Code of Practice on Disinformation – Report of GDI for the period January 1, 2023 – January 1, 2024

Executive summary

In 2023 the Global Disinformation Index (GDI) became a signatory of the European Union's Strengthened Code of Practice on Disinformation (COP). The Global Disinformation Index is a not-for-profit organisation that operates on the three principles of neutrality, independence and transparency. Our vision is a world free from disinformation and its harms. Our mission is to catalyse industry and government to defund disinformation. We provide disinformation risk ratings of the world's news media sites.

GDI believes that a robust regulatory regime against disinformation depends on the input of signatories and stakeholders. Consequently, we are pleased to submit our first formal COP transparency report. Here is a summary of how we implemented our commitments.

II. Scrutiny of Ad Placements

Commitment 1

GDI commits to rate sources to determine if they persistently publish Disinformation and will provide reasonable information on the criteria under which websites are rated, make public the assessment of the relevant criteria relating to Disinformation and operate in an apolitical manner.

Over the past year, research reports publicly released on disinformation in media markets include:

- Russian Invasion of Ukraine Narrative Report: Germany
- Disinformation Risk Assessment: The Online News Market in Thailand
- Disinformation Risk Assessment: The Online News Market in Türkiye
- Disinformation Risk Assessment: The Online News Market in Bangladesh
- Disinformation Risk Assessment: The Online News Market in Japan
- Disinformation Risk Assessment: The Online News Market in the Philippines

Public analysis and news on disinformation in media markets include:

- Securing Human Rights Means Fixing the Information Ecosystem
- Climate Delayism is the New Climate Denial
- Brand Safety Isn't Censorship. It's Capitalism.
- How Disinformation Is Undermining Our Human Rights

VIII Transparency Centre

Commitment 34

GDI has contributed to the Centre's information to the extent that the Code is applicable to our services. Specifically, GDI has been proactive in submitting comprehensive transparency reports, documents, and relevant data under the Code.

IX. Permanent Task-Force

Commitment 37

GDI's position as an nonprofit civil society organisation supports the work of the task force by ensuring there is independent third party oversight and scrutiny of information and solutions provided by signatories. GDI has been enthusiastically engaged in meetings and data-sharing with the following subgroups:

- Subgroup on Monitoring and Reporting
- Subgroup on Ad Scrutiny

Additionally, GDI has also been conducting regular analysis of transparency reporting from parties under COP and VLOP jurisdiction. This includes a public response to the European Commission's consultation on implementing regulation on VLOP transparency reporting under the DSA. GDI recommended

1. A standardised template for service transparency reports would facilitate cross-report comparison and greater accountability by giving a common benchmark.
2. Content moderation teams broadly tend to have more expertise in Western European languages, with less focus in Eastern European regions. This could lead to an enforcement gap in content moderation across the EU.
3. The VLOP reports' focus on content moderation and silence on demonetisation signals that COP transparency reporting might be a more effective path forward to gaining further insight into demonetisation metrics.

GDI also submitted to the European Commission an analysis of the first round of transparency reporting in 2023. In this report, GDI proposed two key recommendations:

1. Indicators should be included in data sharing and aggregated statistics relating to **how much money is being made from disinformation, how harmful content is being distributed, and who is being exposed. The gaps in these reports underscore the need to have more specific data and context disclosures by default from Signatories**. Disclosure standards should be set based on the services provided by the Signatory. **One example of this is requiring a member-state breakdown of actioned domains and pages for all Signatories that provide advertising technology services. Another important example would be platforms disclosing the action and demonetisation taken under specific policies.**
2. **Support relevant third-party approaches, to provide advertising buyers transparency on the placement of their advertising.** Reference could be made to using third party data.

X. Monitoring Of The Code

Commitment 38; Commitment 39; Commitment 40; Commitment 41; Commitment 43

GDI's wealth of knowledge in the disinformation ecosystem and country media market reviews supports the monitoring of the Code by ensuring relevant signatories are disclosing, sharing, and updating the data necessary to assess compliance. GDI has instituted internal systems to ensure high quality and efficiency in our cooperation with policy processes and mission of disrupting the disinformation ecosystem.

