



EU CODE OF PRACTICE ON DISINFORMATION 2022

Subscription Document for Signatory Reporters Without Borders (RSF)





Name of the Signatory

Reporters Without Borders (RSF)

About the Signatory

Reporters Without Borders, also known under its French name Reporters sans frontières (RSF), is an international independent organization that acts for the freedom, pluralism and independence of journalism and defends those who embody these ideals. Founded in 1985 and based in Paris, recognised as a public interest organization in France since 1995, RSF has consultative status with the United Nations, UNESCO, the Council of Europe and the International Organization of Francophonie (OIF). RSF has 130 correspondents around the world, 6 international sections (Germany, Austria, Spain, Finland, Sweden, Switzerland) and offices in 7 cities (London, Brussels, Tunis, Washington DC, Rio de Janeiro, Dakar, Taipei).

The Journalism Trust Initiative, initiated and operated by RSF, is an internal compliance and external accountability and transparency tool for newsrooms of all sizes and types. It is based on an official standardization deliverable, the CWA17493:2019, according to EU law and translates the self-assessments and independent third-party audits of media outlets into a machine-readable trustworthiness indicator as referenced in the Code of Practice.

Service name	Description of the service
Journalism Trust Initiative (JTI)	Trustworthiness Indicator





V. EMPOWERING USERS

List of adopted commitments and measures ¹		Qualitative reporting elements and service level indicators ²
<p>Commitment 22</p> <p>Relevant Signatories commit to provide users with tools to help them make more informed decisions when they encounter online information that may be false or misleading, and to facilitate user access to tools and information to assess the trustworthiness of information sources, such as indicators of trustworthiness for informed online navigation, particularly relating to societal issues or debates of general interest.</p>	<p><u>Measure 22.4</u></p> <p>Relevant Signatories providing trustworthiness indicators will ensure that information sources are being reviewed in a transparent, apolitical, unbiased, and independent manner, applying fully disclosed criteria equally to all sources and allowing independent audits by independent regulatory authorities or other competent bodies.</p>	<p>QRE 22.4.1: Relevant Signatories will provide details of the basic criteria they use to review information sources and disclose relevant safeguards put in place to ensure that their services are apolitical, unbiased, and independent. They will provide examples of how these are applied equally to a representative range of different publishers. Each analysis will indicate who contributed to assessing the source, or which certification body assessed the source.</p>
	<p><u>Measure 22.5</u></p> <p>Relevant Signatories providing trustworthiness indicators will provide compliance and correction mechanisms and respect the right of publishers to be heard, including to engage in the assessment process before indicators are applied and to</p>	<p>QRE 22.5.1: Relevant Signatories will publish regular corrections on their ratings or indicators if updates or mistakes occur. Relevant Signatories will provide examples of exchanges with publishers, including evidence of this engagement as recorded in trustworthiness indicators, and will regularly update their analysis to reflect any changes in the publications' practices, including any improvement of their practices.</p>

¹ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

² Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate





	<p>have their responses available to consumers after assessments are published.</p>	<p>SLI 22.5.2: Relevant Signatories will report regularly on the number of publishers who have improved their journalistic practices after being assessed on the disclosed criteria and whose conformity, respectively trustworthiness scores thereby improved.</p>
	<p>Measure 22.6</p> <p>Relevant Signatories providing trustworthiness indicators by means of voluntary, self-regulatory and certifiable European standards or European standardisation deliverables as defined by European law ('technical standards')³, such as the CWA17493:2019, will</p> <ul style="list-style-type: none">- Develop and revise them based on internationally accepted best-practices and ethical norms;- Make them publicly available and accessible in a non-proprietary, neutral way;- Govern their implementation in line with European Accreditation and EU Regulation (EC) No 765/2008.	<p>QRE 22.6.1: Relevant Signatories will publish self-evaluation and certification results of conforming entities as well as related statistics and analysis on engagement and conformity assessment, including complaints management.</p>
		<p>SLI 22.6.1: Relevant Signatories will publish related statistics and analysis on engagement and conformity assessment, including complaints management.</p>

³ Such as the Journalism Trust Initiative CWA17493:2019





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

As a prospective Signatory, RSF contributed to the development and drafting of the Code and these specific commitments, measures and indicators throughout the revision process. Insofar, they reflect our preparedness to sign up. However it must be noted that our commitments are corresponding to commitments of other Signatories, namely tech companies and VLOPs, as the provision of trustworthiness indicators and our additional effort to provide data and reporting in line with the Code only makes sense if they are being used to reflect the Code's overarching rationale. This transactional logic will inform both our policy and operational next steps towards implementation.





