events, similar to the Conference on the Future of Europe. They should be organised on a national, local and European level"¹²³.

To involve more citizens in elections and political debate, LRAs could organise awareness campaigns similar to "This time I am voting" developed by the European Parliament in 2019 for the European elections. This kind of campaign should be based on social media, which as a modern channel of communication can reach wider audiences, above all among the young population¹²⁴. In this way, LRAs' activity against disinformation will not limit itself to developing counternarratives and/or debunking, which are more reactionary activities, but it could use a valuable tool such as strategic communication to prevent disinformation itself.

¹¹⁸ EU Official interview, 2 March 2022.

 $^{^{119}}$ European Committee of the Regions, 2020, Opinion of the European Committee of the Regions – Action Plan against Disinformation, OJ C 79, 10.3.2020, p. 52.

¹²⁰ Pamment, J., 2020, The EU's Role in Fighting Disinformation: Crafting A Disinformation Framework. Carnegie Endowment for International Peace, p. 14.

¹²¹ European Committee of the Regions, 2021, Opinion of the European Committee of the Regions — European democracy action plan, COR 2021/01278, OJ C 440, 29.10.2021, p. 32.

¹²² Conference on the Future of Europe, 2022, Conference on the Future of Europe: Report on the Final Outcome, available at: https://futureu.europa.eu/pages/reporting?format=html&locale=en, viewed 18 May 2022.

¹²³ Ibid.

¹²⁴ L'uboš Kukliš, Chief Executive of Slovak Media Authority, Chair of EPRA, Chair of Subgroup on Disinformation at ERGA interview, 14 February 2022.

4.Initiatives to counter disinformation at local and regional level

This Chapter provides a typology of different types of initiatives taken by LRAs in response to disinformation threats, with examples of good practices. Types of action include awareness raising, development of media literacy, strong public communication, promoting involvement of civil society stakeholders and citizens, and support for local media. It is followed by a chapter exploring three specific initiatives in greater detail.

4.1 Awareness-raising and capacity building exercises

Greater awareness and capacity building for LRAs are essential to enhance resilience to disinformation. As highlighted by the European Commission in its Action Plan against Disinformation, it is important to have a better understanding of the sources of disinformation, its objectives and society's vulnerabilities¹²⁵. Increasing capacity building includes providing targeted training, public conferences and other forms of learning methods to combat the dissemination of disinformation. Although LRAs are often the best placed to identify disinformation at an early stage¹²⁶, the Committee of the Regions noted that local authorities often lack the expertise, skills and resources necessary to combat the spread of false information¹²⁷. Allocating financial and capacity building resources to LRAs is essential to strengthen their ability to detect disinformation and have access to relevant information.

In Sweden, the Civil Contingencies Agency (MSB) is in charge of identifying and countering disinformation¹²⁸. The country uses a bottom-up approach, recognising that a lot of the work on mitigating information influence campaign comes from municipalities and civil society¹²⁹. MSB provides information and training in municipalities and regions in cooperation with the Swedish Association of Local Authorities and Regions 'to detect, identify and respond to' information operations¹³⁰. For example, to counter foreign attempts to influence the 2018 Swedish elections online, the MSB, in association with the LRAs, informed municipalities of the need for a comprehensive security analysis for the

¹²⁵ JOIN/2018/36 final.

¹²⁶ European Parliament, 2022, REPORT on foreign interference in all democratic processes in the European Union, including disinformation, (2020/2268(INI)).

¹²⁷ European Committee of the Regions, 2021, Opinion of the European Committee of the Regions — European democracy action plan, COR 2021/01278, OJ C 440, p. 3.

¹²⁸ Jankowicz, N. 2019, Avoiding the Band-Aid Effect in Institution Responses to Disinformation and Hybrid Threats, German Marshall Fund of the United States Alliance for Securing Democracy.

¹²⁹ Jean-Baptiste, Jeangène Vilmer, 2021, Hybrid COE Research Report, Effective state practices against disinformation: Four country case studies.

¹³⁰ Čižik, Tomáš, 2017, Information Warfare - New Security Challenge for Europe.

upcoming elections¹³¹. In July 2018, MSB released a handbook on influence operations for political campaign operators and local administrators as part of a massive awareness-raising campaign¹³².

In another example, the Italian Ministry of Public Administration has developed an e-book built from an exchange of best practices between journalists, local and national government representatives, social media companies, to improve the ability of public officials to use social media strategically¹³³.

4.2 Developing media literacy

Media literacy has been recognised as one of the main tools in combatting disinformation. The importance of improving critical thinking and digital media literacy to increase societal resilience was stated in Recital 59 of the revised Audiovisual Media Services Directive¹³⁴. The aim of media education is to provide citizens with the necessary knowledge and skills to analyse and evaluate information, including online¹³⁵. It should empower citizens to reflect and make their own critical judgement about the credibility of information¹³⁶.

Already in 2010, the Committee of the Regions outlined that LRAs are key players in fostering media literacy as they are the closest to grassroots concerns and are often responsible for primary and secondary education¹³⁷. Young people are vulnerable to disinformation and schools are important institutions to provide skills to distinguish between reliable and unreliable sources of information¹³⁸, including from primary school level¹³⁹.

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¹³¹ Ohlin, J. D., Hollis, D. B., 2021, Defending Democracies: Combating Foreign Election Interference in a Digital Age.

Age.

132 Swedish Contingencies Agency, 2018, Countering information influence activities: A handbook for communicators.

¹³³ Matasick C., et al., 2020, OECD Working Papers, Governance responses to disinformation: How open government principles can inform policy options.

¹³⁴Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities.

¹³⁵ Digital Future Society - Dealing with Disinformation: Strategies for digital citizen empowerment, 2020.

¹³⁶ High level Group on fake news and online disinformation, A multi-dimensional approach to disinformation, 2018.

¹³⁷ European Committee of the Regions, 2010, Opinion of the Committee of the Regions on regional perspectives in developing media literacy and media education in EU educational policy, 2010/C 141/04, OJ C 141.

¹³⁸ Council of Europe, Dealing with propaganda, misinformation and fake news, https://www.coe.int/en/web/campaign-free-to-speak-safe-to-learn/compendium/-/asset_publisher/V117nfhFNH6d/content/dealing-with-propaganda-misinformation-and-fake-news-intro?_101_INSTANCE_V117nfhFNH6d_viewMode=view/

¹³⁹ Council of Europe, 2018, Guidelines to respect, protect and fulfil the rights of the child in the digital environment.

Numerous LRAs have integrated media literacy into their policies. In Belgium, primary and secondary schools in Brussels-Wallonia Federation receive all daily newspapers free of charge for two weeks in September. The purpose of the project is to help students become familiar with newspapers and give them the opportunity to assess the diversity of publications in order to develop their critical thinking and analytical skills to make informed personal opinions ¹⁴⁰.

Finland has also been conducting initiatives to educate its citizens to counter disinformation¹⁴¹. The country is consistently ranked among the most media literate European countries¹⁴². Media literacy policy is implemented by the National Audiovisual Institute (KAVI) and Ministry of Education and Culture in collaboration with media education professionals¹⁴³. The policy highlights the importance of taking into account local specificities in media education. Municipalities are responsible for education and media education takes places in municipal services¹⁴⁴. For example, the city of Helsinki has an information centre, the Youth Voice News Centre, that promotes the voice of young people on major issues within the democratic debate. Its activities allow young people to further engage and participate in public discussions¹⁴⁵. A major initiative is the annual Media Literacy Week (MLW), which aims to increase media literacy skills of young people and support teaching professionals. The MLW encourages local stakeholders to organise events to support media education at their level¹⁴⁶.

Media literacy initiatives are often centred on schools and target young people; they are already in the education system and easier to reach. However, as noted in Chapter 2, other age groups are also vulnerable to disinformation and can benefit from media literacy training¹⁴⁷. In Toronto, local authorities have implemented an intergenerational programme tackling the divide in media literacy needs among seniors and youth¹⁴⁸. The programme creates a space for young students to support senior citizens in gaining online skills. In Europe, the DIGITOL intergenerational project covering six European countries (Belgium, Bulgaria, Estonia, Germany, Greece, Italy and Romania) targeted digital literacy

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¹⁴⁰ Council of Europe, 2016, Mapping of media literacy practices and actions in EU-28; Wallonia Federation, Circulaire 7747 du 18 Septembre 2020 relative aux opérations "Ouvrir mon quotidien" et "Journalistes en classe" dans les écoles fondamentales et secondaires, available at : http://www.enseignement.be/index.php?page=26823&do_id=8002, viewed 31 May 2022.

¹⁴¹ Matasick C., et al., 2020, OECD Working Papers, Governance responses to disinformation: How open government principles can inform policy options.

¹⁴² Media Literacy Index, 2021, https://osis.bg/?p=3750&lang=en

¹⁴³ Nordic Policy Centre, 2020, Media literacy education in Finland.

¹⁴⁴ Ministry of Education and culture, 2019, National media education policy, Media literacy in inland, available at: Media literacy in Finland; National media education policy (valtioneuvosto.fi).

¹⁴⁵ Jaakola M., 2018, Voicing young people's perspectives: Media influencing as a form of collaboration between youth organisations and the professional media.

¹⁴⁶ Mediataitoviikon, <u>In English - Mediataitoviikko</u>.

¹⁴⁷ European Parliament, 2020, Strengthening media freedom: the protection of journalists in Europe, hate speech, disinformation and the role of platforms (2020/2009(INI)), OJ C 425, 20.10.2021, p. 28–42

in older people through local level training initiatives aimed at enhancing social cohesion of communities¹⁴⁹. DIGITOL is using intergenerational educational and non-formal practices to engage with older adults¹⁵⁰. Another initiative, the IN-EDU (In INclusive communities through Media literacy & Critical Thinking EDUcation) project, implemented by seven European partners based in Italy, Bulgaria, France, Croatia and Slovenia, aims to reinforce media literacy at local level¹⁵¹. One of the expected outcomes of the project is to encourage the creation of a curriculum and teaching resources in media literacy that could be easily adapted to the local context¹⁵². By working at local level, IN-EDU intends to have a greater impact on the wider communities¹⁵³. The project focuses on improving the critical thinking of teachers, parents, families and other stakeholders¹⁵⁴.

