

Code of Practice on
Disinformation – Report of
CRISP for the period 17th
Jan 2022 – 17th Jan 2023

Table of Content

VI. Empowering the research community	1
Commitment 29.....	1
IX. Permanent Task-Force	3
Commitment 37.....	3
Reporting on the service’s response during a period of crisis	6
Covid-19 pandemic.....	6

Executive summary

The last year has shown a maturity in Disinformation not only in the continued focus by Government, Big Tech companies, Crisp, NGOs and other organizations, but also with the threat environment.

With the range of Disinformation operations and approaches that are being seeded into the information space only growing. Each new narrative, or an evolution of an existing one, that gains traction provides another reusable or recyclable component that can be used by a group seeking to create doubt or to drive a particular agenda. These agendas have also grown beyond historically what society would have described as medical disinformation. Many have a number of key, common considerations such as child welfare, adult mortality, environmental mismanagement, “deep state” intervention, and are able to persist for a variety of reasons from profiteering, self-promotion or indeed strategic investment.

How has the medical disinformation space evolved through 2022

In the beginnings of COVID, governments and groups involved in the response were very much in a reactive mode. During the formative aspects of the pandemic, there were an incredible number of new and emerging narratives, at that period there was not the body of credible and rigorous medical research to counter the pace of disinformation narratives. The challenge of building trust in the environment, setting out clear context for the current and critically evolving situation was a necessary area of focus. From this robust foundation, not only in the core analysis but also in the critical collaborative relationships across the space, the combined community is in a much stronger space.

The dangerous and damaging narratives related to COVID, have moved in an opportunistic manner to adapt to whatever the next health related issue might be and where there can be any linked assertions. Monkeypox, prolonged, exacerbated, or mutated Influenza, Strep A – within northern Europe, are all examples where damaging narratives are re-invigorated, or re-purposed with these unrelated health outbreaks. This evolutionary approach has been seen previously with vectors such as mobile communications which were an impact to children, the environment and ultimately then attributed as a source of COVID in some of the broader or fringe narratives.

As we look to the developments in 2022 – whilst the nature of the medical narratives continues to change, against the pandemic timeline, other areas such as elections and geo-political challenges, energy and food supply are also part of the global disinformation landscape.

A global view for an effective regional response

The main focus for the EU DSA : Disinformation Task Force has naturally been the EU Member States and closely aligned geographical regions –focused on limiting the harm and impact to those citizens within that physical scope. It is clear that social media and the broader internet are not limited by the same borders. Crisp takes a global view of disinformation response in collaboration with the widest set of online harms. Having a total global view enables a much more informed response, in support of Policy makers, NGOs and Tech companies – highlighting new & emergent narratives which may have not impacted EU Member States as yet.

This is critical and potentially more obvious for global challenges such as the COVID pandemic. With a global or unconstrained view of disinformation Crisp is able to draw operational comparisons that will enable more effective identification, analysis and ultimately response. Many of the individuals/ groups, aims and narratives have common components globally. There are of course exceptions, but where there are religious considerations around the vaccines in LATAM, we see this replicated, in equally religious countries within the EU, perhaps not to the same degree but we do see these as opportunities for early indication of early narratives that have the potential to impact the EU. A targeted vector to introduce these narratives is often diaspora communities, or common interest groups such as gaming or parenting forums.

Crisp can identify those not just cross-platform within a given country or region, but across multiple regions. For instance, similar methods being used in APAC related to elections, that we have correlated with activities and narratives then identified in LATAM. This wider, global context is critical to producing the most valuable intelligence picture (or view). Interventions derived from a much richer understanding of the environment – will have superior outcomes for governments, platforms, and citizens. Getting and staying ahead of this global threat requires a full network response – across a diverse stakeholder set and Crisp is proud to play its part in this challenge.

How prepared are Crisp and the wider community compared to previous years for disinformation

Having worked in not just Disinformation, but also across several adjacent online harms – such as Hate Speech and Harassment. Crisp has been able to build out tools and capabilities built over the previous 17.5 years, from AI, ML and Risk Assessment capabilities to broader language and Strategic Risk Assessment.

Key events in 2022 demonstrated the need to have better and more detailed language coverage in less common language sets and support for smaller communities. The need to be able to be effective against narratives in lower

population language sets – which had likely been used intentionally as there was an historical view that these communities were less monitored or supported. Crisp have continued to build out cultural understanding and response ahead of, and in direct response to the evolving threat environment.