II. Scrutiny of Ad Placements	
Commitment 1 Relevant signatories participating in ad placements commit to defund the dissemination of disinformation, and improve the policies and systems which determine the eligibility of content to be monetised, the controls for monetisation and ad placement, and the data to report on the accuracy and effectiveness of controls and services around ad placements.	
Measure 1.6	Relevant Signatories will advance the development, improve the availability, and take practical steps to advance the use of brand safety tools and partnerships, with the following goals: ● To the degree commercially viable, relevant Signatories will provide options to integrate information and analysis from source-raters, services that provide indicators of trustworthiness, fact-checkers, researchers or other relevant stakeholders providing information e.g., on the sources of Disinformation campaigns to help inform decisions on ad placement by ad buyers, namely advertisers and their agencies. - ● Advertisers, agencies, ad tech companies, and media platforms and publishers will take effective and reasonable steps to integrate the use of brand safety tools throughout the media planning, buying and reporting process, to avoid the placement of their advertising next to Disinformation content and/or in places or sources that repeatedly publish Disinformation. ● Brand safety tool providers and rating services who categorise content and domains will provide reasonable transparency about the processes they use, insofar that they do not release commercially sensitive information or divulge trade secrets, and that they establish a mechanism for customer feedback and appeal.
QRE 1.6.4	GDI has made public how we define disinformation. Identifying disinformation is a complex and nuanced process that goes beyond fact checking. Disinformation, as we use the term, does not denote information about which reasonable parties may disagree, such as varying political views. Instead, we use the word to refer to deliberately misleading information, knowingly spread, or the omission of certain facts in service of a particular narrative. GDI views disinformation through the lens of adversarial narrative conflict. Adversarial narratives share common characteristics: They have the intent to mislead; They are financially or geopolitically motivated; They aim to foster long-term social, political or economic conflict; They create a risk of harm to at-risk individuals, groups or institutions. "At-risk groups" range from immigrants, to protected classes like women, persecuted minorities, people of colour, the LGBTQ+ community, children etc. "Institutions" goes beyond institutions themselves to also include the current scientific or medical consensus on topics such as climate change or vaccines, as well as democratic processes like voting laws or the judicial system. The harm caused by disinformation is wide ranging, from risks of financial damage to violence, illness or even death. Content that promotes these disinformation narratives also poses a potential risk to brands. Advertisers have a right to choose where their adverts end up and what sort of content their ad dollars support. GDI's assessments of news sources enables advertisers and ad technology companies to minimise this risk. Research reports publicly released on disinformation in media markets include: Russian Invasion of Ukraine Narrative Report: Germany Disinformation Risk Assessment: The Online News Market in Thailand Disinformation Risk Assessment: The Online News Market in Türkiye Disinformation Risk Assessment: The Online News Market in Bangladesh Disinformation Risk Assessment: The Online News Market in Japan

	Disinformation Risk Assessment: The Online News Market in the Philippines Public analysis and news on disinformation in media markets include: Securing Human Rights Means Fixing the Information Ecosystem Climate Delayism is the New Climate Denial Brand Safety Isn't Censorship. It's Capitalism. How Disinformation Is Undermining Our Human Rights

VIII. Transparency Centre	
Commitment 34 To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website.	
Measure 34.3	Relevant Signatories will contribute to the Transparency Centre's information to the extent that the Code is applicable to their services.

IX. Permanent Task-Force	
Commitment 37 Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus.	
Measure 37.1	Signatories will participate in the Task-force and contribute to its work. Signatories, in particular smaller or emerging services will contribute to the work of the Task-force proportionate to their resources, size and risk profile. Smaller or emerging services can also agree to pool their resources together and represent each other in the Task-force. The Task-force will meet in plenary sessions as necessary and at least every 6 months, and, where relevant, in subgroups dedicated to specific issues or workstreams.

Measure 37.2	Signatories agree to work in the Task-force in particular – but not limited to – on the following tasks: 1. Establishing a risk assessment methodology and a rapid response system to be used in special situations like elections or crises. 2. Cooperate and coordinate their work in special situations like elections or crisis 3. Agree on the harmonised reporting templates for the implementation of the Code's Commitments and Measures, the refined methodology of the reporting, and the relevant data disclosure for monitoring purposes. 4. Review the quality and effectiveness of the harmonised reporting templates, as well as the formats and methods of data disclosure for monitoring purposes, throughout future monitoring cycles and adapt them, as needed. 5. Contribute to the assessment of the quality and effectiveness of Service Level and Structural Indicators and the data points provided to measure these indicators, as well as their relevant adaptation. - Refine, test and adjust Structural Indicators and design mechanisms to measure them at Member State level. 6. Agree, publish and update a list of TTPs employed by malicious actors, and set down baseline elements, objectives and benchmarks for Measures to counter them, in line with the Chapter IV of this Code. 38 7. Seek out and discuss research, expert input and up-to-date evidence relevant to the Code's commitments, such as, inter alia, emerging best practices in safe design, retroactive flagging, repository of fact-checks, provenance tools. 8. Discuss and provide guidance on the adequate quantitative information to be provided by signatories to fulfil their reporting obligations regarding agreements with fact-checking organisations across different services. 9. Regularly discuss whether the Code's Commitments and Measures need updating in view of technological, societal, market and legislative developments, as well as in view of accommodating new signatories and, where the Task-force agrees to be necessary, carry out such updates. 10. Review the appropriateness and consistency of adapted Measures for smaller or emerging services. 11. Promote the Code among relevant peers and integrate new Signatories to the Code.
Measure 37.3	The Task-force will agree on and define its operating rules, including on the involvement of third-party experts, which will be laid down in a Vademecum drafted by the European Commission in collaboration with the Signatories and agreed on by consensus between the members of the Task-force.
Measure 37.4	Signatories agree to set up subgroups dedicated to the specific issues related to the implementation and revision of the Code with the participation of the relevant Signatories.
Measure 37.5	When needed, and in any event at least once per year the Task-force organises meetings with relevant stakeholder groups and experts to inform them about the operation of the Code and gather their views related to important developments in the field of Disinformation.

