



IMS (International Media Support)

Submission to the UN Special Rapporteur on the promotion and protection of freedom of opinion and expression:

Report on disinformation

15 February 2021

Introduction

1. IMS (International Media Support) welcomes the opportunity to make a submission to the report of the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression. We find that the forthcoming report on the issue of disinformation and freedom of opinion and expression is particularly timely as the varying and insufficiently coordinated responses to disinformation call for a universal approach and guidelines.
2. We acknowledge the efforts of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, including her special focus on disinformation and restrictions on media freedom.
3. IMS is a global non-profit organisation working to promote public interest journalism to strengthen democracy, ensure development and reduce conflict. Our submission draws on our multi-year experience of media development assistance in over 30 countries across the four continents, and particularly on our work with more than 100 media partners across the globe on managing disinformation.
4. In this submission, IMS seeks to respond to the questions raised in the call for inputs. Our submission includes an introduction, executive summary, methodology, recommendations and provides IMS views on the following points raised in the consultation:

Key global challenges posed by disinformation (§ 19 - 26)

Global discourse on measures to address disinformation (§ 27 - 37)

Measures to address disinformation as suggested by IMS and media partners (§ 38 - 48)

The role of governments in addressing disinformation (§ 49 - 60)

Governmental action, disinformation and COVID-19 pandemic (§ 61 - 71)

The impact of gendered and sexualised disinformation (§ 72 - 78)

The role of global tech companies (§ 79 - 81)

Key recommendations to the Special Rapporteur (§ 82 - 99)

Executive summary

5. The scale, volume and distribution speed of disinformation raise concerns for governments, businesses and citizens alike. To respond effectively to this problem, there is a need to disambiguate, understand and clearly delimit the phenomenon by agreeing on a universal definition.
6. The COVID-19 pandemic, elections from the United States to Ugandan and the plight of the Rohingya in Myanmar have further unfolded the unprecedented impact of disinformation on global order, peace and security of nations and everyday life. The challenges have also come with some solutions, as it has been evidenced by, for example, the complete shuttering of Donald Trump—big tech is no longer concealing its power. Social media platforms have the means to act decisively and quickly, depending on their will. These have also raised the issue of transparency and accountability of the platforms and driven home the calls for multi-stakeholder approaches to secure balance between freedom of expression and harms caused by disinformation.
7. Free and independent media has an undeniably important role in pushing back against disinformation by providing access to accurate, robust journalism, based on core editorial ethics and professional standards.
8. Internet access is essential to ensuring that reliable information reaches audiences. In many countries where IMS works, and where broadcast and print media are largely controlled by the governments, the internet is the only place where citizens can get access to reliable information.
9. We identify a holistic policy approach to the challenge of disinformation by exploring a range of governance responses that rest on the open government principles of transparency, integrity, accountability and stakeholder participation. Governance responses, however, are not always clear cut, given countries' parallel obligations to uphold freedom of speech and the press, and to avoid position as arbiters of truth.
10. In many countries where IMS works, disinformation is also spreading offline, where arguably, it is more difficult to differentiate the opinionated pieces of information from facts and “fake news” from quality journalism based on strong editorial ethics. If decision-makers within traditional media allow facts to be presented as polemic and opinions to

penetrate the news as evidenced in Colombia, disinformation is given legitimacy.

11. As disinformation is a universal issue that affects all parts of society, we consequently recommend the agreement of a universal definition, underpinned by multidisciplinary approaches essential to understanding and designing actions and tools to fight disinformation. It is integral that different stakeholders, on different levels, jointly contribute with their expertise and actions with an overall goal of protecting access to truthful information for all. Any regulation governing those activities should be proportionate and fully compliant with the requirements of Article 19 of the International Covenant on Civil and Political Rights. Furthermore, self-regulatory mechanisms developed in this area should operate independently and transparently, welcome meaningful participation from all relevant stakeholders, hold accountability to the public and work fully in accordance with the ethical standards of the multimedia ecosystem.

Methodology

12. This submission is overall based on IMS' global connectedness, including, inter alia, its close work with UNESCO, membership in the Global Network Initiative (GNI) and observer status in the Council of Europe Steering Committee on Media and Information Society (CDMSI).
13. Interviews with IMS staff and media partners across the globe in or with expertise in South and Southeast Asia, Sub-Saharan Africa, Eastern Europe, the Middle East and North Africa and Latin America was the primary source of input.
14. Further, as part of this contribution, these interviews were coupled with an extensive desk review of recent academic research. Forthcoming IMS research "*Covid-19 and the media: A pandemic of the paradoxes*" served as a leading source as well as IMS and Fojo Media Institute's study "*The ethnification of Ethiopian media*". The IMS Global Response Department's internal disinformation strategy drawn up in the spring of 2019 also served as a guide in drafting our recommendations.
15. In responding to the questions posed by the consultation, IMS followed the commonly understood, but not universally agreed definition of disinformation, presented in paragraph 2 of the announcement of the consultation: "Although there is no agreed universal definition of disinformation, it is commonly understood to be false information that is created and spread, deliberately or otherwise, to harm people, institutions and interests."
16. Whilst the focus of this submission is on disinformation, academic discourse on the subject has been built around the similar and overlapping concept of "fake news". "Fake news" has been coined as information originating from either social media or mainstream platforms that is not factual but presented as such and not satirical.¹ While IMS and other media development organisations are making a conscious effort to steer clear from this term as it

¹ Paskin, D. (2018) Real or fake news: who knows? *J. Soc. Media Soc.* 7(2), 252–273.

serves to undermine good journalism, it is used interchangeably in this submission because of its reference in the academic literature that has shaped our findings.

17. Having recognised the insufficient attention and response to the gender-specific and often sexualised disinformation targeted at women, its detrimental effect on human rights, freedom of expression of women and democratic institutions, the submission includes a dedicated section on the gendered disinformation (§ 72 - 78) and provides recommendation on the issue in as part of § 95 - 99.