2022 showed the COVID narrative evolving and as with previous public health and citizen welfare moving to a much more opportunistic narrative model – where any health incident would in some way be attributed back to the COVID vaccines and their efficacy, or unintended impacts. Crisp as part of our horizon scanning capability expects this narrative to be long term and enduring.

Crisp has been building out Analyst, Data, Language and Cultural capabilities to ensure a coherent and scalable approach to increasing the body of disinformation narratives. Increasing the wider teams ability to the stand-up fusion cell teams (multi-disciplinary teams) with partners across the Task Force and indeed more broadly.

Where is the next threat coming from

Understanding of the Disinformation challenge is maturing, it is clear that it is one of the most fast moving and pervasive challenges that modern society faces in a age of open internet.

Looking towards 2023 and beyond the need to bring together more diverse partners, from new geographies and wider academia become more important. With that the challenge of aligning disparate views and aims.

Threats within the EU and related region 2023:

1. Evolution of COVID – also including Long COVID variations – this is the on-going long tail – potential for the re-emergence of mask narratives as regions recommend them to be worn again
2. Continued Geo-Political Challenges
3. Mainstream Disinformation narratives will likely move to climate considerations and food supply-chain integrity
4. Post-COVID several the medical and healthcare narratives will revert back to pre-COVID health related areas such as cancer treatments

It will become important as a group to be able to move from reactive measures to proactive measures – driven from both a strategic and local risk assessment level to ensure a balanced and holistic response, at member state level and at citizen level.

Guidelines for filling out the report

Baseline reports are detailing how Signatories have implemented their Commitments under the Code and provide the Qualitative Reporting Elements (QREs) and Service Level Indicators (SLIs), as they stand one month after the implementation. The baseline report should also include a comparison between the measures in place under the previous Code to the measures taken to implement the new Code. The measures taken to implement the new Code should be outlined per commitment in the dedicated field of the reporting template.

Reporting period

The reporting period to be covered in the baseline reports is from 16 December 2022 to 16 January 2023 for all Signatories. (The implementation period of the Code from 16 June 2022 to 16 December 2022 is followed by a one-month reporting period from 16 December 2022 to 16 January 2023.) Signatories shall submit baseline reports outlining policy updates and actions taken to implement the Code during the implementation period. Data, e.g. on the number of actions taken under a specific policy, should be reported on from the end of the implementation period (16 December 2022) until the cut-off date of 16 January 2023. In case specific data is not available for the first reporting period (from 16 December 2022 to 16 January 2023), please provide the monthly average based on the previous quarter, clearly outlining the methodology used in the relevant field. The submission date for baseline reports is January 31, 2023.

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. 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 table directly, in written form.

Reporting SLIs and data

Reporting on Service Level Indicators requires quantitative information to be reported on in the reporting template.

- SLIs should generally be reported on per Member State. Where required by the Code, reporting needs to be done both per Member State and per language, e.g. SLI 30.1.1.
- 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 reporting template, not through external links. Please use the Member State/ language template provided and insert it accordingly after every SLI that you report on.
- 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 contextualise 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 should 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. Please also indicate inconsistencies or gaps regarding methodology in the field dedicated to methodology.

Attachments

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

Crisis reporting template

Relevant signatories are asked to provide proportionate and appropriate information and data in special situations like a crisis. Reporting is a part of a special chapter at the end of the monitoring template and should follow the guidelines:

- The “Intervention or action (short summary)” column should describe the action in very few words (for instance “We remove autocomplete suggestions that comprise harmful misinformation about the pandemic.”, “Under Policy X, content is demoted or removed based on severity”, etc.).
- The “Intervention or action (explanation and implementation)” should provide explanation and context on implementation and rationale of the intervention. For instance why and which authoritative sources were promoted throughout the crisis and how the promotion would look like for users, how the integrity teams detect and disrupt crisis related disinformation campaigns and which disinformation campaigns were found/disrupted, etc.
- The 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 monitoring template.
- Reporting should be brief and to the point, not exceeding 500 characters in the [second column] and not exceeding 2000 characters in the “Intervention or action (explanation and implementation)” column unless absolutely necessary.
- Where Signatories assess that there are no meaningful or feasible metrics under the Code for a particular intervention or action, they are able to outline concisely why that is the case and whether or not they expect to be able to provide further metrics in the next reporting period.

