# MEETING THE CHALLENGES OF INFORMATION DISORDER IN THE GLOBAL SOUTH

EDITED BY
HERMAN WASSERMAN

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# INTRODUCTION

## MEETING THE CHALLENGES OF INFORMATION DISORDER IN THE GLOBAL SOUTH

HERMAN WASSERMAN

# INTRODUCTION

## ABSTRACT

Despite information disorder being a widespread problem in countries in the Global South, the study of this phenomenon remains dominated by examples, case studies, and models from the Global North. Knowledge about the various manifestations of information disorder, the range of responses, and the success rate of interventions to counter the disorder remains fragmented and partial. In order to gain a better understanding of the knowledge gaps and areas where further research is required, as well as to identify opportunities for inter- and intra-regional cooperation, a scoping study of efforts to counter information disorder in the Global South was needed. The project that was subsequently launched had three interconnected objectives:

1. To map the actors currently working to counter information disorder and to identify the frameworks upon which such interventions are based
2. To learn from current approaches, tools, and methods used to counter information disorder
3. To gain an overview of the research landscape and to identify key issues and questions for further research.

This scoping study provides an overview of key stakeholders and regional networks and a wide overview of approaches, tools, and methods being used currently. On the basis of the information gathered through this scoping, an agenda for further research and areas for intervention has been identified. Further research on information disorder in the Global South must be encouraged; a critical praxis approach, in which academic scholarship and practical action research can inform each other in ways that are mutually beneficial, must be adopted, and journalism should be supported as a public good while continuing efforts to ensure ethical, trustworthy, and quality journalistic content.

## 1. INFORMATION DISORDER AS A PROBLEM IN THE GLOBAL SOUTH

Despite information disorder being a widespread problem in countries in the Global South, the study of this phenomenon remains dominated by theoretical paradigms, examples, and case studies drawn from relatively recent experiences in Global North contexts. This is despite the fact that information disorder in the Global South is a much older problem, often predating the social media era. Across the Global South, organizations and movements have arisen to combat this problem. More research on the way that these organizations work; on how their responses are informed by social, political, economic, and historical contexts; and on their successes and challenges can provide important insight into how to design responses to improve the quality of information, enhance access to such information, and strengthen freedom of expression across the Global South. Moreover, these insights can also hold lessons for similar work to counter information disorder on a global level.

There is widespread concern that we are currently experiencing a global information disorder characterized by the large-scale contamination of the public sphere with rumors, hate speech, dangerous conspiracy theories, harmful misunderstandings, and orchestrated campaigns of deception. This disorder is often seen as a confluence of a rapidly changing media ecology and an increasingly fractious, populist, and decentered political environment (Tumber and Waisbord 2021, 1). Global concerns about false and misleading information, especially on social media and messaging platforms, keep growing (Newman 2021). The “infodemic” of false, misleading, or harmful information related to the Covid-19 pandemic (WHO 2021) has accelerated these concerns and garnered considerable research attention. There has been a strong growth in concern about the situation in popular discourse. Media users report the perceived increase in exposure to “fake news” as a key reason for lower levels of trust in news media (Knight Foundation 2018). Global apprehension about false and misleading information continues to rise, with particular concerns about the widespread popularity of messaging apps in the Global South (Newman 2021). While critical theory has historically highlighted the link that always exists between truth claims and power relations, the contemporary global landscape of information disorder tends to eschew social agreements on methods and facts. Instead of transparent, agonistic public debate and scientific process to support truth claims, the “post-truth” populist public sphere tends to draw on binary political identities for support (Tumber and Waisbord 2021, 21).

The manifestation of information disorder around the world has given rise to a burgeoning research area, which includes analysis of issues ranging from election manipulation, populist politics, and influence operations, to questions of media trust and implications for journalism practice, as well as the Covid-19 infodemic. As a research area, information disorder studies bears some of the characteristics of an evolving subfield of the broader field of communication and media studies (as well as cognate areas like political science and sociology). As a result, its basic reference points are still being established: its conceptual frameworks are still contested, and its rapidly growing corpus of literature still draws on a range of theoretical frameworks (including but not limited to propaganda, rhetoric, political communication, journalism studies, and audience studies) and the establishment of new journals, special issues, and handbooks devoted to the topic.

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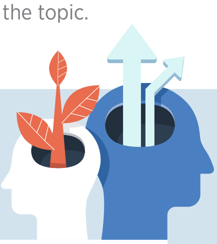

## INFORMATION DISORDER

One of the most influential typologies for the concept of “information disorder” comes from Wardle and Derakshan (2017). Their conceptual framework for examining information disorder identifies three types of information which, taken together, constitute the overall disorder. These information types are distinguished on the basis of their degree of harm and falseness, as well as on the assumed intention of the sender. These elements are referred to as misinformation, disinformation, and malinformation. (Wardle and Derakshan 2017, 5, 20):

- Misinformation is when false information is shared, but no harm is intended.
- Disinformation is when false information is knowingly shared to cause harm.
- Malinformation is when genuine information is shared to cause harm, often by moving information designed to stay private into the public sphere. Such information might be based on reality, but it is used to inflict harm on a person, organization, or country (e.g. email leaks, online harassment, and hate speech).

> There is an emerging consensus that the term "fake news" is problematic, partly because it suggests an inherent contradiction ("news" is by definition verifiable reports), partly because the term "fake news" can be taken to refer to satirical news programs which offer legitimate critiques of journalism (Wasserman 2017), and partly because of the way the term has been "weaponized" by politicians to undermine the news media.

Despite this rapid growth in research, the key concepts and theories underpinning the area are still debated (Damstra et al. 2021).

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Wardle and Derakshan (2017, 6) furthermore highlight the different elements of such information:

- Actors are distinguished according to their type, level of organization, type of motivation, level of automation, intended audience, intention to cause harm, and intention to mislead.
- The message is distinguished according to its duration, accuracy, legality, imposter type, and target.
- The interpreter refers to how the message is read and what action is taken.

When analyzing information disorder, Wardle and Derakshan (2017, 6) also focus on different phases of information disorder—that is, the moments of the message's creation, reproduction (when the message is turned into a media product), and distribution (when the media product is made available for consumption).

While this typology of information disorder is comprehensive and detailed, making it suitable as a framework to understand the problem as a whole, it also has some limitations. As Bontcheva and Posetti (2020, 44) point out, Wardle and Derakshan's typology hinges largely on the ability to identify the intention of the sender, which is not always practical, because such motives are often diverse, contradictory, or unclear. Problems also arise when motivations change along the informational distribution chain, for instance when a message originally created with the intention to mislead ("disinformation") is widely shared by users not having the same motivation to deceive (thus becoming "misinformation"), even if the harmful effect and consequence of the message remain the same. Bontcheva and Posetti (2020, 44) further argue that the notion of "malinformation" could stigmatize non-disinformational discourses in which particular facts may be selected as part of legitimate debates and contestation of meaning. For this reason, Bontcheva and Posetti (2020, 25) prefer using the umbrella term "disinformation" to "broadly refer to content that is false and has potentially damaging impacts."

On the other hand, the different elements specified in Wardle and Derakshan's typology (actors, message, interpreter) create the opportunity to identify different entry points for interventions, for example by focusing on the regulation of actors, the correction of the message, or the education of those who receive and interpret the message. Bontcheva and Posetti (2020) use a similar distinction between different disinformation elements in their framework to categorize different types of responses:

- Ecosystem responses are aimed at producers and distributors (including legislative, pre-legislative, and policy responses; national and international counter-disinformation campaigns; and electoral-specific responses).
- Responses within the production and distribution of messages include curatorial responses, technical and algorithmic responses, and demonetization and advertising-linked responses.
- Responses aimed at the target audiences of disinformation campaigns include normative and ethical responses, educational responses, and lastly empowerment and credibility-labelling responses.

These different typologies illustrate Damstra et al.'s (2021) point that the contested conceptual frameworks and definitions have, in their own right, been one of the major areas of focus in the emerging research field of disinformation studies. Since the purpose of this study is not to enter further into conceptual debates, but to descriptively map responses to information disorder in the Global South, a pragmatic approach to conceptualization has been followed. This study therefore does not adopt one particular conceptual framework or typology, but draws from the existing literature in ways that support the study's aims. Although the term "information disorder" is used in this study as the overarching term to describe the destabilization of the public sphere, and "disinformation" as a general term to denote particular manifestations of harmful information, some terminological flexibility was retained. The different regional reports may therefore show a preference for terms that are dominant in the particular region. As the study's main focus is on the types of responses and actors working to counter information disorder and to contribute to democratic, participatory, and equitable public spheres in the Global South, it further draws on the conceptualization of responses outlined by Bontcheva and Posetti (2020), although not following any particular framework in a programmatic way.

Central to the study's rationale is the need to broaden the field of information disorder studies beyond its current preoccupation with experiences and perspectives from the Global North, which are often presumed to have universal relevance. The recent sharp rise in interest in information disorder started to peak around the 2016 US election campaign. It was during this campaign that concerns around false news, foreign influence operations—including fears about Russian election interference, following this country's previous disinformation campaign in the Ukraine—and the weaponizing of the term "fake news" (Carlson 2020; Farhall et al. 2019; Tandoc, Jenkins, and Craft 2019) became topics of widespread concern. Despite this strong growth in information disorder as an area of scholarly and popular interest, the majority of research still views the phenomenon from vantage points in the Global North. As Madrid-Morales and Wasserman (2022) show, of all the articles on the topic of disinformation/misinformation/fake news published in academic journals between 2000 and 2020, the vast majority refer to countries or regions in the Global North. It is clear that academic research on information disorder has so far "failed to include adequate diversity on matters of geography, culture, and language as well as race, class, and gender" (Lewis and Molyneux 2018, 19). The focus on the USA means that the field currently lacks geographical, cultural, linguistic, and geopolitical diversity (Lewis and Molyneux 2018, 19). This is despite countries in the Global South having had to deal with information disorder long before its recent rise as a scholarly and journalistic preoccupation. The factors feeding into the crisis of disinformation in the North are often much more vividly recognizable in the South. Research into information disorder in the Global South can therefore also hold lessons for how to understand the phenomenon elsewhere, and help us design more contextually informed ways to combat it.

> Central to the study's rationale is the need to broaden the field of information disorder studies beyond its current preoccupation with experiences and perspectives from the Global North, which are often presumed to have universal relevance.

## 1.1 INFORMATION DISORDER, MEDIA DEVELOPMENT, AND SOCIAL CHANGE

The global manifestation of information disorder has presented challenges concerning how to think about media development and social change in the Global South. Already prior to the rise of information disorder as a point of scholarly focus, the field was divided between cyber-optimists and cyber-pessimists, or techno-utopians and techno-dystopians, who debated the impact of digital technologies on societies. In the field of media development, optimism often seemed to dominate. Those celebrating the potential of mobile and social media for social change often take their cue from the Arab Spring protests, which have been referred to popularly as a "social media revolution," or from campaigns such #BringBackOurGirls, #Kony2012, #MeToo, and #FeesMustFall, to indicate how social media platforms such as Twitter, Facebook, or WhatsApp can provide activists with the means to mobilize, organize, and construct group identities. Social media have also made it possible to enlist the participation of citizens in democratic debate, in the co-production of news discourses, and in the monitoring of political power or election violence.

On the other hand, there are also those who have called into question this potential of social media to support constructive social change in the Global South. The severe inequalities in access to digital and online media in these regions have often been pointed out as a factor that should dampen enthusiasm over the revolutionary potential of online media for development and social change. Other inherent problems in social media which mitigate the potential for sustainable social change are the creation of weak ties that prevent sustainable organization-building, and low-risk participation that has little impact or may wither under pressure. Digital technologies can also be used by the opponents of social change, who may employ them for surveillance, disinformation, and repression. The most important reason, however, why the optimism around the democratic and development potential of new digital communication technologies has been receding is the sobering reality of a growing information disorder. Digital platforms are seen as central to information disorder, with social media being seen as the breeding ground for disinformation, racism, xenophobia, and misogyny, a situation which is especially virulent in postcolonial contexts marked by social polarization, ethnic tensions, and economic inequality.