Key global challenges raised by disinformation

18. **Defining disinformation is a key challenge in and of itself.** The lack of a universal definition of disinformation constitutes a challenge for adopting a global approach to combatting the threat it poses to democratic processes worldwide.
19. The different forms of disinformation require unique definitions and accompanying dedicated approaches to combatting their respectively imposed detriments. Coupled with the contextual factors that further play a role in complicating how disinformation is spread, a one-fits-all solution is not on the horizon. Absent more precise definitions, legislation may be adopted in haste with chilling effects on freedom of expression and freedom of the media. Increased regulation can furthermore roll back some of the liberty-enabling gains of the internet age.
20. **Disinformation upsets and impedes international peace and security, environmental policies and economy.** Disinformation campaigns are often part of hybrid warfare,² involving cyber-attacks and hacking of networks. NATO has recognised disinformation as a tool to “deepen divisions within and between Allied nations, and to undermine people’s confidence in elected governments”.³ Disinformation can also have a negative impact on environmental policies and from an economic perspective, disinformation poses concern on both public economic growth and individuals’ benefits.⁴
21. **Disinformation continues to have a negative impact on professional journalism.** Quality journalistic content on the internet finds itself on the same playing field as manipulative propagandist pieces, misinformation and disinformation. A perfect storm of factors has given purveyors of disinformation a dramatic advantage in their efforts to foster fear, promote populism, cultivate conflict and stoke distrust in truth-focused media—the rise of user-generated content coupled with increased mobile connectivity, advertising

² Golovchenko, Y., Hartmann, M., & Adler-Nissen, R. (2018, September). State, media and civil society in the information warfare over Ukraine: citizen curators of digital disinformation. *International Affairs*, 94(5), 975–994. Also echoed by our respondent from Ukraine, Oleg Khomenok, Member of the Board of Global Investigative Journalism Network.

³ NATO. (2020, July 17). *NATO’s approach to countering disinformation: a focus on COVID-19*.

<https://www.nato.int/cps/en/natohq/177273.htm>

⁴ Ibid

technology and the age-old nature of human attraction to sensationalism makes a tough stand for good journalism.

22. **Televised disinformation** constitutes a formidable challenge in quite a few countries where IMS works – from Latin America to Eastern Europe. Televised disinformation is more difficult to expose and fact check, especially when disinformation is presented in the real time. In some cases, televised disinformation would be connected to or inspired by a piece of disinformation originated online.
23. Abdication of editorial responsibility is apparent as opinion has been permitted to penetrate the news. When morning talk shows open the debate floor on whether a rape was provoked by the rousing clothing of the victim, editors and owners of media legitimise misplaced blame by giving a stage to misogyny. Ultimately, it is the responsibility of each outlet to draw red lines in a manner that protects freedom of expression while remaining true to democratic values.
24. **The power of messaging platforms is strong.**⁵ Echoed by our advisors in Sub-Saharan Africa, our advisor in Latin America cited WhatsApp as the most dangerous form of media in the region as it can be infiltrated to intentionally cause harm. ‘Everyone’ is cited to be on the messaging app and likely a part of multiple interest groups with approximately 250 persons in each group. Our advisors estimated that the average WhatsApp networks in their communities easily reach 1,500 persons when messages are forwarded.
25. The semi-private nature of a platform like WhatsApp and the relative belief that fellow group members are exchanging information to help each other make well-informed decisions create a greater likelihood for the average citizen to befall deceit. Our advisors explained that ill-intended political actors are the primary source of the problem on WhatsApp and how they have been trained to infiltrate large group messages to spread disinformation. When government actors are threatened and challenged, proxies tasked with the role to pacify society and explain policy positions of elite groups pose as neighbours to spread rumours and lies—all a part of a strategy to disinform. If a lie is not caught right away, it is taken as true and spreads at full speed.
26. **All facets of life are harmed by disinformation.** In brief, we hold that increased political polarisation, decreased trust in public institutions and undermined democracy⁶ continue to be among the most formidable global challenges posed by disinformation. Linked to these detriments is a negative impact on public health, i.e. disinformation related to vaccination,

⁵ Garimella, K., & Eckles, D. (2020). Images and Misinformation in Political Groups: Evidence from WhatsApp in India. *Harvard Kennedy School Misinformation Review*, 1(5), (revealing that misinformation is highly prevalent on WhatsApp public groups).

⁶ Clayton, K., Blair, S., Busam, J. A., Forstner, S., Glance, J., Green, G., Kawata, A., Kovvuri, A., Martin, J., Morgan, E., Sandhu, M., Sang, R., Scholz-Bright, R., Welch, A. T., Wolff, A. G., Zhou, A., & Nyhan, B. (2020, December). Real Solutions for Fake News? Measuring the Effectiveness of General Warnings and Fact-Check Tags in Reducing Belief in False Stories on Social Media. *Political Behavior*, 42(2); Persily, N. (2017). Can democracy survive the Internet? *Journal of Democracy*, 28(2), 63–76.

cancer, nutrition and smoking.⁷ Public health concerns as a consequence of disinformation have become even more clear during the COVID-19 pandemic.⁸ Other negative impacts of disinformation are linked to public safety⁹ and elections as shown in the 2016 US presidential election.¹⁰ Disinformation further leads to discrimination and boosts identity politics.¹¹ Gendered disinformation undermines women's credibility, negatively impacts their electoral success and disincentivizes women to pursue careers in the spotlight. Gendered disinformation is a threat to democracy by limiting the participation of women, and by increasing the notion of politics and leadership as a male field, in which women do not have a place.

Global discourse on measures to address disinformation

27. This section outlines and problematises what IMS sees as the most valuable and relevant key measures in the global discourse on how to address disinformation.
28. The challenge of disinformation reinforces the importance of professional public interest journalism in safeguarding fundamental rights and democratic standards.
29. To acknowledge at the outset, IMS fully supports UNESCO's continued commitment to responding to disinformation, notably, UNESCO's extensive research and publications, focus on media and information literacy for all, fact-checking, exploration of the use of artificial intelligence as a measure to counteract disinformation – underpinned by the overall efforts to promote quality journalism and the UN Plan of Action for Safety of Journalists and the Issue of Impunity.
30. In the same vein, the Council of Europe has produced a rich body of recommendations and principles with a holistic view of responding to disinformation. The organisation is providing standards in the areas of artificial intelligence, internet freedom, human rights of internet users, the roles and responsibilities of internet intermediaries, network neutrality, search engines, but also safety of journalists, sustainability of media in the digital age and other areas related to press freedom.¹²

⁷ Kapantai, E., Christopoulou, A., Berberidis, C., & Peristeras V. (2020). A systematic literature review on disinformation: Toward a unified taxonomical framework. *New Media & Society*.

