

Code of Practice on
Disinformation – Report of
Les Surligneurs for the
period 1st January 2024 to
31 December 2024

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Executive summary

Les Surligneurs is an independent fact-checking media outlet based in France whose mission is to fight disinformation, notably in the field of the law, through the publication of legal-checks, fact-checks, analyses, investigations, or the organization of events and debates.

Les Surligneurs is a verified member of both the IFCN and the EFCSN and follows the highest fact-checking standards.

V. Empowering Users

Commitment 17

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

Measure 17.2

QRE 17.2.1

Les Surligneurs organises and participates in awareness-raising events on disinformation issues and fact-checking. In 2024, it notably organized the first two editions of a new series of debates:

- « [La régulation d'internet peut-elle apporter la paix ?](#) », 12/11/24;
- « [La désinformation est-elle en train de tuer la démocratie ?](#) », 10/12/24.

Measure 17.3

QRE 17.3.1

Les Surligneurs occasionally works with EDMO. It notably contributed to a [report published in August 2024](#) on the implementation of the Code of practice by signatories.

VI. Empowering the research community

Commitment 26

Relevant Signatories commit to provide access, wherever safe and practicable, to continuous, real-time or near real-time, searchable stable access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation through automated means such as APIs or other open and accessible technical solutions allowing the analysis of said data.

Measure 26.1

QRE 26.1.1

Les Surligneurs' articles are freely accessible, and anyone can scrap and analyse them. Les Surligneurs remains open to sharing its relevant data for research purposes. The group itself is strongly connected to the academic sector as it is driven by law professors and doctoral students. Anyone can contact contact@lessurligneurs.eu for such a request. None has been received yet.

VI. Empowering the research community

Commitment 27

Relevant Signatories commit to provide vetted researchers with access to data necessary to undertake research on Disinformation by developing, funding, and cooperating with an independent, third-party body that can vet researchers and research proposals.

Measure 27.3

QRE 27.3.1

Les Surligneurs is a member of the EFCSN and works on the establishment of the repository and other initiatives at the EU scale. It remains open to work with the third-party body referred to in Commitment 27.

VI. Empowering the research community

Commitment 28

Relevant Signatories commit to support good faith research into Disinformation that involves their services.

Measure 28.1

QRE 28.1.1

Anyone can contact contact@lessurligneurs.eu or fill a form to make requests. Appropriate human resources are dedicated to this, considering that the volume of demands is low.

Measure 28.2

QRE 28.2.1

Les Surligneurs' fact-checking articles are completely and freely accessible. Anyone can scrap and analyse them.

Measure 28.3

QRE 28.3.1

Les Surligneurs is open to work with EDMO on the annual consultation of European researchers. It did not prohibit or discourage public interest good faith research into Disinformation.

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	
QRE 33.1.1	<p>Les Surligneurs is a member of both the International Fact-checking Network (IFCN) – since July 2021 – and the European Fact-Checking Standards Network (EFCSN), in line with the highest standards of fact-checking.</p> <p>Vincent Couronne, the publication director, is a member of the Governance Body of the EFCSN.</p> <p>Les Surligneurs participates in the Journalism Trust Initiative launched by Reporters Without Borders and published a transparency report accordingly. It is also a member of the European Digital Media Observatory (EDMO) and the Observatoire des initiatives de lutte contre la désinformation (ODIL).</p> <p>The governance body has no decision power over the editorial team, which works independently.</p> <p>By the end of 2024, Les Surligneurs had 11 full-time employees including 7 journalists.</p>

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 34.1	
Measure 34.3	
Measure 34.5	

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 35.1	
Measure 35.2	
Measure 35.3	
Measure 35.4	
Measure 35.5	
Measure 35.6	

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	
Measure 36.2	
Measure 36.3	
QRE 36.1.1 (for the Commitments 34-36)	N/A
QRE 36.1.2 (for the Commitments 34-36)	<p>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.</p> <p>The Transparency Centre website had, for the reporting period in question: 20255 page views 5626 report downloads in total The average engagement time per session was 4 minutes and 5 seconds (4m5s).</p>

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

Measure 37.2

Measure 37.6

QRE 37.6.1

Les Surligneurs is working with the task-force and is, more specifically, engaged in the sub-groups on Empowering fact-checkers and on Generative AI. It participates to the meetings and work of the said sub-groups, and to the plenary meetings of the Code (notably, in 2024, regarding its conversion to a Code of Conduct under the DSA).

