

Code of Practice on Disinformation –  
Report of GLOBSEC for the period January –  
December 2024

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## Executive summary

Two main activities conducted by the GLOBSEC's Centre for Democracy and Resilience ("Centre") related to the Code are:

1. Research and Monitoring of disinformation: Centre regularly monitors the trends in narratives and methods used to spread disinformation, especially across the CEE region.
2. Awareness raising on disinformation: Centre engages with the public through a range of awareness-raising and capacity-building activities with a range of target groups on the issue of tackling disinformation and related topics.

GLOBSEC is participating in four subgroups: Crisis Response, Monitoring and Reporting, Generative AI subgroups and WG on elections. GLOBSEC assigned specific people to attend meetings of the specific Task-force subgroups and the team always makes sure there is a person present in case the assigned representative is not able to attend.

Main activities during the **monitoring period (January 2024 – December 2024)**:

**GLOBSEC Trends 2024**: Released in May 2024, [GLOBSEC Trends 2024](#) served as a key tool for analysing public perceptions of democracy, foreign influence, and disinformation across the CEE region. Leading up to the EP elections, utilising data from the Trends opinion poll, GLOBSEC published an analysis [Elections to EU Parliament 2024: The Race to Mobilise Voters Starts Today](#), predicting voter turnout trends and highlighting vulnerabilities to populist narratives. The research findings directly contributed to shaping policy discussions at the GLOBSEC Prague Forum 2024, the NATO Public Forum, and expert consultations with EU and national regulators.

**Policy Recommendations for the European Commission**: GLOBSEC published the report *Pivotal Moment for Europe: Central European Proposals for the Next EU Leadership*, outlining recommendations from CEE countries to strengthen the EU's competitiveness, security, and global influence. The report includes two key contributions from the Centre: [Countering Foreign Malign Influence](#), which offers strategic guidance for the incoming European Commission on addressing hybrid threats, and [Blueprint for Social Media Regulation](#), a policy paper balancing online platform regulation with free expression and security.

### Media literacy and awareness-raising activities included:

Throughout the year, GLOBSEC actively participated in numerous events, conferences, and expert discussions, sharing insights on disinformation, hybrid threats, and the impact of digitalisation on democratic processes. Below is an overview of key contributions made across different months:

February

- GLOBSEC Trends data was presented at the *Balkan Disinformation Summit* in Kosovo, organised by the Geopost.

March

- GLOBSEC Trends data was presented to an audience of professors, researchers, and students at Amsterdam University.
- A presentation on information operations and their impact was delivered at a workshop organised by the Baltic Centre for Media Excellence for journalists and CSO representatives in Riga.
- Findings of GLOBSEC Trends were debated during an expert workshop titled *Building Resilience to Hybrid Threats: Preparing for a Year of Elections*, organised by GMF US in Warsaw, Poland.

## May

- Insights on misinformation and polarisation in high-stakes elections were shared during a panel at the *New Horizons in Journalism* event, organised by the World Press Institute in Sofia.
- A discussion was held at an event co-organised by GLOBSEC and Political Capital, titled *Keletre vagy Nyugatra mutat a magyarok iránytűje*.
- A half-day event, *Russia's Disinformation in the War Against Ukraine: Understanding the Threat and Addressing It*, was organised in cooperation with the Embassy in Lithuania and Poland.

## June

- Potential solutions for countering hybrid threats in Europe, including strategies derived from GLOBSEC Trends data, were presented at a workshop on disinformation and foreign influence in European democratic processes, organised by the ECFR branch in Rome.
- Insights on *The Impact of Digitalization on Democratic Processes* were shared during the *Digital Czechia* event.
- Webinar titled *Innovative Uses of AI by Civil Society in Europe* was organised hosting speakers from DRI, Microsoft and independent consultant on the benefits of AI for civil society organisations.

## September

- Slovakia's experience with AI-generated content being used as a tool within influence operations during elections was discussed at the AI Symposium organised by IFES in Prague.
- A presentation was delivered at the Annual Conference of the Open Information Partnership in Albania during a session titled *Mapping Disinformation beyond the Kremlin: Allies, Amplifiers, and Illiberal Regimes*.

## October

- A presentation was delivered at an expert seminar titled *Disinformation in the Western Balkans and the European Neighbourhood*, organised by CIDOB, a think tank in Barcelona.

## November

- Contributions were made at *Megaphone 2024* and *CODECON* conferences in Slovakia.
- A discussion took place at the *Transatlantic Policy Forum* in Prague.
- A lecture was delivered on how to detect information operations and the vulnerabilities of Slovak society to students of journalism and participants of the EU Media Campus in Bratislava, Slovakia.

## December

- Key vulnerabilities to malign influence across Europe were presented at the seminar *Information Warfare, Hybrid Threats and Nuclear Risk: The Hidden Threats of a Digital Age*, organised by Harvard Kennedy School Belfer Center for Science and International Affairs and G7 Italy.
- Trends in influence operations in the CEE region were presented at the *DISICON* conference, organised by NDI Kosovo, during an expert session titled *The Interplay Between Security and Information Integrity*.
- In cooperation with the Alliance4Europe GLOBSEC organised an expert online roundtable on the lessons learned from elections in Romania and Moldova.

<b>III. Political Advertising</b>	
Commitment 12	
Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices. [change wording if adapted]	
Measure 12.1	[insert wording if adapted]
Measure 12.2	[insert wording if adapted]
Measure 12.3	[insert wording if adapted]
<b>QRE 12.1.1 (for measures 12.1-12.3)</b> [insert wording if adapted]	The <a href="#">report</a> <b>Central and Eastern Europe's Blueprint for Social Media Regulation</b> by GLOBSEC explores regulatory approaches to online political advertising, disinformation, and platform accountability in the EU. It provides policy recommendations tailored to the region's specific challenges, focusing on transparency, content moderation, and electoral integrity. The report highlights the need for stricter oversight of digital political campaigns while balancing fundamental rights such as freedom of speech. It serves as a roadmap for policymakers seeking to mitigate the risks of online manipulation while ensuring a fair and democratic information space.