⁸ UNESCO. (2020). *Journalism, press freedom and COVID-19 Issue brief in the UNESCO series: World Trends in Freedom of Expression and Media Development* https://en.unesco.org/sites/default/files/unesco_covid_brief_en.pdf

⁹ See for example Dixit P., & Mac, R. (2018, September). How WhatsApp Destroyed A Village. *Buzzfeed News*. <https://www.buzzfeednews.com/article/pranavdixit/whatsapp-destroyed-village-lynchings-rainpada-india>

¹⁰ Faris, R., M., Roberts, H., Etling, B., Bourassa, N., Zuckerman, E., & Benkler Y. (2017). Partisanship, Propaganda, and Disinformation: Online Media and the 2016 U.S. Presidential Election: Technical Report. *Berkman Klein Center for Internet & Society Research Paper*.

¹¹ Kapantai, E, Christopoulou A, Berberidis C., & Peristeras V. (2020). A systematic literature review on disinformation: Toward a unified taxonomical framework. *New Media & Society*.

¹² Most of the work is done through The Council of Europe Steering Committee on Media and Information Society (CDMSI) – a body vested with the important mission to steer the work of the Council of Europe in the field of freedom of expression, media and internet governance.

31. IMS, Free Press Unlimited (FPU) and other media development organisations work on the public interest media’s ability to produce, distribute and sustain quality news—not only but also as a means of responding to disinformation.
32. Boosting media and information literacy is a leading measure because we believe it is a cornerstone in building resilience towards disinformation—critical thinking is an essential skill for identifying untruths. Backed by UNESCO, Council of Europe and academic scholars, educational institutions should include information literacy to encourage the rational, skeptical and unbiased evaluation of information needed to question disinformation.¹³ Both IMS national-level and international media development partners also echo this measure, such as Regional Press Development Institute (RPDI) in Ukraine,¹⁴ and Free Press Unlimited (FPU), respectively. IMS country programmes in Sri Lanka to Ethiopia put a great emphasis on the importance of media and information literacy in efforts to fight disinformation.
33. To support users in making decisions about the credibility of the content they encounter, third parties have created fact-checking databases, for example, FactCheck,¹⁵ browser extensions,¹⁶ and media literacy initiatives.¹⁷
34. Manual fact-checking websites, tools and platforms have emerged to serve the public on identifying and reporting on disinformation.¹⁸ However, manual fact-checking does not scale well with the volume of newly created information, especially on social media, and there are limitations in terms of public outreach.
35. Automatic detection of disinformation is another measure. However, the speed, ease and scalability of information spread on social media mean that (even) automated content moderation by the platforms cannot always keep up with the problem.¹⁹
36. Another way of understanding the different measures against disinformation is through the categories as suggested by de Beer & Matthee²⁰ for detecting disinformation. These include

¹³ Machete P., & Turpin M. (2020). The Use of Critical Thinking to Identify Fake News: A Systematic Literature Review. In Hattingh, M., Matthee, M., Smuts, H., Pappas, I., Dwivedi, Y., & Mäntymäki, M. (Eds.), *Responsible Design, Implementation and Use of Information and Communication Technology*. I3E 2020.

¹⁴ This was highlighted by Oleg Khomenok, Member of the Board of Global Investigative Journalism Network during one of the consultations.

¹⁵ FactCheck.ORG. (n.d.). <https://www.factcheck.org/>

¹⁶ See for example Factmata. (n.d.). <https://factmata.com/>; Trusted News. (n.d.). <https://trusted-news.com/> and NewsGuard. (n.d.). <https://www.newsguardtech.com/>

¹⁷ See for example Caulfield, M. (2017). *Web Literacy for Student Fact-Checkers*. Pressbooks; Poynter Institute. (2019). What is MediaWise? <https://www.poynter.org/mediawise/>; Roozenbeek, J., & van der Linden, S. (2019). Fake news game confers psychological resistance against online misinformation. *Palgrave Communications*, (5)1, 65.

¹⁸ A comprehensive list of fact-checking websites is available at <https://reporterslab.org/fact-checking/>

¹⁹ Geend, C., Yee, S., & Roesner F. (2020). Fake News on Facebook and Twitter: Investigating How People (Don't) Investigate. *Proceedings of Conference on Human Factors in Computing Systems*.

²⁰ de Beer D., & Matthee M. (2021). Approaches to Identify Fake News: A Systematic Literature Review. In: Antipova, T. (Ed.), *Integrated Science in Digital Age 2020. Proceedings of International Conference on Integrated Science 2020*.

five approaches: 1) language; 2) topic-agnostic; 3) machine learning; 4) knowledge-based and 5) hybrid. The language approach focuses on linguistics by a human or software program and mainly assesses grammar and syntax. The topic-agnostic approach also looks at linguistic features but includes web markup capabilities to identify fake news, such as large number of advertisements or longer headlines with eye-catching phrases. Machine learning algorithms can also identify disinformation via datasets that can be created through crowdsourcing.²¹ The knowledge-based approach conversely aims at using sources that are external to verify if news is fake or real and to identify the news before the spread thereof goes viral—this could be done manually by experts via computational fact-checking or crowdsourcing. The last approach is the hybrid approach, which combines human and machine learning. The hybrid model is effective because it combines social media news with machine learning and a network approach.²²

37. Whilst some of these measures are efficient, they are not alone sufficient—not even the hybrid model. Accordingly, it is integral that different stakeholders on different levels jointly contribute with their expertise and action to aim to protect access to truthful information for all. As disinformation is an issue that affects all parts of society, consequently, multidisciplinary approaches are essential to understanding and designing actions and tools to fight disinformation.

Measures to address disinformation as suggested by IMS and media partners

38. **Promoting a multi-stakeholder dialogue** amongst media, civil society, politicians, academia and tech has been an important step in designing strategies to manage disinformation at the national level. In Sri Lanka, IMS has supported the formation of the Network Against Disinformation where politicians have joined forces with members of civil society to debunk disinformation during election season.
39. In mid-February 2020, IMS facilitated a consultation on countering disinformation leading up to parliamentary elections where political candidates crossed party-lines to unite in a campaign to buck the trend of character assassination and “fake news” that plagues the process of informed decision making.²³ The Sri Lankan Election Committee has welcomed this initiative as it has openly cited its lack of legislative teeth to curb intentional misleading of the public.
40. This multi-stakeholder consultation was attended by young politicians from the three main parties and it only took ten days for a formal alliance between the parties to launch ‘The

²¹ The authors exemplify how Twitter has used an approach called the “Twitter Crawler”.

