Code of Practice on Disinformation – Report of Demagog Association for the period of 1 January - 31 December 2024

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Executive summary

Demagog is the first Polish fact-checking organization, established in 2014. Our mission is to combat disinformation and improve the quality of public debate by providing access to unbiased and credible information. For more than 10 years we've been fact-checking political claims, keeping track of the promises and debunking harmful disinformation. We strive to build a strong misinformation-resilient civil society that keeps politicians accountable for what they say and promise. We believe that we can achieve this goal by empowering citizens with critical fact-checking and media literacy skills. That's why we share our expertise with others in our educational project called Fact-checking Academy.

We are signatories to the 2022 European Code of Practice on Disinformation and the Polish Code of Good Practices in Combating Disinformation. We are members of the International Fact-Checking Network (IFCN), European Fact-Checking Standards Network (EFCSN) and the Central European Digital Media Observatory Hub (CEDMO). We are partners to Meta's Third Party Fact-checking Program and TikTok's Fact-checking Program.

So far, we have fact-checked more than 6000 political claims and additionally, nearly 3000 of fake news.

Activities of our Fact-Checking Academy have ever-increasing scope. So far, we have organized more than 700 different workshops and seminars that gathered approximately 18 000 participants in total. We believe that only via scaling of our media literacy activities we can achieve meaningful change. That's why, in parallel to our on-site workshops and seminars, we have also developed our e-learning platform. Currently, almost 4000 users of the platform have access to various online courses on fact-checking, media literacy and digital skills.

We are active members of various international projects, including EU-funded consortiums. For example, we are participating in the Hatedemics project, whose aim is to strengthen the preventive and reactive measures against hate speech and disinformation online. It aims to empower NGOs/CSOs, fact-checkers, public authorities and youngsters as activists to effectively prevent and combat polarisation, the spread of racist, xenophobic and intolerant speech, as well as conspiracy theories.

In 2021, we were awarded with the Polish-American Freedom Foundation's Sektor 3.0 prize for innovation in socially useful activities. In 2023, our work was recognized by journalists of the Press Club Poland, who distinguished our organization with their special award for supporting journalists and their audiences in defending against disinformation.

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 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 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, filer 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.

Measure 33.1	Demagog Association commits to operate under strict ethical and transparency rules and to comply with relevant codes setting the qualitative standards for the fact-checking community based on principles of transparency, non-partisanship and fairness.
QRE 33.1.1	Demagog Association maintains its commitment to adhere to highest qualitative standards for the fact-checking community. Since 2019 we are verified member of the International Fact-Checking Network (IFCN). As of March 2025, in the IFCN there are 68 verified active signatories and 10 organizations under renewal process which come from EU member states, Council of Europe states and Kosovo.
	Since 2023 we are certified members of the European Fact-Checking Standards Network. We have been verified as compliant with its Code. As of March 2025, there are 60 verified members of the EFCSN and 4 organizations under review procedure.
	The European Code of Standards for Independent Fact-Checking Organisations is a set of criteria designed to ensure that organisations fact-checking mis and disinformation adhere to the highest standards of methodology, ethics and transparency in order to best serve the public interest.
	Membership in the EFCSN signifies an organisation's rigorous commitment to provide accurate information ethically and transparently, without bias or prejudice. Members focus on matters in the public interest and have a proven track record of excellence, integrity and accountability.
	Our membership in the IFCN has been renewed on 4th of October 2024.
	We plan to renew our membership in the EFCSN in April / May 2025.
SLI 33.1.1 - number of European fact-checkers that are IFCN-certified	Number of organizations verified in the IFCN and the EFCSN is based on teritorial principle. Organizations taken into account are located in the EU member states, Council of Europe member states, Kosovo and Belarus.

	Nr of fact-checkers IFCN-certified: 68 signatories 10 organizations under renewal 9 organizations with certification expired	Nr of fact-checkers EFCSN-certified: 60 verified members 4 organizations under review
Data	March 2025	March 2025

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	Demagog Association reaffirms its commitment to actively contribute, within the scope of its operations and activities to the Transparency Centre.
Measure 34.4	Demagog Association reaffirms its commitment to actively contribute, within the scope of its operations and activities to the Transparency Centre.

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.	
Measure 35.2	Demagog Association reaffirms its commitment to include in an accessible and understandable manner all the relevant information within the scope of its operations and activities in the Transparency Centre.
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Measure 35.4	Demagog Association reaffirms its commitment to include in an accessible and understandable manner all the relevant information within the scope of its operations and activities in the Transparency Centre.

VIII. Transparency Centre

Commitment 36

Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner.

Measure 36.1	Demagog Association reaffirms its commitment to update the relevant information contained in the Transparency Centre in a timely and complete manner.
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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	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.
Measure 37.2	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.

Measure 37.3	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.
Measure 37.4	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.
Measure 37.5	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.
Measure 37.6	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.
QRE 37.6.1	Demagog Association actively participates in the work of the Permanent Task-force. We are in the following subgroups: Crisis Response Subgroup, Outreach and Integration Subgroup, Empowering Fact-checkers Subgroup and the Working Group on Elections.

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	Demagog Association reaffirms its commitment to ensure the proper implementation of the Code.
QRE 38.1.1	Demagog Association delegated its Director of International Affairs, Pawel Terpilowski, to be a representative of the organization in the work of the Permanent Task-force. He is also coordinating all of the activities that the Demagog Association is undertaking to ensure the proper implementation of our commitments in the Code of Practice. Those actions and measures are supervised by the Board of the Demagog Association. Demagog Association allocates necessary financial resources to ensure compliance with the Code.

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.