<b>III. Political Advertising</b>	
Commitment 13	
Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising. [change wording if adapted]	
Measure 13.1	[insert wording if adapted]
Measure 13.2	The scope of activities within Measure 13.2 only falls under the scope of countries, which will be included in GLOBSEC's research in the next years, depending on available projects and funding.
Measure 13.3	The assessment under measure 13.3 will be, so far, limited to Slovakia, as GLOBSEC has knowledge of the country's public administration, whereas it plans to expand to other countries in the future.

<p><b>QRE 13.1.1 (for measures 13.1-13.3)</b> [insert wording if adapted]</p>	<p>On February 20, 2024 GLOBSEC hosted a webinar titled "<b><i>Election Era 2024: Navigating the Digital Divide - AI's Dance Between Threats and Defenses</i></b>", featuring discussions on AI-generated disinformation in elections across Slovakia, Argentina, Bangladesh, Taiwan, and Turkey. The webinar provided insights on how AI-generated content was used in political campaigns and the risks of AI-powered misinformation targeting voters.</p> <p>Since October 2024 GLOBSEC has been regularly meeting with other researchers on the topic of monetisation of disinformation and exchange of know-how lead by What to Fix.</p>
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<h2>V. Empowering Users</h2>	
<h3>Commitment 17</h3>	
<p>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]</p>	
<p>Measure 17.1</p>	
<p><b>QRE 17.1.1</b> [insert wording if adapted]</p>	<p>A summary of GLOBSEC’s media literacy activities over the past year has been provided in Executive Summary section of this report.</p>
<p>Measure 17.3</p>	
<p><b>QRE 17.3.1</b> [insert wording if adapted]</p>	<p>GLOBSEC is part of EDMO, BROD and CEDMO.</p>

## 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. [change wording if adapted]

#### Measure 29.1

- **GLOBSEC Trends 2024** provided a data-driven assessment of public opinion in nine CEE countries, offering critical insights into attitudes towards the EU, NATO, and key geopolitical issues. By employing a rigorous methodology and disseminating findings through public reports, expert briefings, and policy discussions, GLOBSEC ensured that its insights were accessible to policymakers, researchers, and the broader public. This research played a vital role in informing evidence-based policymaking and enhancing understanding of regional dynamics.
- In addition, GLOBSEC contributed to discussions on combating online disinformation and regulating social media through its report ***Pivotal Moment for Europe: Central European Proposals for the Next EU Leadership***. The report outlined key recommendations on strengthening the EU's approach to tackling foreign information manipulation, enhancing platform accountability, and mitigating the impact of disinformation campaigns on democratic processes.
- The [report](#) titled ***Sputnik Moldova and the Kremlin's Propaganda Machinery in Moldova's Information Space*** examined how Sputnik News operates within Moldova to disseminate Kremlin-aligned narratives. The report highlights the challenges Moldova faces in safeguarding its information space against foreign influence, particularly given the concentration of media ownership among pro-Kremlin oligarchs and the unresolved Transnistrian conflict.
- The [report](#) ***Access to Data for Researchers: The State of Play***, which was based on the survey conducted among 57 researchers across the EU, examined challenges in obtaining data for studying online platforms. It found that restrictive policies hindered research on disinformation, platform governance, and online security. The report called for better regulatory frameworks to balance privacy with transparency and offered recommendations for improving data access.

	<ul style="list-style-type: none"> <li>The <a href="#">report <i>Disinformation Narratives Surrounding the Assassination Attempt on the Slovak Prime Minister</i></a> analysed narratives in Slovakia and Hungary following the attack. Using media monitoring and qualitative analysis, the study identified key disinformation themes, including political conspiracies and foreign influence claims. The report examined how these narratives spread across platforms, their impact on public perception, and differences between Slovak and Hungarian discourse.</li> <li>GLOBSEC actively participated in the <b>consultation processes</b> related to DSA, providing expert feedback on the <a href="#">DSA electoral guidelines</a>, <a href="#">data access for researchers</a>, and the <a href="#">delegated regulation templates</a>, offering recommendations on mitigating online risks during elections and ensuring transparency in platform obligations.</li> </ul>
<b>QRE 29.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
<b>QRE 29.1.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
<b>QRE 29.1.3</b> [insert wording if adapted]	The research outputs of GLOBSEC during the monitoring period was distributed via email to all stakeholders and signatories of the Code of Practice. Additionally, whenever feasible, we have shared research outcomes and related methodologies with the broader public.

### 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 34.5	[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 35.1	[insert wording if adapted]
Measure 35.2	[insert wording if adapted]
Measure 35.3	[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]

Measure 36.1	[insert wording if adapted]
Measure 36.2	[insert wording if adapted]
Measure 36.3	[insert wording if adapted]
<b>QRE 36.1.1 (for the Commitments 34-36)</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
<b>QRE 36.1.2 (for the Commitments 34-36)</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

### 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]

<b>QRE 37.6.1</b> [insert wording if adapted]	
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## 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. [change wording if adapted]

Measure 38.1	[insert wording if adapted]
<b>QRE 38.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

## 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. [change wording if adapted]

## 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. [change wording if adapted]

Measure 40.1	[insert 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]
Measure 40.6	[insert wording if adapted]

## **X. Monitoring of Code**

### Commitment 41

Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO. [change 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]

## **X. Monitoring of Code**

#### Commitment 44

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]