> Digital technologies can also be used by the opponents of social change, who may employ them for surveillance, disinformation, and repression.

Central to media development strategies is the assumption that a strong, independent, and viable media is vital for democracy. From this perspective, information disorder poses a double threat: not only is the public sphere awash with false, confusing, or unverified information, but this contamination of the online public sphere has happened in parallel with a financial and political crisis affecting traditional, quality, fact-checked news sources. The sustainability of ethical, independent, and trustworthy news media is especially important in the Global South as a bulwark against state propaganda and attempts by authoritarian states to obstruct the free flow of information and critical journalism. Broadcast and print media outlets in the Global South had been suffering from the collapse of advertising markets and struggling to adapt to the challenges of internet media even before the Covid-19 pandemic struck. The pandemic has, however, further eroded the revenue base of many news outlets around the world, with subsequent job losses and closures of news outlets often disproportionally impacting on smaller independent and community newspapers in the Global South. In addition to these economic pressures, the Covid-19 pandemic has also brought a resurgence of censorship and control by governments in the Global South, which have used disinformation around the pandemic as a smokescreen to intensify their repressive tactics.

Media development efforts in the Global South will therefore increasingly have to focus not only on the economic viability of media across the region, but also on their ability to withstand political pressures. At the same time, the limits of journalism to counter information disorder should also be recognized. Journalism is not exempt from contributing to information disorder, especially when journalism becomes politicized, as the Latin American regional report of this study has made especially clear. Journalism should therefore remain subject to critique, journalists should be included in critical literacy efforts, and media outlets should remain the focal points of development efforts.

In politically fragile settings across the Global South, information disorder presents an especially dangerous and vexing challenge. Even in countries where ostensibly democratic systems are in place, there has been an authoritarian creep, as governments have clamped down on media criticism and citizen protest by shutting down the internet for prolonged periods, creating the space for rumors and unverified information to thrive.

Although access to the internet has long been one of the goals of media development efforts, access and participation online also have a dark side. In contexts where access to the internet is limited, many people may still belong to messaging groups that require low data usage (for example WhatsApp); they thus have the power to share and spread false information, making economic, social, and political fragility even more severe. Owing to media capture or weak journalistic institutions, traditional media outlets can accelerate, rather than mitigate, the spread of false information. Likewise, the fragilities of government institutions and the frayed social fabric in these settings mean that efforts to respond to information disorder give rise to censorship and the infringement of freedom of expression. Solutions like "fake news" bills, bounded by narrow state interests, actually result in the crushing of free expression at the behest of authoritarians. Even where legislative attempts to curb information disorder might be well intentioned, for instance to protect citizens from harmful Covid-19-related messages, measures such as the criminalization of disinformation may hamper the free flow of information and be used for unscrupulous ends.

Not only is there a paucity of research on information disorder in Global South contexts, but the existing knowledge and current initiatives are frequently in silos, which impedes the development of broader policy and programmatic solutions—that is, work to bolster responsible journalism is often disconnected from work on digital misinformation campaigns in a given country, or from internet governance fora. At the same time, these efforts to respond to sometimes urgent manifestations of information disorder—for instance related to the threat of violence or to upcoming elections—must improve in their ability to establish long-term development objectives in these contexts: the governance of digital communication technologies, the development of the media sector, and the unpacking of legal and regulatory issues. And this must happen in national, regional, and global contexts where respect for democratic governance is declining, and multi-stakeholder participation has historically been exceptionally challenging.

A key issue for development is that the complex relationships between geopolitics, internet governance, legal systems, data analytics, media/journalism, and basic human rights like free expression and privacy remain poorly understood and badly integrated, especially in the Global South, where information disorder is much less studied. Information disorder is not bounded by the state, nor by language or platform, and toxic information can travel at an accelerating rate around the world through communities of shared interests (linguistic, diaspora, social, political), skewing facts and distorting truth.

This study maps efforts currently underway in the Global South to counter information disorder by identifying key actors and stakeholders, and establishing the most important research questions for an ongoing developmental agenda that links the fight against information disorder with the building of sustainable, independent media in the Global South. As a vital democratic institution, a credible, trusted, viable media is central to the deepening of democracy in these regions, in line with Goal 16 of the UN's Sustainable Development Goals (SDGs): "Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels."

## 1.2 PREVALENCE IN THE GLOBAL SOUTH

In the Global South, journalism has always been contested terrain: prone to manipulation, state ownership, censorship, and patrimonial relationships between journalists and political elites. In these contexts, alternative communication networks have often fulfilled a progressive function. Humor, ridicule, gossip, and jokes have been integral to anti-colonial struggles in Africa; orality has been a feature of communication in the Arab world; and popular cultural forms like music and satire have fulfilled journalistic functions in contexts of oppression (Bebawi 2022; Ellis 1989; Mano 2007). Contemporary practices associated with information disorder therefore often map onto older social forms in these regions.

More recently, however, concerns have been growing about a perceived high exposure to especially digital disinformation and its impact on often fragile democratic environments in the Global South. Survey research shows, for instance, that perceived exposure to fabricated political news stories in African countries is even higher than in the USA (Wasserman and Madrid-Morales 2019).

Extreme speech is another major issue across the Global South, often with historical antecedents in colonialism (Udupa, Gagliardone, and Hervik 2021).

> Political and social polarizations within highly economically unequal societies are amplified on social and mobile media platforms, which are aggressively pushed by big tech companies that view the Global South as a lucrative emerging market.

The Covid-19 pandemic has exacerbated both the spread of harmful disinformation and increased pressure on independent news outlets in the region. As this report shows, local political leaders have appealed to long-standing anti-Western sentiments by laying claim to indigenous knowledge while contributing to information disorder. This includes alternative treatments for Covid-19, such as steaming (Tanzania), a toxic local root (Kyrgyzstan), and a variety of "cures" in Sri Lanka, Pakistan, Turkmenistan, Kazakhstan, and elsewhere. Rumors about contaminated facemasks that have been sent to "destabilize Africa" (BBC 2020), or claims that Bill Gates would be testing vaccines in Africa (Cowan 2020), are further indications of how information disorder in these regions often draw on long-standing anti-Western bias. These tropes are also reminders that Covid-19 is not the first pandemic to ravage Africa: they are reminiscent of claims by former South African health minister Manto Tshabalala-Msimang during the early 2000s that garlic, beetroot, and the African potato would cure HIV/AIDS (Davis 2014), and of vaccine hesitancy among rural South Africans during the 1918 flu pandemic as a result of distrust of the motives of Western health workers (Steinberg 2007).

Understanding information disorder in the Global South therefore requires a sociotechnical and technopolitical approach (Gagliardone 2016; Marwick 2018) which incorporates the study of media ecologies as interlinked with longer histories and social dynamics. This report aims to provide insight into how regional media ecologies, political forces, and social dynamics inform the ways in which organizations work to combat information disorder across the region.

A study of efforts to counter information disorder in the Global South is important not merely because it contributes to greater geographical diversity in the field (much as this is needed), but also because the South can hold lessons for the North. Because of its long history of information disorder, the South could have provided early warnings for later manifestations of similar problems in the North. Berger (2022) reminds us, for instance, that the Ukraine was a target of geopolitical interference before this became a concern in the 2016 US elections, and that disinformation was weaponized in the Philippines to target journalists like the recent Nobel laureate Maria Ressa before accusations of "fake news" led to hostility towards journalists in the USA. Similarly, recent revelations by Facebook whistleblowers have shown that the platform was complicit in hate speech by the Myanmar military against the Rohingya before similar tactics were used in domestic US politics (Mozur 2018).

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There is, however, a danger that focusing on the prevalence of information disorder in the Global South can deepen stereotypes of the region as "underdeveloped," "chaotic," "undemocratic," and "passive." For this reason, it is important to emphasize the resilient and creative ways in which many journalists, activists, and organizations across the Global South have demonstrated agency in combating the problem. This study tracks these varied responses to information disorder.

While there has been a steep rise in the number of journalistic fact-checking endeavors across the region, such initiatives can only respond to a fraction of publicly circulating mistruths, and verified corrections reach only a tiny proportion of the audience that would have seen the disinformation in the first place. Moreover, there is a realization that because information disorder is a multi-levelled, complex phenomenon, responses to the problem also have to be varied, intersectional, and holistic.

# 2. BACKGROUND AND METHODOLOGY

The general objective of this scoping study was to synthesize existing knowledge about the range of efforts underway in the Global South to counter information disorder and to identify gaps in existing knowledge which future research could address. Ultimately, the study sought to contribute to field-building in the area of information disorder studies by providing detailed data and analysis from the under-researched contexts of the Global South.

The project had three specific interconnected objectives:

1. To map the actors currently working in the counter-information disorder and to identify frameworks upon which interventions are based
2. To learn from current approaches, tools, and methods used to counter information disorder
3. To gain an overview of the research landscape and to identify key issues and questions for further research.

This was an exploratory and descriptive study that followed a collaborative, participatory approach, drawing on the expertise of leading researchers in four sub-regions of the Global South, namely Latin America, sub-Saharan Africa, Asia, and the Middle East/North Africa (MENA). The teams used a range of methods, including desk research, regional workshops with key organizations, and stakeholder interviews to gather data from the respective regions. The findings from each of these regions were presented to the whole group, discussed, and reworked before being synthesized into this report.

Through this collaborative process, which included monthly team meetings, the research process in itself had the aim of making connections between various actors, creating spaces for dialogue, and identifying points of comparison which can contribute to field-building. By identifying key issues that cut across different regions with regards to the impact of information disorder in the Global South, an agenda for further research was developed. This agenda builds on the connections created through this project, with the aim of overcoming the fragmentation that currently characterizes the research field.

# 3. CONTEXTS

If information disorder is understood as not only a technological, but also a multi-levelled, complex, and evolving sociocultural phenomenon, dis- and misinformation needs to be understood within the context of social dynamics and material circumstances.

The Global South experience can be instructive, as we understand information disorder not as a universally homogenous phenomenon, but as a contextual one which requires contextually relevant responses. To understand how information disorder is embedded within these regions, four contexts are of particular importance, namely media, social, political, and geopolitical contexts.

## 3.1 MEDIA CONTEXTS

Media landscapes in the Global South are often characterized by high concentration. The media often have a history of being state-owned or state-controlled, and are marked by patrimonial relationships between journalists and powerful social and political actors. Their news agendas are therefore often captured by social elites. Across these regions, newsrooms are under-resourced; journalists work under precarious economic conditions and are frequently the target of harassment and attacks.

As has been the case elsewhere, indications are that low levels of media trust in the South are linked to perceived exposure to disinformation, as a study in African countries has shown (Wasserman and Madrid-Morales 2019). While notions such as "echo chambers" or "filter bubbles" have been considered novel phenomena in recent digital media studies, the contemporary media landscape in African contexts often reflects much older stratifications of class, language, race, and ethnicity, carried over from colonialism (Maweu 2021).

This historical legacy of fragile media systems is being exacerbated by global neoliberalism: The South represents important emerging markets for digital platform companies, which are acting as gatekeepers of information at the same time as they are functioning as amplifiers of disinformation. As part of Facebook's Free Basics service in several parts of the Global South, including Africa (Nothias 2020) and Latin America (Valente 2021), users get zero-rated access to a limited number of internet sites. Although it can be argued that these users at least have some access to online resources, this may also mean that users in this "walled garden" are exposed to information disorder while having limited opportunities to corroborate the information they receive. Additionally, although Facebook collaborates with third-party fact checkers in the Global South (Nothias 2020), the platform's own fact checking activities are hugely skewed towards English-language content in the Global North (Freedland 2021).

## 3.2 SOCIAL CONTEXTS

A socio-technical approach to information disorder requires that we focus not only on media landscapes and digital platforms which facilitate the disorder, but that social dynamics such as cultural histories, economic inequalities, audience perceptions, and citizens' interactions with information disorder be considered as well.