²² Okoro, E., M., Abara, B. A., Umagba, A. O., Ajonye, A. A., & Isa, Z. S. (2018). A hybrid approach to fake news detection on social media. *Niger. J. Technol.* 37(2), 454.

²³ IMS. (2020, February 27). The Truth Square – Trapping Disinformation. <https://www.mediasupport.org/the-truth-square-trapping-disinformation/>

Truth Square – Trap Disinformation’.²⁴ In addition to youth representing the main political parties in Sri Lanka, the platform includes input from senior journalists, academics and the media. In operation, ‘The Truth Square’ is based on the observations of media activists who author a weekly report of both traditional and social media that is then sent to specialists to review. This analysis then goes to the Election Commission along with the political candidates to release their findings back to the media.²⁵

41. In addition to this strategy, IMS has introduced several other initiatives to boost multi-stakeholder dialogue and policy change at the national level within the Swedish International Development Cooperation Agency (Sida) International Training Programme for Media Development in a Democratic Framework that is implemented by NIRAS, IMS, FOJO Media Institute/Linnaeus University and Global Reporting Sweden AB. The programme has set up a worldwide network of stakeholders working on self-regulation issues across the globe – Africa, Asia, Latin America and Eastern Europe and initiated several policy change projects at the national level.
42. **Best practice replication** is another measure that IMS partners have used to combat disinformation. In February 2020, IMS connected its partner Frontier Myanmar to the Philippines’ Rappler for a briefing on its ‘Sharktank’ database. The ‘Sharktank’ is a social media monitoring tool initiated in 2016 to scan posts and comments on now over 48,000 public pages and 6000 public groups.²⁶ As online hate speech and influencer campaigns continued to plague Myanmar, Frontier Myanmar CEO Sonny Swe expressed interest to learn more about this innovative method to combat disinformation and IMS provided him with a path to get there.
43. Though described as a fruitful and promising exchange of knowledge, little action has been taken forward in replicating the Rappler method in Myanmar due to the onset of the pandemic shortly thereafter. In the present state of the coup, it is unlikely that knowledge exchanged during this meeting will be implemented in Myanmar until the context stabilizes.
44. **Analysing the contextual factors** that fuel disinformation is another means to understand its origins as they can be coupled with hate speech. As knowledge of the root of a problem is the key to solving it, IMS has undertaken ethnic studies to better understand polarization in countries at strife.
45. In the Ethiopian context, the ethnification of the media, whereby media describe communities as “us” or “them” based on their own ethnic affiliation, has proven to be a risk to the internal stability of the country; the prevalence of ethnic belonging and identity

²⁴ Ranasinghe, I. (2020, February 27). The Truth Square’ to trap disinformation during General Elections. Economy Next. <https://economynext.com/the-truth-square-to-trap-disinformation-during-general-elections-54121/>

²⁵ Ibid

²⁶ Garside, J. (2020, February 26). *Rappler editor Maria Ressa: ‘They could shut us down tomorrow’*. The Guardian. <https://www.theguardian.com/world/2020/feb/26/rappler-editor-maria-ressa-journalist-they-could-shut-us-down-tomorrow-philippines-fake-news>. See also Rappler. (2018, October 27). *Tip of the Iceberg: Tracing the network of spammy pages in Facebook takedown*. <https://specials.rappler.com/newsbreak/investigative/215256-tracing-spammy-pages-network-facebook-takedown/index.html>

politics gaining significance in media discourse has recently brought turmoil the country's streets. IMS has documented the media outlets contributing to ethnic division in a November 2020 publication with its partner the FOJO Media Institute along with Addis Abba University and NLA University College.²⁷

46. To highlight the case of a particular outlet in Ethiopia, the Oromia Media Network (OMN) began in 2014 as a satellite TV station among the ethnic sect of displaced Oromo based in the United States but has grown into a self-proclaimed social movement and has played a key role in staging protests in recent years.²⁸
47. Though openly citing the Tigray—the ethnic rival group of the Omoro—as a defined enemy, OMN denies any allegation that it forwards ethnic hatred or engages in incitement to violence; the station's founder claims people confuse strong opinion with hate speech.²⁹
48. A noteworthy subject of protest that the OMN has stood behind concerns the death of Omoro singer and activist Hachalu Hundessa who was murdered on 29 June 2020. In the wake killing of the Omoro icon, ethnic unrest left at least 166 people dead from clashes fuelled by social media.³⁰ Even though internet penetration is very low in Ethiopia (approximately 19%),³¹ social media is still powerful enough to bring people to the streets at first word of provocation. In an underhand attempt to bring political stability, IMS staff in our Sub-Saharan Africa Department note the 'trigger-happy' tendency of the Ethiopian government to shut down the internet when ethnic tensions arise.

The role of governments in addressing disinformation

49. At the outset of this section, it is important to note that during consultations with IMS staff and media partners, almost all noted that State governments and their actors in the countries that IMS operates are most often the leading perpetrators of spreading disinformation—they further noted that the questions posed to shape this submission flow contrary to acknowledging this reality.
50. The following outlines policy options for governments, though we reiterate concern that the toughest fight against disinformation may very well be versus government institutions themselves.

²⁷ Skjerdal T., & Alemayehu Moges M. (2020, November). The ethnification of Ethiopian media. *Fojo Media Institute and IMS*. <https://www.mediasupport.org/news/new-study-documents-ethnification-of-the-ethiopian-media/>

²⁸ Ibid

²⁹ Ibid

³⁰ BBC News. (2020, July 5). *Hachalu Hundessa: Ethiopia singer's death unrest killed 166*. <https://www.bbc.com/news/world-africa-53298845>

³¹ The World Bank. (n.d.). Individuals using the Internet (% of population) – Ethiopia. <https://data.worldbank.org/indicator/IT.NET.USER.ZS?locations=ET>

