

CODECHECK

A REVIEW OF PLATFORM COMPLIANCE
WITH THE EC CODE OF PRACTICE
ON DISINFORMATION

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ÚDARÁS
CRAOLACHÁIN
NA hÉIREANN

BROADCASTING
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BAI FOREWORD

The COVID 19 crisis has highlighted again the harmful impact of disinformation on the operation of all aspects of our society. False information about the virus, how it is spread, available treatments, and the government's response have caused alarm and cost lives. The COVID crisis has also underlined that this issue needs to be examined and tackled at a national and international level.

The adoption of the Code of Practice on Disinformation (the Code) by Facebook, Google, Twitter and Microsoft was a significant development in the fight against disinformation in Europe. It introduced additional regulatory oversight over the operation of these platforms at a national and European level. The Code represents a recognition by the platforms of enhanced accountability for the content that is carried and promoted on their services. Through the Code they committed to taking specific actions to tackle disinformation and agreed to support verification by third parties of the implementation and effectiveness of their actions. One of these third parties was the European Regulators Group for Audio-visual Media Services (ERGA) and the Broadcasting Authority of Ireland represents Ireland on ERGA.

This Report, and ElectCheck 2019¹, are the BAI's contribution to the assessment by ERGA and the EU of the effectiveness of the implementation of the Code in 2019. The BAI also chaired the ERGA sub-group which designed and coordinated ERGA's activity in this area. This was a significant undertaking for a relatively small regulator. I would like to acknowledge the work of the BAI team and our research partners in the Institute for Future Media and Journalism (FuJo) at Dublin City University (DCU) in the delivery of this project.

As outlined in the conclusions of this Report, and the overall ERGA Report, significant progress was made during 2019 in relation to the implementation of the Code by the signatories. However, the research also indicates significant weaknesses in terms of the content and structure of the Code and the procedures for reporting, monitoring and enforcing the commitments. This is particularly the case at a national level as the Code was an EU wide initiative. Recommendations are set out in this Report and the ERGA Report to address these issues and the BAI believes these should be given further and meaningful consideration by all stakeholders.

In parallel with this process the BAI continues to engage with many of the same stakeholders in the context of the transposition of the Audiovisual Media Services Directive ("AVMSD") scheduled for September 2020. The BAI is also active in debates about the further evolution of regulation in the digital space and is playing a lead role in the ERGA Sub-Group that is developing advice for the EU Commission on these issues and the new Digital Services Act. This is a fast-moving agenda where Ireland is an important player, especially as many of the key platforms are established here. The BAI is committed to engaging with all stakeholders in order to ensure that the best outcomes are achieved for citizens in Ireland and Europe.

Michael O'Keeffe
Chief Executive, BAI

April 2020

DCU FOREWORD

The COVID-19 crisis underscores the problems in the digital information environment as reliable health information struggles to compete with disinformation, rumours and scams. In early March, the major platforms issued a joint statement affirming their commitment to “elevating authoritative content” while combating fraud and disinformation. This swift response demonstrates that the platforms can take decisive action to counteract harmful action, but time will tell whether this emergency response can be translated into new norms for countering disinformation.

At the FuJo Institute, we are monitoring the increase in disinformation and conspiracy theories surrounding the pandemic. This work is informing the Provenance project, which is developing automated supports to help people evaluate online content. The need for better information supports is a major finding in the current report.

While the signatories to the Code of Practice on Disinformation have made clear progress on their commitments, there are significant shortcomings in commitments both to users and the research community. Users are given some information about how their personal information is used but it is not sufficiently detailed nor transparent. There has been some greater transparency following from the COVID-19 crisis but many disinformation researchers are still largely relying on Facebook’s Ad Library, or Crowdtangle and the inherent limitations affect the type, quality and depth of research that can be conducted

Recommendations are set out in this Report and the ERGA Report to address these issues and we would like to see these being actively considered by all stakeholders.

Jane Suiter
Director, FuJo, DCU

April 2020

INTRODUCTION

Disinformation online represents an evolving challenge to contemporary democratic processes and societal debates. In response, the European Commission adopted a communication “Tackling Disinformation: A European Approach”² in April 2018 which proposed the development of a self-regulatory code of practice for online platforms and the advertising industry to increase transparency and better protect users. The Code of Practice on Disinformation (henceforth ‘the Code’) was published in September 2018. Signatories to the Code including Facebook, Twitter, Google and Microsoft have committed to addressing five key issues: (A) Scrutiny of ad placements; (B) Political advertising and issue-based advertising; (C) Integrity of services; (D) Empowering consumers; and (E) Empowering the research community. The European Regulators Group for Audio-visual Media Services (ERGA) is the body tasked with supporting the European Commission in monitoring the implementation of the five commitment areas - or pillars - of the Code. To do so, 13 National Media Regulators agreed to participate in an ERGA led project to monitor the implementation of the Code on a national level. Ireland’s National Media Regulator, the Broadcasting Authority of Ireland (BAI), commissioned the Institute for Future Media and Journalism at Dublin City University (DCU) to assess the compliance of four Signatories (Facebook, Twitter, Google and Microsoft) with the Code.

The monitoring process was carried out in two phases. The first phase was “aimed at verifying that Code’s commitments with particular pertinence to the integrity of the electoral processes were implemented effectively during the European elections”³. Signatory commitments met under Pillar B (aimed at ensuring political adverts are clearly identified by the users) were addressed in detail in the first phase of monitoring at EU level by the *ERGA Intermediate* report⁴ and at the Irish national level in the *ElectCheck 2019* report⁵.

The second phase of monitoring was aimed at providing an assessment on the implementation of the commitments of all five Pillars of the Code after an initial 12-month period (i.e. in October 2019). In compliance with the commitments of the Code, each of the Signatories submitted a self-assessment report⁶ (henceforth ‘SAR’) detailing how it met its commitments under each of the Pillars of the Code over the 12 month period. These SARs detailed the Europe-wide efforts by each of the Signatories to meet its commitments. As noted in the Assessment of compliance with the Code of Practice commitments (*ERGA Final report*)⁷: “ERGA in consultation with the European Commission decided to analyse these reports and provide an evaluation of their content in the context of activity at a country level.” As such, ERGA members were tasked with analysing the reports to provide an evaluation of their content at a national level.

An initial analysis of the SARs conducted by the EU Commission in October 2019 found that while “comprehensive efforts by the signatories to implement their commitments” have been made, “further serious steps by individual signatories and the community as a whole are still necessary”⁸.

2 http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51804

3 http://erga-online.eu/?page_id=14

4 http://erga-online.eu/wp-content/uploads/2019/06/ERGA-2019-06_Report-intermediate-monitoring-Code-of-Practice-on-disinformation.pdf

5 https://fujomedia.eu/wp-content/uploads/2019/09/Elect-Check-2019-Report_Interactive-PDF-1.pdf

6 <https://ec.europa.eu/digital-single-market/en/news/annual-self-assessment-reports-signatories-code-practice-disinformation-2019>

7 www.erga-online.eu/?page_id=14

8 http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=62698

Overall, the summary report noted that a wide variety of actions to empower consumers were reported by the Signatories including initiatives to increase media literacy, tools to better inform users, and increased collaborations with fact-checkers.⁹ However, the report found that, in general, the commitments made under Pillars D and E appear to have not progressed at the same level as the commitments under Pillars A-C.

The EU Commission also noted that the SARs reported on a number of policies and tools intended to provide researchers and the fact-checking community with access to platform data including API access and advertising libraries. However, as noted in both the EU Commission's summary and the *ElectCheck 2019* report, these are structurally limited and raise significant questions regarding the confidence researchers can have in the comprehensiveness of the data extracted. In terms of meeting commitments to empower researchers, the summary review concluded that Europe wide, "the provision of data and search tools to the research community is still episodic and arbitrary and does not respond to the full range of research needs". Additionally, it notes differences between the Signatories in terms of how each implemented the five Pillars of the Code across the EU Member States.

To understand how these activities were implemented at a national level, ERGA member, the Irish national regulator, The Broadcasting Authority of Ireland commissioned researchers at the Institute of Future Media and Journalism at Dublin City University (DCU) to review the SARs submitted by Facebook, Twitter, Google and Microsoft. Researchers reviewed each of the SARs submitted and gathered information to verify whether the actions outlined in the reports occurred in Ireland from January - December 2019¹⁰. The initial SARs submitted by the Signatories contained very little country-specific data. As a result, there were limitations in what the NRAs could verify through their monitoring activity conducted at a national level. To conduct research at a national level and to address the lack of country-specific data in the SARs, ERGA and the EU Commission sent a letter to the platforms with specific questions to be answered at the Country level regarding initiatives implemented to support Pillars A and C (in Italy and Germany) and Pillars D and E (in Czech Republic, Italy, Croatia, France, Germany, Hungary, Latvia, Poland, Portugal, Slovakia, Spain, Sweden and Ireland). ERGA identified fourteen questions that investigated the activities of the Code Signatories in regard to empowering consumers (Q1-9) and supporting the research community (Q10-14).

This present report outlines the responses by the Code Signatories under Pillars A and C and examines in-depth specifically which of the actions occurred within Ireland under Pillar D, to empower Irish consumers and Pillar E, to support the Irish research community. Some 13 research teams throughout Europe are conducting the same reviews to establish the commitments in other EU member states. These reports were combined for a Europe-wide report delivered at the ERGA Plenary in December 2019 with a final report due in April 2020¹¹ to be submitted to the European Commission. As noted in the *ERGA Final* report the approach by researchers across the 12 member states included (inter alia) making contacts with the fact-checking organizations, universities, civil society organizations, associations of consumers and journalists, to better assess the way in which the activities reported in the SARs had actually been carried out by the online platforms with regards to Pillars D and E of the Code in the various Countries. To assess and review the implementation of the Code within the Irish context from January-December 2019, this report draws upon information provided by Irish stakeholders in fact-checking (TheJournal.ie) and media literacy (Media Literacy Ireland), the SARs of the Code Signatories (Facebook, Twitter, Google and Microsoft) and the Signatories' responses to the follow-up questions posed by ERGA.

⁹ <https://ec.europa.eu/digital-single-market/en/news/annual-self-assessment-reports-signatories-code-practice-disinformation-2019>

¹⁰ While the Code Signatories agreed to comply with the Code of Practice until October 2019, their efforts continued beyond this date and both SARs and in particular, the follow-up questionnaires refer to a range of actions taken up to December 2019. As such this report has considered actions reported up to December 2019.

¹¹ www.erga-online.eu/?page_id=14

OVERVIEW OF PLATFORM INITIATIVES TO SUPPORT PILLARS A AND C:

Pillar A: Scrutiny of Ad Placements

Pillar A addressed the monetisation of problematic behaviours and the extent to which Signatories introduced policies and procedures to disrupt this. This section outlines the actions taken within Ireland to address this issue.

Facebook

Facebook reported that prior to an advert appearing on the platform it must be reviewed to ensure it meets its Advertising Policies. The review process checks advert images, text, targeting and positioning prior to approval and prohibits adverts that violate community standards, promote illegal products/activities, discriminate against people, contain sensational, low-quality, disruptive, false or misleading content as well as adverts that attempt to circumvent its review process. For pages and domains that repeatedly share false information, their distribution will be reduced in the news feed and their ability to monetise and advertise will be removed. Repeat offenders will not be permitted to advertise on the platform. Facebook reported that its policy is to downgrade misinformation rather than to entirely remove it. Within its SAR Facebook did not provide any specific data to corroborate that its review procedures and those actions taken against repeat offenders resulted in any disruption in the spread of disinformation, nor did it provide country-specific information on the implementation of these procedures. Without this information, it was not possible for the researchers to assess the extent to which these procedures impact and address the spread of disinformation on the platform rather than just targeting dishonest business practices.

Twitter

Regarding the scrutiny of advert placement, Twitter stated that as of November 22, 2019, it will no longer accept political advertising which it defines as “content that references a candidate, political party, elected or appointed government official, election, referendum, ballot measure, legislation, regulation, directive, or judicial outcome [...] including appeals for votes, solicitations of financial support, and advocacy for or against any of the above-listed types of political content”¹². News publishers are exempt from this updated policy if they can meet several criteria as outlined by Twitter which includes verification of a user handle as that of an official news website¹³. However, in the absence of a repository of all adverts that might include political or issue-based adverts or further clarification of the list of causes and issues that are permitted and banned, it was not possible to establish the extent to which Twitter is used by politically motivated actors to advertise political content in Ireland.

12 <https://business.twitter.com/en/help/ads-policies/prohibited-content-policies/political-content.html>

13 <https://business.twitter.com/en/help/ads-policies/prohibited-content-policies/political-content/news-exemption-page.html>

Google

Google outlined a number of policies that address the scrutiny of advert placements including the Misrepresentative Content policy that prohibits advertisers from excluding relevant information or providing misleading information about themselves, products or services. Google also outlined a number of additional policies including Google Ads Insufficient original content policy (which addresses the links provided in adverts and where they take users that click on them), AdSense Valuable inventory policy (which addresses copied or auto-generated content) and Google Ads Inappropriate content policy (which addresses shocking or sensitive content). Such policies are in place and many activities using auto-generation, bots, misrepresentation and dishonesty by advertisers are prohibited. In Google's SAR it stated that it took down 2,925 Google Ads accounts due to a Misrepresentation policy violation, 1,023 accounts with Insufficient Original Content and 7 AdSense accounts with Valuable Inventory policy violations. However, it is not possible to verify these figures, only to report what Google claimed.

Microsoft

Microsoft reported on policies across its services to ensure clear and accurate advertising is served to consumers and the economics of disinformation are disrupted. Microsoft Advertising (formerly Bing Ads) which serves the majority of adverts displayed on Bing and other Microsoft and third-party services, works with both advertisers and publishers to employ policy and enforcement measures to prevent the dissemination of disinformation through advertising. For advertisers, the Misleading Content Policies prohibit advertising that is fraudulent, deceptive, misleading or harmful to others including those that falsely claim or imply affiliations or endorsements with third parties, governmental entities or organisations. Its Relevance and Quality Policies manage the quality and relevance of adverts served to consumers through its advertising network and prohibit adverts that lead users to sites that misrepresent the origin or intent of their content. These policies are implemented through both manual and automated enforcement. Microsoft also reported that it conducts a manual review of all adverts flagged to its customer support team and removes those that violate these policies. In its SAR, Microsoft reported that in 2018 it suspended nearly 200,000 accounts and removed 900 million bad ads and 300,000 bad sites for violating its policies. Microsoft reported that these figures represent removals based on all policy violations. In relation to adverts specifically judged to be misleading, between 1 July 2018 and 30 June 2019, it rejected more than 169 million ads. Information was not provided on the percentage of overall advertisements on the platform these figures represent, nor was any country-specific information pertaining to Ireland provided.

In relation to publishers, Microsoft Advertising's policies include a comprehensive list of prohibited content that adverts cannot serve against, such as aggressive or misleading news, and unmoderated or unsavoury content. Publishers are required to maintain a list of prohibited terms and provide Microsoft with information on their content management practices as well as undergo reviews of their policy compliance.

On LinkedIn, Advertising Policies prohibit deceptive, fake, offensive and incomplete content and all adverts run on the platform are subject to a review process to ensure compliance with its policies. Consumers may also report adverts that will be removed if deemed to be in violation of these standards.

Pillar C: Integrity of Services

Pillar C addressed the Signatories policies and activities regarding the identity and misuse of fake accounts and automated bots on its services. This section outlines the actions taken within Ireland to address these issues.

Facebook

Facebook reported that to protect the integrity of its services it removes content that violates its Community Standards which include prohibitions on maintaining multiple accounts, creating fake profiles, evading registration requirements as outlined in their Terms of Service and engaging in coordinated inauthentic behaviour. Facebook reported that it prevents fake accounts from abusing the platform in three ways, (1). blocking accounts from being created; (2) removing accounts at sign up when they show indications of being inauthentic; and (3) removing accounts already on Facebook that exhibit signs of being fake or malicious. Further, Facebook removes content such as hate speech, spam, and misinformation that contributes to offline violence and voter suppression. In its SAR, Facebook reported that it disabled 2.19 billion fake accounts in the first quarter of 2019, this volume of fake accounts it suggests, is largely due to an increase in automated attacks which attempt to create large volumes of accounts all at one time. In terms of Facebook Accounts, Pages, and Groups that are removed for specific violations of its Coordinated Inauthentic Behaviour policy, it reported that this represents a small subset of the overall accounts and content it removed from its platform. Between January-October 2019 Facebook removed some 7,606 Accounts, Pages and Groups engaged in coordinated inauthentic behaviour originating in Egypt, Honduras, Iran, Israel, Kosovo, North Macedonia, Moldova, Romania, Russia, Saudi Arabia, Spain, Thailand, the UAE, the UK and Ukraine¹⁴. Facebook did not supply information on the exact number of Accounts, Pages and Groups which came under review over this period nor did it offer any specific data on these initiatives within the Irish context.

Twitter

Twitter identified a range of activities that utilise automation and bots such as malicious automation, fake accounts and spam and stated that it fights the use of automation and bots strategically. Twitter allows users to report potential spam to be reviewed and stated it is working on identifying these activities on an ongoing basis.