Although developmental approaches to the combating of information disorder in these regions have often emphasized strategies such as media literacy, ignorance is not necessarily the main driving force behind the problem. Research has shown that while media users in Africa often suspect or know that information is false, they share it anyway because of sociocultural reasons such as a community orientation ("I have a duty to warn others") or satire and humor ("Just for fun") (Madrid-Morales et al. 2021). Social and economic factors also play a role, as do questions of access to and relative trust in media. Rural communities use social networks less than their urban counterparts; they rely more on opinion leaders, local experts, and networks such as family, community, or religious structures (Tully et al. 2021). When it comes to trusting information about Covid-19 vaccines, South African media users express greater trust in family than in government or social media (Wasserman and Madrid-Morales 2021). This study therefore also set out to understand these sociocultural dynamics that shape information disorder in the Global South.

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## 3.3 POLITICAL CONTEXTS

Regions in the Global South are frequently marked by political upheaval, protest action, and conflict, the outcomes of which are increasingly shaped by media and communications. When journalists in contexts of political turmoil blur the line between activism and evidence-based reporting, as has been the case in the Arab world (Bebawi 2022), this can contribute to information confusion. In Latin America, the region's history of dictatorial rule and protest action has often been accompanied by disinformation and censorship (Bachmann, Grassau, and Labarca 2022) and, as this report shows, electoral politics in the region continue to be characterized by information disorder. This report also shows that in several Asian countries, election processes are disrupted by state-backed or politically aligned online actors, such as "IT cells" (India), "troll factories" (the Philippines), "buzzers" (Indonesia), "cyber troops" (Malaysia), and "cyber sena/the cyber army" (Nepal). In several countries in the region, such as Indonesia, Sri Lanka, and India, political candidates are often targeted on the basis of their ethnicity and religion, as part of growing ethno-nationalist narratives. In situations of ethnic and racial polarization and socioeconomic inequality, disinformation campaigns can easily exploit existing tensions. This was evident in the actions of the British public relations firm Bell Pottinger, which used a racially polarizing online campaign to deflect criticism from corrupt politicians in South Africa (Segal 2018).

> Citizens often look to governments to help stop information disorder, as research across sub-Saharan Africa has shown (Tully et al. 2021). But increasingly, governments use the discourse of "fake news" to suppress free speech instead.

Internet shutdowns or intentional crashes are employed widely in African and Asian countries, and the Covid-19 pandemic has provided a new smokescreen for governments to criminalize disinformation or clamp down on dissent (RSF 2021). As this report suggests, governments across the region are themselves also sources of information disorder. In Latin America, the Covid-19 pandemic has been used in the service of populist politics. The Latin American section in this study highlights the way in which President Jair Bolsonaro in Brazil spread falsehoods about the pandemic and engaged in populist rhetoric in an effort to pander to his base. In countries with high levels of freedom of speech, such efforts by governments may be resisted, but in contexts where freedom of expression is suppressed, such resistance is more difficult. This is the case across much of sub-Saharan Africa and in parts of Asia, where governments frequently use internet shutdowns to clamp down on dissent. As this report notes, even where such efforts claim to be in response to information disorder, these strategies tend to be repressive rather than constructive.

This report also shows how disinformation impacts on popular movements. As the section on the MENA region in this study shows, during recent uprisings in Lebanon, for instance, disinformation that was spread through WhatsApp affected the course of protests, encouraged violence, and spread panic, while protests in Iraq were marked by inflammatory sectarian rhetoric on social media. There are also examples in the Latin American section of how information disorder impacted on protests in Chile, Colombia, and Ecuador.

## 3.4 GEOPOLITICAL CONTEXTS

Changing geopolitical relations impacting on the Global South are also reflected in aspects of information disorder. Recent geopolitical shifts, such as the increased presence of China in Africa, are at the root of xenophobic disinformation, such as rumors of China selling "plastic rice" on the continent (Subedar 2017). At the same time, China's aggressive "wolf warrior" social media strategy was applied by Chinese diplomats on social media in Africa to counter criticism in the context of the Covid-19 pandemic (Shumba 2021). As this report shows, regional tensions are often also exploited by disinformation campaigns. This is especially evident in Asia, where inauthentic influence operations in Pakistan have sought to amplify anti-India sentiments and vice versa, online disinformation was circulated related to border disputes between Tajikistan and Kyrgyzstan, information operations by China targeted the 2020 elections in Taiwan, and Russian disinformation campaigns have extended their influence in many parts of Central Asia. In Latin America, President Jair Bolsonaro of Brazil and President Nicolás Maduro of Venezuela have used the Covid-19 pandemic to fuel anti-Chinese sentiments. Similar sentiments have spilled over into other parts of Asia, like the Philippines, where workers of Chinese descent became targets of disinformation. Amidst these geopolitical tensions, fact-checking organizations that receive support from Western donors often have to contend with perceptions of a lack of independence.

It is within these varied contexts that organizations across the Global South have worked to counter information disorder.

# 4. FINDINGS: RESPONSES ACROSS THE REGIONS

## 4.1. TYPES OF RESPONSES

The ways in which information disorder can be combated has been one of the central strands of research in the area (Damstra et al. 2021, 1948), and has already led to typologies such as the one provided by Bontcheva and Posetti (2020), as discussed above. The urgency of responding to the infodemic accompanying the Covid-19 pandemic underlined the necessity of such responses, and has spurred further research into ways in which information disorder around the virus and vaccines could be countered. Yet often these responses have too glibly drawn on the notion of a uniform "inoculation" strategy against information disorder which ignores contextual specificity—not only between the Global North and South, but also within the South itself, as Gagliardone et al. (2021) have shown regarding the different ways in which African users display agency in engaging with false messages. Research into appropriate responses to information disorder therefore has to be informed by context if these responses are to be successful.

### IDENTIFICATION RESPONSES: MONITORING, FACT CHECKING, AND INVESTIGATION

The central aim of this study has been to provide an overview of the various organizations and actors working to combat information disorder in the Global South, and the types of responses they provide. Among these, identification responses have been especially notable in recent years. Identification responses include monitoring and fact-checking responses as well as investigative responses (Bontcheva and Posetti 2020). These strategies are aimed at identifying instances of disinformation, verifying and fact checking claims, and, in some cases, extending this monitoring to the broader context of information disorder—the networks, systems, and mechanisms facilitating information disorder. This type of response was found to be one of the most dominant, if not the most dominant, forms of combating information disorder across the regions of the Global South represented in this study. In sub-Saharan Africa, it appears that fact-checking methodologies are maturing into deeper investigative efforts which aim to unearth the sources, drivers, and impacts of information disorder.

A wide range of fact-checking organizations are active in these regions, many of them having been established fairly recently. Even in the MENA region, where some fact-checking organizations have been active since the democratic revolutions around 2011, the majority were only established in the last few years. The rise of information disorder around the Covid-19 pandemic has provided an additional impetus for fact-checking organizations. Although the number of organizations continues to grow across these regions, not all of them are equally active or robust.

Some fact-checking organizations are aligned to media houses, and have been successful in conducting specialized in-depth investigations in addition to verification activities. In some cases, fact checking has become integrated into mainstream journalism. An example of this is the Joongang Tongyang Broadcasting Company (JTBC), one of the largest broadcasting houses in South Korea, which allocates five minutes of its prime-time news bulletin for fact checks of popular news items. An encouraging sign of public trust in fact-checking processes is the contributions made by audiences. In Kyrgyzstan, the organization Factcheck.kz receives fact-checking suggestions from readers via their social media accounts, and in India, independent fact checkers follow up on leads provided by members of the public.

Other fact-checking organizations operate independently. These outfits tend to rely heavily on international donor organizations, governments, or big tech companies to fund their operations. The US-based National Endowment for Democracy

(NED), the US Embassy, the Open Society Foundation (OSF), Facebook, and Google are some of the prominent international funders.

Some regional cooperation between fact-checking organizations is starting to emerge. In Kyrgyzstan, Factcheck.kg has worked with partners from Ukraine and Moldova, and has also received help from the Netherlands-based organization Bellingcat. In Latin America, fact-checking agencies have formed an alliance called Latam Chequea, consisting of thirty-four organizations from seventeen countries and coordinated by the agency Chequeado, from Argentina. Furthermore, international networks, like the Association for Progressive Communications (APC), the Electronic Frontier Foundation, and Reporters Without Borders (RSF), work alongside the regional coalition AlSur and nationally based organizations with a regional scope, such as Observacom in Uruguay, Cele in Argentina, and Derechos Digitales in Chile. Regional organizations also contribute to the work of international bodies. For example, Access Now, which is active in Latin America and the Caribbean, has given input into strategy discussions of the EU, UNESCO, and the UN's Special Rapporteur for Freedom of Opinion and Expression. In the MENA region, a few large organizations and platforms that provide fact-checking services in Arabic have also been formed, including Agence France-Presse (AFP) Fact Check, Fatabyyano, Misbar, and others, and while most organizations in this region work on a national basis, some have a regional or even a global scope.

A common challenge faced by fact-checking organizations is a lack of funding, which makes their long-term viability uncertain. The high dependency on donor funding or term-limited funds creates sustainability problems. In addition, these initiatives are often hamstrung by a shortage of human resources, not enough training, and the complexity of having to verify content in local languages. Structural problems also hamper their work, such as difficulties in accessing reliable information and data and the absence of, or inadequate, legal support and protection.

Across the regions, fact checkers also report harassment and threats, making safety a concern for many, especially in the absence of legislation protecting them. These fact-checking organizations are often supported by international donors or supporters such as tech platforms (e.g. Google's support for Latam Chequea), international media agencies (e.g. AFP's global fact-checking network which also operates in the Global South), or Western governments (e.g. the US Embassy's support of fact checkers in Latin America and Africa), which builds on longer-standing media development efforts in these regions. But in highly polarized political situations, fact-checking organizations receiving international donor funding also have to contend with accusations that they are not independent or objective, and in some cases they are surveilled by governments.

> The lack of formal policies to guide fact checking remains a challenge. Some organizations are members of the International Fact-Checking Network (IFCN)—in sub-Saharan Africa, this applies to most fact-checking organizations—and most are signatories to the standards of the IFCN and other local media councils.

This means that there are strict correction policies which require these organizations to publicly account for any errors in the fact-checking process, and they are required to follow internationally recognized processes. Others, however, operate in a more ad hoc fashion.

Although collaborations are starting to emerge, as are innovative ways of linking different issues together in response to information disorder, more coherent and cohesive efforts are still needed. Such holistic, collaborative efforts are especially necessary if organizations are to tackle information disorder in a proactive, constructive, and sustainable manner rather than in a reactive and ad hoc mode.

### ECOSYSTEM RESPONSES: LEGISLATION AND POLICY

Ecosystem responses can also be noted across the regions, but these policy and legal responses are characterized by paradoxes. Several countries in the Global South have attempted to counter information disorder through legislation. Unfortunately, legislative responses have also been used more crudely, and not always with transparent intentions. In most Arab countries, accusations of "fake news" or "disinformation" are used as a pretext to suppress freedom of expression and silence government critics. Most of these countries have laws governing the media, electronic crime, and cybercrime that prohibit the spread of false news and punish those who publish it. The Covid-19 pandemic provided many countries with a motivation or pretext to tighten these laws. This has also been the case in the Asian region, where various legal tools have been deployed to regulate information disorder, with some having the specific aim of addressing information disorder around the pandemic. Critics of these laws claim that they are often applied selectively and in a politically motivated manner, and used to stifle freedom of expression when it comes to criticism of the government. Punishments under these laws often include fines and prison sentences. In the Latin American region, laws have also been passed in response to information disorder in the context of the pandemic, as this regional report highlights.

> The same governments that set about developing legal and policy responses aimed at the information ecosystem are frequently themselves the sources of information disorder. When citizens register their dissatisfaction with governments, governments tend to either engage in spreading disinformation themselves, or respond by shutting down the internet, as is common across Africa and Asia in particular.

Although combating information disorder is not a priority for many governments, the Covid-19 pandemic has prompted many of them to launch awareness campaigns aimed at curbing the spread of the virus and encouraging the uptake of vaccines.