51. As of 2018, a least 52 countries representing every region of the world have implemented or are actively considering some form of legal, regulatory or policy approach to disinformation, misinformation or fake news.³²
52. Overall, government responses to changing media ecosystems – including the increased prevalence of disinformation – have been limited and mostly ad hoc. Countries are increasingly coming to terms with the need to engage on these issues systematically. The near-ubiquitous reach of new technologies globally points to the tensions faced by national governments in their efforts to respond. Whose role it is across the public sector to address these challenges is not straightforward; most likely, there is a need for multiple government actors to take co-ordinated action on different dimensions of the problem.³³ Co-ordinated action could perhaps even take shape in the drafting of a new body of international law built from those outlined in the Tallinn Manual 2.0 on how existing international law applies to cyber operations.³⁴ Governance responses, however, have largely not been clear cut, given countries’ parallel obligations to uphold freedom of speech and the press and to avoid being seen as arbiters of truth.
53. The following points are presented by the OECD³⁵ as a range of policy options to respond to disinformation that are connected to countries’ ongoing open government reform efforts and beyond.
- *Public communication efforts* (including the strategies, co-ordination mechanisms and competencies involved in enhancing governments’ abilities to share information and engage in dialogue with citizens).
 - *Direct responses to disinformation* (such as targeted efforts to identify disinformation, create counter-narratives and measure the effectiveness of such initiatives).
 - *Regulatory and legal responses* (such as identifying innovative ways to develop regulation, promote freedom of speech, and require more transparency of media company ownership/sources of advertising funding; tackling media or advertising market concentration; and specific regulation directed at online speech).
 - *Media and civic policy responses* (such as facilitating access to government information; supporting public-service broadcasters, citizen journalism and other outlets that expand voice; implementing media and digital literacy campaigns; funding research; and developing multi-stakeholder platforms to craft policy).
54. From IMS point of view, it is important that democratically-minded states (at an arms-length) are investing in good journalism and ensuring diversity in the media production.

³² Funke, D., & Flamini, D. (2018). A Guide to Anti-Misinformation Actions Around the World, *Poynter*.
<https://www.poynter.org/ifcn/anti-misinformation-actions/>

³³ Ibid

³⁴ Nagasako, T. (2020, October 6). Global disinformation campaigns and legal challenges. *International Cybersecurity Law Review*, (1) 125-136.

³⁵ Matasick, C., Alfonsi, C., & Bellantoni, A. (2020). OECD Working Papers on Public Governance No. 39. Governance responses to disinformation: How open government principles can inform policy options

55. An examination of Open Government Partnership³⁶ (OGP) National Action Plans highlights how countries are underutilising the link between open government reform efforts and the disinformation challenge to pursue initiatives related to media freedom and public communication. As a global platform composed of nearly 80 countries and 20 subnational governments, the OGP provides a valuable platform for bringing together public officials and civil society organisations to promote open government principles. As such, the initiatives pursued via OGP member countries can serve as useful indicators of open government priorities internationally.³⁷
56. Canada, France, Germany and Italy have recently proposed or passed laws that seek to outlaw disinformation or hate speech.³⁸ As highlighted by the Expert Group on Fake News and Online Disinformation set up by the European Commission, most policy responses to disinformation should be non-regulatory, as responses focused on content regulation present a range of problems that have implications for freedom of speech and the control of information.
57. Governments have an important role to play with regards to the promotion of media and information literacy and public service media should support States in this regard. As noted above, States should require media literacy in primary and secondary education systems. The importance of media and information literacy is furthermore underlined by the Council Of Europe, with legal standards guiding their work on this area such as CM/Rec(2018)1 of the Committee of Ministers to member States on Media Pluralism and Transparency of Media³⁹ and CM/Rec(2018)7 of the Committee of Ministers to member States on Guidelines to respect, protect and fulfil the rights of the child in the digital environment.⁴⁰
58. Finland has been rated Europe's most resistant nation to disinformation where media literacy has become a basic 'civic competence' that every citizen should possess – from a primary school pupil to a politician.⁴¹
59. Denmark became the first country in the world to elevate technology and digitalization to a cross-cutting foreign and security policy priority in mid-2017. The initiative was named technological diplomacy, or simply 'TechPlomacy'. Through this initiative, Denmark influences the international agenda around tech policy questions based on Danish interests and values, including through new alliances, multilateral fora, and multi-stakeholder

³⁶ About Open Government Partnership. (n.d.). <https://www.opengovpartnership.org/about/>

³⁷ Matasick, C. Alfonsi, C., & Bellantoni, A. (2020). Working Papers on Public Governance No. 39. Governance responses to disinformation: How open government principles can inform policy options. *OECD*.

³⁸ Ibid

³⁹ Council of Europe. (2017, December 7). *Draft Recommendation CM/Rec(201x)xx of the Committee of Ministers to member states on media pluralism and transparency of media ownership*. <https://rm.coe.int/draft-recommendation-on-media-pluralism-and-transparency-of-media-owne/168077351e>

⁴⁰ Council of Europe. (2018, September). *Guidelines to respect, protect and fulfil the rights of the child in the digital environment: Recommendation CM/Rec(2018)7 of the Committee of Ministers*. <https://rm.coe.int/guidelines-to-respect-protect-and-fulfil-the-rights-of-the-child-in-th/16808d881a>

⁴¹ See, inter alia, Henley, Jon. (2020, January 29). How Finland starts its fight against fake news in primary schools. *The Guardian*. <https://www.theguardian.com/world/2020/jan/28/fact-from-fiction-finlands-new-lessons-in-combating-fake-news>

partnerships. The topics dealt with range from cybersecurity and disinformation, combating terrorism online and exploring the effects of deep fakes, to digital taxation, protecting privacy online, responsible artificial intelligence and data ethics. Cooperation with civil society and media has been an important part of the TechPlomacy work and IMS is grateful for the strategic contributions provided to the implementation of multi-stakeholder dialogue in Myanmar and Sida's International Training Programme for Media Development in a Democratic Framework.