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	Demagog Association reaffirms its commitment to provide relevant yearly reporting on the implementation of its commitments and measures in the Code of Practice as well as adequate feedback on improving the monitoring and reporting framework of the Code
Measure 40.3	Demagog Association reaffirms its commitment to provide relevant yearly reporting on the implementation of its commitments and measures in the Code of Practice as well as adequate feedback on improving the monitoring and reporting framework of the Code
Measure 40.4	Demagog Association reaffirms its commitment to provide relevant yearly reporting on the implementation of its commitments and measures in the Code of Practice as well as adequate feedback on improving the monitoring and reporting framework of the Code
Measure 40.5	Demagog Association reaffirms its commitment to provide relevant yearly reporting on the implementation of its commitments and measures in the Code of Practice as well as adequate feedback on improving the monitoring and reporting framework of the Code

Measure 40.6	Demagog Association reaffirms its commitment to provide relevant yearly reporting on the implementation of its commitments and measures in the Code of Practice as well as adequate feedback on improving the monitoring and reporting framework of the Code

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.

Demagog Association reaffirms its commitment to provide relevant reporting, information and data upon request of the European Commission, in accordance with the rapid response system established by the Task-Force. In relation to this commitment, Demagog Association also partcipates in the Crisis Response Subgroup in which we are monitoring current development of crisis situations of international concern. We were also enaged in activities related to the 2024 European elections, including reporting on our activities related to the election period.

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.

Demagog Association reaffirms its commitment to provide reports and data following the harmonized reporting templates and refined methodology for reporting and data disclosure.

Reporting on the signatory's response during an election

Reporting on the service's response during an election

2024 European Parliament Elections

Threats observed or anticipated at time of reporting:

During the reporting period, two election campaigns took place in Poland. Apart from the European elections in June, Polish local elections were organized in early April. Due to this particular national context, the nature of political debate in Poland seamlessly transitioned from a local focus to issues related to the European Union.

This meant that Poland experienced a prolonged campaign period that lasted from February all the way to the European elections in June. The challenges related to these two election campaigns differed. In local elections, due to their scale, insufficient fact-checking at the local level was one of the most relevant issues.

No significant disinformation campaigns related to local elections were observed.

Regarding the European elections, disinformation narratives focused on specific EU policies and political agendas, rather than undermining election integrity. We can highlight a few examples of such narratives:

- EPBD: Disinformation narratives regarding the Energy Performance of Buildings Directive were present in the public debate on a large scale. Claims that Poles would be expropriated from their homes due to the enforcement of the measures in the Directive were propagated mainly by right-wing politicians.

- Migration Pact: With the approval of the new Migration and Asylum Pact, discussion regarding the potential legal consequences of this document quickly erupted. Right-wing politicians from parties like Konfederacja or Suwerenna Polska claimed that Poland would be forced to accept migrants or pay 20,000 EUR, without providing additional context regarding other measures and policies within the legal framework. It was also claimed that these new migration policies were the result of countries like Spain, Italy, Germany, and France wanting to shift or "export" their own problems to more stable countries like Poland.

- Green Deal: Narratives regarding issues like food imports from outside the EU were spread concerning the EU Green Deal. Politicians claimed that the EU Green Deal would lead to the destruction not only of domestic agriculture and food production in Poland, but also in the EU overall. In more radical cases, it aligned with climate change denial. We assess that the majority of EU-related disinformation during the European election campaign period originated domestically and was disseminated for the political purposes of specific candidates and parties.

Mitigations in place – or planned - at time of reporting:

Demagog Association has prioritized the election-related disinformation within the scope of its fact-checking partnerships with very large online platforms - Meta and TikTok.

We were part of the EFCSN's Elections24Check project supported by the Google News Initiative. As one of the most active participants, we have submitted 267 fact-checks to the repository, focusing on various EU-related issues.

In order to overcome the challenges related with the limited scope and reach of our activities, we have partnered with the Google News Initiative to organize two fact-checking hackathons for journalists, activists and concerned citizens. The concept was to promote the idea of factchecking, share our expertise and know-how and also increase the reach of our work.

The first hackathon before the local elections was joined by more than 60 participants, from 19 different media outlets. Together, they have produced 75 fact-checking articles. The second hackathon before the European elections was also joined by more than 60 participants from 10 different media outlets. They have produced 14 articles.

As a member of the Central European Digital Media Observatory Hub we were involved in producing regional briefs on current disinformation trends related to the European elections. We have also shared our insights with other members of fact-checking community within the European Fact-Checking Standards Network, the International Fact-Checking Network, as a member of Elections Working Group in the Code of Practice Permanent Task-Force and with other stakeholders.

[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].

Empowering the Fact-Checking Community

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.

Commitment 33	Additional projects and activities

Demagog Association was involved in two major projects related to the elections period in Poland. -

- **Elections24Check project:**

  The Elections24Check project aimed at increasing cross-country collaboration in detecting and debunking European electoral disinformation across the EU while promoting the access of European citizens to verified information so they could make informed decisions in the lead up to the European Elections in June 2024. It leveraged the collective expertise of European fact-checking organisations that are verified members of the European Code of Standards for Independent FactChecking Organisations. Elections24Check was a joint project of the European Fact-Checking Standards Network and its participating member organisations, supported by the Google News Initiative. Over 40 factchecking organizations participated in the project.

- **Fact-checking hackathons:**

  Demagog Association with the support of the Google News Initiative have organized two hackathons for journalists, activists, students and concerned citizens before local and European elections. The concept was to promote the idea of fact-checking, share our expertise and know-how and also increase the reach of our work. Those events supported the fact-checking empowerment of local journalists by increasing their fact-checking capabilities.