

Code of Practice on
Disinformation – Report of
Maldita.es for the period of
January 2024

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Executive summary

Executive summary (max. 2 pages)

Maldita.es is a non profit organisation dedicated to fighting disinformation. Our goal is to give people “tools not to be fooled”, so we develop innovative formats particularly suited for social media and for the creation of a community that shares our mission and is ready to help us fulfil it. Most of our editorial activities are based in fact-checking techniques, production of explainers, and data journalism. Furthermore, we do Media Literacy, Academic Research, and Public Policy in order to build a society that everyday grows more capable to identify dis and misinformation before sharing it.

As part of Maldita.es’ goal of **strengthening the European fact-checking community through better cooperation**, Maldita.es currently holds the presidency of European Fact-Checking Network’s governance body. The EFCSN has made an effort to assist small fact-checking organisations by encouraging the development of technical capacity (such as the creation of enhanced databases) and skill sets (such as advocacy capabilities) to strengthen their contribution to the fight against disinformation.

Moreover, there is no doubt that cooperation is one of the best practices for fact-checking, especially in times of crisis or elections. In the context of the snap general election in Spain of 23 July 2023, Maldita.es collaborated with Democracy Reporting International (DRI) to investigate **how disinformation, hate speech, and political speech interact during electoral processes** through some of the main digital platforms. Also in the context of the Spanish elections, we collaborated with Avaaz for the **distribution in its network of the main disinformation content identified** during the campaign as part of our research. Additionally, we elaborated an ex-post investigation to analyse the **response of six very large online platforms to the most viral disinformation contents** identified and previously debunked by Maldita.es, whose results were shared with Maldita.es’ stakeholders and in the press.

Apart from the collaborations in which we engaged in the context of the Spanish elections, Maldita.es participated in a number of activities throughout the year in many other areas related to the fight of disinformation. An example of this is Maldita.es’ participation in the **seminar ‘The Impact of Disinformation on Online Platforms and Their Users’**, as part of CONNECT University Autumn School on Online Platforms Ecosystem, a flagship initiative of the European Commission’s DG Connect that aims to inform the EU staff and the general public about the latest digital trends and challenges which are highly linked with EU's relevant policies.

Maldita.es continued its collaboration with the **Information Sharing and Analysis Center on Foreign Information Manipulation and Interference (FIMI-ISAC)**, a group of like-minded organisations that engage in protecting democratic societies, institutions, and the critical information infrastructures of democracy from external manipulation and harm. Maldita.es participated in the consultation process for the creation of the experts group and in its actively participating on its development.

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 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 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.

VII. Empowering the fact-checking community	
Commitment 33	
Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence. [change wording if adapted]	
Measure 33.1	[insert wording if adapted]
QRE 33.1.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters] Maldita.es is an active part of the European Fact-Checking Network (EFCSN). Currently holds the chairmanship of the association's governance body. We have updated our methodologies, policies and procedures to make them even more transparent and accessible, in order to be compliant with the EFCSN Code of Standards .
SLI 33.1.1 - number of European fact-checkers that are IFCN-certified [change wording if adapted]	Maldita.es has also been a verified signatory of the International Fact-Checking Network (IFCN) Code of Principles since 2018 and has undergone the assessment procedure each year since then. The assessment is accessible here and our declarations on methodology , organisational transparency , and neutrality are also public on our website.
Data	Methodology of data measurement [suggested character limit: 500 characters] We have taken into account fact-checking organisations based in EU Member or Council of Europe states, plus Belarus and Kosovo. For both networks, we have included the status of the organisations as for the end of February 2024.
	Nr of fact-checkers IFCN-certified 38 verified members 14 under review
	50 signatories 27 organisations under renewal 8 organisations with certification expired
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. [change wording if adapted]	
Measure 34.3	[insert wording if adapted]
Measure 34.4	[insert wording if adapted]
VIII. Transparency Centre	

Commitment 35

Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable. [change wording if adapted]	
Measure 35.2	[insert wording if adapted]
Measure 35.3	[insert wording if adapted]
Measure 35.4	[insert wording if adapted]

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]	
QRE 36.1.1 (for the Commitments 34-36) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters] The administration of the Transparency Centre website has been transferred fully to the community of the Code's signatories, with VOST Europe taking the role of developer.

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 ERCA. 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	[insert wording if adapted]
Measure 37.2	[insert wording if adapted]
Measure 37.3	[insert wording if adapted]
Measure 37.4	[insert wording if adapted]
Measure 37.5	[insert wording if adapted]
Measure 37.6	[insert wording if adapted]
QRE 37.6.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters] Maldita.es takes part in five different sub-groups within the Task-force: Crisis Response SG, Monitoring &

	<p>Reporting SG, Empowering Fact-checkers SG and Generative AI SG. By attending every meeting of these subgroups, we have shared insights from our daily fight against disinformation, different narratives we encounter and the challenges possessed by AI, as well as what we perceive as shortcomings of other signatories when it comes to fighting and measuring disinformation, particularly during crises and elections. Furthermore, we have raised concerns from the fact-checking community and given constant feedback on the decisions that were being taken.</p>
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<p align="center">X. Monitoring of Code Commitment 38</p>	
<p>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. [change wording if adapted]</p>	<p>QRE 38.1.1 [insert wording if adapted]</p> <p>Outline relevant actions [suggested character limit: 2000 characters] In order to comply with our commitments under the Code, the entire Public Policy and Institutional Development team is in charge of duties related to both reporting information and engaging with the Task-Force, other signatories and different relevant actors that could contribute to the implementation of the Code. These include contacts with civil society organisations, researchers, public authorities, and online platforms within the Code and also with potential partners that are not yet signatories. Meanwhile, Maldita's debunking team closely searches for and monitors different narratives and networks that promote disinformation, providing valuable evidence to alert relevant Signatories of potential policy breaches or act as an early-warning system. With the aim of identifying larger trends in misinformation, these observations are also being shared with other independent fact-checking organisations within the IFCN and EFCSN.</p>

<p align="center">X. Monitoring of Code Commitment 39</p>	
<p>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]</p>	

<p align="center">X. Monitoring of Code Commitment 40</p>	

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. [change wording if adapted]

Measure 40.2	[insert wording if adapted]
Measure 40.3	[insert wording if adapted]
Measure 40.4	[insert wording if adapted]
Measure 40.5	[insert wording if adapted]

X. Monitoring of Code

Commitment 42

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]

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]