Uploading data to the Transparency Centre

After the submission of the baseline reports and the launch of the Transparency Centre website, all data from the reporting template must be uploaded to the Transparency Centre within maximum 7 days, allowing easy data access and filtering. 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 Center 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.

VI. Empowering the research community

Commitment 29

Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences.

In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes
If yes, list these implementation measures here [short bullet points].	<ul style="list-style-type: none"> ● Increased language coverage – driven both by Crisp Global Disinformation Assessment which has been carried out on a minimum of a quarterly basis covering not just the EU region – but global – focusing on regions which have the risk of disinformation ● Correlating common patterns and approaches observed out with the immediate Member States and how these may then impact EU States and neighboring partners or related diaspora ● Increased in the type and context of the intelligence sources and identification mechanisms for disinformation and related tactics, covering not just additional platforms and services, but also new and additional features or surfaces that have been added to existing platforms.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No
If yes, which further implementation measures do you plan to put in place in the next 6 months?	<p>Within the next 12 months, continue to track the key emergent new areas of Disinformation – against a Global Intelligence Threat picture</p> <p>Increasing cultural language and depth of context especially for new and emergent regions, countries and thematic areas.</p>
Measure 29.1	
QRE 29.1.1	Over the previous reporting period 2022 Crisp has conducted disinformation analysis across LATAM, North Americas, APAC, South Asia, EU and key geographies across Africa.

	<p>The Disinformation analysis has been split into a number of sub-sections:</p> <ul style="list-style-type: none"> ● Health Related ● Election Related ● Geo-political ● [Only by exception] Corporate - non state-owned/ or state influenced corporation or entities <p>Regional prioritization has been dictated by a number of key factors:</p> <ul style="list-style-type: none"> ● Internet access and adoption and more specifically social media (UGC content) across specific regions ● Crisp country level assessment - which supports the triage and identification of those countries which represent a high risk or vulnerability to their citizens from disinformation ● Covering geo-political, to socio-economic through to levels of digital literacy and overall education in the region ● Geo-political instability in region or historically events in country which increase potential for risk ● Natural resources specifically in 2022 energy demand and supply not just within the EU member states but also internationally.
QRE 29.1.2	Crisp revising report method for Transparency Centre – will update progress in 6 months
QRE 29.1.3	<p>Crisp have supported the establishment of the working group and where possible attended and shared overviews of thematic activity.</p> <p>Going into 2023 period Crisp will seek to more formally brief the signatories and wider members of the group including EDMO, ERGA – Crisp internal constraints permitting</p>
SLI 29.1.1 - reach of stakeholders or citizens informed about the outcome of research projects	Not assessable during initial 2022 – Year 1 review period
	Not assessable during initial 2022 – Year 1 review period
Member States	N/A
List actions per member states and languages (see example table above)	Not applicable to Crisp Services
Measure 29.2	
QRE 29.2.1	Requires Code resilience fostering mechanism to be sufficiently in place – therefore not measurable during 2022 – will revise and update on progress

QRE 29.2.2	Not measurable during 2022 – therefore no updates made
QRE 29.2.3	Not measurable during 2022 – therefore no updates made
SLI 29.2.1	No research projects made public during 2022
	No research projects made public during 2022
Member States	
List actions per member states and languages (see example table above)	Not applicable

IX. Permanent Task-Force	
Commitment 37	
<p>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.</p>	
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	No
If yes, list these implementation measures here [short bullet points].	N/A
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No

If yes, which further implementation measures do you plan to put in place in the next 6 months?	N/A
Measure 37.1	See QRE 37.6.1 Entry
Measure 37.2	See QRE 37.6.1 Entry
Measure 37.3	See QRE 37.6.1 Entry
Measure 37.4	See QRE 37.6.1 Entry
Measure 37.5	See QRE 37.6.1 Entry
Measure 37.6	See QRE 37.6.1 Entry
QRE 37.6.1	<p>Crisp looks forward to supporting the wider Task-force in particular in the Crisis Response / Special Situation context.</p> <p>Over the previous reporting period (2022) Crisp has assessed a range of High-Risk Elections and a larger number of Mid-Tier disinformation events.</p> <p>Each of these high-risk elections had a dedicated team of analysts, working in a fusion-cell (a hybrid team of cultural and language specialists, supported by Data and ML experts) incorporating at least one other operational partner and fact checker group either directly or indirectly linked.</p> <p>The resulting set of high-priority themes would then be further developed to understand the originating group, rationale, scale and likely recidivism to give an overall view of impact for the particular narrative, in context.</p> <p>This triaged and developed set – allowed interventions to be incrementally deployed, depending on the source and nature of the disinformation narrative – and the environment where it is likely to have been manifesting. The analysis is environment/ platform agnostic and therefore also includes considerations for cross-platform and multi-region narratives.</p> <p>With the interventions deployed – Crisp continued to provide an on-going assessment of the narrative and linked to that – effectiveness of any partner deployed mitigation.</p>