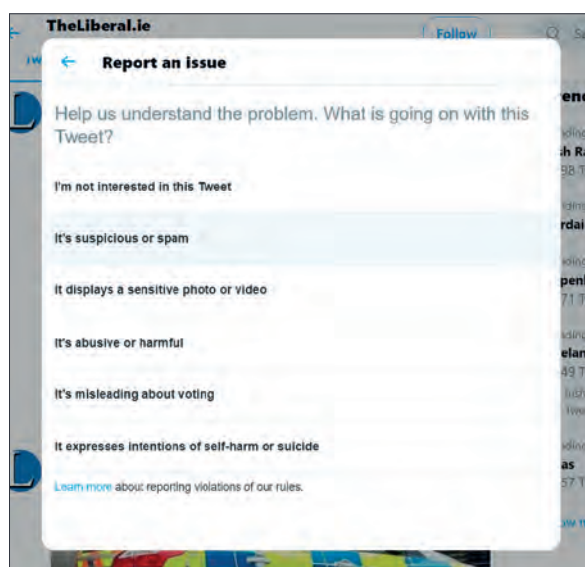


Figure 1. Twitter report functions

¹⁴ <https://ec.europa.eu/digital-single-market/en/news/annual-self-assessment-reports-signatories-code-practice-disinformation-2019>

In response to ERGA's follow-up questions, Twitter outlined a number of actions taken against manipulation such as removal of Tweets, temporary suspension of accounts, and permanent suspensions. The actions taken are dependent upon the severity of the violation. Twitter stated that between 01 January-31 August 2019, 126,025,294 accounts were pro-actively challenged by Twitter platform-wide and it received 4,544,096 user reports of suspected spam. However, Twitter provided no information on the regional breakdown or number of tweets or accounts from Ireland that were subject to actions.

Google

Regarding content automation Google stated that the same rules apply to human actions and bots that fall foul of four rules. These are (1) impersonation; and (2) misrepresentation in Google news and advertising. (Under the first two rules Google reported that it bans users who misrepresent themselves as someone they are not.); (3) engagement abuse, where Google stated that it prohibits "artificial manipulation of engagement such as video dislikes and views". The extent of content taken down is not clear. And (4) Influencing operations which includes identifying nodes of actors such as the Internet Research Agency (IRA) in Russia or another node in Iran seeking to disrupt political or electoral campaigns and removing their content. In its SAR Google stated that "from September 1, 2018, through August 31, 2019, YouTube removed over 10,842,500 channels for violation of its spam, misleading, and scams policy, and more than 56,500 channels for violation of its impersonation policy" and provided a link to the removal transparency report¹⁵. Ireland, however, was not featured in the regional breakdown of removals and it was not possible to establish the extent to which these prohibited activities were occurring or to verify the effectiveness of actions that Google implemented to protect users in Ireland.

Microsoft

Microsoft reported on its initiatives to protect the integrity of its services against false accounts and automated bots. On Bing, the search results are ranked using proprietary algorithms, drawing on billions of URLs, that serve to limit the manipulation of the search results by bots and to prioritise high authority content. On LinkedIn, the policies in its User Agreement prohibit the use of bots or other automated methods to access the service, add or download contacts or send or redirect messages. A dedicated Anti-abuse team enforces this prohibition and conducts manual investigations of accounts engaged in automated activity. Once again without any insight into how these algorithms work, it was not possible to assess the impact of these initiatives on Irish consumers.

¹⁵ https://transparencyreport.google.com/youtube-policy/removals?videos_by_country=period:Y2019Q3;region::p:2&lu=videos_by_country

QUESTIONS FOR PILLAR D: EMPOWERING CONSUMERS

The aim of Pillar D as outlined in the *ERGA Final* report is to “dilute the visibility of disinformation by improving the findability of trustworthy content and by making it easier for users to discover and access different news sources representing alternative viewpoints and by providing them with easily-accessible tools to report disinformation” while simultaneously engaging in media literacy campaigns to make users aware of the threats of disinformation. This section outlines the information provided by four of the Code Signatories, Facebook, Twitter, Google and Microsoft in both their initial Self-Assessment Reports (SARs) and the nine follow-up questions posed to them by ERGA to address Pillar D of the Code in greater detail. All of this data was reviewed by the researchers to identify what actions were taken by these Signatories to the Code to empower consumers in Ireland.

Q.1 *Are the products, technologies and programs identified by the platforms in the SAR effective in your Country in helping people to make informed decisions when they encounter online news that may be false, including by supporting efforts to develop and implement effective indicators of trustworthiness in collaboration with the news ecosystem?*

Facebook

Facebook reported that rather than removing misinformation outright from its platforms (Facebook and Instagram), its policy is to reduce its distribution and to downrank inauthentic information. Stories that have been fact-checked by a third party and given the result of ‘false’ will be demoted, meaning the post will not be shown at the top of the news feed on Facebook and any potential future views will be reduced. Facebook reported that pages, domains or groups that share disinformation repeatedly will have restrictions placed on their Pages inhibiting their ability to advertise and monetise. On Instagram, it reported that misinformation will be removed from the Explore and hashtag pages. In order to provide users with greater context to the news and information disseminated on the platform, Facebook introduced three measures (1) users are notified if they have shared or are about to share information that has been fact-checked and given the result of ‘false’ or ‘mixture’ with enhanced warnings for false videos and images; (2) the provision of explanatory articles written by fact-checkers alongside the fact-checked content in the news feed; and (3) the Context Button feature which allows users to view more information about the websites, publishers and images they see on its platform. Facebook offered greater detail on the functionality of this ‘Context Button’ feature in response to ERGA’s follow-up questions, reporting that it has added further trust indicators to it. These trust indicators are standardised disclosures which provide clarity to users on the ethics and accuracy of news organisations they see posting on the platform. These trust indicators are provided by a consortium of news organisations entitled the Trust Project and display information pertaining to the fact-checking practices, ethics statements, funding and ownership of these news organisations. Although Facebook reported that these indicators are now available in English and Spanish content, it is unclear how comprehensive this feature is within the Irish context. When looking at posts from prominent Irish news organisations RTE News, The Irish Times and TheJournal.ie, only the latter offered the additional trust indicator information

that it was a fact-checking organisation. No additional or more detailed trust indicators were visible on the RTE News and The Irish Times Facebook posts.

Facebook stated it has increased transparency and control for users through the 'Why am I seeing this post' tool which explains to users how their past interactions on the platform have impacted the ranking of posts in their news feeds and allows them to manage their preferences. In addressing health-related misinformation Facebook reported that it has made ranking updates to reduce the visibility of posts exhibiting exaggerated or sensational health claims and posts attempting to sell products based on health-related claims. The distribution of vaccine misinformation has been reduced in the News Feed and users have been directed towards authoritative information on the topic. On Instagram, Facebook reported that it neither shows nor recommends content containing vaccine misinformation on the Explore or hashtag pages. In relation to the expansion of Facebook's overall fact-checking efforts, it reported that the number of partnerships it's engaged in with third-party fact-checkers has doubled over the course of the past 12 months. However, it is Facebook's policy that current and former politicians and political candidates are exempt from its fact-checking initiatives¹⁶. This means that Facebook will not forward content or advertisements to their third-party fact-checkers for review, nor are the fact-checkers permitted to conduct their own fact-checks of political actors directly on the platform. Politicians must still comply with Facebook's Community Standards and advertising policies and should a politician share any content that has previously been debunked by fact-checkers, Facebook reports that "they plan to demote that content, exclude it from advertisements and display related information from fact-checkers". Facebook did not report on the extent to which this plan has been implemented across the EU member states.

In its initial SAR, Facebook did not report on any specific initiatives to place a label directly on content that has been fact-checked and given the result of 'false', to alert people to the trustworthiness of a post in conjunction with the news ecosystem. Facebook did announce on Oct 21, 2019, that it will clearly label content that has been labelled 'false' or 'partly false' in an effort to protect the 2020 US elections. Further, in answering ERGA's additional questions it stated that by December 2019, consumers globally will see a warning on photos and videos that have been fact-checked and given the result of 'false' or 'misleading' across both the Facebook and Instagram platforms that will include a link to the fact-checkers assessment. It was not possible however for the researcher to identify content that had been labelled as fact-checked, so it is unclear if this has been fully rolled out as yet within the Irish context.

Overall, it is was not possible for the researchers to assess to what extent any of the tools detailed above resulted in a reduction of the distribution of false news, as Facebook did not provide any of its own data or research for this purpose. In its follow-up questionnaire, Facebook pointed to third-party research from Stanford University, the University of Michigan and La Monde, which claim that false news sites on the platform have declined since 2016¹⁷. Without further information on the success and uptake of these tools within the context of the European Elections, it was not possible to assess these tools effectively.

Twitter

There are no indicators on the interface of the platform regarding the quality of the content published on Twitter. For example, while Google and Facebook claim to facilitate labelling in search results indicating that an article has been fact-checked, Twitter has made no such commitments to indicate where this has occurred. However, some additional information regarding the source of adverts can be obtained through its Ad Transparency Center.

16 Facebook state that this policy is rooted in their fundamental belief in free speech, respect for the democratic process and that by not limiting political speech people will be better informed and politicians more accountable for their words. <https://www.facebook.com/help/publisher/182222309230722>

17 <https://about.fb.com/news/2018/10/inside-feed-michigan-lemonde/>

Google

Google reported it had added a fact-check label to news content on its search results and news feed. TheJournal.ie is the only fact-checking organisation in Ireland linked with the Reporters Lab which is a fact-checking organisation that works in conjunction with Google to label content on the platform's newsfeed. However, when, for example, a story about Ireland where the topics had been fact-checked was searched for on Google search or via the news feed, no label could be identified on the range of linked articles listed.

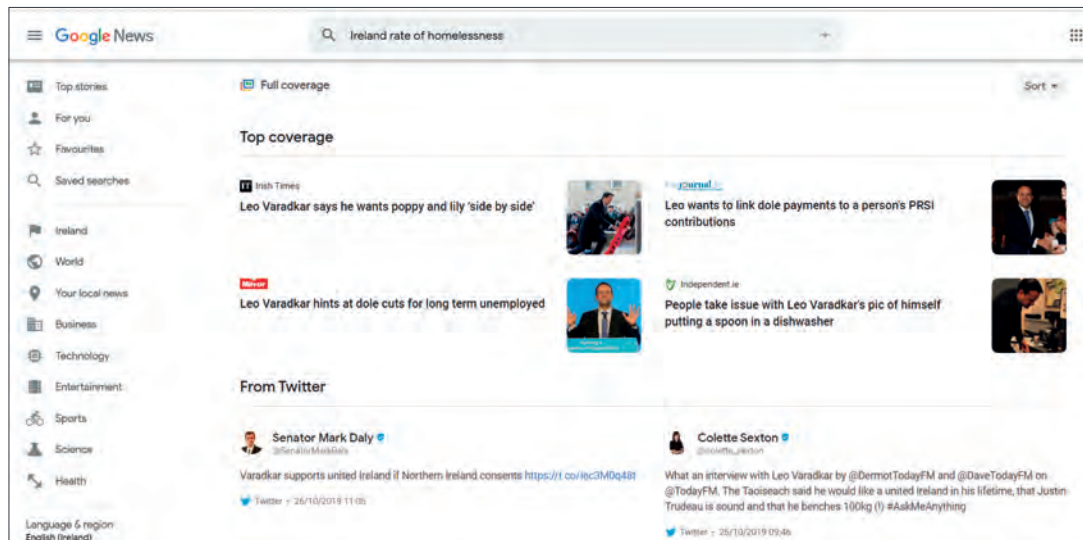


Figure 2. Google New Search Engine, 'Ireland Rate of Homelessness' Search Query.

Google also identified 'Publisher Transparency on YouTube' as a transparency measure for users. In its response to ERGAs follow-up questions, Google stated that "it has a feature to label publishers that are government or publicly funded on the watch pages of their videos." However, on the party page for Irish political party Fianna Fail, no labels could be identified on the channels landing page. Google stated that there are additional features regarding topics content that have not yet been rolled out in Ireland.



Figure 3. Political party homepage 12/12/2019.

Microsoft

Microsoft partnered with NewsGuard Technology which reviews online news sites across a series of nine journalistic criteria and then gives them a rating to promote a better understanding amongst its users of the reliability of the source. Microsoft stated that it has plans to expand this service, however, it is currently only available in Italy, Germany, France and the UK and so its effectiveness cannot be evaluated from the Irish perspective. In the follow-up questions posed by ERGA to Microsoft, it was asked to provide information on the take-up and impact of these tools amongst consumers and to what extent these tools supported a reduction in the spread of false news. It responded that it did not have any information available at present on the effectiveness of these initiatives. Microsoft offered no information on any items that were referred to them for review by fact-checkers nor the possible outcomes of any reviews that may have taken place. In relation to the labelling of content that may have been subject to a fact-checking review, Microsoft offered no information on any ad hoc labels that may have been placed on content and no clarification on who is responsible for putting these labels in place.

Q2 *Are the products, technologies and programs identified by the platforms in the SAR to prioritize relevant, authentic and authoritative information where appropriate in search, feeds, or other automatically ranked distribution channels effective in your Country?*

Facebook

In addressing health-related misinformation Facebook reported it has made ranking updates to reduce posts exhibiting exaggerated or sensational health claims and posts attempting to sell products based on health-related claims. The distribution of vaccine misinformation has been reduced in the News Feed and users have been directed towards authoritative information on the topic. A search of 'vaccines' directs users to the official accounts of The Center for Disease Control and the World Health Organisation.



Figure 4. Facebook News Search Feed Search for Term 'Vaccines'.

However, a search of other contested terms such as 'global warming' did not reveal authoritative content providers as prioritised at the top of the feed and so it cannot be verified that the processes employed by Facebook to direct users to authoritative sources are sufficient and comprehensive.

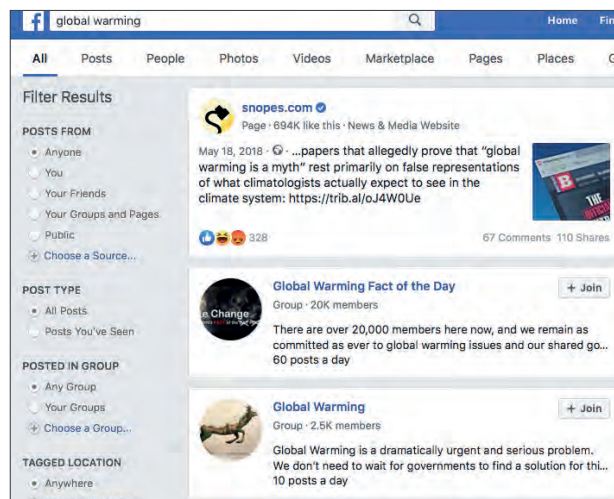


Figure 5. Facebook News Search Feed Search for Term 'Global Warming'.

Twitter

Twitter reported some efforts to prioritise authoritative information. There are only two cases outlined where Twitter prioritise public health resources. One, for vaccines which directs users to the Health Service Executive (HSE) and the second, is regarding suicide. In the case of vaccines, users who search the terms see the title 'know the facts' and the account of the HSE is prioritised in the search results. Twitter reiterated its efforts in the follow-up questions posed by ERGA, to providing authoritative information on vaccines on the platform and there is clear evidence that this takes place in Ireland.

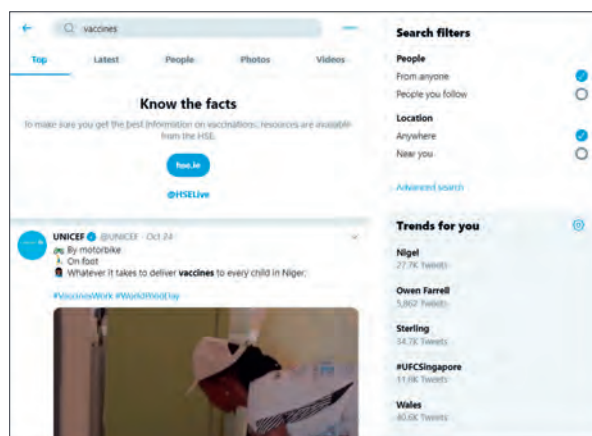


Figure 6. Twitter Search for Term 'Vaccines'.

In contrast, if other topics and contested terms are searched such as 'global warming', authoritative sources of information are not prioritised in the news feed.

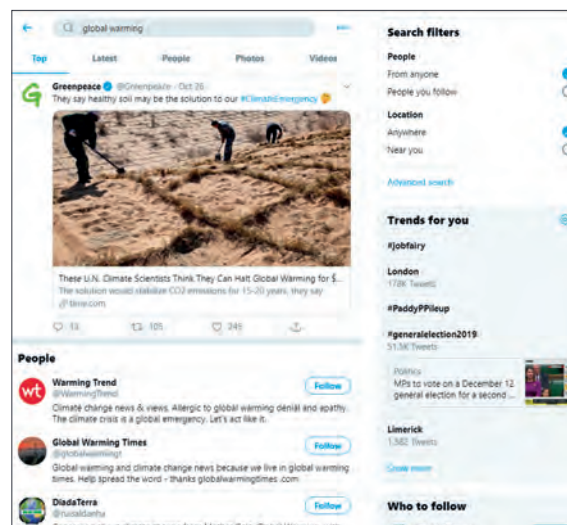


Figure 7. Twitter Search for Term 'Global Warming'.