Measure 37.6	Signatories agree to notify the rest of the Task-force when a Commitment or Measure would benefit from changes over time as their practices and approaches evolve, in view of technological, societal, market, and legislative developments. Having discussed the changes required, the Relevant Signatories will update their subscription document accordingly and report on the changes in their next report.
QRE 37.6.1 Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with.	GDI engaged in meetings and data-sharing with the following subgroups: ● Subgroup on Monitoring and Reporting ● Subgroup on Ad Scrutiny Furthermore, GDI engaged in analysis of transparency reporting of parties under COP and VLOP jurisdiction: GDI submitted a public response to the European Commission's consultation on implementing regulation on VLOP transparency reporting under the DSA. GDI recommended 4. A standardised template for service transparency reports would facilitate cross-report comparison and greater accountability by giving a common benchmark. 5. Content moderation teams broadly tend to have more expertise in Western European languages, with less focus in Eastern European regions. This could lead to an enforcement gap in content moderation across the EU. 6. The VLOP reports' focus on content moderation and silence on demonetisation signals that COP transparency reporting might be a more effective path forward to gaining further insight into demonetisation metrics. GDI also submitted to the European Commission an analysis of the first round of transparency reporting in 2023. In this report, GDI proposed two key recommendations: 3. Indicators should be included in data sharing and aggregated statistics relating to **how much money is being made from disinformation, how harmful content is being distributed, and who is being exposed. The gaps in these reports underscore the need to have more specific data and context disclosures by default from Signatories**. Disclosure standards should be set based on the services provided by the Signatory. **One example of this is requiring a member-state breakdown of actioned domains and pages for all Signatories that provide advertising technology services. Another important example would be platforms disclosing the action and demonetisation taken under specific policies.** 4. **Support relevant third-party approaches, to provide advertising buyers transparency on the placement of their advertising.** Reference could be made to using third party data.

X. Monitoring of Code	
Commitment 38 The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code.	
Measure 38.1	The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code.
QRE 38.1.1	GDI's wealth of knowledge in the disinformation ecosystem and country media market reviews supports the monitoring of the Code by ensuring relevant signatories are disclosing, sharing, and updating the data necessary to assess compliance. GDI has instituted internal systems to ensure high quality and efficiency in our cooperation with policy processes and mission of disrupting the disinformation ecosystem. This includes incorporating regular contributions from GDI's teams with expertise in content classification, data analysis, policy design, algorithmic systems, and threat investigation. For more information on GDI's operations, see here.

X. Monitoring of Code
Commitment 39 Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble. [change wording if adapted]

X. Monitoring of Code	
Commitment 40 Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each Signatory, service and at Member State level.	
Measure 40.2	Signatories will report yearly on the implementation of the Commitments and Measures taken under the present Code, including on the relevant QREs and SLIs, at service and Member State level.
Measure 40.4	Signatories will develop, within the Task-force, harmonised reporting templates.

Measure 40.5	Signatories will regularly work to improve and optimise the monitoring and reporting framework of the Code, including the SLIs, within the Task-force, building in particular on feedback from the European Commission, ERGA and EDMO.
Measure 40.6	Signatories will cooperate with the European Commission, respond to its reasonable requests and provide the European Commission with reasonable information, data and further input necessary to assess the implementation of the Code, allowing for the Code's efficient and thorough monitoring, including at Member State Level.

X. Monitoring of Code	
Commitment 41 Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO.	
Measure 41.1	Within 1 month of signing the Code, Signatories will establish a Working Group to tackle this objective. This working group will be tasked with putting forward data points to be provided by Platform Signatories, and a methodology to measure Structural Indicators on the base of these data points, to be executed by non-Platform Signatories. Signatories will share data points appropriate to enable the measurement of metrics to be determined by the working group, such as prevalence or other contextualised metrics for sources and spread of online disinformation. Signatories will assess the work that will be necessary to deliver on the goals of this commitment, and discuss within the Task-force whether financial support is required.
Measure 41.2	The Working Group will report on its progress to the Task-force on a trimestral basis. It will consult with expert stakeholders including but not limited to EDMO, ERGA, and researchers to inform its work and outputs. 7 months after the signing of the Code, a conference will be convened with external stakeholders to present on progress thus far and seek feedback.
Measure 41.3	By 6 months after the signing of the Code, the Working Group will table with the Task-force a workable proposal for such Structural Indicators. By 9 months, relevant Signatories will provide to others within the Working Group the data points required to measure the Structural Indicators, and they will share publicly the aligned Structural Indicators. The Working Group will publish their measurements for the Structural Indicators in line with the first full report by the Signatories, as well as its full methodology, with the understanding that those may still require refinements over time. Signatories commit to keep updating the measurements, aligned with their reporting periods. Measurements will be published on the Transparency Centre in a way that allows to monitor them over time for the entire ecosystem and between different services.

X. Monitoring of Code
Commitment 43
Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]