

1st Policy Survey of European Fact-checking Organisations



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Introduction

Introduction

When the International Fact-Checking Network (IFCN) and Maldita.es launched the first policy survey for European independent fact-checking organisations, we intended to understand **how our community approaches public policy and regulatory issues** at this crucial time: when the European Union authorities seem ready to address the huge disinformation crisis they have in front of them, particularly its online component. The result of that endeavor is the report you have in your hands.

It reflects the knowledge and benefits from the experience of the 24 European fact-checking organisations that have responded, some of them are based in countries that are members of the EU and some others are not. **Results are detailed in five major sections.**

We are deeply indebted to all those fact-checking organisations in Europe - inside and outside the European Union - that graciously volunteered their time to participate in the survey and discussion. Hopefully this report will be useful for them to plan future involvement in public policy conversations, where **their expertise can be critical to one of the most important battles of our time:** the fight against disinformation.

Executive summary

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The most important finding of this survey is that **European fact-checkers want a seat at the table when policy decisions are made**. There is no hesitancy to engage public authorities: 95.7% of them think those authorities should engage them for expert advice and 87% declare that through their work, they have learnt lessons that could be useful for designing more effective public policies and regulations. However, they find several obstacles to sharing that knowledge.

Most fact-checking organisations would like to do more policy work (78.3%) but two thirds of those claim that **they do not have enough resources to do so**. Even among those IFCN signatories already doing policy, they normally have just one person dedicated to it who employs less than 5 hours per week. And that has consequences: a big majority (81.8%) does not think independent fact-checking organisations are adequately represented in policy discussions at the EU level.

“There is power in working together. We can have a stronger voice together”

**Phoebe Arnold -
Partnerships Manager
at Full Fact**

To compensate for those shortcomings, European fact-checking organisations believe in cooperation: there is almost a consensus (95.7%) that they would benefit from having **a unified voice when negotiating with digital platforms or policymakers**. They are also much more supportive of public action against disinformation at the EU level than by national governments of the member states.

Among the public policies they think will be more effective in curbing the dissemination of disinformation online are the creation of a **EU-wide regulator of large digital platforms** (86.4%) and a push in Media literacy courses (82.6%), but they would also like to see changes in the way some of the largest digital platforms address disinformation.

Among all the measures those could take, those that the most fact-checkers consider effective against disinformation are **allowing ample data access** to them, researchers and civil society organisations (100%) and funding third-party media literacy initiatives (100%). They also almost unanimously advocate for them to fund independent research (95.7%) and collaboration with independent fact-checking organisations (95.7%).

95.6% considers it would also be effective for those platforms to design moderation procedures in collaboration with fact-checkers, researchers and civil society organisations. As for what to do with disinformation contents, **Fact-checkers remain divided about the usefulness of the deletion of the content they flag as disinformation**, while 87% say using labels and other graphic resources to warn users is more effective.

European fact-checkers and public policy: a state of affairs

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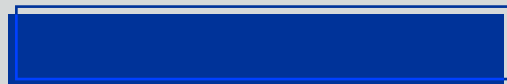
The very first thing to know regarding European fact-checkers and public policy is that they are invested in it. Not “interested” as in passively observing what happens in the policy arena: fact-checking organisations want to shape public policies affecting disinformation. 95.7% think **governments should engage fact-checkers for expert advice** and 87% consider they have, through their daily fact-checking activities, learned lessons that could be useful for designing more effective public policies and regulations.

Many of them are already trying to contribute to those public debates. More than 65% of organisations have participated in open consultations or policy-related discussions with public authorities in the last two years. But that participation is still weak: if we look at what is probably the most consequential legislative proposal regarding online disinformation in the history of the European Union, the Digital Services Act (DSA), **only half of organisations have even reviewed the text** and less than 20% have engaged in advocacy to influence it.