This has been the case with the majority of governments in the MENA region. The governments of Lebanon, Jordan, Egypt, Kuwait, and Saudi Arabia all started initiatives focused on refuting rumors, correcting false information, and promoting public awareness of issues related to Covid-19. Some of the government-led initiatives to combat information disorder in the MENA region predate the Covid-19 crisis. In 2015 the Iraqi Ministry of the Interior launched a Department for Combating Rumors to monitor media outlets and social networking sites in Iraq. It is not clear, however, whether this agency was aimed in the first instance at countering information disorder or rather at silencing those critical of the government.

Similar trends can be noted across Asia, where several governments have taken measures to deal with information disorder. These include setting up fact-checking operations themselves, such as task forces and "war rooms." An example is the Digital Economy and Society Ministry in Thailand's "Anti-Fake News Center." In Pakistan, the Ministry of Information and Broadcasting launched a Twitter page titled "Fake News Buster," while the governments of Singapore, Vietnam, and Malaysia run websites aimed at debunking false information. In Vietnam, the army has a special online information warfare unit called "Force 47," which consists of thousands of soldiers tasked with setting up, moderating, and posting on pro-state Facebook groups in order to correct "wrong views" online. The initiatives undertaken by the Indonesian Ministry of Information and Communication Technologies (Kominfo) include a "war room" which uses both humans and artificial intelligence (AI) tools to detect false content. In Sri Lanka, the Ministry of Mass Media runs its own fact-checking operation.

Several Latin American countries have also criminalized disinformation. These include Venezuela, Bolivia, Belize, Nicaragua, and the Bahamas, where spreading false news is punishable by fines or prison sentences. In several other countries in this region, bills proposing similar measures are being considered. In Colombia, the government has already implemented "cyber patrols," specialized groups of security forces set up to monitor the internet with the aim of holding accountable those who contribute to information disorder.

In sub-Saharan Africa, only one country (Ethiopia) has legislation that was enacted to directly address information disorder. The rest of the countries make use of an amalgamation of different laws that indirectly address information disorder, including penal codes or laws and cybercrime acts. Examples of such legislation include laws that speak against falsehoods, cybercrimes, disinformation, and, more recently, Covid-19. Civil society actors on the continent have expressed widespread concern regarding the use of legislation to suppress disinformation, given the history of authoritarian regimes in sub-Saharan Africa repressing human rights and the media fraternity through restrictions on the right to information, freedom of the press, and freedom of expression.

A key feature of the communication ecosystem across the Global South is uneven, unpredictable, or inadequate access to information. This makes it difficult for journalists, civil society organizations, and fact checkers to access reliable information with which to counter rumors or false information. Only seven countries in the MENA region have adopted legislation guaranteeing the right to access information, and even where laws do exist, they are not always implemented consistently. Given the challenges related to freedom of expression and accessing information, attempts to legislate against information disorder in the region always have to be weighed up against the need to protect freedom of expression.

### PRODUCTION AND DISTRIBUTION RESPONSES: TECHNOLOGICAL AND CURATORIAL RESPONSES

Responses within production and distribution are less common across the Global South, especially as far as the use of technological and algorithmic responses to counter information disorder is concerned. In Africa, there are a few organizations, such as Media Monitoring Africa and RoveR, that use using natural language algorithmic processing to identify information disorder. The Digital Africa Research Lab holds big technological platforms accountable by ensuring they adhere to global policies whilst taking into consideration the needs and concerns of African users. Some technical responses can also be noted in Latin America, for instance the development of machine learning to identify information disorder by the Argentinian organization Desconfio. In the MENA region, not much progress has been made in this area, but there are a few examples, such as the Tanbih platform in Qatar, which analyzes and detects disinformation by means of AI and deep neural networks. What is notable here, however, is that this backlog—compared to similar efforts in the Global North—can be explained in part by the sociocultural context. The Arabic language constitutes an obstacle in the development of AI tools, and the lack of data in the language makes platform development difficult.

Some curatorial responses are evident in the Asian region, both by local platforms (e.g. the South Korean messaging app KakaoTalk, which has implemented content restrictions on certain types of content) and big platforms such as Google and YouTube, which have acted on takedown requests pertaining to information disorder in countries like Singapore, Thailand, and Indonesia. Facebook's track record of regulating information disorder in the region has, however, been controversial, with the use of the platform for the spreading of disinformation in Myanmar and the Philippines being frequently cited examples. Of late, Facebook has made an effort to collaborate with local fact checkers on content moderation, and LINE (a messaging platform), TikTok, Google, and WhatsApp have pledged support to fact-checking initiatives in the Asian region. In Latin America, local organizations such as Derechos Digitales and AlSur have also been engaging big tech platforms like Facebook, Twitter, and Google about content moderation.

### EDUCATION OF AUDIENCES

Responses aimed at the target audiences of disinformation campaigns are widespread and well established across the regions mapped here, with media literacy campaigns being one of the most commonly used strategies. In sub-Saharan Africa, a total of twelve initiatives were found which focus on education and empowerment. In this region, media literacy campaigns extend to the promotion of critical thinking skills, especially when it comes to particular issues such as albinism or sexual minorities. Creative and innovative approaches to literacy and empowerment in the region include an interactive game used by Pollicy in Uganda, and the YALIChecks project aimed at youth and young leaders. Several other training programs, some offered by governments, were also noted.

In Latin America, similar educational work is being done by UNESCO through its MIL Clicks project, which distributes training and awareness materials in Spanish, Portuguese, and English. Under the auspices of UNESCO, an international network of actors involved in media education, GAPMIL, promotes media education events and activities in the region. Google News has also been supporting media literacy initiatives in the region through its partnership with a group of civil society organizations, leading to the formation of the Digimente media literacy project, aimed at young people.

> Although there is little recognition by governments in the MENA region of the importance of media literacy, it already forms part of the curricula of many schools and universities. Several organizations in the MENA region are active in this regard, through providing training on fact checking and on how to combat information disorder, promoting and developing media literacy through preparing local curricula, publishing studies in the field, and running awareness campaigns.

Some of these initiatives are affiliated with universities, and others with media organizations. However, the lack of resources in Arabic poses a challenge to the fostering of a culture of critical thinking and fact checking.

In Asia, a wide range of media literacy projects are conducted by journalists, academics, fact checkers, government institutes, media organizations, and civil society organizations. Media literacy programs are taught at various universities and schools in countries across the region, sometimes in collaboration with NGOs. These are not restricted to urban areas. In Indonesia, the fact-checking organization Liputan6 conducts road shows in Islamic schools, at universities, and in other community centers as a way of tackling hoaxes and disinformation in rural areas with no internet access. Liputan6 also works with local community radio stations to improve media literacy among indigenous groups in the country. In India, the police service has conducted media literacy training among village leaders to educate them on how to identify malicious content in community social media groups and on WhatsApp groups, and on how to report this to the relevant officials.

## 4.2. INTERSECTION OF RESPONSES

Most notably, the work done by organizations in the regions often evinces a multi-levelled response to the problem of information disorder. In linking different issues together in an intersectional manner, these organizations illustrate the importance of approaching information disorder as a complex problem which requires holistic responses.

Examples of how different imperatives are linked together by organizations across the regions include the following:

- Quality of information is linked with the right of access to information and digital technologies, policy interventions on cybersecurity, surveillance, and data protection by the AlSur consortium in Latin America. The assumption here is that without broadening citizens' access to digital resources, they cannot empower themselves with quality information with which to counter information disorder. Similarly, if their data are not protected, or if governments use digital platforms for surveillance of citizens, the integrity of the public sphere is compromised.
- Anti-information disorder work is linked with media freedom and the right to protest (e.g. by Article 19 in Latin America) and with the combating of hate speech (e.g. by Kashif in Palestine). The linking of these issues is based on the understanding that a democratic public sphere is not one in which bad information is merely rooted out; it is also one where good information is allowed to flourish.
- Electoral information disorder is linked with internet rights by organizations like Derechos Digitales in Chile through advocacy campaigns engaging politicians and digital platforms. By linking these issues, it is made clear that for democratic political processes such as elections to succeed, citizens have to be able to participate in online spaces where political agendas are set and discussed.
- Fact checking is combined with media literacy initiatives by, for instance, Dubawa and Africa Check in sub-Saharan Africa. This empowers citizens to not only establish the veracity of information they come across, but also engage more holistically with the media environment and become more critical and discerning consumers of media. It also entails work that enables citizens to critically engage with questions around the political economy of media, such as ownership, state influence and control, and the relationship between the market orientation of the media and their ability to serve the public interest.
- Several organizations in the regions under study are complementing fact checking with their own investigative journalism (e.g. Chequeado in Argentina and Verificado in Mexico), with workshops on media ethics (e.g. Falso in Libya), or with journalism training (e.g. Desinfox in West Africa). The combination of verification skills with journalistic training and the inculcating of ethical values reflects the fact that what is necessary to combat information disorder is not only eliminating false information from journalism, but also encouraging and developing good, ethical journalism.

This intersection of issues and challenges illustrates the need for a holistic, contextual approach to the combating of information disorder in the Global South. The overlapping imperatives further illustrate how information disorder is embedded in a range of social, political, and economic conditions, and how it maps onto historical experiences and wider concerns about the quality of communication in these regions. Because these problems are rooted in social contexts, effective solutions must extend beyond addressing only digital content; rather, they should enable the building of real-world networks, engage politicians and platforms, support independent media, defend the right to information, and understand social identity and lived experience. Successful efforts are likely to be those that are holistic and multi-levelled, and built from the ground up rather than imposed from above.

Furthermore, although similarities can be noted across these contexts, the Global South should not be treated as a monolith. Important differences and variations exist between countries within regions, between different groups within countries, and between different geographical, economic, or social contexts. Assuming that a technologically determinist approach—like a "magic bullet" or hypodermic needle—can be followed across these regions would therefore be a mistake.

## 4.3 TOWARDS A FUTURE RESEARCH AGENDA

This study provides a first mapping of organizations working to combat information disorder in the Global South, and much work remains to be done. A research agenda for the future is suggested by the following recommendations.

The first priority, given the lack of geographical diversity in the field, is to encourage more research on information disorder in the Global South. Such research must move beyond replicating existing empirical studies for the sake of "diversity" and must avoid merely applying theoretical models developed in the North to the South. Instead, research on information disorder in the Global South should take the deep social, media, political, and geopolitical contexts into account, focus on specificity while seeking comparisons, and avoid treating the South as a monolith. This means that more attention should be paid to differences and similarities within Southern contexts, and that South–South collaborative and comparative research should be encouraged, while trends—and, potentially, solutions—that are similar in the Global North and South should be identified.

As this study has shown, a variety of actors in the Global South are working to combat information disorder. These include academics, journalists, NGOs, and a variety of civil society actors. Further research into ways in which information disorder can be combated in the Global South would therefore benefit from a critical praxis approach, in which academic scholarship and practical action research can inform each other in ways that are mutually beneficial. Such a critical praxis can continue to explore holistic, integrated, and interlinked responses to information disorder that flow from specific contextual imperatives, lived experiences, and local knowledge. This also implies that research would move beyond the study of online communities and digital platforms to include more ethnographic work on disconnected or poorly connected communities, how information disorder spreads through oral networks, and how information disorder manifests in everyday life.

Finally, while combating information disorder is a pressing political and social project, the urgency of this work should not lead researchers to revert to superficial or uncritical views which disregard the well-established history of research into issues such as the role of journalism in relations of power, the political economy of media ownership, and critiques of positivist epistemologies that reduce complex understandings of truth and power to a reassertion of journalistic "objectivity." Journalism should be supported as a public good to combat information disorder, while media development efforts should be coupled with continued work on ensuring ethical, trustworthy, and quality journalistic content.

## 4.4 THE ROAD AHEAD

Information disorder is a complex problem that calls for complex understandings of the relationship between economy, society, political life, and everyday lived experiences. Such a multi-levelled phenomenon therefore also requires multi-disciplinary collaborations across regions. This study has identified a number of key interlinked areas in which organizations in particular regions are already working to combat information disorder. Future work that builds on this mapping study should therefore focus on ways in which more collaborations can be established between organizations within and across regions. Such collaborations would be best envisaged in terms of topics and trends rather than geographical locations, in order to facilitate the sharing of best practices across different locations and to draw on the expertise of organizations working in particular focus areas.