4.3 Strengthening public communication

Public communication helps to build trust from citizens and stronger democracies. The OECD highlights the importance of communication and transparency in counteracting disinformation¹⁵⁵. Effective and fact-based communication is important to counter disinformation. and can foster open, democratic debate free from manipulation¹⁵⁶.

Strategic public communication is recognised as one of the most effective ways to create a trusted positive narrative helping to reduce the impact of disinformation. It must be accurate, evidence-based and timely, and can be used to warn about potential disinformation before it occurs, anticipating the flow of false information.

Due to their proximity to citizens, a solid communication strategy by LRAs can serve as a vehicle for building trust with citizens and reinforcing democratic values¹⁵⁷. For example, local governments can use tools that enable citizens to access information and to participate in the exercise of power, promoting openness and accountability¹⁵⁸. The engagement of citizens in collective and participatory communication tends to ensure that citizens can advocate and represent informed positions on certain topics.

¹⁵¹ European Commission, YouthWiki, Bulgaria, <u>6.8 Media literacy and safe use of new media | YouthWiki (europa.eu)</u>

¹⁵⁴ European Commission, YouthWiki, Bulgaria, <u>6.8 Media literacy and safe use of new media | YouthWiki</u> (europa.eu).

¹⁴⁹ DIGITOL | AGE Platform (age-platform.eu)

¹⁵⁰ Ibid.

¹⁵² IN-EDU Project, About us, https://in-eduproject.eu/about.html

¹⁵³ Ibid.

¹⁵⁵ OECD, Public Communication & Information Ecosystems.

¹⁵⁶ JOIN/2018/36 final.

¹⁵⁷ EU Official interview, 2 March 2022.

¹⁵⁸ European Committee of the Regions, 2021, Opinion of the European Committee of the Regions — European democracy action plan, COR 2021/01278, OJ C 440, 29.10.2021.

For example, in Italy during the COVID-19 crisis, local governments used social media for their communication. A study demonstrated that municipalities improved the degree of interaction with citizens by shifting from more traditional communication tools to interactive digital ones¹⁵⁹. Local authorities used social media to communicate on regulatory updates and lifesaving information to counter disinformation. The study suggested that the experience could represent an opportunity to enhance citizens' participation and trust in public authorities. In Spain, local media and local council publications that shared information on the COVID-19 situation helped maintain a sense of proximity with the community¹⁶⁰.

4.4 A multi-stakeholder approach to disinformation

The threats posed by disinformation are increasingly complex; a collaborative approach is key to combating disinformation ¹⁶¹. Coordination can take place between national and local level as well as other stakeholders such as academic institutions, civil society groups, social media companies and citizens. In Germany, the lack of coordination between national and local authorities in responding to false accusations contributed to intensifying the impact of the Lisa case in the mass media. The Lisa case concerned false information about a Russian-German girl who had reportedly been raped by migrants in 2016¹⁶². This incident led to better coordination between authorities at different levels (local, regional and federal) and adoption of wider measures countering online disinformation¹⁶³.

LRAs are key players to take part in discussions and coordinate counter-measures as they can be particularly well-informed of what is happening on the ground¹⁶⁴. For example, in France, the web extension, "Source de Confiance" was created by an LRA association "Villes Internet" gathering more than 9000 local officials and agents in partnership with the "Banque Française Mutualiste", a reference bank for public sector employees. The aim of this initiative is to clearly identify public, institutional and academic websites¹⁶⁵. This free tool for local stakeholders is important to debunk disinformation and to distinguish between real information and false news as it gathers 70 000 websites disseminating public sector resources.

¹⁵⁹ Mori, E., 2021, Local governments' communication through Facebook. Evidences from COVID-19 pandemic in Italy - *Journal of Public Affairs*.

¹⁶⁰ EU Official interview, 2 March 2022.

¹⁶¹ OECD, Public communication responses to the challenges of mis- and disinformation | OECD Report on Public Communication: The Global Context and the Way Forward.

¹⁶² European Parliamentary Research Service, 2021, Strategic communications as a key factor in countering hybrid threats.

¹⁶³ Ibid.

¹⁶⁴ European Committee of the Regions, 2020, Opinion of the European Committee of the Regions – Action Plan against Disinformation, OJ C 79, 10.3.2020, p. 2 and Ľuboš Kukliš, Chief Executive of Slovak Media Auhtority, Chair of EPRA, Chair of Subgroup on Disinformation at ERGA interview, 14 February 2022.

¹⁶⁵ Accueil - Sources de Confiance (sources-de-confiance.fr)

A multi-stakeholder approach requires involvement of local media, social media companies and civil society. Journalists and fact-checking organisations are professionally equipped to detect disinformation. They have leading fact-checking roles and engage in community outreach to increase transparency; in many countries fact-checking organisations are employed by social media companies to carry out fact-checking operations to help identify disinformation (see Chapter 5, Case Study 3 for more information). Furthermore, social media companies can take action to tackle the problem of disinformation. In 2019, a few days before Moldova's parliamentary elections, a social media company removed at least 100 accounts and pages engaged in disinformation. The company stressed the importance of local civil society organisation in identifying the accounts ¹⁶⁶.

4.5 The promotion of local media investment

The OECD stresses the importance of local journalism as crucial for transparency and accountability of regional and local governments¹⁶⁷. Nevertheless, recent years have seen a significant reduction in local media¹⁶⁸, with local television news more focused on national stories¹⁶⁹. A German study demonstrated that the decline of local news increases political polarisation as citizens often substitute local news with national tabloid news¹⁷⁰. Local media tends to be more trusted than national media due to the closer connections they establish with communities¹⁷¹.

Thus, an important step to tackling disinformation can be to provide support for high quality journalism that aims to promote diversity of information and ensure a pluralistic media environment¹⁷². Local media can act as a forum for public debate. In a democratic society, investing in high quality journalism should also contribute to counterbalance and dilute disinformation¹⁷³. Furthermore, as a large share of disinformation spread online is of a local nature, ensuring strong local media as a trusted source of information is really important for debunking disinformation and helping to contextualise national or international messages at

¹⁶⁶ Berzina, L, (2019) Together We Are Stronger: Social Media Companies, Civil Society, and the Fight against Disinformation.

¹⁶⁷ Matasick C., et al., 2020, OECD Working Papers, Governance responses to disinformation: How open government principles can inform policy options.

¹⁶⁸ Ardia D., Addressing the decline of local news, rise of platforms, and spread of mis- and disinformation online

¹⁶⁹ Matasick C., et al., 2020, OECD Working Papers, Governance responses to disinformation: How open government principles can inform policy options.

¹⁷⁰ Ellger F., et al., 2022, Local Newspaper Decline and Political Polarization in Multi-Party Systems.

¹⁷¹ Aspen Institute, 2021, Commission on Information Disorder Final Report.

¹⁷² European Committee of the Regions, (2019), Opinion of the European Committee of the Regions on – 'Tackling online disinformation: a European Approach', COR 2018/03908, OJ C 168, 16.5.2019, p. 6. ¹⁷³ COM/2018/236 final.

the local level¹⁷⁴. This support may include the availability of funding to ensure that media have adequate resources to operate.

LRAs should consider promoting independent local media and protect investigative journalism¹⁷⁵. For example, in Sweden, the government supports local newspapers to ensure a diversity of voices in the media environment¹⁷⁶. Many countries in Europe such as Austria and the Netherlands provide subsidies to newspapers providing accurate political and economic information¹⁷⁷. However, in some countries there is a risk that financial support could compromise their editorial independence. In its resolution on foreign interference, the European Parliament highlighted the importance of disclosure of information about who donates, controls or provides content to media outlets¹⁷⁸.

¹⁷⁴ EU Official interview, 2 March 2022.

¹⁷⁵ EU Official interview, 22 February 2022.

¹⁷⁶ Matasick C., et al., 2020, OECD Working Papers, Governance responses to disinformation: How open government principles can inform policy options.

¹⁷⁷ Greenwell, T., 2017, Journalism is in peril. Can government help?

¹⁷⁸ European Parliament resolution of 9 March 2022 on foreign interference in all democratic processes in the European Union, including disinformation (2020/2268(INI)).

5.Learning from the others: three case studies

Following the typology of actions to counter disinformation at local and regional level, this chapter explores three cases in detail to draw lessons that could be used to build similar initiatives in other localities. The first case study looks at techniques for capacity building of government workers to help them identify and counter disinformation in the context of elections. The second compares different fact-checking organisations across Europe and explores how local governments can work with them to achieve shared goals. The third case study follows a participatory project bringing together local government representatives, citizens and local journalists to resolve issues and build trust in the local community, which can in turn help to tackle the spread of disinformation.

5.1 CASE STUDY I: Capacity building of authorities in the run up to elections, Estonia

For some time, Estonia has been at the European vanguard of efforts to fight online disinformation. Actions have spanned a variety of areas, including improving media literacy, developing strategic communication and raising awareness of public officials.

In 2016 Estonia's State Electoral Office created an interagency task force to combat the influence of disinformation on its democratic process. It adopted a network approach by engaging with partners from other government agencies as well as other organisations¹⁷⁹. As part of this approach, they published the *Guide to Dealing with Information Attacks*, in 2019, which contained information regarding the preparation of disinformation attacks and how to respond to such attacks¹⁸⁰. The guide adapts to the local Estonian context the content of a similar handbook produced by the Swedish Civil Contingencies Agency to help improve the ability of public officials to counter disinformation¹⁸¹.

It therefore acts as an example of how different actors across the EU can learn from each other and adapt best practice from one locality to another to strengthen the fight against online disinformation.

¹⁷⁹ McBrien, T. 2020, Defending the vote: Estonia creates a network to combat disinformation, 2016-2020, Innovations for Successful Societies,

https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/TM Estonia Election FINAL%20edited JG.pdf.

¹⁸⁰ Estonia Government Communication Office, 2019, *A Guide to dealing with information attacks*, https://riigikantselei.ee/media/911/download.