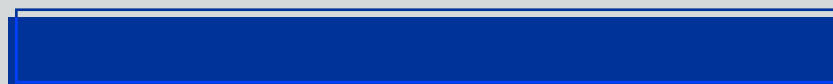
“The fact-checkers see what’s happening in social media and disinformation. If you try to make legislation that is effective, you should consult us”
Tania Röttger – Head of Fact-checking at CORRECTIV

The DSA as an example

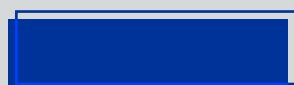
European Fact-checking organisations and the Digital Services Act



Only 54.5% have reviewed the European Commission proposal



81% of organisations have **NOT** engaged in any advocacy regarding it



Only 27.8% have been approached to offer their thoughts on it

The fact-checking organisations are the first to recognize this absence comes with a cost: more than 80% of them believe that the fact-checking community is not adequately represented in policy discussions at the EU level and over 78% would like their own organisations to do **more policy work**. So, if they want to do it, and have valuable things to contribute to the conversation, why don't they do it?

Part of it is because they have not been sought. If we go back to the example of the DSA, only 27% have been approached to offer their thoughts on it. But the main problem lies with the fact-checkers themselves: **many organisations just cannot do it**. Among the 78% that would like to engage in more policy work, 66% do not have enough resources and the rest say no one in their teams is prepared to do it.

“The European Union has been clear that they want to talk to fact-checkers and involve them in the conversation around policy”

**Giovanni Zagni -
Director of
Pagella Politica**

All that is consistent with the way the community sees itself. 77% say that fact-checking organisations are normally **small and fragile**, and the lack of resources has very real consequences in their advocacy efforts. Almost 70% have someone in the team who is specifically in charge of policy issues, but for 57% is just one person who dedicates less than 5 hours per week. [Several studies](#) show that most of the lobbies trying to influence European legislation are not generally within those constraints.

Cooperation: finding a stronger voice



Cooperation: finding a stronger voice

At this point, many organisations are compensating those weaknesses by reinforcing cooperation with other fact-checkers in the policy arena. 87% have talked with other IFCN signatories in Europe about policy issues during the last two years and 65.2% have participated in a program in alliance with other IFCN signatories from Europe. However, those **contacts are still few and far between**: almost half of respondents have two or less of those conversations every year and 57.3% have talked to 3 or less other fact-checkers.

It is clear that **the main obstacle impeding fact-checkers from engaging more on policy issues is not having the necessary resources and expertise**. Those resources might come from the public sector, since 81,8% don't think receiving public money jeopardizes its independence, but there is a much wider agreement in recurring to other sources. Particularly, by establishing meaningful, organised and remunerated agreements with large digital platforms.

“Skills have to be acquired, connections have to be made, and one organisation alone cannot make impacts that lead to some tangible result.”

Ieva Ivanauskaitė
– Head of Business
Development at DELFI

87% agree that digital platforms should use their work as one of the basis of their moderation decisions and more than 95% think that **if those companies use fact-checking in their sites, they should contribute financially to the organisations** producing it. More work is needed to gain knowledge on how fact-checkers envision that collaboration across the different kinds of platforms.

Fact-checkers seem ready to increase collaboration also in the policy arena, with more than 95% saying it would be better for independent fact-checking organisations if they could have **a unified voice when negotiating with platforms of policymakers**. Right now some organisations participate in public policy discussions where they are expected by other actors to serve as de facto representatives for the community as a whole. However, a more formal process would entail true representation for European fact-checking organisations when dealing with other stakeholders.

That enhanced cooperation might as well serve to improve the daily work of organisations themselves and foster common practices in fact-checking in Europe: over 90% think that, regardless of local realities, professional standards can be expected from fact-checkers all across Europe - an interesting point now that [the process has started to write a Code of Professional Integrity for fact-checking organisations](#) in Europe.

