

Code of Practice on
Disinformation – Report of
Global Disinformation Index
for the period February 1,
2024 – August 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 formal CoP transparency report on activities carried out in the context of the 2024 European Parliament elections. 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 contain a high narrative density of disinforming content and will provide reasonable criteria under which websites are rated, make public the assessment of the relevant criteria relating to Disinformation and operate in an apolitical manner.

GDI published a research report on disinformation in the European Elections, including central narratives, implications on electoral results, and key policy takeaways.

- [Disinformation in the European Parliamentary Elections: Analysis and Policy Context](#)

Public analysis and news on disinformation related to the European elections also included:

- [Gendered Disinformation in the European Parliamentary Elections](#)
- [France's Legislative Elections: A Battle of Narratives and Influence](#)

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. This included publicly sharing [GDI's top trends of 2024](#) in data science, intelligence analysis, and policy. Additionally, GDI also shared an analysis of the [threats concerning generative AI](#), with a focus on how AI-generated content can undermine trust to cause real-life harm. GDI has also released analysis on content concerning the ongoing US presidential race, including research on disinformation narratives concerning the [attempted assassination of Donald Trump](#).

As referenced in GDI's previous transparency report, we have 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.

IX. Permanent Task-Force

Commitment 37

GDI's position as a 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 actively engaged in meetings and data-sharing with the following subgroups:

- Subgroup on Monitoring and Reporting
- Subgroup on Ad Scrutiny

Additionally, GDI has also submitted a public response to the [European Commission's consultation](#) on guidelines under the DSA for the mitigation of systematic risks online for elections. GDI's recommendations included:

1. Formalising input, advice, and data from civil society organisations into the mitigation of systemic risks for electoral collaboration would help ensure the process has independent standard-setting and buy-in from a larger range of stakeholders
2. Regulators should impress upon tech companies the need to invest more in their trust and safety teams. Generative AI not only presents new problems but also greatly increases the speed and scale at which standard integrity attacks can be perpetrated.
3. Greater consideration should be given to how generative AI and the DSA intersect with other harms and regulations. For example, how might generative AI augment harassment (especially racially-motivated and sexuality/gender-based) of political figures? How will this lead to self-censorship, discrimination, and other harms during elections?

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. Furthermore, GDI's intelligence-gathering on the assessment of news sources and trends in disinformation narratives has helped empower advertisers, ad tech companies, and digital platforms to minimise the risk of harmful content.

Guidelines for filling out the report

Crisis and elections reporting template

Relevant signatories are asked to provide proportionate and appropriate information and data during a period of crisis and during an election. Reporting is a part of a special chapter at the end of the harmonised reporting template and should follow the guidelines:

- The reporting of signatories' actions should be as specific to the particular crisis or election reported on as possible. To this extent, the rows on "Specific Action[s]" should be filled in with actions that are either put in place specifically for a particular event (for example a media literacy campaign on disinformation related to the Ukraine war, an information panel for the European elections), or to explain in more detail how an action that forms part of the service's general approach to implementing the Code is implemented in the specific context of the crisis or election reported on (for example, what types of narratives in a particular election/crisis would fall into scope of a particular policy of the service, what forms of advertising are ineligible).
- Signatories who are not offering very large online platform services and who follow the invitation to report on their specific actions for a particular election or crisis may adapt the reporting template as follows:
 - They may remove the "Policies and Terms and Conditions" section of the template, or use it to report on any important changes in their internal rules applicable to a particular election or crisis (for example, a change in editorial guidelines for fact-checkers specific to the particular election or crisis)
 - They may remove any Chapter Section of the Reporting Template (Scrutiny of Ads Placement, Political Advertising, Integrity of Services etc.) that is not relevant to their activities
- The harmonised reporting template should be filled in by adding additional rows for each item reported on. This means that rather than combined/bulk reporting such as "Depending on severity of violation, we demote or remove content based on policies X, Y, Z", there should be individual rows stating for example "Under Policy X, content is demoted or removed based on severity", "Under Policy Y, content [...]" etc.
- The rows should be colour-coded to indicate which service is being reported on, using the same colour code as for the overall harmonised reporting template.

Reporting should be brief and to the point, with a suggested character limit entry of 2000 characters.

Uploading data to the Transparency Centre

The reports should be submitted to the Commission in the form of the pdf via e-mail to the address CNECT COP TASK FORCE CNECT-COP-TASK-FORCE@ec.europa.eu within the agreed deadline. Signatories will upload all data from the harmonised reporting template to the Transparency Centre, allowing easy data access and filtering within the agreed deadline. It is the responsibility of the signatories to ensure that the uploading takes place and is executed on time. Signatories are also responsible to ensure that the Transparency Centre is operational and functional by the time of the reports' submission that the data from the reports are uploaded and made accessible in the Transparency Centre within the above deadline, and that users are able to read, search, filter and download data as needed in a user-friendly way and format.