MSB, 2018, Countering information influence activities: A handbook for communicators (msb.se).

5.1.1 Description of the initiative

In 2007 Estonia was subject to a wave of cyberattacks that affected banking systems, government websites and media outlets. The event restricted people's ability to access services and journalists' and government's ability to communicate normally with the population over several weeks¹⁸². Whilst responsibility was not officially drawn to the Russian government, it is likely that the attacks originated from Russia, and followed an event that had caused unrest with the Russian minority population living in Estonia¹⁸³.

As general awareness over the threat of disinformation began to rise following foreign interference in events such as Brexit and the 2016 US presidential elections, Estonia was proactive in moving to ensure the integrity of its own elections. The State Electoral Office built on a national security policy¹⁸⁴ to develop its ability to counter disinformation in the 2017 local elections and in the 2019 national and European elections. As there is not necessarily capacity in individual units to cover the range of skills needed to combat disinformation, a strong cooperation was required between different parts of the administration in order to achieve these objectives. An election task force was created bringing together different government agencies. This taskforce met at increasingly regular intervals in the months leading to the election¹⁸⁵.

Preparations included an analysis of the principal disinformation threats in terms of target population, narratives used, and media used for conveying the disinformation.

Part of the fight against disinformation was publishing a handbook aimed at both the public and private sectors for countering disinformation. *A Guide to dealing with information attacks* was published in 2019, available to the general public¹⁸⁶. The guide contains advice about preparing for and reacting to disinformation attacks, as well as information on common methods of influence, information on bots and lessons for the future.

https://www.kaitseministeerium.ee/sites/default/files/elfinder/article_files/national_security_concept_2017_0.pdf

https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/TM_Estonia_Election_FINAL%20edited_JG.pdf.

¹⁸² McGuinnes, D., 2017, 'How a cyber attack transformed Estonia', BBC News, https://www.bbc.com/news/39655415.

¹⁸³NATO, Strategic Communications Centre of Excellence, 2019, Hybrid Threats: 2007 cyber attacks on Estonia, https://stratcomcoe.org/publications/hybrid-threats-2007-cyber-attacks-on-estonia/86.

¹⁸⁴ Government of Estonia, 2017, National Security Concept of Estonia,

¹⁸⁵ McBrien, T. 2020, Defending the vote: Estonia creates a network to combat disinformation, 2016-2020, Innovations for Successful Societies,

¹⁸⁶ Estonia Government Communication Office, 2019, *A Guide to dealing with information attacks*, https://riigikantselei.ee/media/911/download.

The guide describes a process of first identifying vulnerabilities in the organisation and raising awareness in the organisation of the threat; then preparing strategic messaging and narratives to be used.

In the event of attack, it recommends the following steps: 187

- 1. Assess the threat. This allows the organisation to understand the event that is happening and allows it to signal to others that it is aware of the threat and planning a response. This can be done through mapping the situation, monitoring social media and other media types and verifying the actual facts regarding the claims made by the disinformation event. It should then be followed by contact with key partners and institutions, contact with journalists and then an initial message to the target audience that a problem has been perceived and a response is underway.
- 2. More detailed public response. Give an official message that is as transparent as possible; correct the information, for example through a 'frequently asked questions' section; reference any external credible sources; highlight the values of your organisation where relevant.
- 3. Proactive communication. Communicate with key partners and target groups; make information supporting your position available on your website and ensure it is search engine optimised; tell stories so that your messages are easy to understand and support you; use opinion leaders; use existing events, websites and initiatives to spread your message (there is not time for new ones).
- 4. Retaliation. Several options are available here:
 - a. Ignore if the disinformation has not spread far and impact is small;
 - b. report to the police if laws have been broken only to be taken if you are sure that this has happened;
 - c. delete only to be done if a message has violated a law or platform's rules to be done by contacting the platform if possible;
 - d. uncover the attacker if the attacker is definitely known and potential damage is outweighed by potential positive impact.

The guide was adapted by the government communication office from a larger handbook produced by the Swedish Civil Contingencies Agency, MSB. This handbook is also divided across steps of awareness, identification and countering of information influence.

¹⁸⁷ These points summarise a translation of the guide.

Training sessions were also provided both before and after elections for government workers in ministries and other agencies – courses were planned for local governments but were cancelled due to the pandemic. Training took the form of one-day short courses and a longer three-month course using the UK government's 'RESIST' model¹⁸⁸, which was adapted to the Estonian context.

It should be noted that this initiative is one aspect of a multi-pronged approach, which also includes media literacy measures aimed at the wider population. A media literacy week encouraged citizens to think before sharing and a mandatory 35-hour course for high-school students covered the basics of media literacy¹⁸⁹.

5.1.2 Analysis

Given the capacity building nature of the project, it is difficult to assess exactly how successful it was. One metric is that there were no major incidents of foreign interference detected during the elections in 2019, which could be an indicator that authorities were sufficiently well-prepared to prevent or dissuade large-scale disinformation¹⁹⁰. One of the major disinformation narratives in Estonia aims to sow distrust in the security of the country's online voting system. There did not appear to be any significant change in the number of people using the online system, suggesting that the narrative was sufficiently countered¹⁹¹.

A crucial element of the preparation of the guide was its adaptation to the needs of the end-users. The original Swedish guide was 50 pages. Given that the size of many of the communication departments who would be using the guide was limited to 1-2 people, it was considered that it would be unrealistic to expect them to digest and adapt the full-length original¹⁹². Therefore, the handbook was reduced considerably to a selection of easily practicable points, with a selection of options that could be chosen according to the specific situation. A similar approach could be used by LRAs to provide practicable information for their own circumstances.

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https://www.bbc.com/future/article/20220128-the-country-inoculating-against-disinformation.

¹⁸⁸ UK Government Communication Service, 2021, RESIST 2 Counter Disinformation Toolkit, https://gcs.civilservice.gov.uk/publications/resist-2-counter-disinformation-toolkit/.

¹⁸⁹ Yee, A., 2022, The country inoculating against disinformation, BBC,

¹⁹⁰ Past, L. and Brown, K., 2019, Attacks against elections are inevitable – Estonia shows what can be done, The Conversation, 20/03/2019, https://theconversation.com/attacks-against-elections-are-inevitable-estonia-shows-what-can-be-done-109222.

¹⁹¹ McBrien, T. 2020, Defending the vote: Estonia creates a network to combat disinformation, 2016-2020, Innovations for Successful Societies,

https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/TM_Estonia_Election_FINAL%20edited_JG.pdf.

¹⁹² Former Strategic Communication Adviser at the Government Office of Estonia interview, 25 April 2022.

Support with training sessions gave additional support to develop situational awareness. It was also suggested that this could be achieved through taking time to discuss local disinformation threats within LRAs on a yearly basis through regular half-day awareness sessions¹⁹³.

Concerning the wider approach to building capacity, one of the major success factors appears to have been the decision to bring together people from different agencies and ministries within the administration. This 'network approach' resulted in the creation of a number of different working groups and task forces. Task forces are normally based on personal and professional contacts between government workers while working groups are more formal and made up of designated representatives from a range of departments¹⁹⁴. Flexibility and willingness to work together appear to be major advantages of these groups.

The network approach fits a relatively small governmental structure, where it is not feasible to have expertise in a wide range of areas in every department or agency of government. Through the network, gaps in capacity and expertise can be filled by ad-hoc collaboration with staff from other teams. A system that is set up to accommodate flexibility and sharing of capacities between services and teams is essential for this to function effectively. There must be institutional willingness to allow responsibilities to be shared, with potentially new responsibilities taken on over a limited period of time (for example during elections)¹⁹⁵. Regular cooperation meetings between different departments can contribute to creating this dynamic. The network approach could be adapted to the small-government context of LRAs.

Estonia is also an example of how authorities can work with other organisations in the fight against disinformation. Representatives of the Government Office have built a relationship with a local fact-checking organisation, who are able to provide additional capacity to monitor media sources and social media for disinformation. They can then pass information to government authorities regarding possible disinformation campaigns, so that the authorities maintain strong awareness of trending narratives and are able to assess whether to act to counter them. This is an example of how situational awareness of LRAs could be improved by working with fact-checking organisations.

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¹⁹³ Ibid

¹⁹⁴ Van der Staak and Wolf, 2019, Cybersecurity in elections: Models of interagency collaboration, International Institute for Democracy and Electoral Assistance,

https://www.idea.int/sites/default/files/publications/cybersecurity-in-elections-models-of-interagency-collaboration.pdf.

¹⁹⁵ McBrien, T. 2020, Defending the vote: Estonia creates a network to combat disinformation, 2016-2020, Innovations for Successful Societies,

https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/TM Estonia Election FINAL%20edited JG.pdf.

5.2 CASE STUDY II: Fact-checking initiatives across Europe

The core role of fact-checking organisations is to examine that all the facts in a particular article, speech or social media page are correct. By consequence, they deal every day with disinformation and misinformation and fight constantly to tackle these issues. In this case study, the work of four different organisations based in different geographic areas (Bosnia and Herzegovina, Serbia, Germany and Spain) will be analysed. The aim of this case study is to have an in-depth insight of their practices on the ground to tackle online disinformation and to understand how these practices can be used by LRAs. A wider collaboration between LRAs and fact-checking organisations should be encouraged in order to put in place a multi-sector and synergetic approach to countering online disinformation.

5.2.1 Overview of organisations

Zašto ne¹⁹⁶ is a citizens' Association founded in January 2001 in Bosnia and Herzegovina (BiH). It started as a youth peace organisation with the goal of working towards the demilitarisation of BiH society and the establishment of the right to conscientious objection in BiH, but its mission has continuously expanded by following society's development¹⁹⁷. In collaboration with other civil society organisations, institutions, and individuals, Zašto ne works to create a safe, healthy, active, efficient, and responsible society in Bosnia and Herzegovina, both in terms of government representatives, civil society and citizens¹⁹⁸. The goals of the organisation are grouped into seven main programme areas, the most important of which is fact-checking and promotion of accountability. Two projects are included within this area: Istinomjer¹⁹⁹ and Raskrinkavanje²⁰⁰.