VIII. Transparency Center

List of adopted commitments and measures ⁴		Qualitative reporting elements and service level indicators ⁵
<p>Commitment 34</p> <p>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.</p>	<p><u>Measure 34.3</u></p> <p>Relevant Signatories will contribute to the Transparency Centre’s information to the extent that the Code is applicable to their services.</p>	<p><u>QRE 36.1.1 (for the Commitments 34-36):</u> With their initial implementation report, Signatories will outline the state of development of the Transparency Centre, its functionalities, the information it contains, and any other relevant information about its functioning or operations. This information can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre.</p> <p><u>QRE 36.1.2 (for the Commitments 34-36):</u> Signatories will outline changes to the Transparency Centre’s content, operations, or functioning in their reports over time. Such updates can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre.</p>
	<p><u>Measure 34.4</u></p> <p>Signatories will agree on the functioning and financing of the Transparency Centre within the Task-force, to be recorded and reviewed within the Task-Force on an annual basis.</p>	
	<p><u>Measure 34.5</u></p> <p>The Task-force will regularly discuss the Transparency Centre and assess whether adjustments or actions are necessary. Signatories commit to implement the actions and adjustments decided within the Task-force within a reasonable timeline.</p>	
<p>Commitment 35</p> <p>Signatories commit to ensure that the Transparency Centre</p>	<p><u>Measure 35.3</u></p>	<p><u>SLI 36.1.1 (for the Commitments 34-36):</u> Signatories will provide</p>

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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.	<p>Signatories ensure that the Transparency Centre contains a repository of their reports assessing the implementation of the Code's commitments.</p>	meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage.
	<p><u>Measure 35.5</u></p> <p>Signatories ensure that the Transparency Centre is built with state-of-the-art technology, is user-friendly, and that the relevant information is easily searchable (including per Commitment and Measure). Users of the Transparency Centre will be able to easily track changes in Signatories' policies and actions.</p>	
Commitment 36 Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner.	<p><u>Measure 36.1</u></p> <p>Signatories provide updates about relevant changes in policies and implementation actions in a timely manner, and in any event no later than 30 days after changes are announced or implemented.</p>	
	<p><u>Measure 36.2</u></p> <p>Signatories will regularly update Service Level Indicators, reporting elements, and Structural Indicators, in parallel with the regular reporting foreseen by the monitoring framework. After the first reporting period, Relevant Signatories are encouraged to also update the Transparency Centre more regularly.</p>	





	<p><u>Measure 36.3</u></p> <p>Signatories will update the Transparency Centre to reflect the latest decisions of the Permanent Task-force, regarding the Code and the monitoring framework.</p>	
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p>Reporters Without Borders (RSF) commit to contribute to the work of the Transparency center and cooperate with the Center as much as it is able to, to the extent that the Code is applicable to its services, and to the extent required by the Commitments it takes - considering the proportionality with which, as a civil society actor, it should reasonably be expected to.</p>		





IX. PERMANENT TASK-FORCE

List of adopted commitments and measures ⁶		Qualitative reporting elements and service level indicators ⁷
<p>Commitment 37</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 Task-force are made by consensus.</p>	<p><u>Measure 37.1</u></p> <p>Signatories will participate in the Task-force and contribute to its work. Signatories, in particular smaller or emerging services will contribute to the work of the Task-force proportionate to their resources, size and risk profile. Smaller or emerging services can also agree to pool their resources together and represent each other in the Task-force. The Task-force will meet in plenary sessions as necessary and at least every 6 months, and, where relevant, in subgroups dedicated to specific issues or workstreams.</p>	/
	<p><u>Measure 37.2</u></p> <p>Signatories agree to work in the Task-force in particular – but not limited to – on the following tasks:</p>	