Reporting on the signatory's response during an election

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2024 European Parliament Elections	
Threats observed during the electoral period: GDI observed an uptick in election-related disinformation narratives during the EP elections. This rise came even as the European Commission (EC) implemented guidelines under the Digital Services Act (DSA) to mitigate systemic online risks during elections. These guidelines recommend that Very Large Online Platforms (VLOPs) and Search Engines adopt election-specific risk mitigation measures and collaborate with civil society and independent experts to assess the effectiveness of these measures through post-election reviews. In a victory for civic integrity, no substantial election interference or major disinformation incidents appeared to occur in the lead-up to the elections. No party appeared to significantly benefit from electoral disinformation.	
Mitigations in place during the electoral period: N/A	
[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].	
Policies and Terms and Conditions	
Outline any changes to your policies: N/A	
Scrutiny of Ads Placements	
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	<p>GDI published a research report on disinformation in the European Elections, including central narratives, implications on electoral results, and key policy takeaways.</p> <p><u>The investigation found the following types of disinformation narratives:</u></p> <p><i>Civic Integrity and Disinformation:</i> False claims of voter fraud and election rigging included allegations that the World Economic Forum (WEF) controls the EU. These narratives assert that WEF operatives are embedded within the European Commission and other political establishments, pursuing an agenda regardless of election outcomes. Additionally, some narratives depicted the elections as "fake democracy" due to corruption allegations against MEPs and claims that international treaties predetermine the EU's political plans, leaving the populace powerless.</p> <p><i>Foreign Information Manipulation and Interference (FIMI):</i> Foreign state actors attempted to amplify the impact of electoral interference claims and global conspiracy theories in order to weaken public support for European democratic institutions and specific policies, such as aid to Ukraine. These narratives promoted the notion that the EU is illegitimate and too weak to play a</p>

meaningful role globally, encouraging disengagement from international issues and adherence to non-interference principles. Some narratives specifically targeted European Commission President Ursula von der Leyen, accusing her of corrupt dealings over COVID-19 vaccines and criticising her likely selection for a second term as emblematic of the undemocratic nature of the EU.

Research into FIMI reveals messaging from known Russian disinformation channels that blended accurate reporting with harmful misleading narratives. Russian state-owned news outlets like RT Deutsch, RT France, and RT en Español have suggested unfair conduct and inherently undemocratic behaviour in the EU elections. These claims appeared aimed at furthering a narrative of systemic crisis and the inevitability of corrupt electoral outcomes. Pro-Russian websites like Voice of Europe also contributed to this disinformation landscape by suggesting the elections would not yield meaningful change. They also sought to downplay the influence of pro-Russian messaging and attitudes.

The Role of Global Conspiracy Theories: Global conspiracy theories circulated during the election, which claimed that [shadowy elites control the EU](#), help foster hostility towards political leaders and encourage radical and sometimes violent changes to the political system. These theories added to the perception of a systemic crisis that established politicians cannot or will not address. Some theories even promoted disengagement from the democratic process by portraying voting as [ineffective or harmful](#), suggesting that the system is deliberately rigged against the people's interests.

Key Policy Takeaways: The [persistence of disinformation](#) during the EU elections, despite DSA guidelines, highlights the need to set binding measures in order to safeguard democratic processes. Binding guidelines could then be subject to review as part of the annual DSA audit process which monitors the due diligence obligations and compliance of Platforms with DSA requirements. As the EU begins the enforcement of the DSA and DMA, it is critical that they support the civil society organisations that can act as a bulwark against disinformation. In a time of rising political tensions, ensuring this support will help policymakers further develop processes to mitigate electoral disinformation and its risks.

Additional Public analysis and news on disinformation related to the European elections:

- [Gendered Disinformation in the European Parliamentary Elections](#)
- [France's Legislative Elections: A Battle of Narratives and Influence](#)

Indication of impact including relevant metrics when available: The narratives circulated during the European elections underscore the disinformation pressures that can jeopardise the democratic process in Europe and beyond. Addressing these challenges requires comprehensive strategies across multiple platforms to ensure election integrity and support for democratic institutions against domestic and foreign disinformation campaigns. As political tides shift, it becomes increasingly vital for policymakers to fortify democratic processes against the exploitation of societal divisions by disinformation.

	<p>For more detail on the most common disinformation narratives observed by GDI in the lead-up to the elections, download our report <i>Deep Dive: European Elections Aftermath</i>.</p>
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