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

QRE 38.1.1

By the end of 2024, Les Surligneurs had 11 full-time positions including 7 journalists. They are all working under the EFCSN and IFCN guidelines and standards. One volunteer was in charge of representing Les Surligneurs in the Code of Practice meetings and preparing the reports.

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 40.1	
Measure 40.2	
Measure 40.3	
Measure 40.4	
Measure 40.5	
Measure 40.6	

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.

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.

Reporting on the service's response during an election (2024 European and French Elections)

Reporting on the service's response during an election

Policies and Terms and Conditions

Outline any changes to your policies

Policy	Extending its activity to fact-checks	Les Surligneurs' core activity are legal-checks. During the reported period, we extended this activity to fact-checks, while recruiting new journalists and joining the Meta Third Party Fact-Checking program in March 2024.
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Empowering Users

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

Enhancing Media Literacy	<p>In addition to its fact-checks and legal-checks, Les Surligneurs published several articles during the European and French elections to provide general information on the issue. We also experimented new formats such as video or illustrated legal-checks.</p> <p>Les Surligneurs' members participated in various auditions, events and publications surrounding disinformation and fact-checking. That includes: (i) an EDMO report on the implementation of the Code of Practice, (ii) the creation of various contents and programs on EU election disinformation, legal checking and platform regulation (a full course at Sciences Po Saint-Germain-en-Laye, a podcast, etc.), (iii) two webinars held by law professors on the French elections, (iv) Vincent Couronne's regular participation to the leading TV programme of the French channel "Public Sénat", (v) Guillaume Baticle's participation to the Infox sur Seine event, (vi) a research program in Beyrouth on AI assisted legal-checking, (vii) Vincent Couronne's audition by the French Senate investigation committee on foreign interferences, and (viii) Vincent Couronne being a member of the Governance Body and Treasurer of the EFCSN and being elected Secretary General of the Spiil (union of independent press) which concluded a partnership agreement with the Association Pour l'Éducation aux Médias (APEM) in order to give access to more than 200 media outlets in France to MIL trainings and resources. Vincent Couronne is also a member of the strategic committee of the CLEMI in France (Centres Locaux pour l'Éducation aux Médias). At last (ix), Les Surligneurs' experts published in November 2024 a comparative report on public policies against disinformation (including media literacy) in French-speaking countries in the world, with a specific focus on elections.</p>
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Empowering the Fact-Checking Community

Cross-Country Collaboration	<p>Les Surligneurs also participated to the Elections24Check project, a cross-country collaboration in detecting and debunking European electoral disinformation across the EU between the European Fact Checking Standards Network and its participating member organisations.</p>
	<p>The common database gathered over 3000 articles.</p> <p>Les Surligneurs is a verified member of the EFCSN and the IFCN. Vincent Couronne is a member of the Governance Body of the EFCSN and its Treasurer. As such, he is responsible, thanks to the work of the coordinator of the EFCSN, for the accounting and the funding of the organization. As of November 2024, the EFCSN has received around 2,5 million euros and redistributed most of it to its almost 50 members in Europe. Vincent Couronne also helps in all the legal matters at the EFCSN.</p> <p>Les Surligneurs hosted the General Assembly of the EFCSN in October in Brussels, at Université Saint-Louis Bruxelles.</p> <p>Les Surligneurs launched a project funded by the European Media and Information Fund (EMIF) consisting in developing and AI system which could improve the capacity of other fact-checking media outlets in Europe. This tool has been used during the 2024 elections and helped Les Surligneurs accelerate their response to disinformation.</p> <p>In addition, Les Surligneurs participate in projects with other organisations in the world, such as Lebanon, Côte d'Ivoire, etc.</p>