In follow-up questions posed to Twitter regarding its investment in products, technologies and programs to help people identify and limit the spread of false news and find diverse perspectives about topics of public interest, Twitter stated that its efforts cannot be reduced to a single action because the “fight against such things as spam, malicious automation activity and coordinated disinformation campaigns goes beyond any single election or event” and it employs a multitude of efforts that take place every day to combat false news on its platform. However, it did outline some specific efforts such as the enhancement of machine learning to identify behaviours that detract from the public conversation. In this regard, Twitter stated it has a verification system for creating news accounts and it tracks behaviours that might indicate coordinated attacks. These measures could not be independently verified by the researchers. ERGA requested information on the degree of uptake of these tools and the extent to which they brought about a reduction in engagement with misinformation. Twitter stated this data is not currently available. Twitter also noted that it is in the process of developing new policies on synthetic and manipulated media, but these are yet to be implemented.

Google

Google listed a number of initiatives it has deployed throughout Europe in its SAR. It first notes the ‘Breaking News Shelf’ feature on YouTube. During various searches of YouTube on topical issues in Ireland such as ‘homelessness’ and more specific stories such as the Quinn Industrial Holdings attacks, no automatic news shelf appeared. Adverts were placed at the top of the search results and content from as old as 5 years ago was automatically set as the top results. When the researcher utilised an incognito window – searching did show some news results from Joe.ie and 42.ie regarding Ireland as well as results from RTE. However, it is not clear how consistent the ‘signals’ are regarding other issues. Neither Google’s SAR nor its follow-up response provided a list of the Irish based accounts that are considered to be Top Shelf News providers.

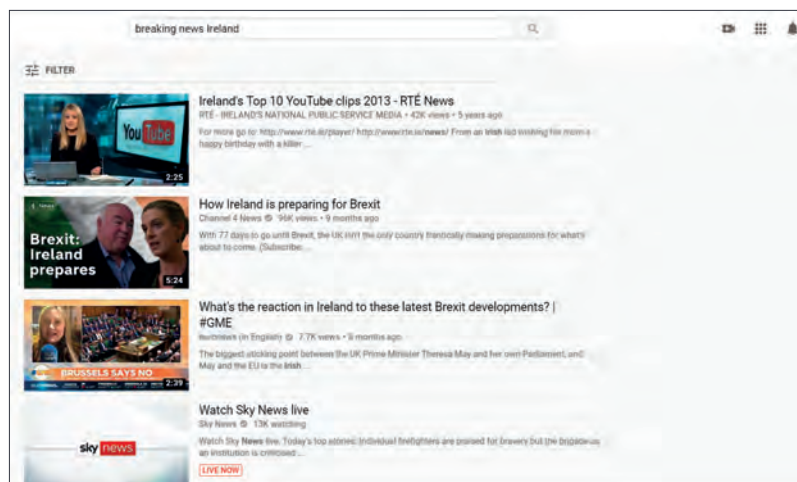


Figure 8. Search via YouTube for breaking news in Ireland to identify 'top shelf'.

ERGA requested information on Google's investment in products, technologies and programmes to help people identify and limit the spread of fake news. In response it listed surface level fact-checking where a label is applied in Google News and Search Feeds where a claim has been fact-checked. However, in the second submission, Ireland is not listed as one of the participant countries. This feature it stated allows fact-checkers to signal a fact-check on the Google feed by using a dedicated HTML mark-up and compliance with Google policies. It is not clear if TheJournal.ie is using this tool. No fact-check label could be identified by the researchers in various searches of the Google News Feed and Search Feed.

Regarding the spread of misinformation, Google reported that it removes YouTube content that violates its policies. There are no explicit policies however that address publishing false information or the grounds for the removal of misleading information. Rather the policies address issues such as fraud, (fake accounts), copyright, harmful and dangerous content that encourages others to inflict harm on others or themselves, hateful content, content that promotes or condones violence towards individuals or groups, noting this does not address what is said about these groups in general only where violence is a factor; graphic content, threats and harassment, which only removes 'malicious' content rather than 'petty', spam and scams which are designed to trick users into boosting views for a video. Google said that "in cases where content brushes right up against its policy line but does not violate it, including attempts to spread harmful misinformation, YouTube reduces recommendations of that content." However, this could not be independently verified.

Additionally, in a question posted by ERGA to Google regarding its attempts to prioritize relevant, authentic and authoritative information where appropriate, it answers: "Beyond matching the words in user queries with relevant documents on the web, search algorithms also aim to prioritize the most reliable sources available. To do this, our systems are designed to identify signals that can help determine which pages demonstrate expertise, authoritativeness, and trustworthiness on a given topic." However, again this could not be independently verified by the researchers.

Whilst Google listed a number of actions taken during the European elections to empower and inform users, it is not possible to retrospectively verify the presence or effectiveness of such initiatives. These initiatives are listed below but additional access to data by Google would be required to identify the efforts specific to Ireland and to evaluate their effectiveness.

- How to Vote
- Posts for Parties
- Candidate Information Panels / Statements
- Posts for EU Parliament
- Election Results

Google also highlighted Candidate Information Panels live in 28 countries in the follow-up questions to ERGA. A search of 'European Election' with a keyword of a candidate did not immediately reveal any link to such Information Panels on the interface of YouTube, either in the main search feed, (figure 9) or when clicking on a candidates video on a party page, (figure 10).

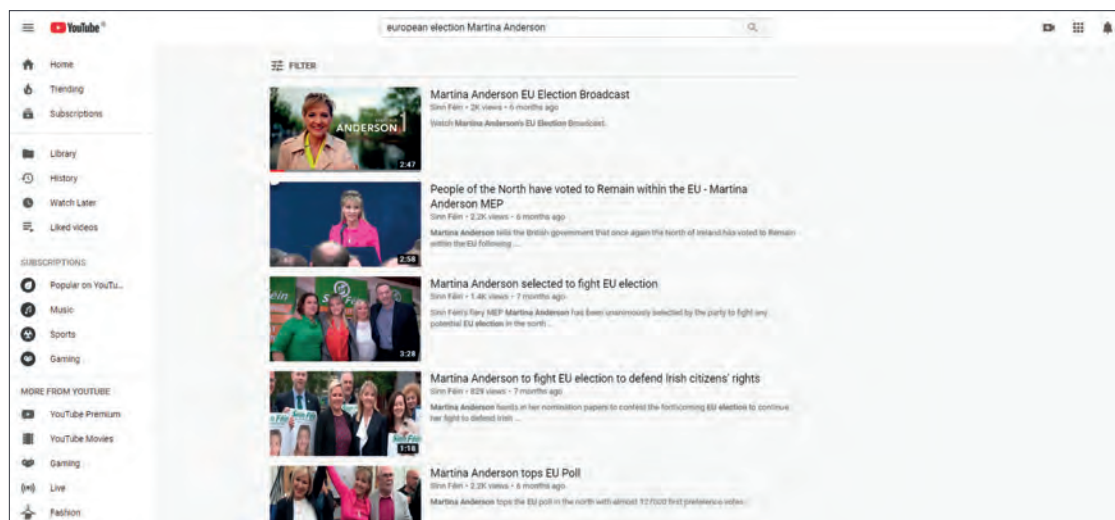


Figure 9. European election 2019 candidate search.

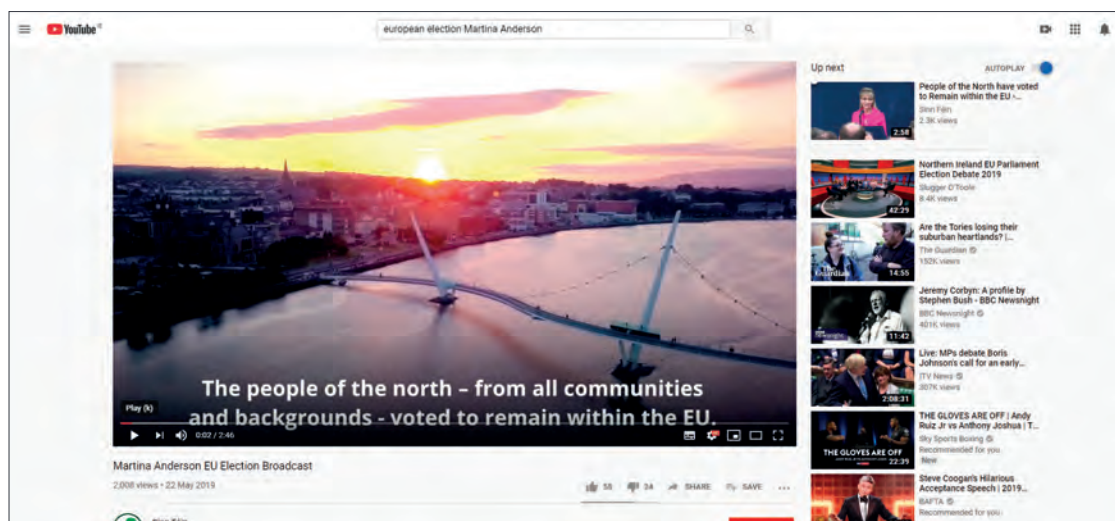


Figure 10. European Election political party channel page.

Google reported that it is difficult to quantify the impact of these measures but that it does aim to ensure users find them useful. It did not elaborate on any specific efforts aimed at assessing or measuring the impact of these initiatives on consumers.

Microsoft

Microsoft reported that its Microsoft News service is partnered with over 1,000 reputable news sources which have been vetted by the Microsoft News' team of journalists, to ensure content shown on its platform is licensed from reputable news providers, represents a diverse set of political viewpoints and provides balanced, credible content. It reported two different measures to provide trustworthy content to users using the 'Bing' search engine. The first, the 'Intelligent Search' feature it stated, provides various potentially valid answers to users' queries displaying them in a carousel to offer a more balanced viewpoint. It is not clear however how this 'Intelligent Search' feature can be accessed by the consumer or whether this feature is built into the service's algorithm. In its SAR, Microsoft provided the example of a 'is coffee good for you?' search query within Bing to demonstrate the feature, however when this process was replicated by the researcher, the results appeared not as a carousel of diverse perspectives but as a standard list of results.

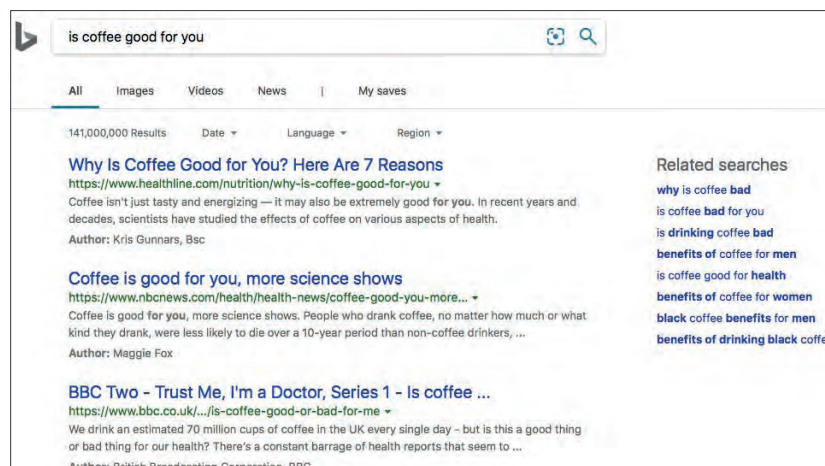


Figure 11. Microsoft Bing Search Engine Results 'Is coffee good for you?'

The second measure reported by Microsoft, the Fact-Check feature, assists users in finding fact-checking information on news content displayed within the 'Bing' search results. Two false news stories were searched in Bing by the researcher in relation to Florida Governor Rick Scott (the example provided in its SAR), and the Speaker of the US House of Representatives, Nancy Pelosi, both returning results highlighting the falsehood of these stories. It is not clear however how comprehensive this feature is, particularly within the Irish context as Microsoft reported in its response to the ERGA follow-up questions that this feature is currently only available in the US and UK versions of the Bing search engine.

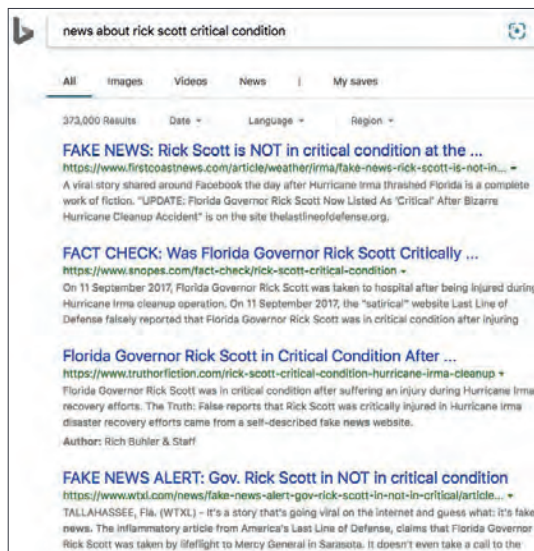


Figure 12. (above left) Microsoft Bing Search Engine Results 'News about Rick Scott critical condition'

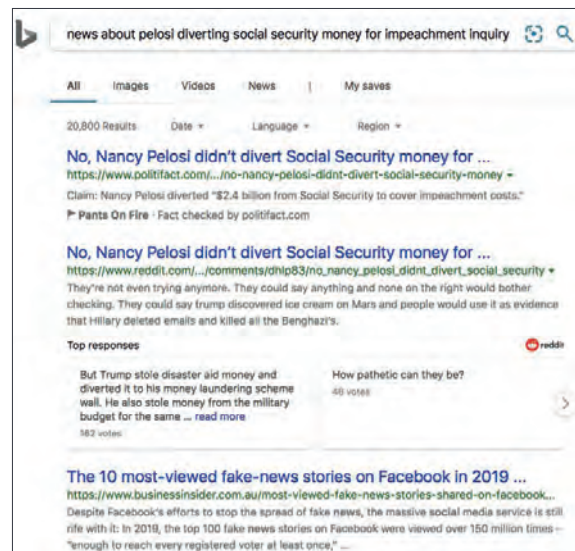


Figure 13. (above right) Microsoft Bing Search Engine Results 'News about Pelosi diverting social security money for impeachment inquiry'

Microsoft reported that it places websites along a high/low continuum. It stated that research has shown that websites promulgating disinformation tend to meet Bing's internal classification standards for 'low authority' sites and that as this tool improves, consumers will be exposed to fewer sites of low reliability when searching for queries in Bing. It did not provide details on this research and so the veracity of this claim could not be verified by the researchers.

On LinkedIn, Microsoft reported on the implementation of "best practices" guidelines for sharing quality content, to encourage the sharing of trustworthy information on the platform. LinkedIn also has an Influencer Program whereby 500 handpicked leaders of different industries create and share content. It further reported that members of its platform are supported in finding news and conversations that are most relevant to their interests through curated interest-based feeds. Without knowledge of the algorithms that create these curated feeds, it was not possible to verify if consumers are being provided with the most authoritative content on these topics of interest.

Q3 *Are the products, technologies and programs identified by the platforms in the SAR effective in your Country that make it easier for people to find diverse perspectives about topics of public interest?*

Facebook

Facebook did not report on specific efforts to assist people to find diverse perspectives about topics of public interest but rather highlights efforts aimed at empowering users to decide for themselves what to trust, read and share by providing them with more information about the content they're seeing. This is done through tools such as 'why am I seeing this ad' and 'why am I seeing this post' and through the introduction of the 'Context' button which provides information about websites and publishers they see on the platform. These measures reflect greater transparency in relation to what content consumers are seeing on Facebook as a result of their own activity and preferences but they do not address the provision of diverse perspectives to users about topics of public interest.

Twitter

While Twitter's response suggested that its algorithm does offer a range of relevant content when terms are searched for, this question was not directly addressed in its SAR or the follow-up ERGA questionnaire. Additionally, there is no way for the researchers to effectively verify how the algorithm works. In reference to the European election, Twitter stated in its SAR that it aimed to encourage conversation across the EU through the use of hashtags and emoji, #Ep2019 and #EUElection19 which were translated into the 24 official languages of the EU to ensure that citizens could add their voice to the discussion. However, it provided no information regarding how Twitter facilitates users to find a range of diverse perspectives on its platform.

Google

Google's response suggested that its algorithm assists people in finding diverse perspectives on topics of interest, however, there is no way to independently verify if this is the case. It states "the very nature of our products means that users searching for a topic see a plethora of results from various perspectives, whether they're looking on Google Search, News, or YouTube". It also listed some additional tools which include Full Coverage in Google News, Breaking News and Top News Shelves on YouTube, and elevating original reporting in Google Search. In its response to ERGA's follow-up questions, Google stated that it offers the Full Coverage in Google News live feature in each country, including Ireland. However, by using a simple search term for a topical news story the Full Coverage option is not immediately obvious. To find it users have to click on 'View All' under the first group of news articles which then takes users to a more dedicated page for full coverage. Again, the nature of the algorithm which Google stated is now personalised, cannot be independently verified. Similarly, it was not possible to identify the Breaking News feature on YouTube¹⁸ nor to verify that Google elevates original reporting in the feeds.¹⁹

¹⁸ <https://www.youtube.com/channel/UCYfdidRxbB8Qhf0Nx7ioOYw/featured> Accessed 20/01/2019

¹⁹ This is somewhat complicated by the issue of there being no definition of 'original reporting' being provided, as the first article in one title may not be the origin of the content. Additionally, depending on the search topics, for example when searching the name of a victim of a crime, a range of material from the date of the incident, the follow-up investigations and following arrests may all be reported together in one feed and it is unclear what the 'origin' of the general story might be.