60. Notably, France and Germany have followed suit with diplomatic representatives specialising in technology, though the Danish approach is regarded as more pointed and innovative.⁴²

Governmental action, disinformation and COVID-19 pandemic

61. As noted at the outset of the section above, it has been those States whose leaders are most often associated with disinformation and an absence of accountability that have reacted the most excessively to the so-called 'infodemic' they themselves have propelled in response to the COVID-19 pandemic.
62. The following highlights findings in forthcoming IMS research "*COVID-19 and the media: A pandemic of the paradoxes*" and a successful case brought by IMS partner Media Institute for Southern Africa - Zimbabwe (MISA Zimbabwe) to combat the threat of disinformation in the context of the COVID-19 pandemic:
63. On 1 April 2020, Russia amended its Criminal Code imposing fines of up to 5 million RUB (56,000 EUR) and five years in prison on anyone ruled to have deliberately spread "false information" about serious matters of public safety such as COVID-19 and the law is not limited to the duration of the pandemic.⁴³ Within the first three months of the amendment, nearly 200 cases were launched against journalists, including arrests, fines and orders to remove information from the public domain.⁴⁴
64. In March 2020, Ethiopia introduced a law prohibiting disinformation—the Hate Speech and Disinformation Prevention and Suppression Proclamation—which is so broad that, according to Human Rights Watch, it gives the authorities discretionary power to declare any piece of information false and to justify their crackdown on free speech.⁴⁵ Within days

⁴² Riordan, S., & Jarrín, M. T. (2020, January 20). Global Policy Perspective Report: Techplomacy and the Tech Ambassador. *European Institute of International Studies*. <https://www.ieeiweb.eu/wp-content/uploads/2020/01/Techplomacy-and-the-Tech-Ambassador.pdf>

⁴³ Council of Europe Platform for the Safety of Journalists. (2020, April 15). Russian Federation: New Legislation Imposes Penalties and Prison Sentences for Spreading "False Information" on COVID-19: Alert No. 41/2020.

⁴⁴ Ibid

⁴⁵ Human Rights Watch. (2020, May 6). *Ethiopia: Free speech at risk amid Covid-19*. <https://www.hrw.org/news/2020/05/06/ethiopia-free-speech-risk-amid-covid-19>

of enactment, the law was used to charge a journalist for allegedly sharing false information about the government's COVID-19 response.⁴⁶

65. As the pandemic spread to Sri Lanka, its police announced their authority to arrest individuals accused of sharing “fake news” about the pandemic, and did so, including arresting a woman under the country's Computer Crimes Act for allegedly spreading a false rumour that President Gotabaya Rajapaksa had contracted the virus.⁴⁷
66. Colombia, by means of Resolution 385 of 2020, declared a health emergency throughout the country until 30 May 2020 that ordered television, radio stations and all other mass media to disseminate information provided by the Ministry of Health and Social Protection.⁴⁸ Along with this order, President Iván Duque hosted daily COVID-19 briefings to manage public opinion during the crisis.
67. In April 2020, EU Member State Hungary prolonged its state of emergency indefinitely, allowing Prime Minister Viktor Orban to rule by decree, which included powers to criminalise the spreading of “false information” with a sentence of up to five years in prison.⁴⁹ Following international outrage, the state of emergency was revoked in late May 2020, but was then reimposed in November 2020 and instated at present.
68. Authorities in Tanzania suspended journalists and new outlets for merely reporting on COVID-19 and some were fined and ordered to apologize for “transmission of false and misleading information” on the country's approach to managing the pandemic.⁵⁰ Other countries that amended their criminal code to introduce jail sentences for disseminating false information following the COVID-19 pandemic included Algeria, where first time offenders during a health emergency can receive five years in prison. In Zimbabwe, journalists were threatened with up to 20 years in prison for publishing or communicating “false news” regarding the State's lockdown.⁵¹
69. Still amid the pandemic as the new year rolled in, MISA Zimbabwe's legal team lodged a civil action against the Zimbabwean Minister of Health and Child Care and the Minister of

⁴⁶ Taye, B. (2020, May 19). Ethiopia's hate speech and disinformation law: the pros, the cons, and a mystery.

<https://www.accessnow.org/ethiopias-hate-speech-and-disinformation-law-the-pros-the-cons-and-a-mystery/>

⁴⁷ Gunatilleke, G. (2020, April 16). *Covid-19 in Sri Lanka: Is free speech the next victim?* Oxford Human Rights Hub.

<https://ohrh.law.ox.ac.uk/covid-19-in-sri-lanka-is-free-speech-the-next-victim/>

⁴⁸ International Center for Not-For-Profit Law. (n.d.). *Covid-19 Civic Freedom Tracker*.

<https://www.icnl.org/covid19tracker/?issue=9>

⁴⁹ Facsar, F. (2020, April 7). *Hungary: Law to fight coronavirus creates 'uncertainty' for journalists*. DW Akademie.

<https://www.dw.com/en/hungary-law-to-fight-coronavirus-creates-uncertainty-for-journalists/a-53027631>

⁵⁰ Amnesty International. (2020, April 21). *Tanzania: Authorities must end crackdown on journalists reporting on COVID-19*. <https://www.amnesty.org/en/latest/news/2020/04/tanzania-authorities-must-end-crackdown-on-journalists-reporting-on-covid19/>. See also IMS supported 'Denial and Disinformation' series by PumaPodcast's Teka Teka, available at: <https://open.spotify.com/episode/0FywSxfZlsgI5GCNgwgZCa?si=yVCjNcVmQDO-751peqSiWg&nd=1>

⁵¹ International Center for Not-For-Profit Law. (n.d.). *Covid-19 Civic Freedom Tracker*.

<https://www.icnl.org/covid19tracker/?issue=9>

Information and Publicity and Broadcasting Services in January 2021 that hinged on the absence of information in regard to statistics on the prevalence of COVID-19.

70. Linking the lack of information provided about positive cases with the issue of disinformation, MISA Zimbabwe submitted that the government was underreporting the COVID-19 cases as it was not performing its duty to collate all information from both public and private testing centres. MISA Zimbabwe furthermore submitted that such an approach was placing the lives of Zimbabwean citizens at risk as they were kept uninformed in regard to the extent of which COVID-19 infections were on the rise in Zimbabwe and subsequently the extent to which responsible behaviour is expected from the public at large. The High Court of Zimbabwe granted a provisional order in favour of the applicants on 21 January 2021 instructing the government parties to forthwith widely disseminate comprehensive and adequate information regarding the pandemic.⁵²
71. Coupled with the Zimbabwean government's postponement of legislative and council by-elections just the month prior to reducing the spread of the virus,⁵³ this case is telling of how government actors can turn the advantage in their favour when convenient. In addition to affirming the responsibility of the government to ensure the provision of accurate information to its citizens, this case shows how easily a State can abuse a measure meant to protect its citizens.