> An initial workshop and follow-up collaborative meetings would provide an opportunity for researchers to present their work to a wider audience, as well as to meet and exchange ideas with their counterparts in other regions. During this meeting, focus areas for future collaborations can be identified and developed further.

The second phase of future work in this area would entail the building of networks of solidarity between researchers and activists across geographical contexts. Such collaborations between academics, activists, and practitioners would follow the approach of a critical praxis in which theory and practice inform each other. Because of the interlinking of various imperatives found in this study (as pointed out above), inter-regional collaboration between organizations working in cognate areas and with expertise in particular aspects of combating information disorder is likely to be more productive and mutually beneficial than organizations working across a range of issues within one particular geographical area. For this reason, it is recommended that future collaborations take place and be supported along particular themed tracks. These could include the relationship between information disorder and the following themes: regulation and legislation, political economy of media, freedom of expression, digital rights and access, media literacy, fact checking, and investigative journalism. These themed tracks could facilitate the sharing of expertise, network building, and resource sharing to build further resilience in the fight against information disorder—not only countering negative information in the public sphere, but also supporting and developing the conditions which allow good information to thrive.

This study has taken a first step in mapping the wide range of actors and responses to information disorder in the Global South. Taken together, they illustrate clearly that we cannot afford to view the global problem of information disorder by continuing to focus on only a section of the world.

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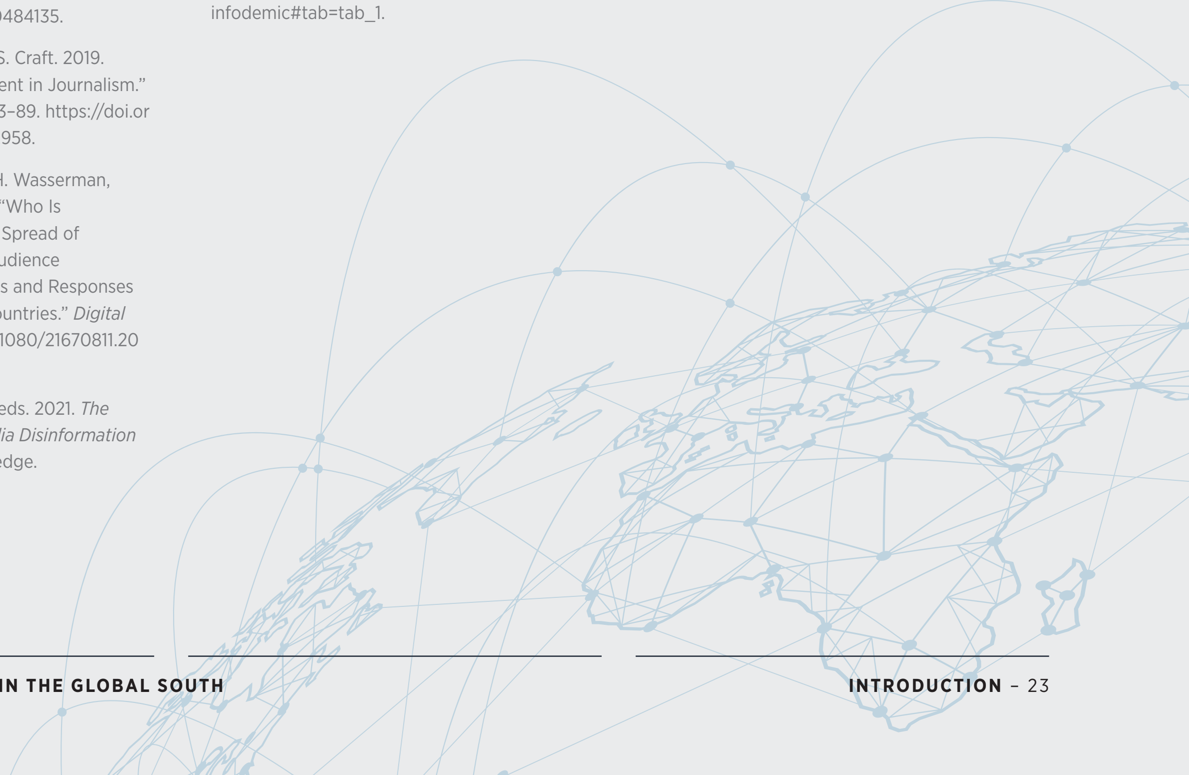

# MIDDLE EAST AND NORTH AFRICA

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# PART I GENERAL OVERVIEW

## 1. INTRODUCTION

"Fake news" has become a well-known term in the Middle East and North Africa (MENA), a region where many countries are experiencing endless wars, along with political, economic, and social crises. Unfortunately, the region is also witnessing the increasing suppression of freedom of opinion and expression, which places enormous pressure on journalistic work and independent media and limits the free circulation of information. This, in the larger context of the tremendous, rapid digital and technological development that is taking place worldwide, renders the Arab world an environment that is prone to the spread of false or misleading information—the perfect environment for promoting "information disorder."

Today, the term "fake news" is no longer appropriate or sufficient to explain the extent of harmful information in the world. The term "information disorder" covers misinformation, disinformation, and malinformation. Information disorder clearly describes how we have come to live in a world where fake and inaccurate information has become a dangerous weapon, used to wage wars, distract societies from core issues, direct public opinion, change election outcomes, and attack independent journalism. In the MENA region, information disorder, misinformation, and disinformation are still referred to by using the more general term "fake news," which is defined as news that does not meet the criteria of credible news and which is spread without verification (Ireton and Posetti 2018, 7).

The negative impact of information disorder on societies and on the information environment is immeasurable. It is important to know how to confront and address the outcomes by properly understanding, interpreting, and analyzing information disorder. What are misinformation and disinformation? How does it circulate? How and why is it used? Who is behind it? In what environment does it grow and thrive? How does it affect society? These are only a few of the many important questions that must be answered in order to understand information disorder in a way that would help to counter it.

The Covid-19 pandemic, which is ongoing at the time of writing, has also made these questions more pressing. Parts of the Arab world, such as Syria, Palestine, Iraq, Yemen, Libya, and Sudan, were already facing huge waves of mis- and disinformation due to wars, political turmoil, and security issues (such as wars in Syria, Yemen, and Libya; explosions in Lebanon and Iraq; clashes in the Maghreb/Northwest Africa, and so forth). Now, the region is witnessing a surge of mis- and disinformation about health issues, the Covid-19 pandemic, and vaccines. This has had catastrophic consequences for the region, as has been the case all over the world.

Examples of misinformation that has spread in the Arab world during the pandemic are that the novel coronavirus is not of natural origin but was manufactured in a laboratory, that inhaling water vapor eliminates the virus, that wearing masks to prevent the spread of the virus causes a lack of oxygen in the body, and that vaccines against

Covid-19 contain genetic materials that alter human DNA. There have also been fake announcements promising financial assistance to those affected by Covid-19 (AFP Fact Check 2020b). These instances of misinformation, and many more, caused panic and negatively affected the Arab world's response to the pandemic, including people's willingness to get vaccinated.

Mis- and disinformation not only circulate over social media platforms and traditional media outlets, but also dominate people's conversations in cafes, at home, and at workplaces. Even political figures and decision makers have contributed to circulating misinformation. This has made it hard to counter the spread of the virus, with the result that it will take longer to overcome the pandemic. The Arab world has thus been led to an encounter with another type of dangerous epidemic—that is, an "infodemic." This is defined by the World Health Organization (WHO) as "too much information including false or misleading information in digital and physical environments during a disease outbreak. It causes confusion and risk-taking behaviours that can harm health" (WHO n.d.).

Conspiracy theories and disinformation about Covid-19, as mentioned above, are just a few examples of the extent of the infodemic. Other instances include the disinformation that spread in the Arab world after the murder of French teacher Samuel Paty by a hardline Islamist on October 16, 2020, and the killing of three people in a terrorist attack inside the Notre Dame Basilica on October 29, 2020, increasing sectarian tensions among Muslims around the world. Misleading news was disseminated about the perpetrators of the attacks, about reactions against France in the world, about violations against Muslims in France, and so on (AFP Fact Check 2020a).

To take another example, in Lebanon, mis- and disinformation spread via social media platforms, especially WhatsApp, during the revolution of October 17, 2019. The unprecedented protests against the Lebanese political system and systemic corruption were accompanied by various types of fake news that misled both the public and the media. Reports and documents disseminated included a fake version of the government reform paper and a fake list containing the names of the incoming ministers. There were fake reports declaring a state of emergency, copying decision makers' voices and misleading the public with false statements. Photos were edited in order to incite viewers. These fake news items affected the course of the popular movement, encouraged violence on the streets, and spread panic amongst the Lebanese people (Maharat Foundation 2020). Fake news continues to be disseminated in the context of the ongoing economic and financial crisis in the country.

In Iraq, a scathing sectarian rhetoric spread on social media sites in 2020 after rumors circulated about the arrest of the owner of a car loaded with explosives in the Shiite-majority Dhi Qar region. The rumors alleged that this person had come from the Sunni-majority city of Tikrit.[1]

Notwithstanding the countless examples of mis- and disinformation in the region, the Arab world has not been completely taken in by this. Many organizations and initiatives, despite their work being limited and recent, have combated and continue to combat the spread of mis- and disinformation. Such initiatives have come about despite the lack of research regarding information disorder and its causes and effects in the Arab world and the impact and viability of these entities and initiatives, how they operate, and their approaches.

The types of mis- and disinformation targeted by these initiatives are not limited to a single context; among other areas, they cover the political, economic, social, security, health, cultural, artistic, sports, and technological sectors.

> The Arab region has witnessed many crises and upheavals in recent years, especially since the Arab Spring in 2011, including revolutions in Tunisia, Egypt, Syria, Yemen, and Libya. This is in addition to regime changes, significant elections, and economic crises such as the one in Lebanon. The most recent in the series of crises is the Covid-19 pandemic, which was ongoing at the time of writing.

This exploratory study was carried out by Arab Reporters for Investigative Journalism (ARIJ) through the Arab Fact-Checkers Network (AFCN), in cooperation with the University of Cape Town (UCT) in South Africa. It aims to identify the efforts, at all levels, that have been made to counter information disorder in twenty-two Arab countries and to identify the key actors in this area. The study explores the nature of these efforts to combat information disorder, where they are undertaken, and the institutions responsible—their objectives, approaches and methodologies, and the challenges they face. In addition, we studied the environment in which these entities and responses operate, especially in relation to freedom of opinion and expression, freedom of the press, and the right to access information. The study also explores the gaps that remain, to identify areas that should be targeted in future to limit the impact of information disorder.

# 2. OBJECTIVES AND SCOPE OF THE STUDY

This study provides an overview of the entities that are currently active in the fight against information disorder in the MENA region, and the methods and responses they use. It also discusses and analyzes legal and human rights issues and the context of freedom of opinion and expression in which these entities operate.

The study aims to answer the following main questions:

1. How is information disorder understood in the region? What are its most prominent manifestations?
2. What types of actors are combating information disorder in the region and what responses do they provide?
3. What are the main sources that fund these entities?
4. What challenges do these entities face, at all levels?
5. Do these different actors cooperate amongst themselves? What obstacles stand in the way of this cooperation?

The responses observed among media institutions, civil society organizations, international organizations, and government bodies in the region in the fight against information disorder include:

- fact-checking platforms and initiatives
- initiatives that enhance media and information literacy
- legal responses
- academic responses
- technological initiatives
- the use of artificial intelligence (AI) in the field.

This study focuses on the five most important and/or most frequently used responses in the region:

1. Fact checking and the evaluation of media content
2. Media, information, and digital literacy
3. The response of official and government organizations
4. Legal responses
5. The use of technology and AI.

In summary, this study explores the efforts being made in the fight against information disorder in the region and the challenges that active actors in the field are facing. It emphasizes the need for improvement in the combating of mis- and disinformation in a region that has been affected extensively by wars, political tensions, corruption, and the suppression of freedom of expression and freedom of the press.