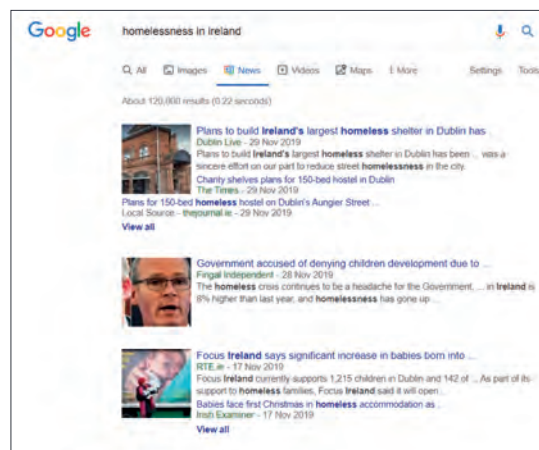


Figure 14. Google News search result for homelessness in Ireland.

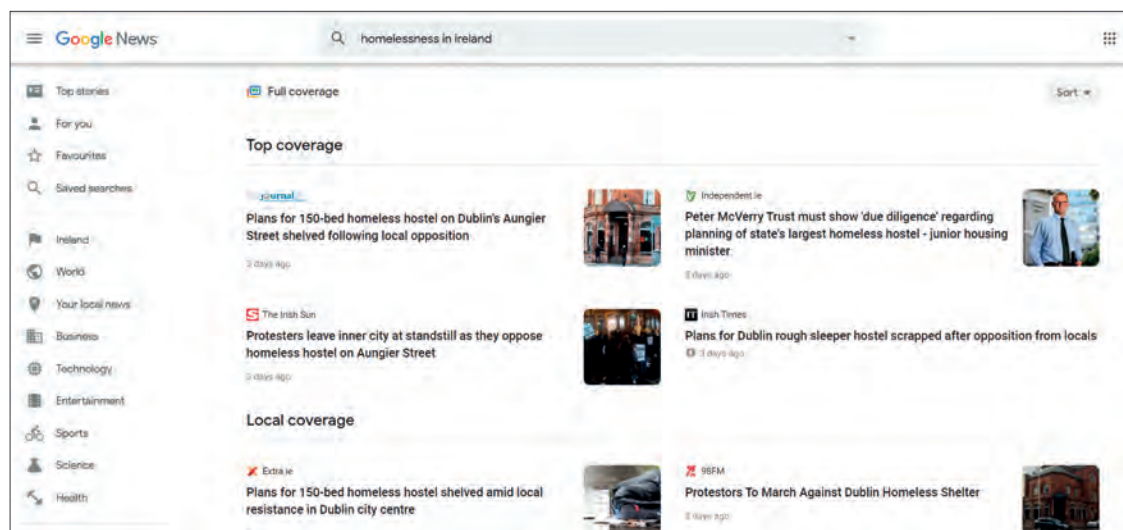


Figure 15. Google News Full Coverage of topic homelessness in Ireland.

Microsoft

As mentioned above, Microsoft reported that the 'Intelligent Search' feature provides various potentially valid answers to users' queries displaying them in a carousel to offer a more balanced viewpoint. This was not visible to the researcher when searching for the example offered by the Signatory in its SAR. Further, it highlighted its Microsoft News service partnership with over 1,000 reputable news sources which have been vetted by the Microsoft News' team of journalists, to ensure content shown on its platform is reputable and represents a diverse set of political viewpoints. However, this cannot be independently verified by the researchers.

Q4 *Is there evidence that the activities and initiatives identified in the SAR in relation to partnerships with civil society, governments, institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital media literacy were implemented and effective?*

Facebook

The majority of Facebook's media and digital literacy initiatives were not specific to Ireland but rather are pan European. Facebook reported that it supported fact-checking partners across all 28 member states providing tips on how to stamp out false news²⁰. Facebook reported that based on information provided by its agency partners, this campaign received over 100 million impressions across the EU, however, these figures have not been independently assessed or verified by Facebook. It is also not possible for the researchers to verify this claim.

Facebook reported that it partnered with Freeformers (a company that trains workforces in digital skills) and over 20 in-country NGOs and training organisations to deliver a Digital Skills Training Programme to 75,000 citizens across seven European countries, naming Ireland as one of the participants in its report. The webpage associated with this campaign, however, lists just 6 participant countries (Italy, Germany, France, Spain, Poland and the UK) with the exclusion of Ireland²¹. Therefore, we could not assess if this initiative was, in fact, rolled out in Ireland and who the partners to this initiative may have been.



Figure 16. Freeformers website listing the locations of the Digital Skills Training Programme in partnership with Facebook.

20 <https://fullfact.org/toolkit/#three-questions>

21 <https://freeformers.com/fb/>

This 'Digital Skills Training' initiative appears to place a focus on the commercialisation of data rather than upon promoting critical thinking and media literacy. The training modules are as follows on the Freeformers website:



Figure 17. Freeformers website listing the training modules for the Digital Skill Training Programme in partnership with Facebook.

Facebook introduced a digital literacy library (DDL) in 45 languages which provides lessons from the Youth and Media team at the Berkman Klein Centre for Internet and Society at Harvard University, focused on promoting critical thinking and thoughtful sharing of content online for 11-18 year olds. The Facebook Youth Portal is a place for teens to acquire general tips and information on privacy and safety available in 60 languages. In answer to ERGA's follow up questions, Facebook reported on its 'Inside Feed Blog' which provides numerous videos explaining its approach to tackling disinformation. Once again, Facebook did not provide information on the scale or impact of these tools so it is not possible to assess their effectiveness within Ireland.

Media Literacy Ireland (MLI) reported to the researchers that Facebook has offered it support through the presence of a representative on their Steering Group as part of their '#BeMediaSmart' campaign, and the further promotion of MLI by hosting the company launch event at their premises in Dublin city on Friday, February 23, 2019. A Facebook representative has also attended the majority of the MLI events that have taken place over the last 2 years.

Twitter

Twitter has engaged with a number of digital media literacy programmes in Ireland. Several of the initiatives that were outlined in Twitter's SAR were implemented in Ireland. These include:

1. #BeMediaSmart campaign in Ireland in association with the Broadcasting Authority of Ireland (BAI). In contributing to this, Twitter offered Ads for Good grants of up to \$5,000 each to nonprofit/charitable members of MLI to support the #BeMediaSmart campaign online. This was coordinated through MLI. The three beneficiaries of these grants were:
 - National Youth Council
 - National Adult Literacy
 - Webwise
2. School Digital Champions program which hosted students from secondary schools across Ireland in conjunction with the Department of Communications, Climate Action, and Environment. In the follow-up questionnaire, Twitter added that it later (on November 22, 2019) invited a school from Lucan Co Dublin in Ireland to learn about careers and digital literacy. Twitter stated that a number of NGOs and charities participated in this but the SAR did not list the organisations.

3. It provided training on Twitter's Ads Transparency Centre to members of ERGA but in the absence of more information on this training provision the BAI was not able to confirm if it had been notified or participated. Twitter also stated that they provided training "on campaigning best practices for political parties and candidates". This training also included safety and account security information" and was live-streamed from Twitter's HQ in Dublin.
4. Training with civil society: #WeDeserveBetter and a workshop in Dublin on hateful content, electionpledge.org
5. Twitter has been a member of MLI since early 2018 and has contributed to the Working Group responsible for the delivery of the #BeMediaSmart campaign, even though they are not officially a member of said Working Group.

Google

Google has been a member of MLI since early 2018 but has not directly participated in the Working Group or specific events. However, following the most recent MLI annual conference which took place on November 1 2019, Google has approached MLI to discuss how to become more involved in future activities. Google sponsored the development of the Be Media Smart campaign micro-site with the developers billing Google directly for the fees, with no input from Google regarding the structure, content or the management of the website.

Google also provided a €1 million grant to Irish children's charity Barnardos. A recent initiative the collaborative project aims to "enable children in Ireland to interact safely and responsibly online". As a result of the grant, a 4-year education programme will be rolled out in schools across the country. Over 4,000 workshops will be held in 1,000 schools, with Google and Barnardos aiming to reach up to 10,000 students in the first year of the programme and over 75,000 students overall."

Google's report cited a number of initiatives that do not appear to have been implemented in Ireland and are largely Europe Wide, these include:

1. YouTube Creators for Change - There is no Irish Chapter or creator listed as a 'Creator for Change' on the initiative's webpage.

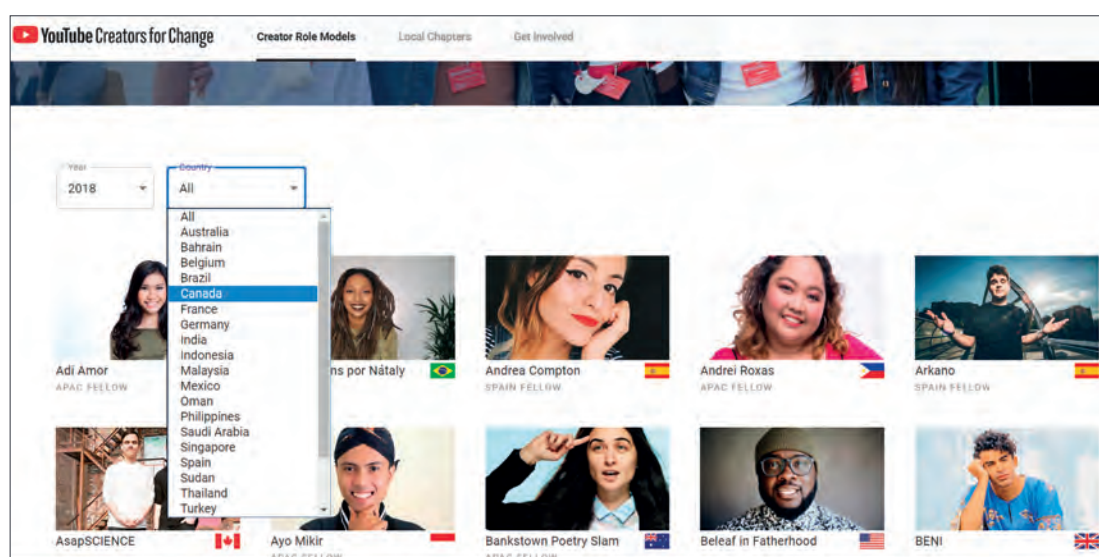


Figure 18. YouTube Creators for Change Interface.

2. Be internet Citizens _ This is a series of workshops linked with the Creators for Change and did not include any Irish participants. <https://intnetcitizens.withyoutube.com/policy/>
3. Be Internet Awesome – this is designed for educators and partners but it is not clear if it is used within Ireland. https://beinternetawesome.withgoogle.com/en_ie/teachers

To date, Google has not hosted or participated in any specific events or workshops with MLI. However, they have attended the main MLI events such as the annual conference.

Microsoft

Microsoft did not report on any Irish specific initiatives or partnerships to support critical thinking and digital media literacy in its initial SAR. It did report that it is the official sponsor of NewsGuard's digital media literacy program in Europe, however, Ireland is not one of the countries in which NewGuard is currently available. Its partnerships with academia and industry outside of Ireland are also focused primarily upon research on the impact of technology on society and on the development of tools to improve the truthfulness and trustworthiness of online communications.

Q5 *Did the platforms encourage market uptake of tools in your Country that help consumers understand why they are seeing particular advertisements (i.e. why they have been targeted by a particular ad)? Are these tools easy to see and to access?*

Facebook

Facebook introduced the "Why am I seeing this ad?" tool which allows users to view the reasons they have been targeted by an advert on Facebook such as demographics, websites they've previously visited or their personal interests which resulted in their profiles being matched with a specific advert. This title does not appear on the post itself, rather, to access this information the user is required to click on the three dots on the top right-hand corner of the post. A drop-down menu then appears with 4 main options: (1) hide ad; (2) report ad; (3) save video; and (4) why am I seeing this ad? If users click on the 'Why am I seeing this ad' heading they are then given the option to hide all adverts from this advertiser and/or to make changes to their advert preferences. Each advert that appears in the consumer's feed carries a label of 'sponsored' directly on the post. Facebook provided no insights on the engagement of consumers with this tool to allow them to better understand why they are seeing particular advertisements. Rather, it stated that from late March 2019 when it launched the ad transparency tools for the 27 EU member states, to September 2019, there were 444,000 political ads posted across the member states with a total spend of 31.5 million. It reported that these tools were promoted to consumers through media, politics, stakeholders and its consumer marketing activities but no specific metrics for Ireland (or any other member state) were supplied.

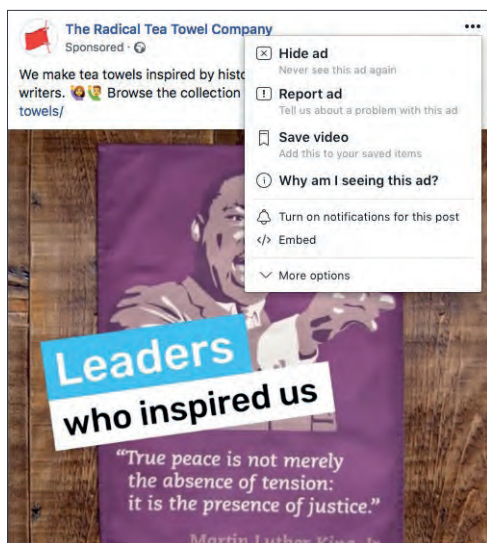


Figure 19. (above left) Facebook drop-down menu with 'Why am I seeing this ad?' option.

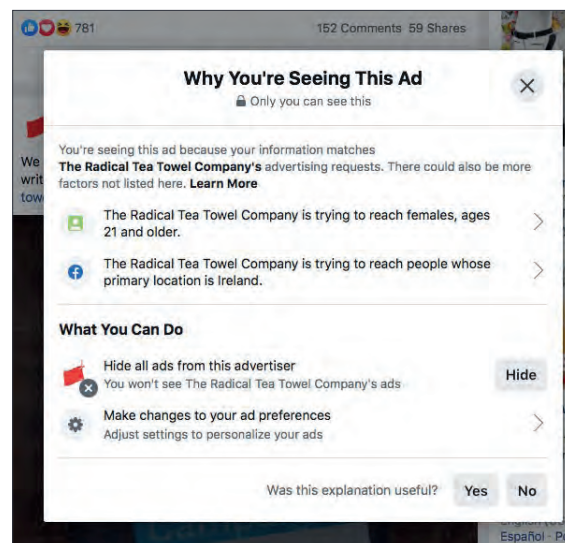


Figure 20. (above right) Facebook 'Why am I seeing this ad?' Interface, explanation and preference management tools.

Twitter

Twitter provided a feature to allow users to get some information about why an advert has appeared in their stream as well as an option to remove the advert. Adverts are labelled with the term 'promoted' at the bottom of the post and often a #ad in the text of the post. By clicking on the term 'promoted' users are taken to a dedicated page where the adverts state who has promoted it.

In follow-up questions regarding the encouragement of market uptake of tools, Twitter noted that its Ad Transparency Centre is a repository of all ads currently running on Twitter. However, the problems with the accessibility of this database for the purposes of media monitoring particularly around elections are detailed in *ElectCheck 19*. Ahead of the European elections Twitter introduced a verification process for political actors to ensure their location in the EU and required increased transparency around the placement of political adverts. Political adverts so far are available on a public database and general adverts, accounts, and trends are labelled as 'promoted' with some advertiser information made available to users. However, in November 2019 Twitter announced a ban on political and campaign advertising and limited options on caused based advertising. Causes can be promoted on Twitter but accounts doing so are subject to a certification process²² and the options for microtargeting are limited to "geo, keyword, and interest targeting". No other targeting types are allowed, including tailored audiences.²³ Geo-targeting is permitted at the state, province, or region level and keyword and interest targeting may not include terms associated with political content, prohibited advertisers, or political leanings or affiliations. As noted in *ElectCheck 19* report, Twitter did not label issue-based adverts in Europe and given the new policies at Twitter, it is not clear the extent to which general caused based adverts are being used to promote political messages.

22 <https://business.twitter.com/en/help/ads-policies/restricted-content-policies/cause-based-advertising/cause-based-certification1.html>

23 <https://business.twitter.com/en/help/ads-policies/restricted-content-policies/cause-based-advertising.html>

Twitter did provide information regarding enforcement actions on problematic content. Adverts that did not comply with advertising policies were rejected including adverts that were “deceptive, misleading, or harmful business propositions, making misleading, false, or unsubstantiated claims, promoting misleading information or omitting vital information on pricing, payment terms, or expenses the user will incur or promoting offers or deals that are not available or easily located on the landing page.” Twitter stated that 350 such ads were rejected in Ireland between Jan 1 - Aug 31 2019.

Google

For Google, the encouragement of market uptake is conceptualised as the provision of labels and links on an adverts video that can offer users more information regarding the advertiser. On YouTube, adverts appear at the start of a video. The immediate image of the adverts is somewhat cluttered but among the 14 items in the area, there is a small 'I' and a link to the advertisers' website. The information here is sparse and offers two broad statements as to why a user might see an advert. These statements are related to the video the user is watching or the records of their activity whilst signed into Google. No specific information regarding what users information was used to direct the advert was provided.

