Code of Practice on Disinformation – Report of FIDU – Federazione Italiana Diritti Umani for the period 1 January – 31 December 2025

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Executive summary

FIDU (Italian Federation for Human Rights) is a global organization dedicated to safeguarding human rights, upholding the rule of law, and supporting victims of human rights abuses. FIDU's work primarily focuses on advocacy, awareness campaigns, fact-finding missions, monitoring elections and trials, and reporting abuses. To achieve its mission, FIDU draws upon its vast international network, which includes civil society organizations (CSOs), universities, media professionals, lawyers, and experts. These collaborations aim to strengthen traditional mechanisms for human rights protection and introduce innovative tools to combat impunity and defend victims of abuses. Recognizing the growing threats posed by disinformation, information suppression and foreign interference to human rights and the rule of law, FIDU actively engages in efforts to counter these phenomena. FIDU's work in this field focuses on raising awareness about the negative impact of disinformation and foreign interference on society, as well as monitoring and analyzing the narratives, methodologies, and targets used in disinformation and influence campaigns.

During the reporting period and in relation to the Code's commitments, FIDU ensured continuity and consolidation of its media literacy and counter-disinformation approach. Resources developed under the European Commission's CERV Programme projects remain freely accessible online and continue to be promoted and used as practical guidance for citizens, trainees and educators. In parallel, FIDU consistently publishes media literacy and critical thinking content through its communication channels, reinforcing key messages and practical tips over time. This communication work follows a case-study-based methodology and is tailored to reach inclusive and diverse audiences, using accessible language and formats and, where relevant, adapting messages to different levels of digital literacy and vulnerability.

In addition to maintaining and disseminating these tools, FIDU carried out a broad set of activities on disinformation and foreign interference, including institutional awareness-raising initiatives, trainings and workshops (in person and online) primarily targeting students, young professionals and media workers, and structured cooperation with stakeholders, including universities such as the Master in Journalism and Multimedia Communication at the LUISS School of Journalism. FIDU also contributed to cross-sectoral exchanges to advance best practices and recommendations, including participation as an observer member in AGCOM's Media and Digital Literacy Coordination Table. Specifically, during the reporting period, FIDU's activities related to media literacy and the fight against disinformation focused on four main areas: advocacy, training, participation in cross-sectoral activities, and publications.

Regarding publications, FIDU continued to disseminate media literacy resources and produced additional analytical and awareness-raising outputs addressing authoritarian interference and threats to civic space, including work on transnational repression (TNR) and related tactics—such as online smear and disinformation campaigns targeting dissidents—that contribute to information suppression, distort information environments and generate a chilling effect on participation and free expression, highlighting how TNR and FIMI can operate hand in hand.

Furthermore, FIDU's work on disinformation includes constant monitoring and analysis of disinformation in the context of the Russian war of aggression against Ukraine. In collaboration with Ukrainian partners, FIDU works to raise awareness of the realities of the war while countering pro-Kremlin narratives. This includes continuous monitoring of how these narratives circulate through both traditional and online media, identifying recurrent themes and targets, and analysing the methods and channels used in influence operations affecting public debate in Europe.

Guidelines for filling out the report

Reports are detailing how signatories have implemented their Commitments under the Code and 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.

Reporting period

The reporting period to be covered in the reports is 12 months (edit reporting period) for signatories who are not offering very large online platform services. Signatories shall submit reports outlining policy updates and actions taken to implement the Commitments and Measures they signed up to under the Code. All data and policy updates should be reported for 12 months period from the submission of last reports.

Adjusting the reporting template

Signatories who are not offering very large online platform services can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Relevant signatories will report only on commitments and measures they subscribed to and provide Member State-level data only if feasible.

Reporting per Service

When filling in a report for several services, use colour codes to clearly distinguish between services. At the beginning of the report, clarify what colour is used for which service.

Reporting in text form

Reporting in the form of written text is required for several parts of the report. Most of them are accompanied by a target character limit. Please stick to the target character limit as much as possible. We encourage you to use bullet points and short sentences. When providing information to the QRE, please make sure that your answer covers all the elements of the associated commitment and measure. Links should only be used to provide examples or to illustrate the point. They should not be used to replace explanations or to provide data in the forms. All relevant explanations and data must be included in the report directly, in written form.