Istinomjer is an online platform for monitoring and evaluating the responsibilities of public officials and ruling political parties through daily analysis of the consistency and veracity of their public statements²⁰¹. It also monitors and analyses the quality and level of fulfilment of electoral promises of the parties, given before and after the elections²⁰². Initially, this was done only at the national level but then it progressed to checking several political levels, including the local

¹⁹⁶ Zašto ne webpage available at: https://zastone.ba/en/, viewed 11 April 2022.

¹⁹⁷ Zašto ne, About us, available at: https://zastone.ba/en/ca-why-not/, viewed 11 April 2022.

¹⁹⁸ Ibid.

¹⁹⁹ Istinomjer webpage available at: www.istinomjer.ba, viewed 11 April 2022.

²⁰⁰ Raskrinkavanje webpage available at: <u>www.raskrinkavanje.ba</u>, viewed 11 April 2022.

²⁰¹ Zašto ne, Istinomjer, available at: https://zastone.ba/en/programs/responsible-government/istinomjer/, viewed 11 April 2022.

²⁰² Ibid.

and regional ones²⁰³. In 2017, Zašto ne realised that a similar approach was needed in the field of media responsibility that could not be covered by Istinomjer. For this reason, the new platform Raskrinkavanje was launched, which deals with media scrutiny and media fact-checking. It follows media announcements and checks and evaluates those whose credibility seems questionable, by assessing their veracity²⁰⁴. Based on the obtained ratings, the media whose publications are analysed are divided in two lists: a list of media that publish fake news and a list of high-risk media. By reviewing these lists, it is possible to quickly and easily determine which media should be approached with caution.

Istinomjer and Raskrinkavanje are mainly funded by the National Endowment for Democracy, a non-profit foundation which offers grants to support projects dedicated to the growth and strengthening of democratic goals²⁰⁵.

CRTA²⁰⁶ (Center for Research, Transparency and Accountability) was founded in Serbia in 2002. It defines itself as an "independent, non-partisan civil society organisation committed to developing democratic culture and civic activism"²⁰⁷. Regarding disinformation, it carries out media monitoring related to foreign influence, to analyse if there is biased reporting regarding different foreign stakeholders (e.g. USA, NATO, EU, Russia and China)²⁰⁸. Recently it also started a daily media overview in the form of a newsletter; more in particular, it proceeds to an analysis of the frontlines of national dailies and headlines of news on television with national coverage in order to spot possible disinformation spread through these channels²⁰⁹.

An important CRTA initiative linked to disinformation is Istinomer²¹⁰. It is a fact-checking portal that collects and fact-checks political statements, evaluating them according to criteria of truthfulness, consistency and fulfilment of promises²¹¹. The aim of its activity, conducted in the citizens' interests, is to call on politicians and other public figures to take responsibility for their public discourse and promises²¹². Recently, Istinomer added a new activity: it tries to spot disinformation on social media and publish articles to debunk it²¹³. Istinomer is mainly funded by the funds that CRTA collects through public competitions of

²⁰³ Tijana Cvjetićanin, founder of Istinomjer and Raskrinkavanje (Zašto ne) Interview, 13 April 2022.

²⁰⁴ Raskrinkavanje, O Raskrinkavanju, available at: https://raskrinkavanje.ba/o-raskrinkavanju, viewed 20 April 2022.

²⁰⁵ Istinomjer, O ISTINOMJERU, available at: https://istinomjer.ba/o-istinomjeru/, viewed 27 April 2022 and Raskrinkavanje, O Raskrinkavanju, available at: https://raskrinkavanje.ba/o-raskrinkavanju, viewed 20 April 2022 and Pril 2022 and Pril 2022 and Pril 2022 are described at: https://crta.rs/en/, viewed 11 April 2022.

²⁰⁷ CRTA, About us, available at: https://crta.rs/en/about-us/, viewed 11 April 2022.

²⁰⁸ CRTA Interview, 19 April 2022.

²⁰⁹ Ibid.

²¹⁰ Istinomer webpage available at: https://english.istinomer.rs/, viewed 11 April 2022.

²¹¹ Istinomer, O ISTINOMERU, available at: https://www.istinomer.rs/o-istinomeru/, viewed 20 April 2022.

²¹² Ibid.

²¹³ CRTA Interview, 19 April 2022.

international funds and non-profit organisations interested in strengthening democracy and responsibility in politics in Serbia²¹⁴. Other incomes come from Facebook's partnership and grants related to specific projects²¹⁵.

CORRECTIV²¹⁶ is a non-profit newsroom for investigative journalism in German-speaking areas founded in 2014 that strives to strengthen an open civil society where citizens can play an informed role, through investigative journalism, participation opportunities and educational activities²¹⁷. It is financed funded by a three-pillar model: donations and contributions from citizens, funding from foundations and institutions that support its projects and revenue that comes from its economic activities²¹⁸.

CORRECTIV.Faktencheck is the organisation's fact-checking team²¹⁹. On a daily basis, it uncovers misleading information, provides background information on targeted disinformation and conducts workshops and interviews on how to deal with disinformation²²⁰. Regarding its methodology, it investigates rumours and possible disinformation that circulate on the internet, blogs, videos, and other kinds of social media, spotted directly from the team or thanks to readers' letters or alerts in the WhatsApp chat box²²¹. After looking for evidence for or against a claim, it rates the checked claim on a scale from "True" to "Partially false" to "Made up"²²².

Maldita.es²²³ was founded in 2014 in Spain. It started as Maldita Hemeroteca, a journalistic political format that could be directly found on Twitter in which journalists asked politicians about their changes of opinion on social matters that the public cared about²²⁴. After the Catalonian crisis in the autumn of 2017 and the great wave of disinformation that took place in Spain at that time, the founders decided to expand their fight against disinformation and created Maldita.es²²⁵. Now it is an independent journalistic platform that works to achieve three

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 $^{^{214}}$ Istinomer, O ISTINOMERU: Ko stoji iza nas? Ko nas plaća?, available at: $\underline{\text{https://www.istinomer.rs/o-istinomeru/}},$ viewed 20 April 2022

²¹⁵ Ibid.

²¹⁶ CORRECTIV webpage available at: https://correctiv.org/en/ viewed 11 April 2022

²¹⁷ CORRECTIV, Frequently asked questions: What is CORRECTIV?, available at: https://correctiv.org/en/about-us/faq/, viewed 11 April 2022.

²¹⁸ CORRECTIV, Our finances, available at: https://correctiv.org/en/finances/, viewed 27 April 2022.

²¹⁹ CORRECTIV.Faktencheck webpage available at: https://correctiv.org/faktencheck/ viewed 11 April 2022.

²²⁰ CORRECTIV, Frequently asked questions: What does the fact-checking team do?, available at: https://correctiv.org/en/about-us/faq/, viewed 11 April 2022.

²²¹ CORRECTIV.Faktencheck, Häufig gestellte Fragen: Wie arbeitet CORRECTIV.Faktencheck?, available at: https://correctiv.org/faktencheck/ viewed 11 April 2022.

²²² CORRECTIV.Faktencheck, Häufig gestellte Fragen: Wie überprüft ihr Falschinformationen?, available at: https://correctiv.org/faktencheck/ viewed 11 April 2022.

²²³ Maldita.es webpage available at: https://maldita.es/, viewed 19 April 2022.

²²⁴ Maldita.es, Our Story, available at: https://maldita.es/maldita-es-journalism-to-not-be-fooled/, viewed 19 April 2022.

²²⁵ Ibid.

objectives: monitor and control political discourse and promote transparency in public and private institutions; verify and fight against disinformation; and promote media literacy and technological tools to create an aware community that can defend itself from disinformation²²⁶. Maldita.es has been divided into niche projects with target-specific themes: Maldita Hemeroteca, which analyses 'political flip-flopping'; Maldito Bulo, which fights disinformation on social media (especially on WhatsApp in order to reach the average person and spot local disinformation more easily²²⁷) also thanks to a built-up community that reports through a WhatsApp Service, selects what has to be debunked according to two variables - virality and dangerousness - and labels the information as "Hoax", "No evidence" or "What we know" Maldita Ciencia, that talks about scientific advancements, health, nutrition, and pseudoscientific disinformation; and Maldito Dato, which facilitates the access to transparency procedures and serves as expert guidance in posing the questions to the administrations²²⁹. Another important initiative of Maldita.es is the Unit "Public Policy and Institutional Development"230 which proposes solutions to society and those in leadership positions based on its experience as a fact-checkers' group and expert on disinformation, further elaborated below. This activity is thus an effective collaboration in place with LRAs.

Regarding its funding sources, Maldita.es publishes the relevant information on the webpage "Las Malditas Cuentas: de dónde vienen y a dónde van nuestros ingresos" (The Damned Bills: where our income comes from and where it goes to)²³¹. The major income comes from what Maldita.es calls the "Alianzas tecnológicas" i.e. the collaborations in place with social media networks such as Facebook and WhatsApp²³². Other income comes from: donations from philanthropic organisations, prizes and donations from people.

²²⁶ Maldita.es, What is Maldita.es, available at: https://maldita.es/maldita-es-journalism-to-not-be-fooled/, viewed 19 April 2022.

²²⁷ Carlos Hernández-Echevarría, Head of Public Policy and Institutional Development at Spanish non-profit fact-checker Maldita.es Interview, 18 February 2022.

²²⁸ To know more about Maldito Bulo methodology see: Maldita.es, Metodología de Maldito Bulo, available at: https://maldita.es/metodologia-de-maldito-bulo/, viewed 19 April 2022.

²²⁹ Maldita.es, What is Maldita.es, available at: https://maldita.es/maldita-es-journalism-to-not-be-fooled/, viewed 19 April 2022.

²³⁰ Maldita.es, Políticas Públicas y Desarrollo Institucional, available at: <a href="https://maldita.es/politicas-publicas-pub

Maldita.es, Las Malditas Cuentas: de dónde vienen y a dónde van nuestros ingresos, available at: https://maldita.es/malditas-cuentas-de-donde-vienen-donde-van-nuestros-ingresos/, viewed 27 April 2022.