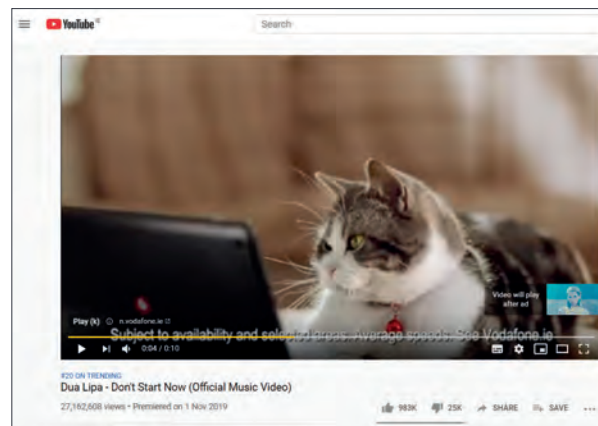


Figure 21. YouTube Interface 'Why am I seeing this ad?' (I) symbol.

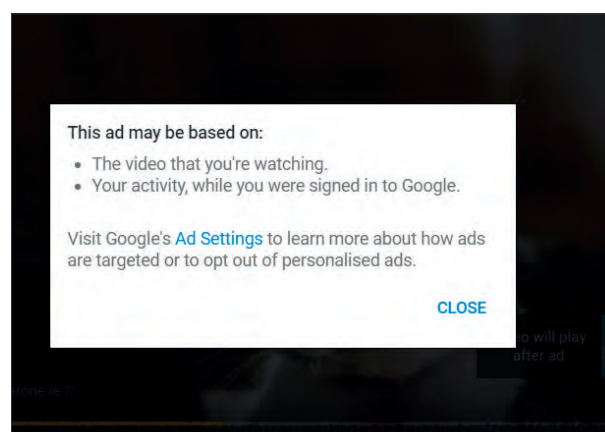


Figure 22. YouTube Interface 'Why am I seeing this ad?' Interface and explanation.

Google allows users to change advertiser settings and to block some adverts as well as provide feedback, but it does not appear to offer an option to block an entire advertiser, advertising company or all adverts. It also provided information for those seeking to monetize content on YouTube and Google that can be accessed by the general public²⁴. Despite a request from ERGA for specific metrics regarding uptake, no metrics for Ireland were provided and thus could not be verified.

Microsoft

Microsoft reported that it provides information to consumers on its advertising targeting practices on the 'Ad Settings' page of the Microsoft privacy dashboard. However, this does not provide specific information about why the user has been targeted by an advert, for example, their demographic or personal interests but rather just allows users to choose whether the advertising they see on the platform will be tailored to their interests. Microsoft simply states on its privacy page that 'your online activity helps Microsoft show you ads that might be more interesting to you'. You can choose not to see adverts tailored to your interests, but you cannot opt-out of being served advertising.

On its LinkedIn service, Microsoft has introduced a new 'Ads tab' that allows users to view all native adverts a company/advertiser has run on LinkedIn in the last 6 months. Adverts visible on the LinkedIn platform are labelled as 'promoted' and contain the name of the organisation that paid for it. It also provides a 'Why am I seeing this ad' tab which is visible when the user clicks on the three dots at the top right-hand corner of a post. Once again specific information on why the user has been matched with that advert is not provided but rather options are given for the user to opt-out of interest-based advertising. Users are also given the option to report an advert. In the follow-up ERGA questionnaire, Microsoft reported that it had no available information or metrics to assess the level of engagement of consumers with these tools.

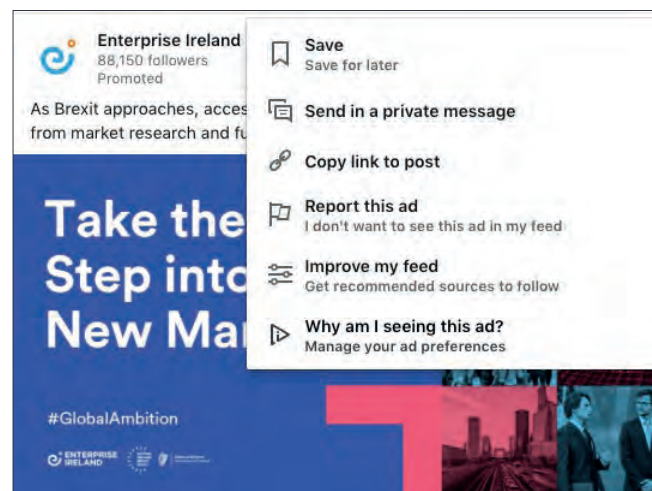


Figure 23. LinkedIn drop-down menu with 'Why am I seeing this ad?' option.

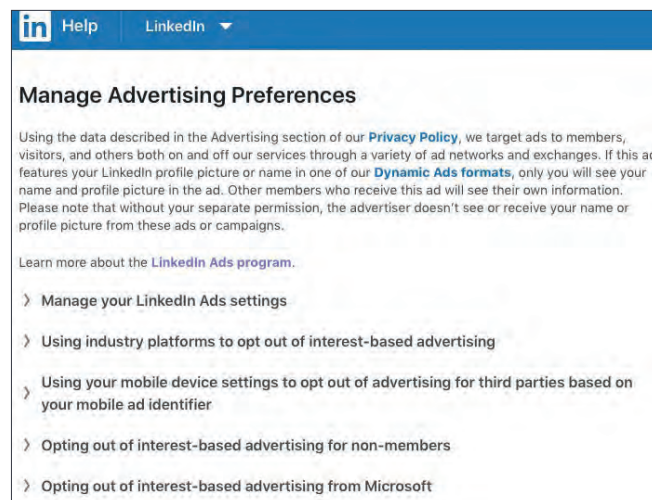


Figure 24. LinkedIn 'Manage Advertising Preferences' option.

Q6 *Do the platforms inform the users in your Country on how their data are used by them? Do the platforms give tools to consumers and inform them on how they can control and personalize the use of their data?*

Facebook

Facebook reported on several measures to inform users about how other applications and websites use and share their data with Facebook and tools to control this activity and their own preferences. As discussed above, the "Why am I seeing this ad?" and the updated Ad Preferences tool show people what relevant reasons such as demographics and interests led to them being shown a specific advert and provides them with more information on advertisers and businesses that have uploaded lists containing their data such as email addresses or phone numbers, along with any advertiser that has used this information to serve a person with an advert in the last 90 days. For organic posts, Facebook introduced "Why am I seeing this post?". Similar to the advert focused version of the tool, it informs users how their past interactions impact the ranking of posts on their News Feed and offers controls such as See First, Unfollow, News Feed Preferences and Privacy shortcuts to allow users to personalise their news feed.

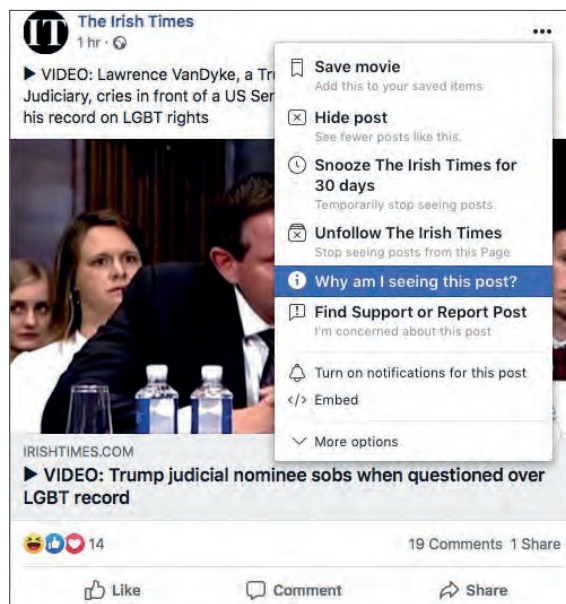


Figure 25. (above left) Facebook drop-down menu with 'Why am I seeing this Post?' option.

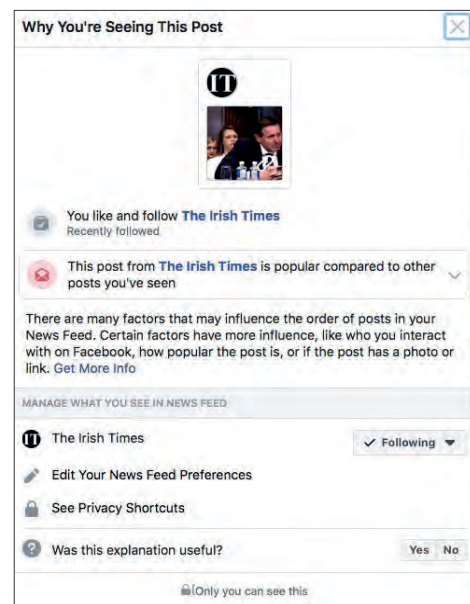


Figure 26. (above right) Facebook 'Why am I seeing this post?' Interface, explanation and preference management tools.

Facebook also introduced the 'Off Facebook Activity' tool to provide information to users on what applications and websites have shared their data with Facebook through Facebook's online business tools such as Facebook Pixel or Facebook Login. To access this information the user needs to be aware of this tool and to search for it in the search box. The user is then presented with a Facebook Shortcuts window and must press the visit button to continue.

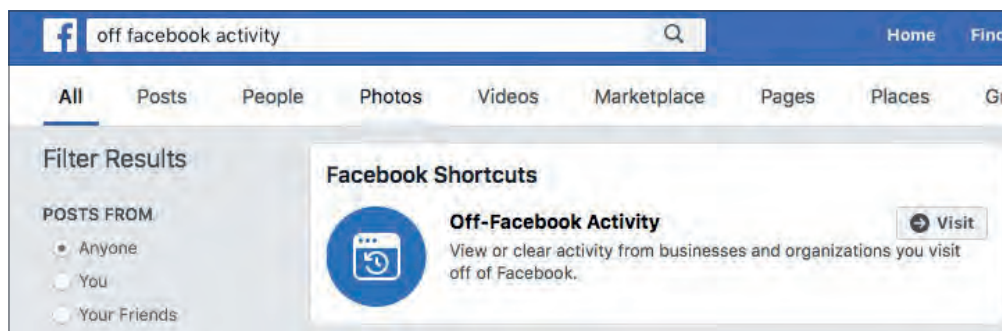


Figure 27. Facebook Search for 'Off Facebook Activity?' tool.

A brief summary of what applications and websites have shared the user's data is then presented along with a brief explanation of what 'Off Facebook Activity' is defined as. There are controls provided to 'Manage your Off-Facebook Activity', to 'Clear History', 'Access Your Information', 'Download Your Information' and 'Manage Future Activity'.

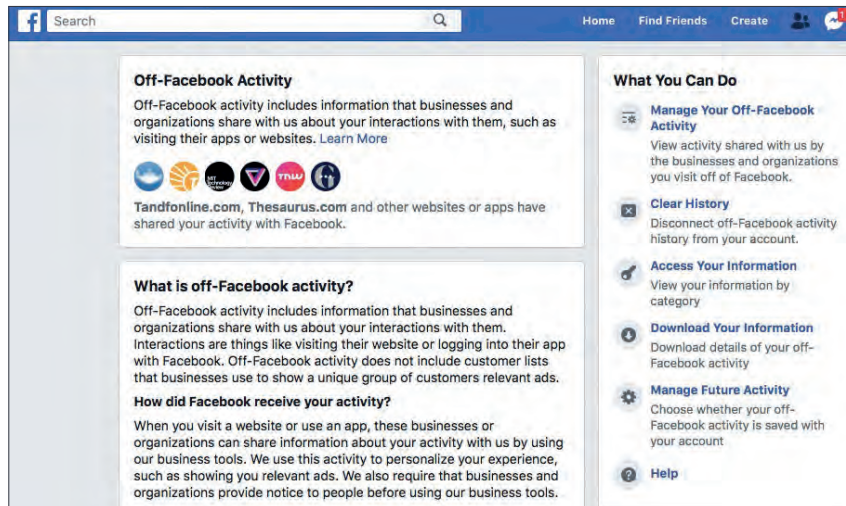


Figure 28. Landing Page for the 'Off Facebook Activity' tool.

For the user to access further information they must click on 'Manage Your Off-Facebook Activity' and re-enter their Facebook password. They are then presented with the list of applications and websites that have shared their data with Facebook for the purposes of more targeted advertising. Consumers are given the option to disconnect this information from their own account and to disconnect future off-Facebook activity, either for all of their off-Facebook activity or just for specific apps and websites.

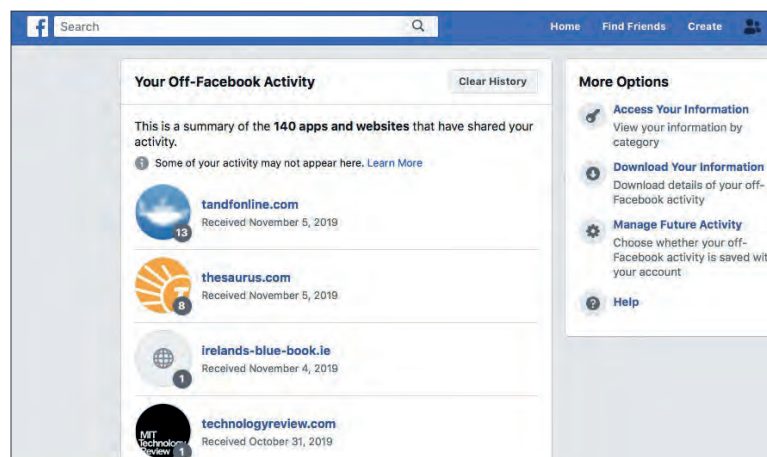


Figure 29. 'Manage Your Off Facebook Activity' Interface.

However, this tool does not represent an exhaustive and comprehensive list of user data that has been received by Facebook from user interactions with applications and websites.

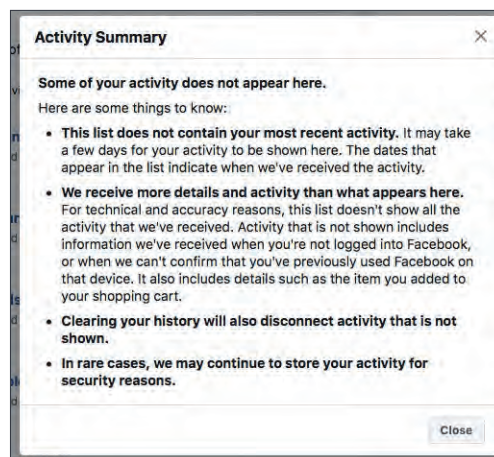


Figure 30. 'Off Facebook Activity' Tool User Activity Summary.

The introduction of this tool has also been a gradual one with availability in just Spain and Ireland at this juncture. Facebook also stated that although the user may wish to clear their history, it may continue to store the data. Facebook provided no specific information on the uptake of this tool within Spain or Ireland in its SAR nor in the subsequent ERGA questionnaire.

Twitter

A drop-down menu in the right-hand corner of Tweets offers a link to further details (see figure 33) such as 'why am I seeing this ad?' (see figure 24) and additional information about why users are seeing an advert (see figure 32). Included in this are two links to 'Personalise Ad Settings' and to 'See your Twitter Data'. The latter links to detailed information about what data Twitter uses to tailor advertising (see figure 33 and 32 below). Links from this include a list of topic interests derived from Twitter. Twitter details here how the topics were derived, "These are some of the interests matched to you based on your profile and activity. You can adjust them if something doesn't look right." A checkbox appears beside each of the topics and allows users to uncheck and remove the topic interest from the list. There is also a link to a section titled 'Tailored Audiences' where Twitter explains that your profile is also on additional lists from third-party advertisers. This list is not immediately provided but must be requested and it is delivered via email. However, Twitter does not inform users of specifically which of these data points were used by the advertiser.

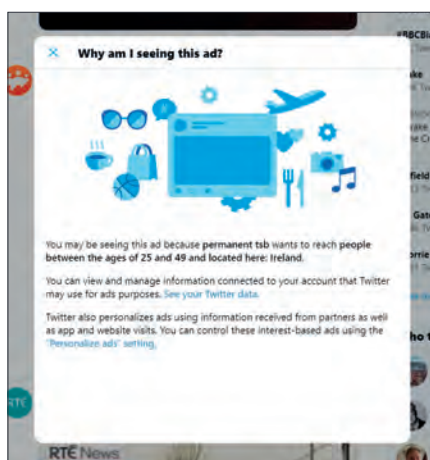


Figure 31. (above left) Twitter 'Why am I seeing this ad?' option.

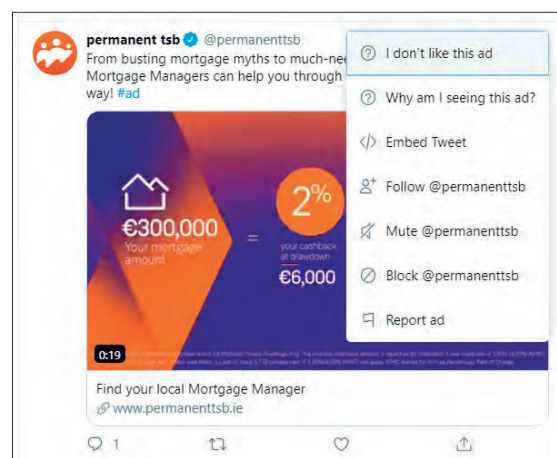


Figure 32. (above right) Twitter 'Why am I seeing this ad?' drop-down menu.

