

# Subscription Document for Clean Up The Internet

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## Subscription Document

### Name of the Signatory

*Clean Up The Internet*

### About the Signatory

Clean Up The Internet ([www.cleanuptheinternet.org.uk](http://www.cleanuptheinternet.org.uk)) is a small civil society organisation active in the UK and EU. Our EU transparency register number is 099046239388-80. We are concerned about the degradation in online discourse and its implications for society and democracy. We campaign for evidence-based, rights-respecting action to increase civility and respect online, to safeguard freedom of expression, and to reduce online bullying, trolling, intimidation, misinformation, and fraud.

For the past few years, our major focus has been on the misuse of anonymous and fake social media accounts. We've conducted research into the ways platforms' laissez-faire approaches to user account and profile creation enables bad actors to exploit anonymous and fake accounts. We've studied the role of accounts with concealed or deceptive identities in a range of harmful online behaviour, including hate, harassment, abuse, fraud, and foreign influence and disinformation operations. We've developed proportionate, rights-respecting proposals for design changes which platforms could implement to restrict the ability of bad actors to exploit fake and anonymous accounts.

As a civil society organisation for whom countering disinformation is a key priority, we are keen to contribute to the success of the DSA, and of the Disinformation Code of Conduct. It's widely recognised that fake accounts are a major enabler of disinformation and foreign information manipulation and interference operations. We therefore believe our research and insights into how fake accounts are exploited, and ideas for measures to counter this misuse, are highly relevant.

The specific commitments which we are proposing to endorse reflect our interests and capacities as a nonprofit which does research and advocacy. Our ongoing research into the use of inauthentic accounts will be highly relevant to the Task Force's efforts to share "relevant information about cross-platform information manipulation, foreign interference in information space" (commitment 16) and will be a useful contribution of "research efforts on the spread of harmful disinformation online and related safe design practices" (commitment 18). We would gladly contribute to relevant subgroups of the Permanent Task Force (Commitment 37), and would anticipate our work being of relevance to the Integrity of Services subgroup. We would of course

commit adequate resources to deliver these commitments (Commitment 38) and provide reports on our actions (Commitments 39, 40 and 43). We would be delighted to respond to any questions or feedback the Taskforce may have, and we look forward to working with you.

Whilst Clean Up The Internet is registered as a nonprofit in the UK, which is also where we are mainly based, we have a longstanding interest in the EU and the DSA. We have long been registered on the EU Transparency Register, and a track record of constructive engagement with EU consultations, commission staff, and MEPs. The issues we research and the platforms we look at are global, as is the relevance of many of the insights and proposals we have developed. We have a good understanding of the differences between the EU and UK's approaches, but when relevant would be in a position to share potentially useful insights from our experiences working in the UK.

## II. Scrutiny of Ad Placements

## III. Political Advertising

## IV. Integrity of Services

### List of adopted commitments and measures<sup>1</sup>

*[Delete those that do not apply]*

### Qualitative Reporting Elements and/or Service Level Indicators<sup>2</sup>

#### Commitment 16

Relevant Signatories commit to operate channels of exchange between their relevant teams in order to proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation and with due consideration for security and human rights risks.

Measure 16.1  
Measure 16.2

QRE 16.1.1:

### Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):

We would expect our work on the creation and use of fake accounts and the ways such accounts are deployed in coordinated inauthentic behaviour including foreign influence and manipulation operations would be relevant to the Integrity of Services subgroup, and we are keen to

<sup>1</sup> Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

<sup>2</sup> Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

become an active participant in this subgroup. We will of course be happy to report on our participation including information about insights we've shared and (we hope) actions taken by others as a result.

V. Empowering Users		
List of adopted commitments and measures <sup>3</sup>  [Delete those that do not apply]	Qualitative Reporting Elements and/or Service Level Indicators <sup>4</sup>	
<u>Commitment 18</u>  Relevant Signatories commit to minimise the risks of viral propagation of misinformation or disinformation by adopting safe design practices as they develop their systems, policies, and features.	Measure 18.3	<u>QRE 18.3.1:</u>
<p><b>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):</b></p> <p>Clean Up The Internet has a track record of conducting research into the use of fake accounts, including for the propagation of misinformation, and of publishing our findings and using them to develop proposals for design measures which platforms could deploy to mitigate these risks. We will continue to do this and hope to highlight relevant insights via the Integrity of Services subgroup and other appropriate channels. We will of course be happy to report these activities, and it is normal practice for us to make our work public.</p>		

<sup>3</sup> Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

<sup>4</sup> Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

## **VI. Empowering the Research Community**

## **VII. Empowering the Fact-Checking Community**

## VIII. Transparency Centre

## IX. Permanent Task-force

List of adopted commitments and measures <sup>5</sup> <i>[Delete those that do not apply]</i>	Qualitative Reporting Elements and/or Service Level Indicators <sup>6</sup>
<p><u>Commitment 37</u></p> <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 Taskforce are made by consensus.</p>	<p>Measure 37.1 Measure 37.2 Measure 37.3 Measure 37.4 Measure 37.5 Measure 37.6</p>
<p><b>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):</b></p> <p>We would hope to be active participants in the Integrity of Services subgroup, as well as other relevant regular meetings. We will of course be happy to report on our participation.</p>	

<sup>5</sup> Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

<sup>6</sup> Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

<h2 style="text-align: center;">X. Monitoring of the Code</h2>		
<b>List of adopted commitments and measures<sup>7</sup></b> <i>[Delete those that do not apply]</i>		<b>Qualitative Reporting Elements and/or Service Level Indicators<sup>8</sup></b>
<u>Commitment 38</u>  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.		<u>QRE 38.1</u>
<u>Commitment 39</u>  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.		
<u>Commitment 40</u>  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 Measure 40.3 Measure 40.4 Measure 40.5 Measure 40.6	

<sup>7</sup> Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

<sup>8</sup> Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

<u>Commitment 43</u>		
<p>Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure as agreed in the Task-force.</p> <p><b>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):</b>  As an NGO working for more effective regulation, Clean Up The Internet fully recognises that Codes of Conduct are only meaningful if signatories dedicate adequate resources, and if they are accompanied by proper monitoring. We are a small organisation, and commit to focus our limited resources on where we can make the meaningful contribution, which at present we anticipate being through the Integrity of Services subgroup. We commit to properly reporting on our participation, and to using harmonised templates wherever these are available.</p>		

Full Name(s) and Signature(s) of the authorised representative(s):

David Babbs, Lead Consultant, Clean Up The Internet



Date and place:

London, UK, 10/11/2025