232 Ibid.

Interestingly, all the above-mentioned organisations collaborate with Facebook through its Third-party fact-checking programme²³³. Facebook decided in 2016 to partner with independent third-party fact-checkers that are certified through the non-partisan International Fact-Checking Network (IFCN) to take action and fight the spread of disinformation²³⁴. Regarding the programme's methodology, factcheckers can identify hoaxes based on their own reporting or thanks to Facebook's keyword detection in case of major news events or trending topics (such as COVID-19); fact-checkers review this content and rate its accuracy²³⁵. The content cannot be removed by them: only Facebook can decide to delete it if it violates the Community Standards²³⁶. Once the piece of content is rated as disinformation, Facebook reduces its distribution so that fewer people see it and applies a warning label that links directly to the fact-checkers' article²³⁷. This has a big impact: pages and domains that constantly spread fake news will notice that the distribution of their content has been reduced and the possibility of earning money and advertising has been abolished²³⁸. In the opinion of some factchecking organisations that were interviewed, putting labels is more useful than directly deleting false information; in this way, people can better appreciate factcheckers' work by understanding the bigger picture and will not think that the programme is just an excuse to apply censorship²³⁹.

5.2.2 Better cooperation between LRAs and fact-checking organisations. What can be done?

The overview above shows that there is potential for cooperation between LRAs and fact-checking organisations aiming to fight online disinformation. This kind of organisation could be an excellent resource for LRAs to improve and increase their situational awareness regarding this issue. It has to be considered that, on some occasions, LRAs' teams risk being too small and having too few resources to deal with a problem as big as online disinformation. In this respect, fact-checking organisations could be of great help, considering their knowledge of recent trends and narratives thanks to their daily monitoring of potential online disinformation sources. It is encouraging to notice that all the consulted

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²³³ Raskrinkavanje (Bosnia and Herzegovina), Istinomer (Serbia), CORRECTIV (Germany) and Maldito Bulo (Spain). To see the full list: Meta, Where we have fact-checking, available at: https://www.facebook.com/journalismproject/programs/third-party-fact-checking/partner-map, viewed 20 April 2022.

Meta, How Facebook's third-party fact-checking program works, available at: https://www.facebook.com/journalismproject/programs/third-party-fact-checking/how-it-works, viewed 20 April 2022.

²³⁵ Ibid.

²³⁶ Ibid.

²³⁷ Ibid.

²³⁸ Istinomer, O ISTINOMERU: Kako funkcioniše Istinomerovo partnerstvo s Facebookom?, available at: https://www.istinomer.rs/o-istinomeru/, viewed 20 April 2022.

²³⁹ Maldita.es Interview, 18 February 2002 and Uschi Jonas, journalist at the fact-checking team of CORRECTIV Interview, 19 April 2022.

organisations are willing to work together with authorities. Zašto ne affirmed in a recent study that "the orientation towards building resilience and educating the public against disinformation has to come from public institutions and needs to be adopted on a strategic level" and "should be informed by the work and knowledge of actors like academic researchers and fact-checkers"²⁴⁰.

The organisations affirmed that **this kind of cooperation is potentially easier at a local and regional level than a national one**²⁴¹. This is because LRAs are traditionally closer to people and are more willing to cooperate and communicate with them²⁴². For instance, CORRECTIV.Faktencheck is about to start the new project CORRECTIV.Faktenforum in which people can become fact-checkers themselves; they will have the support of the CORRECTIV.Faktencheck team, who will provide tips on interview techniques and journalistic writing, and of artificial intelligence, which will help them through algorithms to check the credibility of sources or the authenticity of images²⁴³. Potential cooperation with LRAs could widen the project and help the team to get more people involved²⁴⁴.

It should be noted that all the organisations underlined a **strong need to maintain their independence**. They affirmed that "factchecking has to be done by an independent body"²⁴⁵, otherwise they "risk being instrumentalised for political reasons"²⁴⁶ and accused "of working for someone rather than working to inform the public"²⁴⁷. That is why financial support is considered risky because it could put into question the impartiality of their work²⁴⁸.

However, according to the organisations themselves, this does not mean that collaboration is completely impossible, but that it should be carried out as transparently and cautiously as possible and should not necessarily include financial support but other types of cooperation. Among the organisations consulted, only Maldita.es has a collaboration already in place. As mentioned above, through the "Public Policy and Institutional Development" Unit, Maldita.es is engaged directly with authorities to **educate policymakers about disinformation using its fact-checking experience**²⁴⁹. It also proposes specific policies that could be useful against disinformation, highlights those considered

²⁴³ CORRECTIV, CORRECTIV.Faktenforum, available at: https://correctiv.org/projekte/faktenforum/, viewed 21 April 2022.

²⁴⁰ Karađuz, A., Cvjetićanin ,T., Ćosić ,M., Džebo, S., Krupalija, R., Salkanović, M. and Šehović, N., (Zašto ne), Research on disinformation and conspiracy theories in BiH, available at: https://zastone.ba/en/research-on-disinformation-and-conspiracy-theories-in-bih/, viewed 11 April 2022, pag. 102.

²⁴¹ Zašto ne Interview, 13 April 2022.

²⁴² Ibid.

²⁴⁴ CORRECTIV Interview, 19 April 2022.

²⁴⁵ Maldita.es Interview, 18 February 2002.

²⁴⁶ Zašto ne Interview, 13 April 2022.

²⁴⁷ CORRECTIV Interview, 19 April 2022.

²⁴⁸ CRTA Interview, 19 April 2022.

²⁴⁹ Maldita.es Interview, 18 February 2002.

ineffective and shows the reasoning and evidence that corroborate these suggestions²⁵⁰. This is done through several concrete activities: one-to-one meetings with policymakers and institutions on disinformation issues, including legislation and self-regulation; seminars and other training opportunities on disinformation for policymakers, public servants, institutions, third-sector organisations; participation in task forces, expert groups and other collaborative or advising initiatives; production of public position papers on disinformation policy issues; participation in public debates and events to further public awareness of disinformation and evidence-based discussions on public policies to address the phenomenon²⁵¹. This is certainly a project that could be replicated in other countries.

Fruitful collaboration could also be put into practice through other channels. Fact-checking organisations affirmed that **fast communication and easier access to data** are considered important tools to support their work²⁵². Some of them denounced the authorities' silence in response to their attempts to communicate, even in critical periods such as the recent health crisis²⁵³. Better communication and shared knowledge of data and methodologies are seen as tools with an interesting potential to tackle online disinformation more efficiently²⁵⁴. The priority for LRAs should be to be more transparent themselves by replying promptly to information requests; this is essential because "secrecy, especially when it comes from official sources, creates opportunities for disinformation since there is always someone ready to fill that vacuum"²⁵⁵.

Finally, **education and media and information literacy** have been indicated as important areas in which LRAs and fact-checking organisations can cooperate. All the consulted organisations already promote media literacy training programmes to help citizens be aware of the dangers of disinformation and are open to cooperating with authorities on this²⁵⁶. Raskrinkavanje clearly states on its website that "since strengthening media literacy is one of our goals, we are also open to cooperation with all institutions and/or decision-makers working on media freedom and media literacy policies in BiH"²⁵⁷. Maldita.es adds that "the most important action governments can take against disinformation is to support

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²⁵⁰ Ibid.

²⁵¹ Ibid.

²⁵² Ibid.

²⁵³ Zašto ne Interview, 13 April 2022 and CRTA Interview, 19 April 2022.

²⁵⁴ Ibid.

²⁵⁵ Maldita.es, Regulating disinformation: risks and opportunities – Documento de Posicionamento, available at: https://maldita.es/politicas-publicas-desarrollo-institucional/, viewed 19 April 2022.

²⁵⁶ Maldita.es, What is Maldita.es, available at: https://maldita.es/maldita-es-journalism-to-not-be-fooled/, viewed 19 April 2022. And also: CORRECTIV Interview, 19 April 2022; CRTA Interview, 19 April 2022; Zašto ne Interview, 13 April 2022.

²⁵⁷ Raskrinkavanje, O Raskrinkavanju, available at: https://raskrinkavanje.ba/o-raskrinkavanju, viewed 20 April 2022.

a more educated society"²⁵⁸ and that they should do it together with fact-checking organisations that are uniquely suited for this kind of programme, given their daily and concrete action against disinformation²⁵⁹. The organisations stressed the importance of not limiting these initiatives to schools and universities but finding ways to include society as a whole, since older people are often the most vulnerable group when it comes to disinformation²⁶⁰ and since there is a clear generation gap in the ability to assess the credibility of information²⁶¹. Moreover, in this area, i.e. capacity building in media literacy, transparent financial assistance could potentially be accepted by fact-checking organisations²⁶².

Zašto ne devotes an entire Chapter to recommendations in the area of education and information literacy in its recent Study "Research on disinformation and conspiracy theories in BiH"263 and it affirms that policies should be developed and solutions implemented and promoted at an institutional level, primarily within the education system²⁶⁴. Through a synergistic approach, policymakers should collaborate with experts from various fields to create education curricula, tools, and public awareness campaigns; this will equip people with the skills needed to assess the credibility of information sources in a timely and efficient manner²⁶⁵. Moreover, when it comes to crises such as the COVID-19 pandemic, more targeted and faster information campaigns should be launched to overcome potential blind spots in society's comprehension of new and critical situations, which have been identified as fertile ground for the propagation of disinformation²⁶⁶. In this kind of situation, an early warning system must be built, where experts and practitioners from various sectors can use a functional mechanism to raise awareness and draw decision-makers' attention to signals of growing disinformation trends²⁶⁷.

In view of the above, cross-sector cooperation, led by LRAs but open to factchecking organisations, could be a crucial requirement in making the battle against misinformation successful.

²⁵⁸ Maldita.es, Regulating disinformation: risks and opportunities – Documento de Posicionamento, available at: https://maldita.es/politicas-publicas-desarrollo-institucional/, viewed 19 April 2022

²⁵⁹ Maldita.es Interview, 18 February 2002.

²⁶¹ Karađuz, A., Cvjetićanin ,T., Ćosić ,M., Džebo, S., Krupalija, R., Salkanović, M. and Šehović, N., (Zašto ne), Research on disinformation and conspiracy theories in BiH, available at: https://zastone.ba/en/research-ondisinformation-and-conspiracy-theories-in-bih/, viewed 11 April 2022, pag. 107.