← Interests and ads data	
Interests from Twitter 312 interests	>
Inferred interests from partners 0 interests	>
Tailored audiences 5 audiences from 5 advertisers	>

Figure 33. Twitter portal for users to see what types of data is collected and stored about their interests.

Settings	← Tailored audiences
	Tailored audiences are often built from email lists or browsing behaviors. They help advertisers reach prospective customers or people who have already expressed interest in their business. Learn more
Account >	You are currently a part of 5 audiences from 5 advertisers
Privacy and safety >	You can opt out of interest-based advertising in your personalization and data settings. This will change the ads you see on Twitter, however it won't remove you from advertisers' audiences.
Notifications >	Request advertiser list
Content preferences >	
General	
Display >	
Data usage >	
Accessibility >	
About Twitter >	

Figure 34. Twitter's portal for accessing information about third-party organisations that have access to Twitter user data.

In its follow-up questionnaire, ERGA requested further information on metrics regarding engagement with these tools, however, Twitter stated that this data was not available.

Google

Google provided users with a direct link to their 'Ad settings' which, similar to Twitter, has a long list of topics of interest as well as some demographic information such as gender and age group. Here users are immediately given the option to turn personalisation off and prevent this information from being used, (although not removed or deleted), or to tailor the topics by selecting some of them for removal. While this list is comprehensive and users can make changes, the links do not provide users with information regarding which of the topics or demographic factors were used to direct the adverts to their feed.

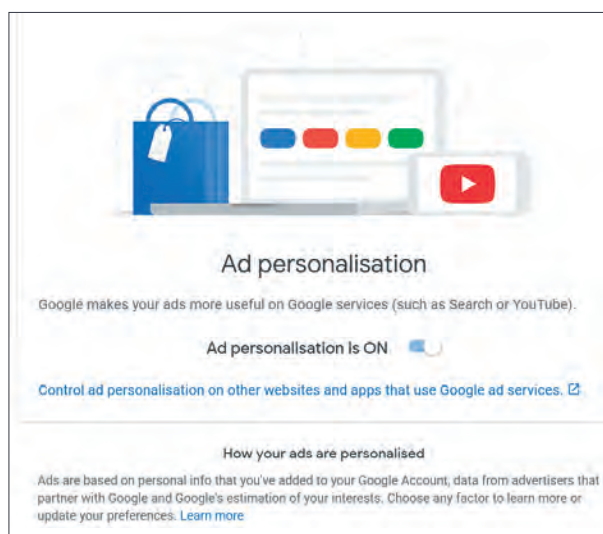


Figure 35. Google Ad Settings Interface.

Microsoft

Within a Microsoft account under the heading of 'Privacy', the platform gives information on the storage and use of user data. This is listed as the storage of browser and search engine history, location data (gathered either through locations that the user has provided or that the platform has detected using GPS technologies), voice command audios, media activity accessed through a Microsoft app or service, information on Microsoft apps or services that the consumer used and how they use them, the collection of reliability and performance data of a Microsoft product or service being used, personal preferences, contacts and interests stored in the Cortana Notebook service, and calendar and contact information from the LinkedIn platform. The user is given the option to view all of the above data and to edit or clear their history. Microsoft also offers users the option to download a copy of the data on the 'Activity History Page'.

Q7 Have the platforms provided tools for users in your Country to report false news?

Facebook

Within Facebook's News Feed users can report both organic content and adverts they are concerned about by clicking on the three dots in the top right-hand corner of the post. For organic posts, the drop-down menu offers a heading of 'Find Support or Report Post'. In order to report the post, the user must select a problem with it from the options provided of 'Nudity, Violence, Harassment, Suicide or Self-Injury, False News, Spam, Unauthorized Sales, Hate Speech, Terrorism or Something else.

Figure 37. (above left) Facebook drop-down menu with 'Find Support or Report Post?' option.

Figure 38. (above right) Facebook 'Find support or Report Post?' Interface and reporting options.

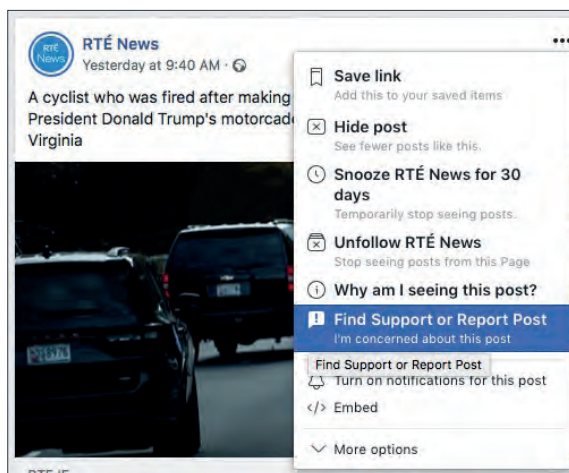


Figure 36. (above left) Facebook drop-down menu with 'Find Support or Report Post?' option.

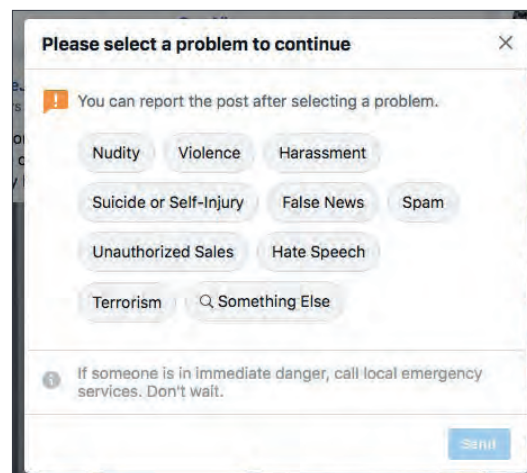


Figure 37. (above right) Facebook 'Find support or Report Post?' Interface and reporting options.

In the case of advertisements, the process is the same with a heading appearing in the drop-down menu entitled 'Report ad'. The user must then select their issue with the advert with options presented as, 'Misleading or Scam, Sexually Inappropriate, Offensive, Violence, Prohibited Content, Spam, False News, Other, Political Candidate or issue. It is unclear in both cases however what exact mechanisms are put in place once these reports have been made.

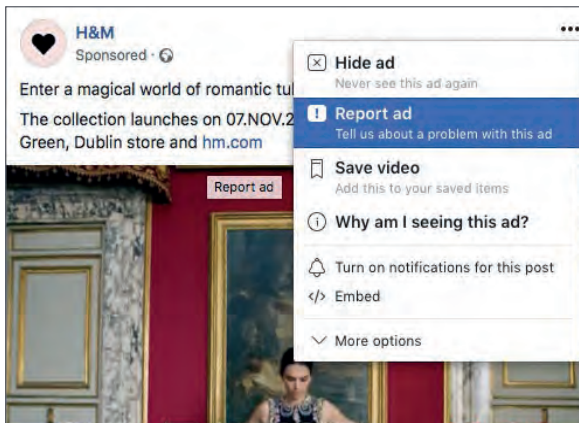


Figure 38. (above right) Facebook drop-down menu with 'Report ad' option.

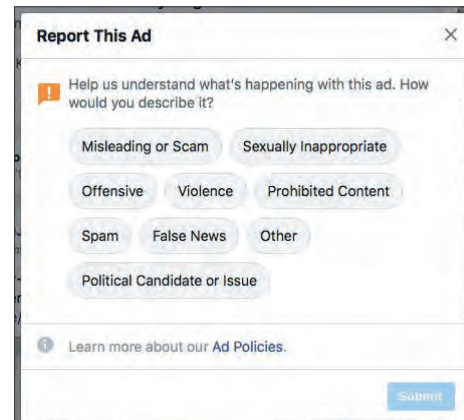


Figure 39. (above right) Facebook 'Report this ad' Interface and reporting options.

Twitter

In the reporting function for violation of 'Twitter's Ad Policy Rules' consumers can report an advert if they view it as misleading or deceptive. Political content is restricted by Twitter and adverts can be reported if they violate Twitter's rules. Political advertisers for elections have to be certified ahead of advertising on the platform. However, as the certification process for the EU elections has closed, it is unclear if there are national-level registration processes for national elections. Tweets that mislead about the process of voting can also be reported in violation of Twitter's advertising rules. No restrictions to issue-based advertising in the EU and no database of potential issue-based adverts or advertisers were provided.

Google

Within the Google news feed, it is possible for users to use the 'Send Feedback' portal located at the bottom of the page as you scroll down. From here users can indicate if the news provider or website is fake and if they suspect the content is fake. On YouTube, Google facilitates the reporting of a range of content via both flagging and report functions. Flagging alerts YouTube's moderating team to review the content and reporting allows users to describe the problem and include screenshots. However, only content that is in violation of the Community Standards is removed from YouTube. While issues such as spamming, copyright infringement, privacy or impersonation violations, threatening behaviour or hate speech, nudity or graphically violent, and harmful content that misleads users are all considered community violations, disinformation is not explicitly a topic that could be in violation of the standards. Google stated that where the advertiser misrepresents their own activities, rather than misrepresents something in general, this will be removed. However, this relates more to commitments under Pillar A, Scrutiny of Ad Placements rather than to the reporting of misleading content or disinformation in general.

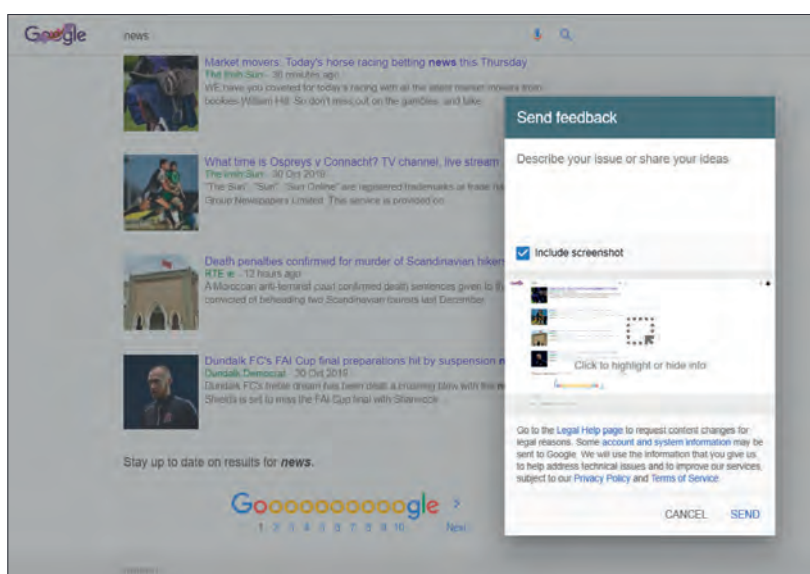


Figure 40. Google News Feed 'Send Feedback' portal.

Microsoft

On LinkedIn users can report both organic content and adverts they are concerned with by clicking on the three dots at the top right-hand corner of the post. For organic posts, the drop-down menu offers a heading 'Report this post' (this post is offensive, or the account is hacked). The user is then given a list of three options to choose from: (1) I think it's inappropriate for LinkedIn; (2) I think it's fake, spam or a scam; and (3) I think it's something else.

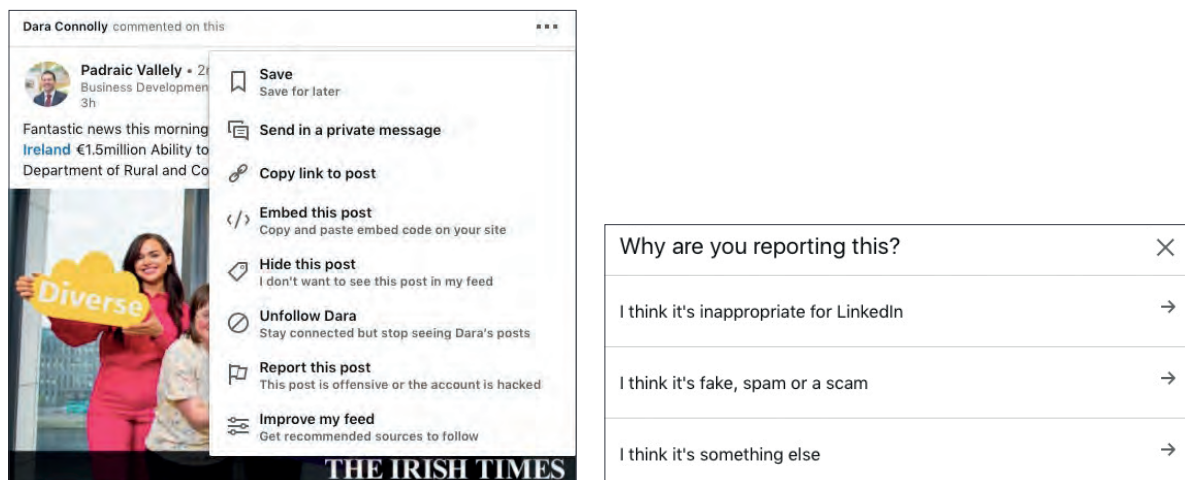


Figure 41. (above left) LinkedIn drop-down menu with 'Report this Post' option.

Figure 42. (above left) LinkedIn 'Why are you reporting this?' Interface and reporting options.

If the user chooses the 2nd heading 'I think it's fake, spam or a scam' they are asked to give further clarification and select from 4 options: (1) I think it's a false account; (2) I think it's misinformation; (3) I think it's promotional or a scam; and (4) I think it's a scam, phishing or malware. It is not clear however what processes are put in place to address this content once these reports have been made.

Figure 43. LinkedIn 'I think it's fake, spam or a scam' Interface and further reporting options.

In the case of advertisements, the process is the same with a heading appearing in the drop-down menu entitled 'Report this ad - I don't want to see this ad in my feed'. The user is then given a list of three options to choose from: (1) I think it's annoying or not interesting; (2) I have seen the same ad too often; and (3) I think it's something else. Should the user click on heading three, they are given the option to choose whether the post relates to a scam or malware, offensive language, pornography, terrorism, violence, hate speech or the infringing of rights. Although advertisements can play a significant role in the spread of disinformation none of the options explicitly relate to concerns of 'fake news' or 'disinformation' and the processes put in place once a report has been made are once again unclear.

Q8 *Have the platforms organized specific events, or workshops, campaigns, videos or any other tool in your Country to inform consumers or journalists about the means to counter disinformation?*

Facebook

As previously mentioned, Facebook supported the establishment of Media Literacy Ireland (MLI) through the presence of a representative on the steering board and assisted in the promotion of MLI by hosting the company launch event at its premises in Dublin city on Friday, February 23 2019. Media Literacy Ireland reported to the researchers that Facebook has attended the majority of its events that have taken place in Ireland over the past 24 months. In terms of Facebook's fact-check initiatives, it partnered with TheJournal.ie and organised an event focused on protecting the integrity of the European elections in April 2019 in Dublin and a webinar which provided a hands-on guide to the use of Crowd Tangle, a tool for tracking the spread of news stories online through Facebook analytics. Facebook reported on its EU Elections Integrity Campaigns which ran from April-May 2019 across 11 EU member states, Germany, France, Spain, Italy, Poland, Belgium, the Netherlands, Sweden, Denmark, the UK and Ireland. The purpose of its campaign was to inform consumers about Facebook's election integrity efforts in the run-up to the European elections with a particular focus on the reduction of misinformation, cracking down on fake accounts and political ads authorisation and ads transparency tools. The campaigns, it reported, ran on its platforms, as well as offline in print newspapers and digital billboards however this campaign is predominantly about highlighting Facebook's own efforts to deal with these issues rather than providing instruction to consumers and journalists on means for them to counter disinformation.

Twitter

Twitter listed several efforts in this regard each of which were validated as having taken place in Ireland. They are listed as follows:

- Educators Guide to Twitter for parents and teachers
- Digital Citizenship guide Information package for parents and educators.
- Hosted several Irish secondary schools to participate in a School Digital Champions event in Twitter's Dublin HQ.
- Training on the Ads Transparency Centre: Dublin HQ.
- #WeDeserve Better and the workshop in Dublin on hateful content

Additionally, Twitter worked more closely with MLI on two events. The first was in response to the #BeMediaSmart campaign and took place ahead of the European elections in May 2019 when MLI participated in the 'Twitter for Good Friday' organised and hosted by Twitter at its Headquarters in Dublin. MLI were invited to present on its experiences and the lessons it had learned in relation to the #BeMediaSmart campaign. This event took place on May 17, 2019, in Twitter HQ Dublin. The second event, a workshop that brought MLI and Twitter together was an MLI organised 'mini masterclass' about coordination and management of digital campaigning. This event took place on November 1st 2019 in Dublin as an optional extra for MLI members on the day of the MLI conference and was co-hosted by ForaChange. Twitter also participated in a panel session during the main conference later that day where it presented resources for the #BeMediaSmart campaign.