“We should have a strong European association of fact-checkers that can speak with one voice, specially now in this historical moment when everybody seems to want to talk to us”

**Giovanni Zagni -
director of
Pagella Politica**

In principle: how fact-checkers see government action against disinformation

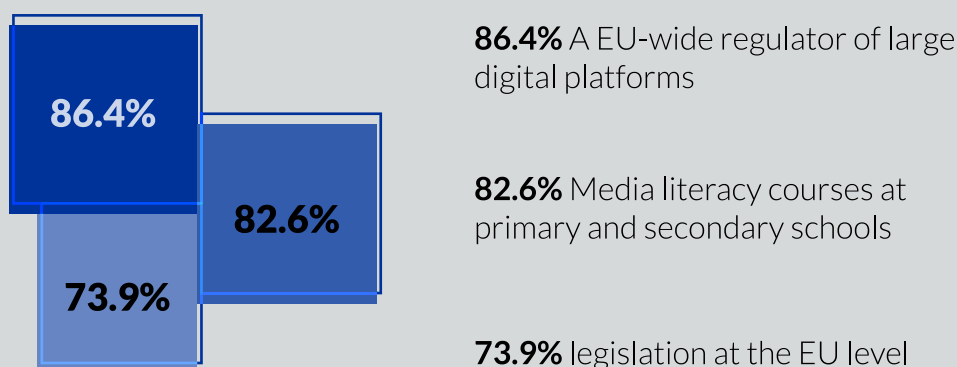
In principle: how fact-checkers see government action against disinformation

European fact-checkers would like to be more involved in public policy conversations, but what for? What are the public policies fact-checkers think would be more effective to fight disinformation? What do they want to advocate for and against? To start answering those questions, it is important to understand **how fact-checking organisations see the role of government in fighting disinformation**, what should different levels of government do and what they should avoid at any cost.

Fact-checking organisations do not think governments should stay out of the fight against disinformation. To the contrary, 81% say government action can be an effective tool against the dissemination of disinformation online **if done properly**. That last part is critical, since even more (86%) agree that government action will generally be misconstrued as censorship or manipulation. So it's a complicated balance.

What governments can do?

The measures fact-checkers find “more effective” to curb disinformation online



Among fact-checkers themselves, **government action is much more preferred when taken at the European level.** Almost every measure is considered to be more effective against disinformation when it is said to come from the EU: 86% of organisations, for example, support an EU-wide regulator of large digital platforms while less than 50% feel the same way for national regulators. The same is true for legislation, where almost 74% think it can be a useful tool if coming from EU institutions. 86% even say the European Commission should set EU-wide standards of moderation for harmful content in very large online platforms.

At the national level, over 60% of organisations think government measures against disinformation online should not be limited to the judiciary acting on illicit material. The measure they consider to be more effective is including **media literacy courses in school curriculums** (82%) and many add that those efforts should not be limited to school-age children and need to be available for other segments of society. As for what governments are already doing about disinformation, 86% of fact-checking organisations find them too focused on foreign interference and not enough on the problem as a whole.

Lately, European Fact-checking organisations have been participating on government efforts against disinformation. More than half have joined a EU-funded

program in alliance with other IFCN signatories from Europe in the last two years and 68% say public funding for independent fact-checking organisations would be an effective way to fight disinformation online.

“We cannot foresee the next campaign idea or disinformation tactic. We need people educated on how to consume media online”

Tania Röttger, Head of Fact-checking at CORRECTIV

Fact-checkers and platforms: now and in the future

Fact-checkers and platforms: now and in the future

When your stated goal is to fight disinformation online, it is impossible to ignore the role of digital platforms, particularly the bigger ones. **Through their terms and conditions their decisions are sometimes far more consequential than those of many governments**, so doing public policy in this field has to include engaging with them. Fact-checkers are used to working inside those platforms and to sometimes cooperate with those companies, but: what do fact-checking organisations demand from them?