Reporting SLIs and data

Reporting on SLIs requires quantitative information to be reported on in this harmonised reporting template.

- Where relevant and feasible, SLIs should be reported on per Member State.
- If no data is available on Member State level, SLIs might, instead, be exceptionally reported on per language. (NB that signatories agreed to revisit this issue after the first reporting, to ensure harmonised and meaningful reporting.)
- Please report data in the format provided by the harmonised reporting template, not through external links. Please use the Member State/language template provided in the harmonised reporting template. Where the table asks for "Other relevant metrics", please name the metric that you would like to report on in addition to the ones already provided. You may include more than the number of additional fields provided where necessary; in that case, please adjust the table as needed.
- Please contextualize all data as much as possible, i.e. include baseline quantitative information that will help contextualize the SLIs (e.g. number of pieces of content labelled out of what volume of content).
- If there are no relevant metrics to report on, please leave the respective columns blank.

Reporting on TTPs

If subscribed to Commitment 14, Integrity of Services, we ask you to report on each identified TTP individually. The number of identified TTPs may vary per service. Where more than one TTP are reported under the same action, clarify the reasoning in the methodology. Where input is not provided, keep the placeholder for the relevant TTP and explain reasons and planned remedial action. Additionally, as with all other SLIs, data can be provided per Member State for each individual TTP.

Missing Data

In case that at the time of reporting there is no data available yet, the data is insufficient, or the methodology is lacking, please outline in the dedicated field (i.e. in the field about further implementation measures planned) how this will be addressed over the upcoming six months, being as specific as possible.

Signatories are encouraged to provide insights about the data/numbers they provide by inserting possible explanations in the boxes of the template "*Methodology of data measurement & insights on data provided*". This should aim to explain the why of what is being reported, for instance - *Are there trends or curiosities that could require or use contextual explanation? What may be driving the change or the difference in the number?* Please also indicate inconsistencies or gaps regarding methodology in the dedicated box.

Attachments

We ask you not to enclose any additional attachments to the harmonised reporting template.

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 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).
- Regarding elections, signatories are expected to provide specific information on their **experience with the RRS for FR and RO elections**. This can be included in the first two rows ("Threats observed…" / "Mitigations in place …"). In addition, **regardless of the RRS activation, signatories should report on relevant actions in place for elections at national level** (parliamentary/presidential) in EU Member States during the reporting period – specifying the country(ies) and election(s).
- 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 <mark>CNECT-COP-TASK-FORCE@ec.europa.eu within the agreed deadline</mark>. 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, filer and download data as needed in a user-friendly way and format.

V. Empowering Users

Commitment 17

In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups. [change wording if adapted]

Measure 17.1	
QRE 17.1.1	FIDU continued throughout 2025 to develop and maintain resources aimed at empowering citizens to evaluate and engage with online content in a critical and informed manner. Tools produced under the Media Literacy for Democracy (MLFD) project (CERV Programme) remain fully accessible and actively promoted, ensuring continuity in FIDU's approach. In particular, the MLFD Booklet (https://fidu.it/wp-content/uploads/MLFD-Booklet.pdf) and the policy recommendations (https://fidu.it/language/en/mlfd-policy-recommendations/) are still available online as practical resources to help citizens recognize disinformation and understand the importance of media literacy. Such tools are also used as supporting material in FIDU's training and awareness-raising activities, including sessions targeting educators, trainees and civil society audiences, providing guidance on how to assess sources, verify information and interpret online content in context. In parallel, FIDU consistently publishes media literacy and critical thinking content through its communication channels, reinforcing key messages and practical tips over time. This communication work follows a case-study-based methodology, using concrete and timely examples to help audiences recognise common manipulation patterns and apply practical verification steps in real-life information environments. Content is also tailored to reach inclusive and diverse audiences, using accessible language and formats and, where relevant, adapting messages to different levels of digital literacy and vulnerability. This sustained, method-based engagement reflects FIDU's ongoing commitment to strengthening resilience to disinformation and broader forms of information manipulation and foreign interference.