Google

Google listed several events in its SAR, held in Dublin in collaboration with partners, whilst omitting others that were identified during the research process. Further, within its SAR Google listed several events that do not appear to have been implemented in Ireland. All of these events are listed below:

1. Google's FactCheck tool allows users to search for content about 'Ireland' through a keyword search. However, the fact-checks contained within this tool provide content from the UK, produced by FullFact or from Northern Ireland produced by FactCheckNI, and largely pertain to Brexit <https://toolbox.google.com/factcheck/explorer/search/Ireland;hl=en;gl=>
2. First Draft Training. Google funds First Draft, this company provided training on disinformation emergencies in collaboration with ONA Ireland on October 9th <https://twitter.com/ONAIreland/status/1173691968955789314>
3. The Trust Project. Google reported that it works with the Trust Project however among the news titles listed there are no Irish titles that are official partners. <https://thetrustproject.org/>
4. Google collaboration with FactCheck EU – there are no Irish partners listed <https://eufactcheck.eu/about-us/>
5. Credibility Coalition: There is no initiative that links Ireland, Google and the Credibility coalition nor does there appear to be any Irish partners of CredCo <https://credibilitycoalition.org/about/> Reporters Without Borders – it is not clear that any Irish participants were engaged in the three training days conducted in Berlin, Cape Town or Paris.
6. Digital tools for training journalists: Google does provide a range of online short courses on various aspects of journalism via the News Initiative <https://newsinitiative.withgoogle.com/training/>. It is not possible to verify if any Irish journalists participated and if so how many.
7. First Draft and Cross Check – As above, these initiatives provided training on disinformation emergencies in collaboration with ONA Ireland on October 9th 2019 <https://twitter.com/ONAIreland/status/1173691968955789314>
8. Google hosted a training event for journalists in 2017 <https://fujomedia.eu/google-news-lab-workshop-irish-journalists/>
9. Google News Lab sponsored fact-check internships at the Journal.ie <https://www.thejournal.ie/thejournal-google-news-lab-fellowship-3151243-Dec2016/>
10. The Irish branch of the National Union of Journalists lists a training event with Google with the NUJ <https://www.nuj.org.uk/events/google-tools-dublin/>

Microsoft

Microsoft reported that it sponsored the Conference for Truth and Trust Online which was held in London on October 4-5, 2019. The conference aims to bring the academic and tech sectors together to develop automated tools to improve the truthfulness and trustworthiness of online communications. It did not report on any specific organised events within Ireland focused on directly countering disinformation.

Q9 *Please provide an evaluation on the adequacy of the activities carried out by the Code's signatories to empower consumers.*

Consumers of Facebook, Twitter, Google and Microsoft are supported primarily in two ways. Firstly, immediately via the interface of the platforms through the provision of tools to report organic and sponsored content and links to additional information on the source of these posts, and secondly more broadly through media literacy or fact-checking initiatives.

Immediate support regarding the content that a user is seeing is mixed across the Code Signatories. The Signatories have provided a range of tools and information portals such as the capacity to report information as problematic. However, it is not clear how often these features are employed by Irish consumer's, what actions were taken by them or what actions each Signatory took on the basis of these potential complaints. In order to accurately assess the level to which consumers are empowered to understand, report and impact information on these platforms, it is necessary for the Signatories to report the national totals of complaints received via these tools as well as the corresponding actions taken to highlight this content to consumers as problematic, remove it entirely or to address the publishers of this content.

Consumers are somewhat supported regarding the use of personal data, but the information provided to users is on the whole, insufficient. Regarding users' personal data and micro-targeting, that cannot be understood as a general support to users as neither Twitter, Google or Microsoft inform users of what specific personal data is used to direct a specific advert to their feed, with the information provided remaining broad and nonspecific. Users 'might' have seen an advert based on a range of criteria, but no criteria are provided. Only Facebook offers more detailed information to users on why they have been matched with an advertisement such as demographics and personal interests however the information on how it uses consumers data remains incomplete.

Regarding supports on disinformation, Irish users are not well supported in terms of being informed of misinformation in circulation online. While Facebook and Google claimed to label fact-checked content, no fact-check labels could be identified by the researchers while searching either Signatories search or news feeds. It also remains unclear who is responsible for adding these labels (the Signatories or the fact-checkers) so that users can see that a claim has been reviewed. In short, the Signatories have partnered with the fact-check organisation in Ireland TheJournal.ie, who is registered with IFCN, but that organisation operates with limited resources. A total of 49 fact-checks were carried out by TheJournal.ie between January-December 2019 however no labels could be identified on the Signatories platforms by the researchers. This is a suboptimal situation for Irish users as they navigate through content online.

Notwithstanding the need to continue media literacy and fact-checking projects in Ireland there are some significant problems in terms of how this content is featured, distributed and promoted on each of the Signatories platforms. It is not possible to establish the distribution of this content among the Irish population nor is it clear the extent to which they are impacting users in general.

This also raises concerns about the processes through which these Signatories partner with civil society, media and other stakeholders. While there have been some supports provided to Media Literacy campaigns, there are no examples of partnering with other organisations in Ireland to conduct research or to engage with academia. And the partnership with fact-checkers via a third party IFCN cannot be described as wholly comprehensive and effective in Ireland.

QUESTIONS FOR PILLAR E: EMPOWERING THE RESEARCH COMMUNITY

The aim of Pillar E as outlined in the *ERGA Final* report is “to enable privacy-compliant access to data for fact-checking and research activities.” This section outlines the information provided by Facebook, Twitter, Google and Microsoft detailing their respective initiatives to empower the research community in Ireland as Signatories to the Code. The researchers utilised the SARs provided by the Signatories, the nine follow-up questions posed to them by ERGA and conversations with civil society organisations (TheJournal.ie and Media literacy Ireland) to identify if the actions reported on under Pillar E of the Code, were effectively implemented in Ireland.

Q10 *Are the initiatives identified in the SARS effective in supporting good faith independent efforts in your Country to track Disinformation and understand its impact, including the independent network of fact-checkers?*

- Have the platforms partnered with a fact-checking organization in your Country?
- Have the platforms supported the fact-checkers community in your Country?
- Based on a reasonable sample of the activity can you conclude if the fact-checking arrangements are effective in your Country?

Facebook

TheJournal.ie found Facebook to be very proactive in engaging with journalists and fact-checkers in the run-up to and during the European elections. Facebook organised an event focused on protecting the integrity of the elections in April 2019 in Dublin and a webinar which provided a hands-on guide to the use of Crowd Tangle, a tool for tracking the spread of news stories online through Facebook analytics. In the months preceding the elections, Facebook launched a media literacy campaign across Europe in conjunction with fullfact.org, a toolkit for identifying fake news, which also provided direct links to fact-checkers websites per country. TheJournal.ie reported that this resulted in approximately 7,000 click through views to its own website. Facebook has established an Elections Operations Centre based in Dublin, focused on election integrity that provides 24/7 coverage and on May 24th, the day of the European election, Facebook engaged with fact-checkers and monitored disinformation online, highlighting stories that may have been appropriate candidates for fact-checking. TheJournal.ie ultimately described Facebook’s support for fact-checking initiatives as one that was both timely and hands-on. It should be noted however that of the four Signatories to the Code examined in this report, only Facebook is engaged in its own fact-checking project partnering with third-party fact-checkers to identify and review potentially false news. Facebook reported that it has implemented a key update over the past few months focused upon preventing content from going viral while it’s in review by fact-checkers. It stated that in several countries it will temporarily reduce the distribution of content that has signalled it may be false, subject to the result of the fact-checking process. Facebook did not provide information on what specific countries this has been rolled out in and so it was not possible to verify that this is functioning effectively within Ireland.

Although overall, TheJournal.ie found Facebook to be proactive and supportive of its fact-checking initiatives around the European elections, there is one important caveat to this. As a result of TheJournal.ie's official partnership with Facebook, it is prohibited by Facebook to fact-check statements or advertisements that have been posted by politicians (current or former), political candidates, or campaigns on their respective Facebook accounts. TheJournal.ie can fact-check this information on its own website but not on Facebook. This rule and its application can result in some uncertainty on whether an individual is to be considered a politician. It was necessary for example, for TheJournal.ie to query with Facebook if posts made by independent candidate for the European elections Gemma O' Doherty fell under this rule, to which it affirmed she did, making her Facebook posts ineligible for fact-checking by TheJournal.ie on the platform. TheJournal.ie found Facebook to be clear and timely in its response to all queries related to its fact-check policies, although this policy represents a significant obstacle to fact-checking initiatives as they relate to political actors. Further to this, as there were three fact-checked news items published by TheJournal.ie in the run-up to and during the European elections, it was difficult for the researchers to draw any conclusions, based on the size of this sample, as to the overall effectiveness of fact-checking initiatives in Ireland.

ERGA requested further information from Facebook on the content referred to them by fact-checkers and the outcomes of these reviews. Facebook in response placed the onus on the fact-checking organisations, merely providing a link to its full list of partners and their respective websites. It did not provide any subsequent information on the outcomes of any specific fact-check reviews. It was difficult for the researchers to assess the entire process by which content is referred to Facebook by the fact-checking organisations and in turn, the process by which Facebook identifies content for review by its fact-checking partners. In its SAR, Facebook reported that it utilises a combination of technology and human review to prioritise what content is enqueued to its fact-checkers. The *ERGA Final* report highlighted however that this priority is not defined by the importance of the news or issue, nor by the level of risk it presents to negatively impacting public opinion. Rather, every fact check organisation can choose autonomously what items to fact-check. In response to the ERGA follow-up questionnaire, Facebook stated that it does not tell its fact-check partners what content to review, as this would undermine the independence of their work. They merely offer them guidelines on the broad types of content eligible for review. Facebook provided no information on how the outcomes of fact-checking reviews which have recognised content as false are identified for users nor who is ultimately responsible for putting and keeping these in place.

Twitter

As Twitter does not publish fact-check labels, there were no fact-checking arrangements to evaluate. More broadly speaking, Twitter referenced a series of research papers that rely on Twitter data to study disinformation. These include The Computational Propaganda Project by the Oxford Internet Institute²⁵ and Digital Age by the Demos Institute UK²⁶. Neither of these includes Ireland as a case study. Twitter does provide some access via an API for researchers to extract information and analyse it. In order to do this, researchers must first apply for a Developer Account which is subject to questions regarding the release of data. One of the questions in the Developer Application addresses the issue of whether the dataset will be made available to Government or Public bodies. It is not clear if this poses a barrier to access if it is, or if it is a facilitation of access to data if it's to be released in this way.

Ireland's fact-checking organisation TheJournal.ie reported that it had no contact from Twitter in relation to specific fact-checking initiatives around the European elections. TheJournal.ie's impression of Twitter's fact-checking initiatives is that they happen mostly behind the scenes and it could do more to engage and partner with journalists and fact-checkers to combat disinformation on its platform. Twitter's efforts on combating disinformation appear to focus on its targeting of bots and false accounts in house, whilst encouraging consumers/users of the platform to report these to the platform. This places the onus and responsibility on the consumer to recognise and report potential instances of disinformation. Twitter's overall strategy to combating disinformation appears to be more reactive rather than a proactive one.

25 <https://comprop.oii.ox.ac.uk/wp-content/uploads/sites/93/2019/05/EU-Data-Memo.pdf>

26 <https://demos.co.uk/project/warring-songs-information-operations-in-the-digital-age/>

ERGA requested specific information on fact-checking organisations supported by Twitter in its follow-up questionnaire. Twitter reported upon five international efforts. Of these five, First Draft News has worked with Irish fact-checkers, journalists and researchers as detailed in question 8 above. In Europe, it listed five organisations however four of these are regional and do not include Ireland while one, EU DisInfo Lab, is EU wide. When asked for specific numbers regarding the number of fact-checks labelled on the platform, Twitter provided no direct comment but stated that its efforts were directed towards “expanding academic research into how Twitter is used for civic engagement and elections.” It was not possible for the researchers to evaluate the effectiveness of these initiatives in Ireland with the information provided.

Google

Google works in collaboration with the International Fact-Checking Network (IFCN) of which Irish online news title TheJournal.ie is a member. However, as TheJournal.ie functions primarily as a digital news outlet, it cannot be wholly understood as an independent fact-checking organisation. Google’s Data Commons Project – works with third-party fact-checkers and the data pertaining to Ireland is also produced by the Irish member, TheJournal.ie. In the Google Fact Check Explorer, the keyword ‘Ireland’ and the specific Irish Fact-Checker TheJournal.ie were searched for, returning no results.

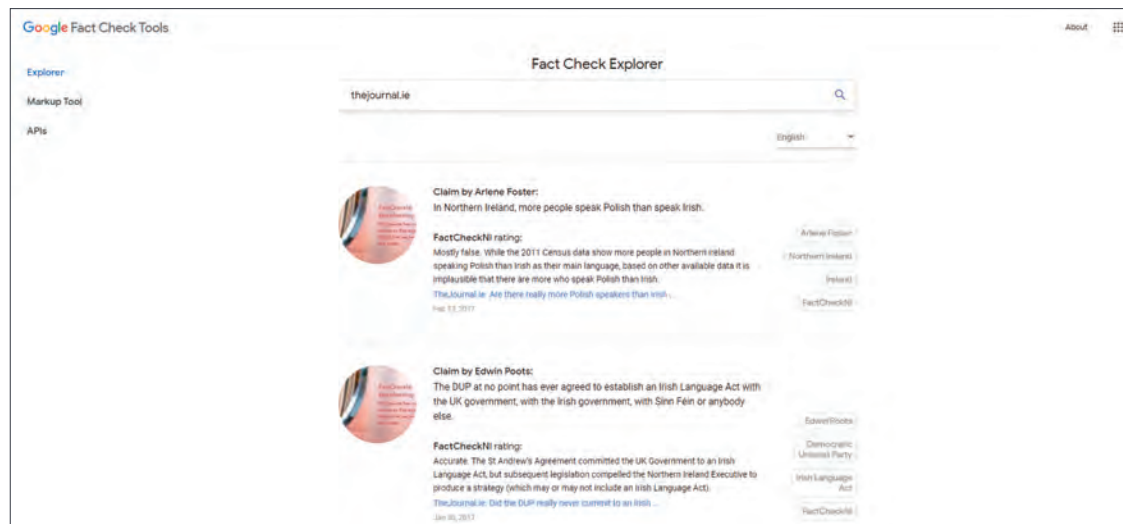


Figure 44. Google Fact-Check Explorer Interface Search for term ‘TheJournal.ie’.

TheJournal.ie stated it received no direct contact from Google in relation to supporting their fact-checking initiatives around the European elections. Google does, however, encourage fact-checkers to come up with their own projects related to combating disinformation by supporting and partnering with organisations such as Full Fact UK²⁷ and First Draft through the Google News Initiative²⁸ and to contact them in relation to implementing these. From a practical and logistical sense, however, TheJournal.ie prefer to conduct its projects in house without having to rely on Google to operationalise them. Google is not proactive in approaching fact-checkers with information, events and projects but rather places the onus on the fact-checking community to approach it with their own initiatives.

27 <https://fullfact.org/blog/2019/may/full-fact-and-international-partners-win-google-ai-impact-challenge/>

28 <https://firstdraftnews.org/about/>

Google did not provide clarity in relation to how items that have been fact-checked are labelled on its feeds. When the researchers conducted a search for one of TheJournal.ie's fact-checked items, with the heading, 'number of homeless people in Ireland in November 2018', no clear label to suggest that this claim had been fact-checked was evident, nor was a link to the fact-check item provided in the feed.

Google reported that it does not rely on specific partnerships or agreements with fact-checkers. Google instead relies upon an open ecosystem coupled with "programmatic and policy layers" whereby the fact-checker uses a Html tag that is applied to the article when it appears in the search feed, complies with policies on fact-checking and provided they rank high enough in the results pages, a fact-check label may appear. It appears that Google has no formal agreement with fact-checkers in Ireland and it is up to the fact-check organisation to go through this process to ensure that fact-checks receive a label. Google was asked by ERGA to specifically identify fact-check content that they had reviewed or labelled. It responded that "users merely have to browse Google Search or News and look for links that show a "fact-check" tag or snippet." However, as noted above, no tags could be identified by the researchers.

Microsoft

Microsoft did not report on any specific partnerships with fact-checkers in Ireland within its initial SAR. In elaborating on its partnerships with the research and fact-checking community in the follow-up ERGA questionnaire, they stated that as Microsoft's services have been targeted far less frequently by actors disseminating disinformation, in comparison with other Signatories to The Code, partnerships with fact-checkers are not necessarily appropriate for its services. The reason for this they stated, is the enterprise and professional focus of its services. It did report that on limited occasions it may partner with fact-checkers however no specific details on these circumstances were provided.

Q11 *Have the platforms shared privacy protected datasets, undertaken joint researches, or otherwise partnered with academics and civil society organizations in your Country?*

Facebook

TheJournal.ie did not request nor receive any privacy protected datasets. Facebook is partnered with the TheJournal.ie as part of its own fact-checking project. It has established Election Operations Centers in Singapore and Ireland that purportedly provide 24/7 coverage focused on election integrity. Its aim, it stated, is to help strengthen global and cross-functional coordination to speed up response times in the weeks leading up to an election. Facebook reported that over 500 full-time employees and over 40 regional teams across the company are engaged in the Elections Operations Centers. Within the Irish context, it engaged with TheJournal.ie in the weeks preceding the European elections and in particular on election day, monitoring disinformation and highlighting stories which may have been appropriate candidates for fact-checking. Facebook supported the establishment of Media Literacy Ireland through the presence of a representative on the steering board, and the promotion of MLI by hosting the company launch event at its premises in Dublin city on Friday, February 23 2019. Facebook has attended the majority of MLI events that have taken place over the last 2 years and supported its #BeMediaSmart initiative which was delivered in Ireland to support the EU Media Literacy Week in March 2019.