# 3. METHODOLOGY

This study is based on descriptive, qualitative, and quantitative research methods. We monitored a large number of organizations and initiatives that combat mis- and disinformation in the region, and the various types of responses. We analyzed the work and efforts of a number of these initiatives as case studies by conducting interviews and collecting data through questionnaires.

We first completed the process of monitoring various types of initiatives and responses in the twenty-two Arab countries that make up the MENA region (Lebanon, Syria, Jordan, Palestine, Iraq, Egypt, Sudan, Tunisia, Libya, Algeria, Morocco, Saudi Arabia, United Arab Emirates [UAE], Qatar, Kuwait, Oman, Bahrain, Yemen, Somalia, Mauritania, Djibouti and Comoros). Next, we conducted interviews with different entities and initiatives from fourteen Arab countries, with a total duration of more than twenty hours. A fact-checking questionnaire was sent to thirty-two platforms, initiatives, and organizations in fourteen countries. A questionnaire on the legal response in combating fake news was sent to eight lawyers who specialize in media legislation in eight Arab countries.

We faced many challenges during the four months of work. The most notable of these are the following:

- A number of government agencies in Saudi Arabia and Egypt refused to cooperate or grant us interviews.
- A number of organizations and individuals in Bahrain, Jordan, Egypt, and Tunisia refused to complete the questionnaires.
- A number of entities refused to conduct interviews via Zoom. They preferred to receive questions and send responses via email.
- With a number of entities, repeated communication was needed before they would agree to cooperate with us.
- A number of entities refused to have their names and positions mentioned in the study, for the sake of safety and for the preservation of their privacy.
- Due to a lack of media interest, there was insufficient data on a number of initiatives and the types of responses they use.

- There was insufficient information on initiatives in a number of countries, such as Oman, Djibouti, Comoros, Somalia, and Mauritania.

In the following section of this study, we analyze the state of fact checking in the Arab world. Who are the active actors in the fact-checking arena? How are they participating in the fight against mis- and disinformation? What challenges are they facing and what are the solutions proposed to overcome these challenges?

# 4. FACT-CHECKING PLATFORMS AND ORGANIZATIONS

Fact checking is not a new concept in the Arab world. Just like the term "fake news," it has become a buzz word in recent years. Platforms and websites specializing in fact checking began to emerge in the region immediately after the revolutions during the Arab Spring of 2011 and the concomitant deterioration of security and the political situation in a number of these countries. The period of the Arab Spring was characterized by a massive flow of false and misleading information, which was used by political regimes as well as their opponents to influence the course of events.

This study therefore discusses organizations and initiatives that have been combating information disorder in the region during the decade since the Arab Spring. Before 2015, there were a small number of platforms working to refute rumors and to correct fake news and publications on social networking sites. More of these platforms have been established in recent years, particularly during the Covid-19 crisis in 2020 and 2021. These have played an important role in verifying information in Arabic, especially information on health-related issues that has been circulated through social networking sites and smartphone applications such as Facebook, Twitter, Instagram, WhatsApp, and Telegram.

As shown in Table 1, we were able to identify fifty-three fact-checking platforms, initiatives and organizations, spread across sixteen Arab countries: ten in Lebanon, two in Syria, four in Jordan, two in Palestine, two in Iraq, two in Yemen, four in Egypt, five in Libya, three in Morocco, three in Algeria, eight in Tunisia, one in Saudi Arabia, one in the UAE, two in Qatar, two in Oman, and two in Sudan. There is no regional networking framework or all-encompassing alliance for these initiatives, except for the AFCN, launched by ARIJ towards the end of 2020 in response to the spike in mis- and disinformation brought on by the unprecedented worldwide Covid-19 pandemic. Eight out of the fifty-three identified platforms and organizations are currently inactive. At the time of completion of this study, no fact-checking platforms existed in Kuwait, Bahrain, Somalia, Mauritania, Djibouti, or Comoros.

**Table 1:**
Fact-checking platforms, initiatives, and organizations in the MENA region (updated December 2021)

| Name of initiative | Country | Website and/or social media account | Status |
|---|---|---|---|
| Fact-o-meter | Lebanon | https://maharat-news.com/fact-o-meter | Active |
| Tahaqaq | Lebanon | https://twitter.com/TahaqaqLb<br>https://www.facebook.com/Tahaqaq.lb/ | Active |
| El3asas | Lebanon | https://twitter.com/el3asas<br>https://www.facebook.com/El3asas/ | Active |
| Kel Yom Iche3a | Lebanon | https://www.facebook.com/rumourskelyomiche3a | Inactive |
| Adwa2 | Lebanon | https://adwa2.org/ | Inactive |
| The 961 Fact Check | Lebanon | https://www.the961.com/fact-check/ | Active |
| Annahar Tatahaqaq | Lebanon | https://bit.ly/2Rmz7ec | Active |
| Fake News + LelTawdih | Lebanon | https://bit.ly/3397I1W<br>https://bit.ly/3qsauvz | Active |
| Check | Lebanon | https://www.facebook.com/check.leb | Active |

| Name of initiative | Country | Website and/or social media account | Status |
|---|---|---|---|
| AFP Fact Check | Lebanon | https://factuel.afp.com/ar/list/all/all/all/38563/37<br>https://twitter.com/AFPfactMENA<br>https://www.facebook.com/AFPfactMENA | Active |
| Verify | Syria | https://www.verify-sy.com/<br>https://www.facebook.com/Verify.syr/<br>https://twitter.com/VeSyria<br>https://www.instagram.com/verify.sy/ | Active |
| Mazbout Maghlout | Syria | https://www.facebook.com/mazbout.m<br>https://twitter.com/mazboutar<br>https://www.instagram.com/mazbout.m/ | Active |
| Misbar | Qatar, Jordan | https://misbar.com/<br>https://www.facebook.com/MisbarFC<br>https://twitter.com/misbarfc<br>https://www.instagram.com/misbar.fc/ | Active |
| Akeed | Jordan | http://www.akeed.jo/ar/<br>https://www.facebook.com/Akeed.Jordan<br>https://twitter.com/Akeed_Jo | Active |
| Fatabyyano | Jordan | https://fatabyyano.net/<br>https://www.facebook.com/Fatabyyano<br>https://twitter.com/fatabyyano_com<br>https://www.instagram.com/fatabyyano/ | Active |
| Saheh Khabarak | Jordan | https://www.facebook.com/sahehkhabarak/<br>https://twitter.com/skhabarak | Active |
| Kashif | Palestine | http://kashif.ps/<br>https://www.facebook.com/PalKashif/<br>https://twitter.com/Pal_kashif | Active |
| Tayqan | Palestine | http://tayqan.net/<br>https://www.instagram.com/TayqanPs/<br>https://www.facebook.com/TayqanPs<br>https://twitter.com/TayqanPs | Active |
| Tech 4 Peace | Iraq | https://t4p.co/<br>https://www.facebook.com/Tech4Peace/<br>https://twitter.com/iQTech4Peace<br>https://www.instagram.com/Tech4Peace/ | Active |
| Saheeh Iraq<br>(established by Saheeh Masr) | Iraq | https://twitter.com/SaheehIraq<br>https://www.facebook.com/saheehiraq | Active |
| Sidq | Yemen | https://www.facebook.com/SidqYem/<br>https://twitter.com/SidqYem<br>https://www.instagram.com/sidqyem/ | Active |
| Fact Yemen | Yemen | https://www.facebook.com/factyemen<br>https://twitter.com/FACTYEMEN | Active |

| Name of initiative | Country | Website and/or social media account | Status |
|---|---|---|---|
| Akhbar Meter | Egypt | https://akhbarmeter.org/<br>https://www.facebook.com/akhbarmeter<br>https://twitter.com/akhbarmeter | Active |
| Saheeh Masr | Egypt | https://www.saheeh.news/ar<br>https://twitter.com/SaheehMasr<br>https://www.facebook.com/SaheehMasr/ | Active |
| Matsda2sh | Egypt | https://matsda2sh.com/<br>https://www.facebook.com/matsda2sh/<br>https://twitter.com/matsda2sh<br>https://www.instagram.com/matsda2sh/ | Active |
| Da Begad | Egypt | https://dabegad.com/<br>https://www.facebook.com/DaBegad/<br>https://twitter.com/DaBegad<br>https://www.instagram.com/DaBegad/ | Active |
| Annir | Libya | https://annir.ly/<br>https://twitter.com/AnnirLibya<br>https://www.facebook.com/AnnirLibya<br>https://www.instagram.com/AnnirLibya/ | Active |
| The Truth Seekers Center | Libya | https://tscly.org/<br>https://www.facebook.com/tscly.org/ | Active |
| Sabr | Libya | https://www.facebook.com/SabrPlatform/<br>https://twitter.com/sabrplatform?lang=ar | Inactive |
| Tahra | Libya | https://tahra.ly/<br>https://www.facebook.com/Tahra2021/<br>https://twitter.com/Tahraly | Active |
| Falso | Libya | https://falso.ly/<br>https://www.facebook.com/Falso.ly<br>https://www.instagram.com/falsoly/ | Active |
| Tahaqaq | Morocco | https://tahaqaq.ma/<br>https://www.facebook.com/tahaqaq.ma/<br>https://twitter.com/tahaqaqma<br>https://www.instagram.com/tahaqaq.ma/ | Active |
| Mati9ch | Morocco | https://www.facebook.com/mati9ch.ma<br>https://mati9ch.com/<br>https://www.instagram.com/mati9ch.ma/ | Active |
| The Moroccan Laboratory for the Observation of Fake News | Morocco | https://bit.ly/3hYNT5o | Inactive |
| Stop Rumors Algeria | Algeria | https://stoprumors.net/<br>https://www.facebook.com/StopRumorsDz/<br>https://twitter.com/stoprumorsdz<br>https://www.instagram.com/stoprumorsdz/ | Active |

| Name of initiative | Country | Website and/or social media account | Status |
|---|---|---|---|
| Fake News DZ | Algeria | https://www.facebook.com/FakenewsDZ/<br>https://www.instagram.com/fakenewsdz/?hl=en | Active |
| Fake News Monitor | Algeria | https://www.facebook.com/anti.propagandadz/ | Inactive |
| Falso | Tunisia | https://falso.tn/<br>https://www.facebook.com/falso.tn/<br>https://twitter.com/falsotn<br>https://www.instagram.com/falso.tn/ | Active |
| ICheck | Tunisia | https://icheck.tn/<br>https://www.facebook.com/icheck.tn/<br>https://twitter.com/icheck_tn | Active |
| Nawaat Fact Check | Tunisia | https://nawaat.org/tag/nawaat-fact-check/?lang=ar | Active |
| BN Check | Tunisia | https://www.businessnews.com.tn/bncheck<br>https://www.facebook.com/BusinessNewsOfficiel<br>https://twitter.com/businessnews_tn | Active |
| Alsaheeh Men Alghalet | Tunisia | https://diwanfm.net/<br>https://www.facebook.com/DiwanFM/ | Active |
| Tunisia Check News | Tunisia | https://tunisiachecknews.com/<br>https://www.facebook.com/Tunisiachecknews | Active |
| Tunifact | Tunisia | https://www.facebook.com/Tunifact/?fref=tag<br>https://twitter.com/tunifacttn<br>https://www.instagram.com/tunifact/ | Active |
| Trust News Tunisia | Tunisia | http://trustnews.tn/<br>https://www.facebook.com/trustnews.tn<br>https://twitter.com/TrustNewsTn<br>https://www.instagram.com/trustnews.tn/ | Active |
| No Rumors | Saudi Arabia | http://norumors.net/<br>https://twitter.com/No_Rumors<br>https://www.facebook.com/NoRumors<br>https://www.instagram.com/To_Rumors/ | Active |
| Circulating Rumors | UAE | https://twitter.com/eshaa3at | Inactive |
| Eekad | Qatar | https://www.facebook.com/Eekadfacts<br>https://twitter.com/EekadFacts<br>https://www.instagram.com/eekadfacts/?hl=en | Active |
| Sanad (Al Jazeera) | Qatar | Internal fact-checking unit at Al Jazeera | Active |
| Oman Without Rumors | Oman | https://twitter.com/rumorsoman?lang=ar | Active |
| No Rumors Oman | Oman | https://www.instagram.com/no_rumors.om/ | Inactive |
| Karrib | Sudan | https://www.karrib.com/ | Inactive |
| Sudan Fact Check | Sudan | https://twitter.com/sudanfactcheck | Active |

Fifty-three may seem like a large number of platforms and organizations. However, in reality, this is not enough to fact check facts in a region raging with political crises, wars, revolutions, and financial crises, and where disinformation abounds, especially since many of these initiatives are working voluntarily and are composed of small teams with limited resources. The right to access information is generally not upheld in the region, while the press faces restrictions, especially in the case of independent outlets. Therefore, these platforms are up against big challenges.