²⁶² CORRECTIV Interview, 19 April 2022.

²⁶³ Karaduz, A., Cvjetićanin, T., Ćosić, M., Džebo, S., Krupalija, R., Salkanović, M. and Šehović, N., (Zašto ne), Research on disinformation and conspiracy theories in BiH, available at: https://zastone.ba/en/research-ondisinformation-and-conspiracy-theories-in-bih/, viewed 11 April 2022.

²⁶⁴ Ibid., pag. 102.

²⁶⁵ Ibid., pag. 106.

²⁶⁶ Ibid., pag. 108.

²⁶⁷ Ibid., pag. 109.

5.3 CASE STUDY III: Collaborative local journalism, Denmark

(Re)-establishing trust between LRAs and their constituencies is an important step towards fighting disinformation. Indeed, as shown by multiple studies and reports, the two are closely interconnected; on the one hand, exposure to the so-called fake news affects trust both in the media and politicians²⁶⁸. At the same time, a decrease in trust results in "seeking the comfort of (…) peers" and increased vulnerability towards "accepting alternative narratives of reality, often linked to conspiracy theories"²⁶⁹.

Trust is an important part of a constructive journalism model created by a Danish journalist Gerd Maria May, STEP (Solutions, Trust, Engagement, Perspective) ²⁷⁰. The main idea behind STEP is that journalists should not be "out of touch" with their audiences and that free and independent journalism is indispensable for the functioning of healthy democracies. Under the STEP model, journalists – without abandoning their role of a watchdog – go beyond the traditional model of journalism by virtue of not only researching problems, but also supporting solutions²⁷¹.

The "solutions" part of the model is closely connected to another project developed in 2019 by Ms May, a Room of Solutions (or "Løsningernes Rum" in Danish)²⁷² is a method of debating which contributes to building trust between different local actors by virtue of engaging them in debates geared at finding actionable and broadly acceptable solutions to local problems.

The Room of Solutions method stresses the need to "involve everyone in the room in finding possible solutions to the problem that is on the agenda". Thanks to the engagement of a trained moderator, "pointing fingers" and "blame game" are avoided during the debate, and all participants are given an opportunity to make suggestions, raise doubts or comment on proposals made by others. This approach allows the Room of Solutions to help to establish democratic self-confidence and sense of control among the people involved. Moreover, the solutions that are

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²⁶⁸ See, e.g. Ognyanova et al., 2020, Misinformation in action: Fake news exposure is linked to lower trust in media, higher trust in government when your side is in power, Harvard Kennedy School Misinformation Review, available at: https://misinforeview.hks.harvard.edu/article/misinformation-in-action-fake-news-exposure-is-linked-to-lower-trust-in-media-higher-trust-in-government-when-your-side-is-in-power.
²⁶⁹ See, e.g. Flore M et al, JRC Reports, 2019, Understanding Citizens' Vulnerabilities to Disinformation and

²⁶⁹ See, e.g. Flore M et al, JRC Reports, 2019, Understanding Citizens' Vulnerabilities to Disinformation and Data-Driven Propaganda, available at:

https://publications.jrc.ec.europa.eu/repository/bitstream/JRC116009/understanding citizens vulnerabilities to disinformation.pdf.

Room of Solutions, The journalistic values STEP, available at: https://roomofsolutions.com/om-fint.

²⁷¹ See https://www.youtube.com/watch?v=iUNeFHYlrlg&list=TLGGTRGdAYH8kigzMDA1MjAyMg.

²⁷² Room of Solutions, Would you like to have a debate moderated in the room of solutions?, available at: https://roomofsolutions.com/om-lsningernes-rum.

developed during a participatory debate are designed with a long-term perspective in mind, which is another way of countering disinformation. These long-term solutions should be preferred over quick fixes for disinformation (such as filtering or removing content), which sometimes run the risk of turning into inefficient actions and verging on censorship.

5.3.1 Description of the initiative

Under the Room of Solutions model, local stakeholders interested in solving a given problem meet to discuss potential solutions. Typically, the meetings take place in person, but during the COVID-19 pandemic online debates were organised as well. All debates are facilitated by a moderator trained in conflict management, and a panel of experts is invited to provide inputs and help ensure that suggested solutions are truly actionable.

Work in the Room of Solutions begins before the discussion takes place, with the selection of topics for debate. This is done through local media outlets with the help of local journalists, who can also participate in the research preceding the debate in order to gather all necessary information about the issue at hand and exploration of potential solutions that could be put up for the debate. In the case of schools, the students are involved in the selection process.

The key element of the Room of Solutions is the voting system. Each person entering the Room of Solutions is given a green and a red card that they are asked by the moderator to raise up in reaction to any given proposal made during the debate (the former is used to express approval, the latter disapproval).

The debates are designed to last approximately one hour and are kept short in order to attract more participants and maintain their attention and active involvement throughout the meeting.

Examples of debates conducted thus far in the Room of Solutions include:

- i) A discussion around a lack of communal space where young people can spend their free time. The solution was found when the mayor of the city offered rooms and a budget for their renovation under the condition that young people volunteer to carry out the necessary renovation works themselves (for which the majority voted yes)²⁷³.
- ii) A discussion around the need for free mental health services available to high school students during the COVID-19 pandemic. Over the course of

²⁷³ Gerd Maria May, Danish journalist interview, 11 April 2022.

the debate, it became apparent that free psychological help was in fact available but due to lack of information it was not being used²⁷⁴.

Since the Room of Solutions initiative is fairly new and its implementation was interrupted by the COVID-19 pandemic, it is still in the relatively early stages of development. While no formal monitoring mechanisms are in place, the founder of the project estimates that approximately 2 000 high school students and 2 000 adults have participated in debates organised in Rooms of Solutions since March 2019. Moreover, as stressed by Ms May²⁷⁵, the measure of success is that those who once participated in a debate tend to come back and that a growing number of local authorities' and media representative express interest in organising similar debates in their locations as well.

5.3.2 Analysis

Even though it might be too early to confidently assess the level of success of the Rooms of Solution model, judging by the information available it appears that the initiative has the potential to effectively contribute to solving local problems and strengthening local participatory democracies. Importantly, it also has the potential to serve as a tool for increasing mutual trust within local communities and as a measure for preventing the spread of disinformation.

Based on the lessons learnt from the debates that took places thus far, the keys to organising a successful Room of Solution debate are threefold. First, the topic that is to be debated has to be carefully selected so that the problem for which the solution will be sought is clearly stated. For instance, general conversation about the future of a school system will most likely not attract as many participants as a meeting dedicated to the problem of a specific local school being closed. Moreover, the selection of a topic of high relevance to the participants of the debate helps to ensure that there is a follow up to the meeting. This is of high importance to LRAs, which have to invest more effort and resources into the participatory decision-making process and debate in the Room of Solutions than into a traditional top-down model.

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 $\frac{https://fyens.dk/artikel/l\%C3\%B8sningernes-rum-p\%C3\%A5-nordfyns-gymnasium-d\%C3\%B8ren-blev-\%C3\%A5bnet-til-frivilligt-arbejde.}{}$

²⁷⁴ Gerd Maria May, Danish journalist interview, 11 April 2022 and Fyens.dk, 2019, Løsningernes Rum på Nordfyns Gymnasium: Døren blev åbnet til frivilligt arbejde, available at:

²⁷⁵ Gerd Maria May, Danish journalist interview, 11 April 2022. See also: The Lenfest Institute, 2018, How a local Danish publisher is empowering high school journalists, available at: https://www.lenfestinstitute.org/solution-set/how-a-local-danish-publisher-is-empowering-high-school-journalists/.

Secondly, skilled moderation is needed to ensure efficient discussion where everyone is given a voice, interventions are kept short and to the point. This is especially important in highly polarised communities. Moreover, attention should be paid to explaining why various potential "quick fixes" that disinformation tends to feed on, such as filtering or removing content, are not in fact appropriate solutions in the long term.

Finally, political will is needed on the side of LRAs; good relationship and preexisting trust between LRAs and organisers of the Room of Solutions were a big advantage, as stated by Ms May²⁷⁶.

The latter might be a challenge while trying to replicate the solution in other countries. Different approaches towards and traditions of self-governance and local democracies in various countries may mean lack of interest among LRA representatives. Moreover, the more centralised the governance system and the fewer competences the LRAs have, the less capacity to offer and implement solutions they possess. Therefore, selecting an issue to be discussed that can be realistically tackled by LRAs should help to avoid the situation where local authorities perceive the debate as spurious or even revealing their limited powers.

Equally importantly, participation in the Room of Solutions necessitates a certain degree of openness and willingness on the part of the LRAs to include their constituencies in the decision-making process. In other words, what is required is increased transparency. An expected major benefit of the latter – as shown by various studies²⁷⁷ – is, in turn, its impact on combating misinformation and disinformation.

For instance, in September 2019 a meeting was organised in the Danish municipality of Middelfart, during which the city's budget policies were explained to citizens. The citizens learnt about the way that the funds between different financial envelopes are allocated and how money cannot be easily transferred between different budgeting lines. One of the expected results of the meeting was making the citizens less susceptible to disinformation regarding money being spent, e.g. on helping refugees rather than childcare or education²⁷⁸.

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²⁷⁶ Gerd Maria May, Danish journalist interview, 11 April 2022.

²⁷⁷ See, e.g. OECD, 2020, Transparency, communication and trust: The role of public communication in responding to the wave of disinformation about the new Coronavirus, available at: https://www.oecd.org/coronavirus/policy-responses/transparency-communication-and-trust-the-role-of-public-communication-in-responding-to-the-wave-of-disinformation-about-the-new-coronavirus-bef7ad6e/">https://www.oecd.org/coronavirus/policy-responses/transparency-communication-and-trust-the-role-of-public-communication-in-responding-to-the-wave-of-disinformation-about-the-new-coronavirus-bef7ad6e/. See also, European Commission, 2021, Guidance to strengthen the Code of Practice on Disinformation – Questions and Answers, available at: https://ec.europa.eu/commission/presscorner/detail/pl/QANDA_21_2586 and The Arthur W. Page center, 2019, Preparation, transparency among keys to fighting fake news crises, available at: https://ec.europa.eu/commission/presscorner/detail/pl/QANDA_21_2586 and The Arthur W. Page center, 2019, Preparation, transparency-among-keys-to-fighting-fake-news-crises-page-center.