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	<ul style="list-style-type: none">- Establishing a risk assessment methodology and a rapid response system to be used in special situations like elections or crises.- Cooperate and coordinate their work in special situations like elections or crisis- Agree on the harmonised reporting templates for the implementation of the Code's Commitments and Measures, the refined methodology of the reporting, and the relevant data disclosure for monitoring purposes.- Review the quality and effectiveness of the harmonised reporting templates, as well as the formats and methods of data disclosure for monitoring purposes, throughout future monitoring cycles and adapt them, as needed.- Contribute to the assessment of the quality and effectiveness of Service Level and Structural Indicators and the data points provided to measure these indicators, as well as their relevant adaptation.- Refine, test and adjust Structural Indicators and design mechanisms to measure them at Member State level.- Agree, publish and update a list of TTPs employed by malicious actors, and set down baseline elements, objectives and benchmarks for Measures to counter them, in line with the Chapter IV of this Code.- Seek out and discuss research, expert input and up-to-date evidence relevant to the Code's commitments, such as, <i>inter alia</i>, emerging	
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	<p>best practices in safe design, retroactive flagging, repository of fact-checks, provenance tools.</p> <ul style="list-style-type: none">- Discuss and provide guidance on the adequate quantitative information to be provided by signatories to fulfil their reporting obligations regarding agreements with fact-checking organisations across different services.- Regularly discuss whether the Code's Commitments and Measures need updating in view of technological, societal, market and legislative developments, as well as in view of accommodating new signatories and, where the Task-force agrees to be necessary, carry out such updates.- Review the appropriateness and consistency of adapted Measures for smaller or emerging services.- Promote the Code among relevant peers and integrate new Signatories to the Code.	
	<p><u>Measure 37.3</u></p> <p>The Task-force will agree on and define its operating rules, including on the involvement of third-party experts, which will be laid down in a Vademecum drafted by the European Commission in collaboration with the Signatories and agreed on by consensus between the members of the Task-force.</p>	





	<p><u>Measure 37.4</u></p> <p>Signatories agree to set up subgroups dedicated to the specific issues related to the implementation and revision of the Code with the participation of the relevant Signatories.</p>	
	<p><u>Measure 37.5</u></p> <p>When needed, and in any event at least once per year the Task-force organises meetings with relevant stakeholder groups and experts to inform them about the operation of the Code and gather their views related to important developments in the field of Disinformation.</p>	
	<p><u>Measure 37.6</u></p> <p>Signatories agree to notify the rest of the Task-force when a Commitment or Measure would benefit from changes over time as their practices and approaches evolve, in view of technological, societal, market, and legislative developments. Having discussed the changes required, the Relevant Signatories will update their subscription document accordingly and report on the changes in their next report.</p>	<p><u>QRE 37.6.1:</u> Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with.</p>

Provide reasoning for the choice of commitments and measures, as well as future plans

Reporters Without Borders (RSF) commit to contribute to the work of the Task-force proportionate to its resources, size and risk profile.

The measures related to Commitment 37 are subscribed to by RSF to the same extent.





X. MONITORING OF THE CODE

List of adopted commitments and measures ⁸		Qualitative reporting elements and service level indicators ⁹
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.		QRE 38.1: Relevant Signatories will outline the teams and internal processes they have in place, per service, to comply with the Code in order to achieve full coverage across the Member States and the languages of the EU.
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.		

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⁹ Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate





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.	<u>Measure 40.2</u> Other Signatories will report yearly on the implementation of the Commitments and Measures taken under the present Code, including on the relevant QREs and SLIs, at service and Member State level.	
	<u>Measure 40.3</u> Signatories will regularly update the Transparency Centre with relevant QREs and SLIs, at least in line with their reporting period under this Code.	
	<u>Measure 40.4</u> Signatories will develop, within the Task-force, harmonised reporting templates.	
	<u>Measure 40.5</u> Signatories will regularly work to improve and optimise the monitoring and reporting framework of the Code, including the SLIs, within the Task-force, building in particular on feedback from the European Commission, ERGA and EDMO.	
	<u>Measure 40.6</u> Signatories will cooperate with the European Commission, respond to its reasonable requests and provide the European Commission with reasonable information, data and further input necessary to assess the implementation of the Code, allowing for the Code's efficient and	





	thorough monitoring, including at Member State Level.	
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 Task-force.		
Commitement 43 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.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)		





Reporters Without Borders (RSF) commit to contribute to the monitoring of the Code of Practice proportionately to its resources, size and risk profile, and to cooperate with the Commission to this end as much as it is able to, to the extent that the Code is applicable to its services, and to the extent required by the Commitments it takes - considering the proportionality with which, as a civil society actor, it should reasonably be expected to.

Paris

July 5, 2022

Christophe Deloire
Secretary General