Moreover, as will be detailed below, a large number of these platforms and initiatives emerged through volunteer efforts by journalists and activists who recognized the great need to contribute to the fight against information disorder in their countries, even with almost non-existent human and material resources. For funding, most of these organizations rely on international organizations, donations, and individual funding. A few larger organizations and platforms for fact-checking services in Arabic have emerged, such as AFP Fact Check, Fatabyyano, Misbar, Tech 4 Peace, and a few others.

## 4.1 CHARACTERISTICS OF FACT-CHECKING INITIATIVES, PLATFORMS, AND ORGANIZATIONS IN THE REGION

We analyzed the work of fact-checking platforms in the region and the challenges they face. We then sent a questionnaire to thirty-two platforms, initiatives, and organizations in fourteen Arab countries. We received twenty-six responses from thirteen countries: two from Algeria, three from Egypt, one from Iraq, two from Jordan, four from Lebanon, three from Libya, one from Morocco, two from Palestine, one from Saudi Arabia, one from Sudan, two from Syria, three from Tunisia, and one from Yemen.

The organizations that responded to the questionnaire were mostly fairly young. The majority (sixteen out of twenty-six) were established between 2019 and 2021, while the remaining ten were established between 2012 and 2018. This suggests that the massive spread of misleading and false information in the Arab world during the Covid-19 crisis encouraged the establishment of specialized initiatives and organizations dedicated to fact checking, because of the crucial role that it can play in confronting mis- and disinformation.

The organizations use different organizational and funding models. Eleven of the twenty-six initiatives are registered companies, while eight are volunteer-based initiatives, four are individual initiatives, and three are affiliated with media platforms. Most of these platforms and organizations obtain their funding from international organizations and individuals. Most of them work with fewer than ten employees or volunteers.

The organizations aim to create awareness of their work by building a public profile. Most of these initiatives and organizations have websites and accounts on various social media sites, while three of them also use smartphone applications (see Table 1).

While most of these organizations focus on fact checking in a local context, some of them have a regional and global scope. Fourteen of these initiatives and organizations focus on fact checking within a local (national) context. One is active regionally and two are active in a global framework, while a further nine focus on the national, regional, and international frameworks, particularly during important and international events that might interest Arab readers.

The focus of these initiatives, organizations, and platforms is mainly on checking political news, followed by social content, and then health and economic content. These are followed by government content, government speeches, and political promises. The technological, artistic, cultural, and sports spheres occupy the lowest levels of interest. Due to the many political, social, and economic crises that Arab countries are experiencing, these are not considered to be priority areas.

Many of these initiatives, organizations, and platforms are not very active, because they face financial constraints and their teams are small and composed of volunteers. Five of them verify only one piece of news or content per day; fourteen of them verify between one and five items per day; five of them verify between five and ten items per day. Only two of them verify between ten and twenty items per day. Although most of these platforms allow the public to send them news, photos, videos, and other types of content for verification purposes, audience interaction with these platforms is fairly low across the region.

> Many of these initiatives, organizations, and platforms are not very active, because they face financial constraints and their teams are small and composed of volunteers.

Only ten out of the twenty-six platforms and organizations describe audience interaction with them on their websites and through social media sites as "high." Observation of the accounts of most of these platforms on social media pages shows weak interaction in terms of likes, comments, and shares. This may be due to several reasons, the most important of which is the lack of experience of these platforms in promoting their content in an attractive manner, their inability to reach a wider audience, and Facebook's restriction of some Arabic content under the pretext of violation of its community standards.

Some of these organizations lack a formal, clear, detailed set of principles, methodologies, or correction policies. Some are run by volunteers, some lack stable funding, some work with very small teams, and some are still beginners.

## 4.2 CONCEPTUALIZATIONS OF INFORMATION DISORDER

The concept of information disorder is still vague and complex in the Arab world. All twenty-six platforms targeted by the survey agree that information disorder refers to the massive spread of mis- and disinformation, especially through social networking sites. This affects people and distorts their views and knowledge negatively.

According to these platforms, information disorder in the region appears in various ways, including the spread of disinformation among different political parties, attempts by government to direct public opinion, media wars between political entities, and attempts to fuel armed conflicts by spreading disinformation in conflict zones. This is in addition to attempts to exploit security issues and the political situation in certain countries to create confusion and social rifts.

> These organizations see many causes for the spread of information disorder in the region. Some of these are political, regional, and religious divisions; external interventions; conflict in war zones; media blackout policies and the lack of transparency by governments. This is in addition to the division of the media scene and control over the media. Other factors include poor political awareness, poor media literacy, and the generally poor fact-checking abilities among citizens in a setting where democracy and good governance are lacking.

Additionally, the organizations agree that those who benefit from information disorder in Arab countries are the ruling regimes, political parties, warring parties in states embroiled in conflict, external beneficiaries, religious organizations, and non-professional media outlets.

The majority of the fact-checking organizations said that government agencies in their countries are not working to confront information disorder. In their opinion, the main reasons for this is that they themselves benefit from information disorder and are a primary source of it. Governments are also not transparent, and combating information disorder is not on their list of priorities. Additionally, they do not have the expertise, staff, or time needed for this type of work.

## 4.3 CHALLENGES FACING THE PLATFORMS AND REQUIREMENTS TO DEVELOP THEIR WORK

Most fact-checking initiatives who completed the questionnaire confirmed that there is a lack of cooperation among the entities who are active in the fight against information disorder in the region. The reasons for this are varied, with the most prominent being intense competition, the practice of copying fact-checked pieces due to unprofessionalism and a "scoop" mentality, poor communication, the lack of a unified fact-checking guide in Arabic, differences in orientations and interests, and security concerns.

The twenty-six initiatives and organizations that responded to our questionnaire face many challenges. The most significant of these is lack of funding and poor financial capabilities, followed by difficulty in accessing reliable information, data, and sources. Further challenges include a lack of staff training and development, a lack of public interaction and interest, the inability to reach a larger audience, a lack of legal protection, and the insufficient use of technology that could facilitate their work.

In order to continue developing their work, the initiatives and organizations need more funding and material support, as well as training and development of expertise. Access to reliable information and data must be promoted, and the tools used by the organizations need to be further developed. They also require legal support and protection.

As for the solutions that could effectively combat the spread of mis- and disinformation in the region, in their responses to the questionnaires, the organizations focused on six main solutions, listed here in order of importance:

1. Fact-checking platforms must be developed, and more work needs to be done to develop and support fact checking in the region.
2. Technology and AI must be used in combating the spread of fake news.
3. Media and digital literacy must be included in the curriculum in schools and universities.
4. Local communities must be targeted through awareness and education programs.
5. More government efforts on the ground and at all levels are required.
6. Legislation must be drafted and enacted to combat fake news and/or strengthen the legal framework in this field.

## 4.4 CASE STUDIES: EIGHT FACT-CHECKING PLATFORMS IN THE REGION

We conducted interviews with representatives of eight platforms from seven countries: Kashif, from Palestine; Tech 4 Peace, from Iraq; Sidq, from Yemen; Verify, from Syria; Falso, from Libya; Tahaqaq, from Morocco; Akhbar Meter, from Egypt; and Saheeh Masr, also from Egypt. The interviews focused on these platforms' objectives, approaches, challenges, and development needs.

### KASHIF

Kashif, the Palestinian Observatory for Verification and Media Education, is one of two fact-checking platforms in Palestine. It works through a small volunteer team to verify information and detect violations.

The founder and director of Kashif, journalist Bakir Abdel-Haq, asserted that the observatory's work and performance developed very quickly, and that its methodology is developing constantly. He added that it greater support is needed so that they can implement all the ideas they have (interview, July 2021).

Abdel-Haq mentioned the limitations they face in accessing a wide audience: "This is actually due to Facebook's policies, as it limits the reach of our posts related to Palestinian content."[2] Besides the lack of funding, the main challenges facing Kashif include the non-recognition of the right to access information in Palestine and the fact that government agencies do not cooperate with the organization.

**Table 2:** Overview of the operations of Kashif, the Palestinian Observatory for Verification and Media Education

| **KASHIF** | |
|---|---|
| Country | Palestine |
| Established | 2020 |
| Website | http://kashif.ps/ |
| Reach | Local, regional, and global, with a focus on Palestine |
| Languages | Arabic |
| Purpose | To combat disinformation in the Palestinian media<br>To ensure that media outlets and social media platforms adhere to publishing ethics<br>To spread a culture of verification in Palestine and encourage the critical reading of content |
| Methodology | Kashif strives to adhere to principles of accuracy, transparency, independence, fairness, and cooperation. It categorizes checked content based on the following categories:<br>• Content that has been manipulated<br>• Content that draws erroneous connections between events or contexts<br>• Wrong context<br>• Fabricated content<br>• Plagiarized content<br>• Misleading content<br>• Satirical content.<br>It does not have a correction policy. |
| Nature of work | Fact checking, combating hate speech, reports on violations in published content, enhancing media literacy, and conducting workshops on verifying information |
| Social media presence (as of January 2022) | Facebook: more than 49,000 followers (https://www.facebook.com/PalKashif)<br>Twitter: more than 200 followers (https://twitter.com/Pal_kashif) |

| Tech 4 Peace | |
|---|---|
| Country | Iraq |
| Established | 2016 |
| Website | https://t4p.co/w |
| Reach | Local |
| Languages | Arabic and English |
| Purpose | To check news content published online through social media sites |
| Methodology | Tech 4 Peace utilizes a news verification mechanism. It has a privacy policy, a correction policy, and a transparency policy. |
| Nature of work | Fact-checking, awareness campaigns, conducting training in verification and digital security, and so forth |
| Social media presence (as of January 2022) | Facebook: more than 1,188,000 followers (https://www.facebook.com/Tech4Peace/?ref=page_internal)<br>Twitter: more than 169,000 followers (https://twitter.com/iQTech4Peace)<br>Instagram: more than 614,000 followers (https://www.instagram.com/tech4peace/)<br>YouTube: more than 19,000 subscribers (https://www.youtube.com/c/tech4peace) |

**Table 3:** Overview of the operations of Tech 4 Peace

In terms of the weaknesses of fact-checking platforms in the region, Abdel-Haq highlighted that there is little cooperation among some platforms. Some platforms even compete with one another. He added: "Competition is necessary, but integration is the most important element."

## TECH 4 PEACE

The Tech 4 Peace platform was established in 2016 to refute and discredit false news and rumors that were circulating extensively in Iraq as a result of the difficult political and security conditions that the country was experiencing, especially due to ISIS's occupation of many cities in the country. A great deal of fake and misleading news was spread by ISIS and its supporters on social media and different online platforms at that time, with the aim of gaining people's support and encouraging them to affiliate with the terrorist organization.

The platform has grown, and so have its audience and projects. It started with a small team, which developed into a larger team of employees and volunteers. From fewer than 6,000 followers on social media sites, its following has grown exponentially, as is detailed in Table 3.

The platform maintains impartiality in a country that is rife with political rivalry by not exempting any political party from the fact-checking process. Besides issues of funding, security risks constitute one of the most prominent challenges facing the platform and its administrators. Security concerns have forced them to conceal their identities and to operate confidentially. The director of Tech 4 Peace, Aws Al-Saadi, confirmed that the platform and its staff members are subjected to threats and extortion; they face legal complaints and numerous obstacles in terms of security and their daily administration and operation (interview, July 2021).