²⁷⁸ Gerd Maria May, Danish journalist interview, 11 April 2022 and Fyens.dk, 2019, Forstå kommunens milliardbudget: Kom til læsermøde og bliv klædt på inden budgetforhandlinger, available at:

On the side of citizens, a lack of local governance traditions may translate into lack of belief that they have anything to say in local policy-making. Nevertheless, the Room of Solutions can potentially be replicated and used in other countries as well. For instance, Ms May has already received inquiries about the possibility of organising debates in Germany and Sweden²⁷⁹. Thanks to the simplicity of the model, the costs of logistics are relatively low and debates can be organised in every kind of surroundings.

Thus far, the initiative has not been connected to any EU-level frameworks and instruments and, as already mentioned, only implemented in Denmark. It is possible that in larger contexts, such as large cities or regions, the need to have small numbers in meetings might lead to a lack of representativeness, making it difficult for the solutions to be later accepted by everyone.

 $[\]underline{https://fyens.dk/artikel/forst\%C3\%A5-kommunens-milliardbudget-kom-til-l\%C3\%A6serm\%C3\%B8de-og-bliv-liversetting to the action of the property of the proper$ kl%C3%A6dt-p%C3%A5-inden-budgetforhandlinger.

279 Gerd Maria May, Danish journalist interview, 11 April 2022.

6. Future trends

Policy makers and public institutions do not only have to find solutions to counter disinformation in the short term, they also have to prepare for the future to accommodate the long-term evolution of disinformation and the contexts in which it is operating. However, this is not an easy task, for both societies and technologies evolve in complex and unpredictable ways, acting as forces that shape each other. Disinformation is closely linked to communication technologies and particularly the internet. As such, policy instruments targeting disinformation will have to operate in a fast-paced environment with impacts becoming exponentially greater on society. This chapter presents an overview of the main trends which will interact with the disinformation landscape, before discussing how some of these trends provide the means to address the problem.

Without effective action to counter current trends, disinformation could have serious implications for the proper functioning of our democracies. If one considers different types of drivers which exacerbate the issue of disinformation, a logical conclusion is that the problem is very likely to grow²⁸⁰. The current attempts to quantify the magnitude of disinformation already clearly demonstrate a worrying trend. For instance, The University of Oxford (Oxford Internet Institute²⁸¹) has monitored organised disinformation campaigns around the world since 2016. Its reports provide insights on the use of disinformation and propaganda by state actors with the help of private firms: recent findings show that an increasing number of state actors are using disinformation, reaching 81 countries in 2020²⁸².

Furthermore, some of these factors not only aggravate the problem but are also aggravated by it, leading to a vicious circle which is extremely difficult to break. On the one hand, wider societal trends such as increases in inequality and polarisation, alongside the decline of professional journalism and growing lack of trust in democratic institutions and traditional media, will open even greater space for online disinformation to flourish. In return, wider production and consumption of online disinformation will lead to larger impacts, undermining social cohesion and leading to what some call a 'crisis of truth' in society²⁸³.

²⁸⁰ Interaction, Global Societal Trends Exacerbating Disinformation, available at: https://www.interaction.org/disinformation-toolkit-2-0/part-1/global-societal-trends-exacerbating-disinformation/.

²⁸¹ Oxford Internet Institute webpage, available at: https://www.oii.ox.ac.uk/.

²⁸² For instance, see the annual report from the Oxford Internet Institute-Computational Propaganda Research Project, available here: https://www.oii.ox.ac.uk/news-events/news/social-media-manipulation-by-political-actors-now-an-industrial-scale-problem-prevalent-in-over-80-countries-annual-oxford-report/.

²⁸³ Vesnic-Alujevic L., 2021, Imagining democratic societies of the future: Insights from a foresight study. Futures & Foresight Science. 2021;3:e60.

Another socio/economic phenomenon evolving separately from the above, is the monetisation of the content on the internet, including disinformation. This issue has come to attention relatively recently, but the findings from studies are already alarming. For instance, the Global Disinformation Index estimates that websites known to spread disinformation in Europe receive around \$76 million annually from advertising revenues, with major brands inadvertently funding these sites²⁸⁴. Even more worrying is the increase in the number of businesses (e.g., communications and public relation firms or other private entities) that offer 'disinformation for hire' services to government and non-government actors²⁸⁵. These private entities provide a range of services spreading disinformation for financial gain²⁸⁶. Such contracts between state actors and private firms are difficult to trace²⁸⁷, therefore there is lack of accountability for those who use these services²⁸⁸. Reports focusing on the issue clearly state that the number of these private firms are on the rise²⁸⁹. These developments will continue to increase the amount of disinformation online, expanding it beyond the realm of ideological or purely disruptive motivations.

Trends in technological developments are likely to contribute to this negative outlook. The most important among these is hyperconnectivity which manifests itself in the exponential use of the internet in all aspects of everyday life²⁹⁰. This has a direct impact on how news and information are identified and consumed. It is already clear that there has been a shift from traditional press/media to social platforms and the internet as information sources in the EU²⁹¹. Outside the EU, messaging applications, for example WhatsApp, have become the main source for news in many countries such as Brazil and South Africa²⁹².

²⁸⁴ Disinformation Index, 2020. Why is ad tech giving millions to EU disinformation sites?, Global Disinformation Index, available at https://disinformationindex.org/2020/03/why-is-ad-tech-giving-millions-to-eu-disinformation-sites, viewed March 2022.

Ann Lewandowski, A., 2021, Disinformation-For-Hire: The Pollution of News Ecosystems And Erosion Of Public Trust, Center for International Media Assistance, available at: https://www.cima.ned.org/blog/disinformation-for-hire-the-pollution-of-news-ecosystems-and-erosion-of-public-trust/, viewed February 2022.

²⁸⁶ Fisher, M., 2021, Disinformation for Hire, a Shadow Industry, Is Quietly Booming, The New York Times, July 2021, available at: https://www.nytimes.com/2021/07/25/world/europe/disinformation-social-media.html, viewed https://www.nytimes.com/aparts/europe/disinformation-social-media.html, viewed https://www.nytimes.com/aparts/europe/disinformation-social-media.html, viewed https://www.nytimes.com/aparts/europe/disinformation-social-media.html, viewed https://www.nytimes.com/aparts/europe/disinformation-social-media.html, viewed https://www.nytimes.com/aparts/europe/disinformation-social-media.html</

²⁸⁷ Bradshaw S. et al, 2021, Industrialized Disinformation 2020 Global Inventory of Organized Social Media Manipulation, Computational Propaganda Research Project, University of Oxford.

²⁸⁸ Fisher, M., 2021, Disinformation for Hire, a Shadow Industry, Is Quietly Booming, The New York Times, July 2021, available at: https://www.nytimes.com/2021/07/25/world/europe/disinformation-social-media.html, viewed February 2022.

²⁸⁹ Bradshaw S. et al, 2021, Industrialized Disinformation 2020 Global Inventory of Organized Social Media Manipulation, Computational Propaganda Research Project, University of Oxford.

²⁹⁰ European Commission, 2021, 2021 Strategic Foresight Report: The EU's capacity and freedom to act, COM/2021/750 final.

²⁹¹ Trends identified by Eurobarometer Surveys confirm this. See for instance the latest report, available at: https://data.europa.eu/doi/10.2775/224727.

Nic Newman, 2019, Digital News Report- Key Findings, available at: https://www.digitalnewsreport.org/survey/2019/overview-key-findings-2019/.

Another important trend related to technology has to do with the ways in which online disinformation is created, shared and amplified. It is expected that technological tools such as AI-powered bots, algorithms to curate content to personal users and other means for creating content or manipulating existing material will become more refined and more easily accessible²⁹³. These technologies will be able to create and disseminate all forms of disinformation at unprecedented speed²⁹⁴. For instance, advances in AI-based Natural Language Processing (NLP) are increasingly blurring the line between synthetic and humanwritten text²⁹⁵. With the help of AI-powered social media bots, the fake content can be shared automatically and massively²⁹⁶, making it considerably more visible. Another important example is the use of deep fakes, where an image or video of a real person or situation is given false words and meaning. Although its use remains very limited at the moment, it is expected that the technology will become accessible to a growing number of people thus becoming a bigger threat²⁹⁷. In the longer term, the advances in quantum computing are expected to be another game changer, for instance by making 'hacking' into encrypted systems of websites much easier, manipulating content at its original source²⁹⁸. A report from the Council of Europe on hybrid threats warns that collectively, all these developments can lead to an 'exhaustion of critical thinking' as users will have to make an increasing amount of effort to distinguish real content from the fake²⁹⁹.

However, some of these factors can also be used to address the issue, rather than aggravate it. For instance, some argued that emerging methods for citizen participation such as direct democracy and deliberative assemblies will be able to foster more trust in democratic processes³⁰⁰. These new approaches have the potential to create a more inclusive environment for different groups in society, who are usually less involved in shaping the policy. By creating renewed engagement and more open communication between public institutions and citizens, they will help address the root causes of disinformation.

²⁹³ Linda Sanchez, 2021, Special Report for NATO Parliamentary Assembly, Committee on Democracy And Security, Bolstering The Democratic Resilience Of The Alliance Against Disinformation And Propaganda.

²⁹⁴ Sedova K., et al, 2021, Report for Centre for Security and Emerging Technology, AI and the Future of Disinformation Campaigns.

²⁹⁵ Slapakova, L., 2021, Towards an AI-Based Counter-Disinformation Framework, The Rand Corporation Blog, available at: https://www.rand.org/blog/2021/03/towards-an-ai-based-counter-disinformation-framework.html, viewed March 2022.

²⁹⁶ Sedova, K., et al, 2021, Report for Centre for Security and Emerging Technology, AI and the Future of Disinformation Campaigns.