Google

Google provided funding for some research initiatives in Ireland. Google funds First Draft which hosted a Disinformation Emergency workshop in Ireland on November 1 2019. It also funds the International Digital News Report which covers 24 EU countries including Ireland. However, it must be noted that the Irish Digital News Report is funded by the BAI. To date, Google has not hosted or participated in any specific events or workshops with MLI. However, it has attended the main MLI events such as the annual conference.

Twitter

Twitter stated that rather than providing datasets directly to researchers the company offers access to data via APIs, both on the main platform and via the Ad Transparency Centre. While Irish organisations such as Media Literacy Ireland say have not requested data or sought research partnerships with Twitter, Irish academics produce research using Twitter data regularly and in this regard, there is evidence that API access is utilised by Irish researchers. Twitter does provide access to a database of Tweets that Twitter believes are state-backed disinformation operations in the Transparency Report Information Operations section. Twitter's SAR lists some academic papers published that has used the datasets in from the Transparency Report Information Operations section it does not appear that these papers include data pertaining to Ireland. To access this database researchers must submit their email address. While the locations of the actors are identified in these databases such as United Arab Emirates, China, Internet Research Agency in Russia, no databases pertaining to Ireland are listed nor is it made clear the extent to which Irish users were exposed to any of the tweets contained in any of the databases. Twitter stated that the files were accessed 20k times in the EU, 2.8% of which were accessed in Ireland which implies that about 560 individuals accessed the files. However, again this cannot be independently verified by the researchers.

Microsoft

Microsoft did not report on any requests for or the sharing of privacy protected datasets with Ireland's fact-checking or research communities. It detailed a number of internal initiatives to engage in research on disinformation, data voids and deep fakes. It is partnered with TAP, a forum of leading researchers focused on the impact of technological change on society, to whom it provides administrative and financial support, however no Irish academic nor affiliated institution are listed amongst this cohort. It has partnered with academic institutions (Princeton University, the Oxford Internet Institute) and with industry with Bing News joining the Trust Project, a consortium of social media platforms and top news organisations whose aim is to make it easier for the public to identify high-quality news. In answering ERGA's follow-up questionnaire Microsoft reported that it is collaborating with the BBC, CBC and the New York Times on Authenticated Media Provenance (AMP) which is developing a tool for applying a "fragile watermark" on media to serve as a visual code of authenticity. Information is not provided as to when or to what extent this initiative will be rolled out. Further, Microsoft did not report on any joint research or academic and civil partnerships specific to Ireland.

Q12 *Are the initiatives identified in the SARS effective in encouraging researchers in the field of disinformation and political advertising in your Country?*

Facebook

Facebook reported upon its partnership with Social Science One (SS1), a group of 83 academic researchers worldwide with the goal of sharing data with the academic community whilst upholding stringent privacy protections for users of its services. More than 60 researchers from 30 academic institutions across 11 countries have been chosen through a competitive peer-review process organised by the Social Science One Research Council (SSRC). Ireland is not one of the countries included in this cohort. Further, in a recent statement, The European Advisory Committee of Social Science One stated, that although the Social Science One initiative has made important progress, due to continuous delays, academics are yet to be provided with the full set of URL data promised by Facebook and philanthropic support for the initiative has begun to withdraw²⁹. The Committee calls not only on Facebook but the other major digital platforms (Google and Twitter), as well as the EU member states, public authorities, and researchers, to work together, warning that the current lack of appropriate access to data for the purposes of scientific knowledge will have dire consequences for democratic societies.

Researchers in Ireland have received access to the Facebook Ad Library API providing data on political or issue-based advertisements published on the platform. However, there are significant concerns in relation to the comprehensiveness of the data provided through the API, its limited functionality and user-friendliness which limit its usefulness for effective independent analysis and monitoring. Facebook reported that in April 2018, it established an independent election research commission with the goal of allowing access to Facebook data, in a privacy-protected manner so that researchers may better understand the impact of Facebook on elections and democracy. It also reported upon the establishment of the Regional Advisory Committee led by Claes Holger de Vreese, Professor and Chair of Political Communication in The Amsterdam School of Communication Research, University of Amsterdam. Once again, however, members of the Irish academic community are not included in these initiatives.

In October 2019 Facebook granted access of the CrowdTangle tool to the researchers in the Institute for Future Media and Journalism (FUJO) based in Dublin City University (DCU). This tool allows researchers to access public Facebook and Instagram data and to track the popularity of news items across the platforms. Once again, however, the European Advisory Committee of Social Science One has pointed to the limitations of this tool for comprehensive, independent scientific research. This is reiterated in The *ERGA Final* report which highlighted that as the CrowdTangle tool provides only aggregated data it “does not allow researchers to explore the comments and replies associated with public posts”, an important element in tracking the spread of disinformation online.

29 <https://socialscience.one/blog/public-statement-european-advisory-committee-social-science-one>

Twitter

As outlined in the *ElectCheck19* report, there are a number of substantial issues with the provision of information on political advertising. Twitter does not provide access to a universal advertising library. Regarding research into disinformation, Twitter provided a library of tweets from state-backed operations on Twitter and it has added to this library throughout 2019. These datasets can be downloaded and analysed, and Twitter's SAR stated that 2.8% of the 20,000 downloads in the EU were from Ireland. However, none of these datasets relate to Ireland specifically, and it is not clear that these datasets were downloaded by researchers. When accessing the datasets Twitter requires users to enter an email address, however, it does not seem to be subject to a verification process and both private email addresses and academic institutional email offer users the same access. Additionally, Twitter provides access to tweets from which datasets can be generated via their public API and this has been utilised by Irish researchers as in the *ElectCheck 2019* report.

Google

It is not clear that Google has worked with any Irish researchers to investigate disinformation nor is there public information regarding the support of independent research efforts. Whilst Google has provided access to a range of political adverts from political entities, as per the *ElectCheck19* report there are a number of substantial issues with the provision of information on political advertising. Google has provided some access to limited content regarding political advertising for media monitoring. However, it does not host a universal ad library. Google also provides some tools to track trends and topics in their search engines and via YouTube via Google Trends.

Microsoft

Although Microsoft is partnered with researchers through the number of initiatives detailed above under Q11, these are primarily focused on the US context and none are specific to researchers within Ireland.

Q13 *Are the initiatives identified in the SARS effective in meeting the commitment to organized events in your Country to foster discussions within academia, the fact-checking community and members of the value chain?*

Facebook

Facebook did not report any Irish specific events organised within academia and the fact-checking community but rather highlights 10 training events which took place across the EU. As previously mentioned, TheJournal.ie reported that it attended an event in Dublin in April 2019, organised by Facebook focused on protecting the integrity of the elections. Facebook reported a number of events and initiatives organised within the EU, such as their sponsorship of the WeEuropeans Initiative, its participation in the European Youth Forum's Yo!Fest event, and policy roundtable events in Brussels and the Munich Security Conference. In October 2019 Facebook sent representatives to participate in a workshop on removing barriers to digital platform transparency across Europe held in Brussels, where it engaged with academics and other experts around the difficulties they face in conducting research on digital platforms. None of these initiatives relate to specific organised events within Ireland to foster discussion with members of the value chain.

Twitter

Twitter did not engage directly with researchers in Irish academic or research institutions. Twitter stated it supports research via the provision of API access to researchers through the Twitter Developer Portal. Additionally, it reported that data on tweets considered to be produced by state-backed actors were released to researchers and that 2.8% of the downloads of this data were in Ireland. This corresponds to an estimated 559 downloads. This is a substantial number given the limited number of Irish Universities with academics engaged in research in the area of disinformation and via digital methodologies. However, it has engaged in media literacy initiatives. Twitter has been a member of MLI since early 2018 and has contributed to the Working Group responsible for the delivery of the #BeMediaSmart campaign, even though it is not officially a member of said Working Group. Additionally, Twitter sent representatives to a multi-stakeholder workshop on 'Removing barriers to digital platform transparency', in October 2019. Twitter reiterated its provision of data to the public via its APIs when asked by ERGA about specific events to support the research and fact-checking community.

Google

Google does not appear to have engaged with research in Irish academic or research institutions. However, it has engaged in media literacy initiatives. It has been a member of MLI since early 2018 but has not directly participated in the Working Group or specific events. However, following the most recent MLI annual conference which took place on November 1, 2019, Google has approached MLI to discuss how it could become more involved in future activities.

Google did not report upon any specific events organised with academia. However, in follow-up questions posed to it by ERGA, Google suggested that 52 journalists received training on misinformation via the online portal Google News Lab training. This figure cannot be independently verified by the researchers nor the quality of the training assessed. It is not clear if the 52 journalists were working professionals, students or to what extent these tools were implemented by the participants.

Microsoft

Microsoft did not report any specific organised events within Ireland to foster discussion with academia and fact-checking institutions. Within the SAR it stated that it sponsored the Conference for Truth and Trust Online which was held in London October 4-5, 2019. The conference aims to bring the academic and tech sectors together to develop automated tools to improve the truthfulness and trustworthiness of online communications. There are no members of the Irish research or fact-checking communities listed on the conference program however it is unclear if any were in attendance.

Q14 *Please provide an evaluation on the adequacy of the activities carried out by the Code's signatories to empower the research Community.*

Facebook, Twitter, Google and Microsoft all reported on the introduction of several policies, tools and training programmes to empower the research community and to provide them with access to data. In evaluating the adequacy of these initiatives within Ireland, the researchers found that although some progress has been made in this regard, there exists significant room for improvement across the four Signatories examined here. The most significant data sources provided to the research and fact-checking community in the run-up to the European elections in Ireland was in the form of online libraries or archives of political adverts made publicly available on the Signatories' platforms. However as reported upon in the *ElectCheck19* report, the data available within these repositories has significant limitations for the purposes of comprehensive research and monitoring. Particularly so in relation to the nature of the targeting practices of online advertisers and the amounts spent by them. Access to data was also available through platform API's yet once again, there are substantial concerns in relation to the limited functionality, search-ability and user-friendliness of these APIs and the ability of the Signatories to unilaterally restrict access to them. The Institute for Future Media and Journalism, based in Dublin City University, was granted access by Facebook to its CrowdTangle tool in November 2019. However, overall, the provision of data and search tools to Ireland's broader research community remains limited, and far below the needs of the research community to conduct meaningful research. As highlighted in the *ERGA Final* report, while platforms such as Facebook, Twitter and YouTube deliver large quantities of personal data to the advertisers and their respective businesses that can be incorporated into specific business products such as targeted advertising, researchers have only limited access to such data. The Signatories also often prevent individual users from deliberately passing on their personal data to researchers thus severely limiting the possibilities to independently study disinformation processes³⁰. Further, the majority of academic partnerships reported by the Signatories in their respective SAR's are weighted in favour of US-based institutions and research groups.

In relation to fact-checking efforts, Ireland's fact-checking organisation, TheJournal.ie reported that of the four Signatories to the Code, only Facebook proactively engaged with it in the run-up to and during the European elections, providing a training workshop and access to the CrowdTangle tool. Facebook too, is the only Signatory engaged in its own fact-checking project partnering with third-party fact-checkers to identify and review potentially false news. However, as a result of TheJournal.ie's official partnership with Facebook as part of this project, it is subject to its policy on political advertising and so is prohibited by Facebook to fact-check statements or advertisements that have been posted by politicians, political candidates, or campaigns on their respective Facebook accounts. TheJournal.ie can fact-check this information on its own website but not on Facebook. This policy represents a significant obstacle to fact-checking initiatives as they relate to political actors online.

Each Signatory to the Code discussed here has supported efforts to promote digital media literacy in Ireland both through interaction with Media Literacy Ireland (MLI) and online initiatives. Without any available data on the impact and uptake of these initiatives, it is difficult for the researchers to evaluate their effectiveness. In contrast to the Signatories' support for media literacy initiatives, specific organised events and partnerships with Irish research and academic institutions remain episodic and inadequate to support any rigorous analysis and monitoring of online disinformation trends. This is in line with the conclusion of the *ERGA Final* report.

30 www.erga-online.eu/?page_id=14

CONCLUSION

This report has presented a review of the actions carried out by Facebook, Twitter, Google and Microsoft in support of their commitments to the EC Code of Practice on Disinformation. Specifically, the researchers assessed the four Signatories' actions in relation to their commitments under Pillars D and E of The Code, D. Empowering consumers and E. Empowering the research community, within the Irish context. Researchers from the Institute of Future Media and Journalism at Dublin City University assessed the adequacy of the activities carried out by the Code Signatories through a review of their SARs, the subsequent EGRA questionnaires and the gathering of further information provided by stakeholders within the fact-checking (TheJournal.ie) and media literacy (Media Literacy Ireland) organisations in Ireland.

Specifically, in relation to **Pillar D**, this report finds that the four Signatories to the Code have introduced various actions aimed at empowering consumers, including mechanisms to report fake news, providing greater information on the content visible on the platforms, greater control and transparency in relation to advertising and user preferences and the promotion of authentic and authoritative information sources. In line with the *ERGA Final* report, this research finds that the level at which Facebook, Twitter, Google and Microsoft have engaged in the above is however mixed and inconsistent. Although all four Signatories provide tools for consumers to report or give feedback on content, it is unclear what the uptake of these tools is in Ireland and also what procedures are in place to address this content once a complaint has been received. Although users are provided with authoritative sources when searching for health-related information such as 'vaccines' when other contested and more politically relevant terms such as 'global warming' were searched for by the researchers, authoritative sources were not prioritised at the top of the search results thus highlighting inconsistencies within this mechanism. All four Signatories provided consumers with varying degrees of information to help them understand why they had been targeted by an advertisement, however in the majority of cases this focused on broad statements of user preferences and history with only Facebook providing more detailed information regarding user demographics and specific interests. In relation to the use of user data by the Signatories, Facebook provided consumers with information about how other applications and websites use and share their data with Facebook and tools to control this activity and their own preferences, whilst Microsoft provided details on the nature of all of the different types of user data they store and provided consumers with the ability to view, clear or download this data. Twitter and Google on the other hand, mainly reported on their advertising policies and providing consumers with the option to manage these preferences.

The most significant shortcoming in the empowering of consumers is in relation to the labelling of trustworthy content. The researchers could not identify any news items across any of the four Signatories' platforms which had been labelled as fact-checked with the corresponding verdict on its authenticity. This represents a substantial obstacle in assisting consumers to make informed decisions when they encounter news online. Facebook did announce on Oct 21, 2019, that it will clearly label content that has been given the result of 'false' or 'partly false' in an effort to protect the 2020 US elections however it is not clear how this will be implemented or distributed across the EU member states. Each of the four Signatories to the Code supported efforts to promote digital media literacy in Ireland both through their interaction with Media Literacy Ireland (MLI) and online initiatives. In the absence of any data on the uptake and impact of these initiatives provided by the Signatories however, it is not possible for the researchers to evaluate their effectiveness.

In evaluating the actions of Facebook, Twitter, Google and Microsoft in their commitments to **Pillar E**, the researchers found that specific organised events/discussions and partnerships with Irish research and academic institutions remain episodic and largely inadequate to support any rigorous analysis and monitoring of online disinformation trends in Ireland. In line with the experiences of other NRA's outlined in the *ERGA Final* report, the distribution of efforts across the Signatories is neither comprehensive nor even. Although the Signatories reported on a number of projects and policies to empower the research community these tend to be weighted in favour of US institutions and research groups. Data was provided to Irish based academics in the form of the aforementioned advertising libraries and APIs however both raised significant concerns in relation to access, user-friendliness and as to whether the data provided within was comprehensive and consistent for monitoring purposes. In November 2019, The Institute for Future Media and Journalism was granted access by Facebook to their CrowdTangle tool however this tool presents its own limitations as it provides only aggregated data prohibiting access to comments and replies associated with public posts.

Overall, the provision of data and search tools to Ireland's broader research community remains limited, and far below the needs of the research community to conduct meaningful research. In relation to supporting the fact-check organisation within Ireland, TheJournal.ie, reported that only Facebook proactively engaged and supported its efforts in the run-up to and during the European elections. TheJournal.ie were also granted access to the CrowdTangle tool by Facebook and given a tutorial on its functionalities. However, as TheJournal.ie is an official partner with Facebook in its own fact-check initiative, it is subject to Facebook's policy on political advertising and thus is prohibited by Facebook to fact-check statements or advertisements that have been posted by politicians, political candidates, or campaigns on their respective Facebook accounts. TheJournal.ie can fact-check this information on its own website but not on Facebook. This policy represents a significant obstacle to fact-checking initiatives as they relate to political actors online.

The self-assessment reports provided by the four Signatories to the Code indicate comprehensive efforts on their parts to address their commitments under The Code and to provide greater transparency to consumers and the research community. This represents some progress in the monitoring of disinformation online. However, the consistency and scope of reporting vary significantly across the four Signatories and overall their commitments to Pillars D & E have not progressed at the same level as Pillars (A-C), with the most significant shortcomings in the labelling of trustworthy content for consumers and the provision of significant platform data to the research community.