SLI 17.1.1 - actions enforcing policies above [change wording if adapted]	Engagement and interactions with the tool.			
	Total count of the tool's impressions	Interactions/ engagement with the tool	Other relevant metrics	Other relevant metrics
Data	N/A	500+ participants engaged in the activities (EU)		

Measure 17.2	
QRE 17.2.1	During the reporting period, FIDU's activities related to media literacy and the fight against FIMI have focused on 4 main areas: **- Advocacy**: Among the main activities in the field: FIDU promoted institutional and public engagement on information manipulation, information suppression, and disinformation risks affecting democratic processes. On **4 April 2025**, FIDU co-organised **a public event held at the Italian Chamber of Deputies** to discuss with experts the European External Action Service's (EEAS) third report on threats related to Foreign Information Manipulation and Interference (FIMI), featuring contributions from the EEAS. The event contributing to awareness of malicious actors' tactics, techniques and procedures (TTPs) and the need for coordinated responses. In addition, on **27 October 2025**, FIDU co-organised a **conference at the Italian Senate** focused on the situation on human rights in Hong Kong, and in particular the trial of Jimmy Lai, which also addressed the broader issue of **information suppression and disinformation campaigns** that pollute public debate in Europe and undermine the information ecosystem. On **10 December 2025** FIDU also co-organised a special screening of the documentary *Mr. Nobody Against Putin* **(2025)** in cooperation with the Embassy of the Kingdom of the Netherlands, followed by a moderated discussion. The event engaged the public on how propaganda and disinformation operations work in practice. **- Training:** FIDU continued to deliver and contribute, through its expert team, to several national and international trainings and workshops (both in-person and online), primarily targeted at CSOs, students, young professionals and media workers. Trainings leveraged practical exercises and case studies to strengthen critical thinking, source evaluation, verification skills, and understanding of manipulation patterns. In this framework, FIDU also contributed to university-based training, including initiatives in cooperation with the Master in Journalism and Multimedia Communication at the LUISS School of Journalism. **- Participation in cross-sectoral activities:** FIDU took part in multi-stakeholder initiatives and high-profile public discussions to exchange insights on media literacy, disinformation trends and broader influence operations. This included the conference **"Culture or propaganda? The Gergiev case in Caserta and Russian interference in Italy"**, held at the **Italian Chamber of Deputies in Rome on 21 July 2025**. The event used the public controversy around conductor Valerij Gergiev and his performance in Caserta as a starting point to discuss the blurred line between artistic freedom and political interference, and to reflect on how culture can be leveraged as a vehicle for propaganda and geopolitical influence within European democracies. In addition, FIDU participates as an observer member in **AGCOM's (Italian Communications Authority) Media and Digital Literacy Coordination Table** and remained engaged

	throughout 2025 in its cross-sectoral exchanges and coordination activities. - **Publications:** FIDU continued to disseminate and promote its **media literacy resources**, including outputs developed under the *Media Literacy for Democracy (MLFD)* project, ensuring they remain accessible and usable by educators, trainers and the broader public, as well disseminate activities related to the report *Sanctioned but Thriving: How Online Platforms Fail To Address the Widespread Presence of Entities Under EU Sanctions* (December 2024) developed through the Counter Disinformation Network with case contributions from eight civil society organisations, including FIDU. In addition, FIDU contributed to public understanding of authoritarian interference and threats to civic space through research and awareness-raising outputs, including publications on **transnational repression (TNR)** and tactics, such as online smear and disinformation campaigns targeting dissidents, that contribute to **information suppression**, distort the information environment and generate a chilling effect on participation and free expression. This work also highlights how TNR and FIMI can operate hand in hand, with cross-border repression increasingly relying on coordinated information manipulation and interference to intimidate individuals, discredit voices, and deter civic engagement.

SLI 17.2.1 - actions enforcing policies above	- Number of participants and number of countries involved in the advocacy activities. - Number of awareness raising activities (conferences and trainings).				
	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of participants	Nr of interactions with online assets	Nr of countries
Data	8	N/A	450+	N/A	3+

Measure 17.3	
QRE 17.3.1 [insert wording if adapted]	For the above-reported activities FIDU partnered with media literacy experts, the Italian Digital Media Observatory (IDMO), the Italian Communications Authority (Agcom), as well as several CSOs with relevant expertise in media literacy and disinformation (FIDU is part of the Counter Disinformation Network, led by Alliance 4 Europe). Additionally, FIDU participate in meetings and events with EU institutions, notably the EEAS – East StratCom Task Force, as well as Europe Direct, EACEA, and DGs representatives.