The impact of gendered and sexualized disinformation

72. The impact of gendered and sexualised disinformation on women in public life, as well as its corresponding impacts on national security and democratic participation, is largely missing in the discourse and must be addressed.
73. Gendered and sexualised disinformation can be defined as “a subset of online gendered abuse that uses false or misleading gender and sex-based narratives against women, often with some degree of coordination, aimed at deterring women from participating in the public sphere. It combines three defining characteristics of online disinformation: falsity, malign intent, and coordination”.⁵⁴

⁵² MISA – Zimbabwe vs Minister of Health and Child Care and Minister of Information and Publicity and Broadcasting, High Court of Zimbabwe, Case No. HC 45/21, Provisional Order/Rule 247.

⁵³ International Institute for Democracy and Electoral Assistance. (n.d.). Postponed elections due to Covid-19. <https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections>. See also Tapfumaneyi, R. (2020, November 3). Zimbabwe: By-Elections Moved to 2021 – Ziyambi. *All Africa*. <https://allafrica.com/stories/202011030210.html>

⁵⁴ Jankowicz, N., Hunchak, J., & Pavliuc, A., Davies, D. Pierson, S., & Kaufman, Z. (2021). Malign Creativity: How Gender, Sex, and Lies are Weaponized Against Women Online. Wilson Center: Science and Technology Programme. https://www.wilsoncenter.org/sites/default/files/media/uploads/documents/WWICS%20Malign%20Creativity%202021_0.pdf

74. A recent investigation identified a bot on the messaging app Telegram that created over 668,000 fabricated, pornographic images of women without their consent.⁵⁵ Similarly, alarming research found that 96 percent of all deep fakes depict women in fabricated, non-consensual pornography.⁵⁶
75. Online gendered abuse and disinformation present a democratic and national security challenge; as adversaries attempt to exploit widespread misogyny, women may be less likely to choose to participate in public life.⁵⁷ Online gendered abuse and disinformation is often intersectional in nature, with abusers often engaging with both sex- and race-based narratives, compounding the threat for women of colour. This has been coined as *malign creativity*—the use of coded language; iterative, context-based visual and textual memes; and other tactics to avoid detection on social media platforms.⁵⁸
76. Journalists use social media as a part of their jobs: to report on evolving stories, to connect with sources, and to publicize their work. Maintaining presence on social media is necessary for success but could present a threefold burden for women journalists where they are targeted; for being women, for being journalists and for their online presence.
77. *Malign creativity* is perhaps the greatest challenge to detecting, challenging, and denormalising online abuse because it is less likely to trigger automated detection and often requires moderate-to-deep situational knowledge to understand.⁵⁹
78. As gendered disinformation is rooted in the overall societal patriarchal structures, the responses need to be seen as holistic and intersecting with different fields (i.e. safety) and segments/level of society (i.e. internet intermediaries, law and policymakers and employers) in order to be efficient. This is further outlined in the “Key recommendations” (§ 95 - 99).

The role of global tech companies

79. In line with the UN Guiding Principles on Business and Human Rights and the “Protect, Respect and Remedy” Framework, global tech companies should respect the human rights of their users and affected parties in all their actions.

⁵⁵ Lytvynenko, J. & Lucas, S. (2020, October 20). *Thousands Of Women Have No Idea A Telegram Network Is Sharing Fake Nude Images Of Them*. BuzzFeed News. <https://www.buzzfeednews.com/article/janelytvynenko/telegram-deepfake-nude-women-images-bot>

⁵⁶ Romano, A. (2019, October 7). *Deepfakes are a real political threat. For now, though, they're mainly used to degrade women*. Vox. <https://www.vox.com/2019/10/7/20902215/deepfakes-usage-youtube-2019-deeptrace-research-report>

⁵⁷ Jankowicz, N., Hunchak, J., & Pavliuc, A., Davies, D. Pierson, S., & Kaufman, Z. (2021). *Malign Creativity: How Gender, Sex, and Lies are Weaponized Against Women Online*. Wilson Center: Science and Technology Programme. https://www.wilsoncenter.org/sites/default/files/media/uploads/documents/WWICS%20Malign%20Creativity%202021_0.pdf

⁵⁸ Ibid

⁵⁹ Ibid

80. IMS echoes the Council of Europe that has proposed standards on responsibilities of internet intermediaries with respect to human rights and fundamental freedoms⁶⁰ that stress the necessity for greater accountability and transparency of global tech.
81. Further, UNESCO suggests that content moderation by global tech can be assessed by the 2018 recommendations of then UN Special Rapporteur on Freedom of Opinion and Expression, which call for safeguards to avoid the elimination of legitimate content in acts of ‘private censorship’.⁶¹

Key Recommendations to the Special Rapporteur

82. In the underlying recommendations, IMS stresses that quality public interest journalism and universal standards for freedom of expression and access to information should be at a foundation for any effort to fight disinformation. We support the mandate of the UN Special Rapporteur in affirming that State policies and responses to disinformation should uphold freedom of expression and access to information. States must preserve a free, safe and enabling environment for journalists and media workers to operate without undue interference, online and offline. States must end the practice of internet shutdowns, ensure the broadest possible access to internet services, and set up efforts to bridge digital divides, including the gender gap.
83. Our foremost recommendation for the UN Special Rapporteur is to mobilise the international community to adopt a **universal definition** for disinformation. Along with States and digital tech companies, public interest media and media development organisations should take part in drafting this definition that will guide global policy responses to disinformation and hateful online content, as well as to make all forms of media a safer space for women. We recognise that drafting a new body of international law may be necessary to tackle a universal approach to disinformation. The UN should play a key role and in setting standards with the involvement of UNESCO and the Internet Governance Forum.
84. In the time of formulating a universal approach, **we discourage national laws regulating disinformation** as State approaches presently involve criminal penalties and other punishment that result in censorship. In the country contexts that we work in—those affected by armed conflict, human insecurity and political transition—the tendencies of governments to take advantage of well-intended laws for their own political gain is too strong. To prevent national regulations from violating freedom of expression, national laws on the content of media and online platforms must be so carefully put in place and subsequently monitored that we strongly advocate for greater focus on the other avenues to combat disinformation outlined below:

⁶⁰ Council of Europe. (2018, March 7). *Recommendation CM/Rec(2018)2 of the Committee of Ministers to member States on the roles and responsibilities of internet intermediaries (adopted by Committee of Ministers at the 1309th meeting)*.