²⁹⁷ Garcia-Camargo, I., and Bradshaw, S., 2021, Hybrid CoE Working Paper: Disinformation 2.0: Trends for 2021 and beyond.

²⁹⁸ Li, E., 2019, The Future of Disinformation, Harvard International Review,, available at: https://hir.harvard.edu/futureofdisinformation/, viewed February 2022.

²⁹⁹ Garcia-Camargo, I., and Bradshaw, S., 2021, Hybrid CoE Working Paper: Disinformation 2.0: Trends for 2021 and beyond.

³⁰⁰ Vesnic-Alujevic L. Imagining democratic societies of the future: Insights from a foresight study. *Futures & Foresight Science*. 2021;3:e60.

In the same vein, instruments put in place today to address disinformation have the potential to contribute positively in the long-term. These include initiatives targeting today's students and pupils and wider media literacy campaigns. If implemented effectively and in a timely manner, these longer-term solutions will significantly contribute to build societal resilience in the future.

Furthermore, technology can also be helpful to fight disinformation. AI-based systems can be used to monitor and detect potential campaigns. One example taken from the above-mentioned systems, is an EU-funded project named "GoodNews" which uses deep learning to identify fake content by looking at the patterns through which it is spread across networks³⁰¹. Algorithms used in search engines can be trained to identify accurate and reliable information³⁰². Moreover, other technologies used in certification of authentic content can be used to check and verify information³⁰³.

In order to tackle these emerging challenges and to utilise the opportunities, policy interventions will need to be dynamic and open to change. What we know so far about online disinformation and how it is evolving presents a complex picture with many variables from social and economic context to global geopolitics and individual attitudes. Thus, systemic approaches which take into account the future trends which build resilience to disinformation are needed.

³⁰¹ See the project information here: https://cordis.europa.eu/project/id/812672.

³⁰² European Parliament, 2021, The impact of disinformation on democratic processes and human rights in the world.

³⁰³ Harrison, K., and Leopold, A., 2021 How Blockchain Can Help Combat Disinformation, Harvard Business Review, available at: https://hbr.org/2021/07/how-blockchain-can-help-combat-disinformation, viewed March 2022...

7. Recommendations

The research carried out for this study has identified a range of best practices, success factors and lessons learnt. These indicate key areas where LRAs can work to address disinformation. The following recommendations aim to provide some guidance to LRAs on how to go about countering disinformation, based on practices that have shown to be successful. It should be noted that LRAs are very diverse. Not all recommendations will be relevant for all LRAs, because of differences in size, economic and social context, competencies and other factors.



LRAs must be given sufficient resources to build their capacity to counter online disinformation threats.

LRAs are well aware of disinformation being a problem at local level, but they often lack

knowledge and resources to tackle it. Therefore, resources are needed for **training** to develop internal competence on the functioning of disinformation and on the potential scope of technical remedies; to ensure human resources for staying abreast of potential threats particularly during election periods; and to establish robust protocols for dealing with disinformation. A wide range of quality resources exists in the public domain that can be adapted to the specific circumstances of a given LRA, and these should be exploited where possible (see Case Study I). Support is required from national and EU levels in the form of direct funding, programmes and initiatives aiding LRAs in their work on disinformation.

Create clearer links with the national level

National-level authorities should **support** LRAs by putting in place a **contact point** that **provides** LRAs with **regular updates** on the latest disinformation trends and narratives.

This contact point could also act as a **link to social media companies** when LRAs have detected a disinformation campaign that they wish the company to act against. Given their size, LRAs are unlikely to be able to devote large resources to monitoring of media and social media or to be able to maintain a contact point with different social networks.



LRAs should also **communicate horizontally** with each other in the event of a threat being detected.

This should be organised, first, among LRAs within Member States. Indeed, a network approach will be valuable for LRAs, many of which have a relatively

small governmental structure. Through a network, the lack of capacity and expertise could be addressed by **ad-hoc collaboration** with staff from other teams. Furthermore, given the international threat of foreign interference, coordination should **also occur across borders**. A **European working group or network could be established** for LRAs to **share experiences** of disinformation threats. This would allow **connections** to be drawn between local incidents in different EU Member States that would otherwise remain isolated. **EU funding** would be valuable to catalyse such a network.



LRAs should work with civil society stakeholders, such as journalists and fact-checkers, to **put in place a synergistic approach to fight online disinformation.**

These stakeholders deal everyday with disinformation and misinformation, which makes

them very knowledgeable and attentive to these issues; they could therefore be an excellent resource for LRAs in their actions and policies against online disinformation, thanks to their understanding of recent trends and narratives. For instance, they can **share their findings** on important topics, such as what makes a claim go viral and what are the most challenging claims to debunk in a specific geographical area. The main area in which this collaboration should be put in place is the **strengthening of digital education** and **media literacy**, to enable citizens to be more aware of and reactive to online disinformation. The initiatives should address not only the young population but society as a whole. Moreover, LRAs should improve their communication and provide easier access to data to these stakeholders, in order to cooperate in the shared fight against online disinformation. Fast and clear communication is essential to avoid leaving a vacuum that could be filled with more disinformation. Finally, LRAs should – when possible – provide **financial support to journalists**, to protect media pluralism, and to fact-checking organisations, to fund media literacy initiatives; this must be done as transparently as possible, to not put into question the **impartiality** and independence of these stakeholders.



LRAs should use their **proximity with citizens** to **foster media literacy**.

Studies show that they tend to **inspire more trust** than national authorities as they are the closest **to grassroots concerns**. They are crucial actors, and

they are often responsible for formal education. As young people are vulnerable to disinformation, LRAs should include **media literacy training** in the education curriculum starting in primary school. Moreover, they could actively support this training by producing materials, such as a set of **digital education and media literacy classroom activity sheets** that can be downloaded and printed by teachers, in order to adapt the educational activities to the local reality.

Media literacy initiatives should also reach a wider audience, including senior citizens. Media literacy has an immense importance in **improving critical thinking** and **providing citizens with the necessary skills** to **analyse and evaluate online news**. LRAs should also use their powers to provide incentives to secure the incorporation of a qualitative media education in the training of teachers. In addition, they should **support media literacy projects** and **partnerships between local media, cultural actors and educational institutions**.



LRAs should build strategies for increasing trust with citizens and reinforcing democratic values.

Disinformation around the COVID-19 pandemic and the Russian invasion of Ukraine have further highlighted the **need for effective communication**

that does not leave space for disinformation. Due to their unique position, LRAs should foster trust and promote credibility and integrity of official information. The fight against disinformation must be waged in transparency, with accurate, evidence-based and timely information. Strategic public communication is recognised as one of the most effective ways to create a trusted positive narrative helping to reduce the impact of disinformation. LRAs should also use tools that enable citizens to access information and to participate in the exercise of power as they are considered as relevant examples of government openness and accountability.



LRAs should follow open government principles including **transparency**, **accountability** and **public participation**.

By allowing public scrutiny, LRAs can build **public trust**. This can be done by communicating clearly

and regularly about government actions and making information and data easy to find and to use. Policies for facilitating public participation should also be developed; they should **take advantage of the inherent proximity between LRAs and citizens**. Promoting **inclusive governance** can increase a sense of community and belonging by **asking citizens for their opinion** more frequently than only during election times. Organising participative public meetings should also raise citizens awareness on selected issues that could be tackled at the local level by LRAs. Additionally, by giving citizens the **opportunity to directly communicate** with local representatives, the space for disinformation narratives is reduced. **Fostering greater trust** can be a major counterweight to attempts to cause societal fragmentation through disinformation.



LRAs and national government should support local journalism as a **cornerstone** for a **sustainable democracy** and for **greater accountability** of local and regional authorities.

The rise of online news and the change of consumer habits reducing advertising revenues has led to a decline of local media. Given that a **significant part of disinformation spread online is of a local nature**, supporting high quality journalism promotes diversity of information and a pluralist media landscape. Local media is **particularly important for debunking disinformation** and contextualising national messages at the local level. Support should ensure that **adequate resources are available for local media** to operate. This may need to be **supported by national level initiatives to protect independent local media**. LRAs could organise **'back-to-school' initiatives** that will enable journalists to discuss their work, the role of the media and the risks linked to disinformation. They could also organise **awareness campaigns** with the help of local newspapers and local media. These activities can also further reinforce recommendation number 5.

8.Annexes

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8.2 List of experts/institutions interviewed for the study

EU institutions and agencies

- Lauri Tierala, Programme Director of the European Digital Media Observatory (EDMO) (08 March 2022)
- EU Officials (30 March 2022)
- Ildze Asenova, European Parliament, Policy adviser to INGE1 Rapporteur (28 April 2022)
- EU official (22 February 2022)
- Ľuboš Kukliš, Chief Executive of Slovak Media Auhtority, Chair of EPRA, Chair of Subgroup on Disinformation at ERGA (14 February 2022)
- EU Official (02 March 2022)

Local and national government representatives

- Local government representative, Denmark (21 April 2022)
- Former Strategic Communication Adviser at the Government Office of Estonia (25 April 2022)

Fact-checking organisations and journalists

- Center for Research, Transparency and Accountability (CRTA) (Serbia) (19 April 2022)
- Uschi Jonas, journalist at the fact-checking team of CORRECTIV (Germany) (19 April 2022)
- Gerd Maria May, Danish journalist (11 April 2022)
- Carlos Hernández-Echevarría, Head of Public Policy and Institutional Development at Spanish non-profit fact-checker Maldita.es (Spain) (18 February 2022)
- Tijana Cvjetićanin, founder of Istinomjer and Raskrinkavanje (Zašto ne) (Bosnia and Herzegovina) (13 April 2022)

Academia

- Elda Brogi, Scientific Coordinator of the Centre for Media Pluralism and Media freedom, European University Institute (05 April 2022)
- Lucas Graves, Associate Professor, University of Wisconsin–Madison (08 March 2022)



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Created in 1994, the European Committee of the Regions is the EU's political assembly of 329 regional and local representatives such as regional presidents or city-mayors from all 27 Member States, representing over 446 million Europeans.