VIII. Transparency Centre	
Commitment 36 Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]	
Measure 36.1	
QRE 36.1.1 (**for the Commitments 34-36**) [insert wording if adapted]	As qualitative reporting elements and service level indicators are essential for full compliance with the code, FIDU remains committed to meeting them accordingly.
SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage [change wording if adapted]	N/A
Data	N/A

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. [change wording if adapted]	
Measure 37.1	
Measure 37.2	
QRE 37.6.1 [insert wording if adapted]	FIDU is active in 2 subgroups. Namely Crisis Response and Outreach and Integration of New Signatories. FIDU members participated in all the CoP plenary sessions.

Reporting on the service's response during a period of crisis

Reporting on the service's response during a crisis	
War of aggression by Russia on Ukraine	

At the time of reporting, significant threats related to mis- and disinformation continue to be observed in the context of the Russian war of aggression against Ukraine. These threats contribute to widespread information disorder, affecting both online and traditional media. The dissemination of false or misleading information through various channels, including news outlets, social media platforms, in person and online events, as well the use of diverse tactics, create confusion and distorts public debates. In some cases, the disinformation and harmful narratives related to the Russian war in Ukraine have been interconnected, with the narratives being manipulated across multiple conflicts. This results in a lack of timely, accurate, and comprehensive information for the general public, which often leads to reactive rather than proactive responses. Additionally, vulnerable groups, such as marginalized communities, are disproportionately impacted by disinformation and require tailored approaches to address their specific challenges.

Mitigation: FIDU's work in the media literacy field and disinformation counteraction aims to mitigate these threats by empowering individuals across different sectors to critically assess both online and traditional media sources, ensuring that more informed, proactive responses are fostered in the face of evolving global challenges. Specifically, FIDU's action, based on a multidisciplinary and cross-sectoral approach, includes:

- Analysis of the modus operandi used by foreign actors: tactics and tools (social media, in person events, fake accounts and state-run outlets disseminated fake news), targets, and goals, as well as monitoring of the incidents/episodes.
- Raising awareness on the impact of disinformation, foreign interference and information manipulation, as well as information suppression at a multi-sector level.
- Promote activities based on cross-sector cooperation.

All the activities are addressed by always keeping in mind the need to balance the right to freedom of expression, the right to be informed, and the protection of democracy and the rule of law from disruptions to the public debate.

During the reporting period, FIDU conducted various activities, including hosting conferences in collaboration with Institutions, publishing reports and policy papers, and participating in expert roundtables. These activities aimed to disseminate knowledge, facilitate discussion, and foster collaboration among stakeholders in order to improve the Member States' response to crisis.

Empowering Users	
Specific Action applied (with reference to the Code's relevant Commitment and	- Organisation of trainings and expert workshops on the spread of disinformation during the Russian war of aggression against Ukraine addressed to digital media and journalism students. - Dissemination activities related to the report *Sanctioned but Thriving: How Online Platforms Fail To Address the*

Measure)	*Widespread Presence of Entities Under EU Sanctions* developed through the Counter Disinformation Network with case contributions from eight civil society organisations, including FIDU. - Organisation of the conference *Ukraine and Italy. Why does Crimea unite us?* in cooperation with Crimea Platform, Zmina and IPHR, Rome, 9 July 2025, with a focus on the role of Russian disinformation operations. - Participation in the *Ukraine Recovery Conference*, Rome, 10-11 July 2025. - Participation in the press conference at the Italian Senate organized by Centro Studi Germani on *Russian strategic narratives in Italian secondary school textbooks*. - Participation in the press conference organised by Bring Kids Back UA, Rome, 21 November 2025, with direct testimonies on the role of Russian propaganda in the schools of the temporary occupied territories of Ukraine. - Publication of an op-ed on the spreading of content from Russian sanctioned outlets in Italy (E.Mongelli, 11 January 2025) Linkiesta: https://www.linkiesta.it/2025/01/russia-today-propaganda-censura/) - Participation in the press conference *Culture or propaganda? The Gergiev case in Caserta and Russian interference in Italy,* held at the Italian Chamber of Deputies in Rome on 21 July 2025.