⁶¹ Posetti, J., & Bontcheva, K. (2020). DISINFODEMIC: Desiphering COVID-19 disinformation. *UNESCO*.

85. IMS recommends a **holistic approach to media and digital literacy**— for all ages and segments of populations. If we think of disinformation as a virus then media and digital literacy could be a vaccine that would help achieve herd immunity—resilience to disinformation. With this in mind, we recommend that UNESCO’s overarching efforts to support media and digital literacy are further boosted. As critical analytical, induction and deduction skills are imperative to understanding bias and exploring media as an active creator of content, we recommend the Special Rapporteur advise States to require media literacy in primary and secondary education systems. Though no trivial task to alter a State education system, continued prioritization of this work by UNESCO will likely play a great role in making progress in this direction.
86. Media literacy in and through the media is required to strengthen what is already at the core of professional journalism—fact checking and verification. Journalists are presumably inherently skeptical of information they are provided by any source and seek confirmation before publishing allegations or conclusions. The definition of “confirmation” must be updated, however, to recognise the increasing ease with which supposed proof—a picture, a recording, a video—could have been faked. Public interest media, including public service media, should support States in promoting media and information literacy.
87. Accordingly, **support to public interest media** remains important. It is essential to support public interest media to develop new business models that maximize the benefits of digital technologies and enhance audience engagement so that public interest content is more widely available on social media and other online platforms. Media workers should be able to analyze and understand digital information. By engaging with their audiences, public interest media can encourage audience members to think critically about the information they receive.
88. To finance this support, we call for the Special Rapporteur to endorse the **taxing of online advertising and investment of revenue into efforts to fight disinformation**. IMS believes that public interest media should be recognised as a public good and appropriate regulatory structures should be in place to support a fairer distribution of gains generated from online monetization of public interest content. Google and Facebook dominate the online advertising market and do not pay adequate tax. At a minimum, revenues arising from the monetisation of public interest media content in the digital environment should be redistributed from online platforms to news content providers, ensuring a balancing effect of such monetisation on the economics of the media industry.
89. In addition to paying their fair share, we call for the Special Rapporteur to incentivize social media platforms to replicate Facebook’s third-party fact-checking initiative. Based on the general consensus of our in-house consultations that deemed traditional fact-checking as only a drop in the ocean in the fight against disinformation as it is reactive and labour-intensive, third party fact-checking, on the other hand, is a more pointed anti-disinformation strategy as it allows fact-checkers to *demote* content.

90. Additional social media tech companies should devise a system where third-party fact-checkers, such as those a part of the Poynter's International Fact-Checking Network,⁶² could be given log-in credentials to the back-end of platforms to assess what has been deemed viral posts.⁶³ Taking into account local linguistic and cultural knowledge of the individual fact-checker, this method then allows back-end third-party fact-checkers to rate content as false upon which the post falls down the feeds of the public at large.
91. Tech giants like Twitter and Google could better link with the Poynter's International Fact-Checking Network that holds stringent criteria for membership and subcontract out this work. At the time of writing, 29 organisations are verified signatories of the Poynter Code of Principles spanning across 17 countries.⁶⁴ We encourage the Special Rapporteur to promote this practice to increase the number of countries that third-party fact-checkers are accredited, particularly in the global south. In parallel, IMS and other media development organisations can work with our partners to contribute to building the capacity of potential third-party fact-checkers in countries that do not yet have their own.
92. To echo existing policy, IMS strongly stands by the Council of Europe's recommendation to create procedures for **equitable access to and sharing of data collected in the process of distributing public interest media content by the platforms**. Implementation of these procedures will help level the playing field between the public interest media and online platforms by way of lessening the dominant position of the latter in the data economy that presently perpetuates and reinforces disinformation to the detriment of public interest media. Regarding the data sharing principle, online platforms should remove obstacles for media organisations to access their audience and instead provide them sufficient access to the data of the users of their content. Access should be accompanied by tools, guidance and tips allowing media organisations, including smaller outlets, to fully benefit from this data.
93. In our desk study for this submission, we concluded that more research and approaches are needed to advance efforts to fight disinformation, particularly in the Global South as research is presently Eurocentrically focused. **Studying the contextual factors of how disinformation occurs** will be integral. Local researchers, librarians, third-party fact-checkers and NGOs working on the issue will likely need financial support.
94. In the same vein, to expand the different **automated approaches** to fight disinformation—language, topic-agnostic, machine learning, knowledge-based and hybrid—globally should **be trained in local languages**.
95. Lastly—but certainly not least—we advise the Special Rapporteur to push for appropriate structures and measures to address the issue of **gendered disinformation**. As gendered disinformation is rooted in the overall societal patriarchal structures, the following four measures suggested should be viewed holistically and intersecting with different fields (i.e.

⁶² Poynter. (n.d.). *The International Fact-Checking Network*. <https://www.poynter.org/ifcn/>

⁶³ Facebook: Journalism Project. (2020, March 23). *Partnering with Third-Party Fact-Checkers*.

<https://www.facebook.com/journalismproject/programs/third-party-fact-checking/selecting-partners>

⁶⁴ Ibid

safety) and segments/level of society (i.e. internet intermediaries, law and policymakers and employers) in order to be efficient.

96. Firstly, as safety measures are closely interlinked to the issue of gendered disinformation, there is a need for internet intermediaries to have incident reports that allow women to report multiple abusive posts at once to provide more context and a more holistic view of the abuse they are experiencing. In the same vein, employers need to develop robust support policies for those facing online harassment and abuse, including clear mechanisms to report the abuse faced by the target. National mechanisms for safety of journalists should consider the gendered disinformation as a threat.
97. Secondly, there is a need to improve the automated detection methods and for internet intermediaries to introduce nudges to discourage users from posting abusive content. Third-party fact-checkers, those engaging in crowdsourcing and setting up the datasets used to identify disinformation need to **incorporate a gendered perspective** in their training in order to identify and respond to gendered disinformation.
98. Thirdly, there is a need to monitor and gather data on online gendered disinformation to better understand its scope, prevalence and societal impact and to use this data for advocacy purposes.
99. Lastly, gendered perspective should be fully integrated into media and information literacy efforts. Media literacy plays a significant role in determining whether gender issues will widely be considered important and legitimate social, political, and cultural matters and can help reveal the gendered-disinformation narratives.



paving the way for good journalism

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