Almost 70% advocate for a systemic change in how platforms approach disinformation: they say those companies should not decide by themselves how to moderate harmful content inside their platforms and 86% would favor an effort by the European commission to set EU-wide standards. When it comes to disinformation in particular, **more than 87% believe platforms should use the work of European fact-checking organisations** as at least one of the basis of their moderation decisions and 95% say that relying on debunks from independent fact-checkers would make them more effective against disinformation.

“Contextualizing and providing information to people to make their own decisions, such as fact-checks, is less risky than just deleting. It’s disingenuous to frame the discussion about removal or not removal”

**Phoebe Arnold –
Partnerships Manager
at Full Fact**

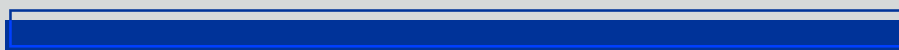
As stressed before, how that collaboration is structured and remunerated is a major concern of European fact-checking organisations. Sometimes content from them is indeed used by the platforms, but for free. Over 95% of respondents are adamant on this issue and think that **if tech companies use fact-checking in their sites, they should contribute to the organisations producing it.** However, fact-checkers can think of many other things very large platforms could do to curb disinformation online that are not related to the integration of fact-checking content.

At the top of the list is transparency. Fact-checkers realize platforms know how disinformation spreads online better than anyone and want them to share that information.

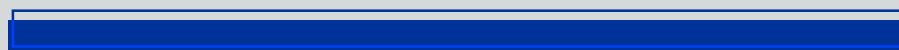
That is why they think the **most effective measure platforms could take is to allow ample data access to researchers, civil society organisations and fact-checkers** themselves. That was rated as effective by 100% of organisations, while several other policies received ratings over 95%: funding third party media literacy initiatives, disinformation research and independent fact-checking, as well as collaborating with those three sectors to design their moderation procedures.

Still rated over 85% in effectiveness against disinformation, European fact-checking organisations point to several other measures: allowing the fact-checking and labelling of elected official’s statements (91%) and political and issue ads (90%), as well as employing labels and other

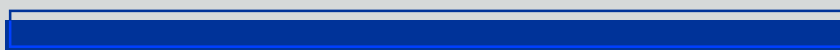
Allowing ample data access to fact-checkers, researchers and civil society organisations (100% effective)



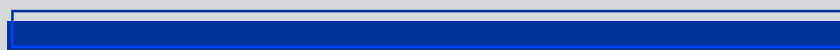
Funding third-party media literacy initiatives (100%)



Funding independent fact-checking organisations (95.7%)



Funding third-party research on disinformation (95.7%)



Relying on debunks from fact-checkers to make moderation decisions (95.6%)



Collaborating with fact-checkers, researchers and civil society organisations to design moderation procedures (95.6% effective)



graphic resources to warn users of content that has been flagged by independent fact-checkers as dis or misinformation (87%). **Among proposals that receive much lower support: deleting all content flagged as disinformation.** Fact-checkers clearly find it more effective to add information and explain the content than making it disappear.

Many European fact-checking organisations are already communicating all this to the largest digital platforms. **Almost three in four fact-checkers have met with a platform to talk about policy issues during the last two years,** but there are lingering doubts as to how substantial those meetings have been: half of the organisations that did actually engage with those companies had less than two conversations per year and 62.5% had most of them as part of a group conversation proposed by the platform.

As it happens, not every major company has been equally attentive to engaging with the fact-checking community in Europe. Among the organisations having had meetings with very large platforms, 93% of them have sat with Facebook and 37% have talked to Twitter, while not one of them has had a conversation with Telegram.

“Deleting is simply the cheapest solution for the platforms. Anything else costs a bit more. I think some are not basing those decisions on what is more effective”

Jelena Berkovic – Senior Advisor at Faktograf

Fact-checkers and regulation: the Digital Services Act and the European Code of Practice on Disinformation

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There are two very important regulation efforts being developed at the moment in the European Union regarding disinformation: one is the **Digital Services Act (DSA)**, that will create new obligations for digital platforms, particularly the very large ones, to address the systemic risks they create and the dissemination of illicit content. The other is the strengthening of the **Code of Practice on Disinformation**, a self-regulatory framework against harmful content that will likely include most big platforms and could serve as a co-regulatory instrument under the scope of the DSA itself.