	<p>The mitigation monitoring phase provided continual improvement or refinement in the efficacy of the response. The narratives particularly within a single election are usually evolutions of each other or some form of recycling of a small number of core themes. Therefore this provided the ability to evolve the mitigations in a similar way to keep pace during the election or similar event.</p>
--	--

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

Covid-19 pandemic

Overview of the main threats observed, such as crisis related disinformation campaigns, spread of misinformation, coordinated manipulative behaviors, malicious use of advertising products, involvement of foreign state actors, etc

Thematic Observations/ Narratives

- Fraudulent medical agencies – moving from audience engagement numbers to monetization – predominantly through online account fundraising – via crypto currency or other digital banking means – adopting at times similar approaches to Hate Actors – to monetize whilst intentionally not breaking current platform policies
- The breakdown of trust between citizens and both Governmental and Medical leadership – which has been magnified – particularly evident in regions where there is a significant lack of free or unfettered access to certified medical professionals
- Language coverage – strongly focused on English / UK / North American narratives – regions with limited access to free and trustworthy medical advice has permitted narratives to persist and to then be re-exported (back) to other EU related regions
- Distrust of private or insurance-based healthcare regimes that were viewed as profiteering from the situation
- Historical distrust in government mandates – mask mandates made then not supported by senior politicians within the government (lack of mask wearing). This has fueled a version of the elitist narrative
- Monetary Drivers – individuals and groups seeking to profit from alternative medications such as animal-tranquilizers, Ivermectin, Hydroxychloroquine or other repurposed unproven medical substances
- Individuals selling themselves/ service or advice – exploitation of the environment for monetization. This evolved as a key revenue stream for a number of individuals and groups and with that the determination to continue their ability to promulgate various narratives
- Sudden Adult Death Syndrome – coupled with the “Died Suddenly” film which is providing a recurring narrative model – easily linking any unexplained death to COVID vaccinations or similar treatments

Executive summary of the company's main strategies and actions taken to mitigate the identified threats and react to the crisis: [suggested character limit: 2000 characters].

- Pre-COVID Crisp healthcare disinformation was already a fully mature service – running with a focus on non-COVID narratives: cancer cures, HIV wide variety of reproductive health 'advice', damaging and dangerous beauty treatments
- Crisp have evolved a Fusion-Cell model moving from a transactional one-way reporting method – to a cross-discipline working groups with a range of partners involved – frequency of which is tailored with the key partners executing the mitigations
- Defined, Developed and Maintained – Strategic Threat Landscape Analysis
- Defined, Developed and Maintained – Analysis by Country and Region
- Real Time approach to dealing with emerging responses and on-going mitigation monitoring
- Development of a predictive model which identified Anti-Vax responses by region – enabling partners to be able to develop mitigations including policy responses in a matter of hours and days

Best practices identified for future crisis situations: [suggested character limit: 2000 characters]

- Global Threat Picture Management – by Region/ Country and Narrative / Cross-Platform

- Proactive and Predictive Monitoring – how early collation of analysis can enable the earliest and most impactful response
- Narrative Migration Globally – whilst not all will apply to the EU scope – some will. It is critical to have a consistent view of the wider environment to ensure that any international narratives can be triaged as early as possible

Future measures planned within the next six months: [suggested character limit: 2000 characters].

- Evolution of COVID disinformation tooling and associated reporting – key focus on capacity and speed of response
- Focus on secondary narratives – e.g. Strep-A linked to COVID vaccinations – (predominantly in the UK, with some examples in Europe) similar reporting to more aggressive forms of influenza are as a result of COVID vaccinations
- Following a now, well-defined path of Mis and Dis information narrative development – established communities continue to wait for a new health related narrative “spikes”. Example: key actors and groups were well practiced in amplifying their messaging and approaches for new health related narratives such as Monkeypox
- Beyond COVID – renewed focus on historical healthcare treatments – organic healthcare solutions – legacy markets around harmful by-product medication – such as cancer treatments and related