European Fact-checkers seem to have **very different views of these two efforts**: 62% say the DSA has the potential to be effective in curbing online dissemination of disinformation while almost 60% say the 2018 version of the Code of Practice has not had a discernible impact in it. Part of the criticism has to do with its self-regulatory nature, with 88.2% characterizing the current Code as a good first step

“If the European Union agrees on something, then it is way easier for it to make an impact on local governments”
Ieva Ivanauskaitė
– Head of Business Development at DELFI

that has nevertheless shown that voluntary agreements don't work. An important thing to have in mind when analyzing survey responses about the Code of Practice is that it was conducted **before several fact-checking organisations joined the drafting process for a new version in late 2021**. Actually, one of the key criticisms was that 72% said that "as long as platforms write the Code, it will not be effective". The survey results, however, provide a great deal of guidance as to what can be improved in the new text in order to turn it into an effective tool against disinformation.

The most widely shared critique is how **the lack of specifics** handicapped the 2018 Code. 100% of organisations say that the Code's commitments were too broadly defined and consequently its compliance was difficult to monitor. 88.2% also [agreed with the EU Commission](#) in that one of the shortcomings of the Code is not to ensure a **better integration of fact-checking** activities in the platforms' activities.

Beyond the improvements in the content of the Code, much better work needs to be done in order to reach out to European fact-checking organisations about it. **21% of them were not even aware of the Code's existence** and only 19% were invited to take part in the stakeholders' meetings organised by the European Commission to provide guidance on

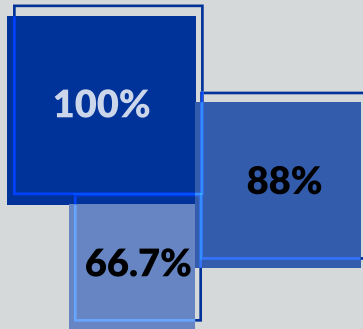
its strengthening. That said, some effects of the Code are real: 60% of organisations have reviewed the Code signatories' reports on coronavirus-related disinformation.

The survey was conducted when only the Commission's proposal was public, so it could not capture opinions about later developments that have been key for fact-checkers during the amendment process - i.e. the attempts to include a "media" exemption from platform moderation. That said, fact-checking organisations in Europe seem to have pretty clear opinions about the strengths and weaknesses of the proposal when it comes to disinformation.

The parts of the DSA that fact-checking organisations find more promising are requirements for enhanced transparency in advertising (100%), the obligation for very large platforms to assess their systemic risks and to establish effective content moderation mechanisms to mitigate them (88%) and the focus on co-regulation beyond self-regulation by the platforms (66%). Among its weaknesses, they list the focus on illicit content alone and not harmful content (77%) and the lack of detailed transparency obligations (77%).

Fact-checkers and the Digital Services Act proposal

The main strengths

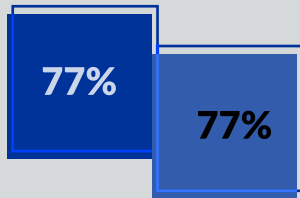


100% Requirements for enhanced transparency in advertising

88% Obligation of effective content moderation in very large platforms

66.7% Focus on co-regulation beyond self-regulation by the platforms

The main weaknesses



77% Focus on illicit content alone and not harmful content

77% Lack of detailed transparency obligations

Methodological note

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All the International Fact-checking Network signatory organisations in Europe were invited to respond to a 85-question online survey over the summer of 2021. Of 44 organisations contacted, 23 completed it (52%) from 18 different European countries. Three in ten were based in a country that is not a member of the European Union.