In addition to obtaining funding and legal protection, the platform needs to develop its operating mechanism and to obtain accreditation by the International Fact-Checking Network (IFCN). Thus far, only two institutions in the region have obtained this accreditation, namely Fatabyyano from Jordan and Fact-o-meter from Lebanon; several other organizations are in the process of becoming IFCN-verified signatories.

As for the weaknesses of fact-checking platforms in the region, Al-Saadi noted: "The checking and publishing processes are very slow. This is in addition to the fact that some platforms steal content from others."

## SIDQ

Sidq is the only fact-checking platform in Yemen, in addition to one new initiative called "Fact Yemen." The country has been ravaged by years of civil war, which makes it the perfect environment for the spread of mis- and disinformation.

The team of ten people and twenty volunteers that make up Sidq work secretly in order to protect themselves. Sidq's website is inactive, but its social media accounts are very active in publishing corrections of fake news and rumors spread through

| **SIDQ** | |
|---|---|
| Country | Yemen |
| Established | 2019 |
| Website | https://sidqyem.com/ (inactive at the time of writing) |
| Reach | Local |
| Languages | Arabic |
| Purpose | To expose rumors and fake news |
| Methodology | The methodology is undefined and unclear.<br>There is no correction policy or code of principles. |
| Nature of work | Fact checking, awareness campaigns, training programs |
| Social media presence (as of January 2022) | Facebook: more than 267,000 followers (https://www.facebook.com/SidqYem)<br>Twitter: fewer than 11,000 followers (https://twitter.com/SidqYem)<br>Instagram: more than 6,500 followers (https://www.instagram.com/sidqyem/)<br>YouTube: more than 400 subscribers (https://www.youtube.com/channel/UCumFNG0IH78K-nFI6YUBuQA) |

**Above: Table 4:** Overview of the operations of Sidq

**Below: Table 5:** Overview of the operations of Verify in Syria

| **VERIFY** | |
|---|---|
| Country | Syria |
| Established | 2016 |
| Website | https://verify-sy.com/ |
| Reach | Local, regional, and global, with a focus on Syria |
| Languages | Arabic, English, and Turkish |
| Purpose | Verify is a non-profit fact-checking journalistic project that aims to reduce disinformation in the media and its impact. |
| Methodology | Its methodology is based on identifying content and sources, analyzing content and sources, drawing inferences, and evaluating content.<br>It classifies verified content into the following categories:<br>• Fraudulent, which includes lies, misleading news, conspiracy theories, and lies related to science<br>• Tampering, which includes errors, bias, and manipulation of facts<br>• Confusion, which includes misleading headlines, satire, and information that is out of context or unconfirmed.<br>The principles it follows are independence, accuracy, clarity, balance, objectivity, integrity, and groundedness.<br>It has a code of conduct and a correction policy. |
| Nature of work | Fact checking, workshops, and fellowship programs (during which they train people in fact checking and work with them for a period of time) |
| Social media presence (as of January 2022) | Facebook: more than 159,000 followers (https://www.facebook.com/Verify.syr/)<br>Twitter: more than 26,000 followers (https://twitter.com/VeSyria)<br>Instagram: more than 19,000 followers (https://www.instagram.com/verify.sy/)<br>YouTube: more than 780 subscribers (https://www.youtube.com/c/Verifysy) |

social media in Yemen. The platform also focuses on awareness-raising campaigns by publishing videos about how to verify information and the dangers of fake news.

The platform's director, Abdullah Al-Masoudi, explained that Sidq has succeeded in maintaining its neutrality against the background of the conflict in Yemen (interview, July 2021). This has been made feasible especially because its team is made up of people with diverse political orientations, representing all parties to the conflict. Sidq also scrutinizes content related to all parties, without exception.

Security concerns prevent the team from appearing in public and from revealing their identity. According to Al-Masoudi, the Sidq platform faces many other challenges, including difficulty in accessing information and a lack of certain skills among team members. They are thus in need of development and training.

Al-Masoudi also confirmed the lack of cooperation among fact-checking platforms in the region. He believes that another weakness generally is that many platforms do not specialize in checking content originating from their countries only. This is in addition to the nature of the language used when writing about and explaining the fact-checking process to the audience, which is complex and therefore harder for the public or the ordinary reader to understand.

## VERIFY

Five years after the Syrian crisis, the Verify platform was launched in that country through its main office in Turkey. It was established when its founders noticed the massive spread of chaotic information, promoted by all conflicting parties.

The platform verifies news, photos, and videos spread about Syria, the region and the world. It also works with a specific methodology and criteria. When publishing results, it includes details regarding the verification process it followed and the sources it relied on.

According to its founder and director, Ahmad Primo, Verify relies on its ability to maintain neutrality. Primo explained that the platform faces many challenges, the most significant of which is financial. This prevents the platform from incorporating more development projects. Other challenges include the lack of accurate data, information, and sources in Arabic and difficulties in accessing information, which he considers to be "a problem that has no solution in our region." In addition to the lack of cooperation, Primo believes that the most prominent problems and weaknesses of fact-checking platforms in the region are imitation, copying of content, a lack of innovation, and a lack of specialization (interview, July 2021).

## FALSO

The Falso platform is one of the projects of the Libyan Center for Freedom of the Press and Media. It was launched in 2020 with the support of the German foreign ministry in light of the Covid-19 pandemic.

Falso focuses on Libyan issues. The platform is divided into two parts, with one section dedicated to monitoring hate speech across Libyan media outlets and another section dedicated to verifying news. The platform was established recently, and it works with a small team and a limited number of participants.

The platform's former editor-in-chief, Asia Ja'afar, stressed that the verification methodology adopted by the platform needs to be further developed. The platform also needs journalists who specialize in investigative journalism and news verification. Ja'afar stressed that Falso needs greater funding and more training for team members. This is in addition to many other challenges, among which are concerns regarding the safety of fact checkers and journalists in a conflict area like Libya. Accessing information is also a challenge, as is the lack of transparency in government institutions. There are other logistical challenges, such as poor electricity supply and internet access, which slow down the work (interview, July 2021).

Ja'afar pointed out that there are many outstanding fact-checking platforms in the region, "while there are also platforms that need to make more effort in verifying news and in the way stories are phrased."

## TAHAQAQ (MOROCCO)

The Tahaqaq platform in Morocco was launched through a voluntary initiative, run by young people, in order to combat the disinformation epidemic that started to sweep the country due to the Covid-19 pandemic in 2020.

Tahaqaq in Morocco, with a small team consisting of volunteers only, refutes rumors and corrects false news through its accounts on social media. The platform was established recently and is not very active in fact checking. However, one of the team's fact checkers, Yasmin La'abi, explained during an interview that the platform "is doing important work on the Moroccan digital scene. Recently, the United Nations Development Program

| **FALSO** | |
|---|---|
| Country | Libya |
| Established | 2020 |
| Website | https://falso.ly/ |
| Reach | Local |
| Languages | Arabic and English |
| Purpose | To monitor the quality of journalistic content and adherence to professional ethics related to hate speech and instigation<br>To combat rumors and disinformation and to encourage the Libyan public to report and verify information |
| Methodology | Falso verifies the coverage of current events and legal responses to instigation resulting from hate speech.<br>It verifies information and claims circulated by media outlets.<br>Misleading news is classified as confusing opinion, accusations without evidence, disinformation or biased news, sensational and false headlines, rumors, and fabricated photos and videos. |
| Nature of work | Fact checking, monitoring for professional breaches by the media, monitoring the Libyan media, and conducting workshops |
| Social media presence (as of January 2022) | Facebook: more than 19,000 followers (https://www.facebook.com/Falso.ly/)<br>Twitter: fewer than 100 followers (https://twitter.com/falso_ly)<br>Instagram: more than 600 followers (https://www.instagram.com/falsoly/) |

**Above: Table 6:** Overview of the operations of Falso

**Below: Table 7:** Overview of the operations of Tahaqaq (Morocco)

| **TAHAQAQ** | |
|---|---|
| Country | Morocco |
| Established | 2020 |
| Website | https://tahaqaq.ma/ (inactive at the time of writing) |
| Reach | Local, regional, and global, with a focus on Morocco |
| Languages | Arabic |
| Purpose | Combating fake news |
| Methodology | The methodology used is not defined or clear.<br>There is no correction policy or code of principles. |
| Nature of work | Fact checking and awareness campaigns |
| Social media presence (as of January 2022) | Facebook: more than 15,000 followers (https://www.facebook.com/tahaqaq.ma/)<br>Twitter: more than 280 followers (https://twitter.com/tahaqaqma)<br>Instagram: more than 72,000 followers (https://www.instagram.com/tahaqaq.ma/)<br>YouTube: fewer than 20 subscribers (https://www.youtube.com/channel/UC2hhqisKi6LJPC-wJPcDbxQ)<br>The platform also has WhatsApp and Telegram groups. |

(UNDP) invested in the platform and concluded a partnership with it on the Healthy Internet Project" (interview, July 2021).

The platform does not have a particular work methodology, code of principles, or correction policy, but La'abi confirmed that "the team works within an internal charter that guides the work." In addition to mentioning obstacles such as poor funding, a lack of skills, and difficulties in accessing information, La'abi highlighted that the platform aspires to reach a larger audience and circulate corrected news pieces in order to raise awareness among the public.

## AKHBAR METER

Akhbar Meter has been evaluating Egyptian media content since 2014. Up to 2018, the site did not receive any funding and was operating with the help of volunteers. Once the site started to receive funding, it developed its methodology and enhanced the standard of its evaluation of Egyptian media. It has also promoted media literacy and focused on providing workshops.

Akhbar Meter is made up of a small team of no more than seven people. Every year, the platform selects the ten most popular Egyptian news sites and then evaluates them periodically according to a specific methodology based on a mathematical equation. It assesses the quality of the content by answering nineteen questions, after which it ranks the sites from best to worst on a weekly, monthly, and annual basis.

The platform continuously strives to develop its work. The project manager, Dina Ibrahim, explained that the platform faces the challenge of a lack of funding, like all other platforms. Other challenges include difficulties in accessing information and a lack of competency and expertise. Naturally, the platform tries as far as possible "to stay away from problematic issues and to preserve the safety of the team members" in light of the restrictions on freedom of opinion, expression, and the press in Egypt (interview, July 2021).

Ibrahim stressed that there is a large number of platforms working in the field of fact checking in the Arab world. In her opinion, the main problem is that "the interaction with these platforms is not great. If there were innovative ways to urge people to interact with them, this would lead to great success."

## SAHEEH MASR

This platform was established in 2019 by a group of Egyptian journalists who work confidentially to protect their identities due to restrictions on the freedom of opinion, expression, and the press in Egypt. The Saheeh Masr platform is one of very few platforms in the region that focuses on fact checking statements made by officials, politicians, and decision makers. The platform developed quickly: It started by correcting statements made by officials, public figures, and media professionals and moved on to publishing reports on issues relevant to public opinion and on misinformation

**Table 8:** Overview of the operations of Akhbar Meter

| **AKHBAR METER** | |
|---|---|
| Country | Egypt |
| Established | 2014 |
| Website | https://akhbarmeter.org/ |
| Reach | Local |
| Languages | Arabic and English |
| Purpose | Akhbar Meter is a digital media observatory that evaluates the content of Egyptian media websites based on their credibility and commitment to professional and ethical standards. |
| Methodology | Akhbar Meter evaluates content and news pieces on the basis of nineteen questions related to the criteria of professionalism, credibility, and respect for human rights.<br>After evaluation, each piece of content receives a score, between 0% and 100%, to indicate its compliance with professional and ethical standards. |
| Nature of work | Fact checking, evaluation of media content, promotion of media literacy, and workshops |
| Social media presence (as of January 2022) | Facebook: close to 100,000 followers (https://www.facebook.com/akhbarmeter)<br>Twitter: more than 1,140 followers (https://twitter.com/akhbarmeter)<br>Instagram: more than 3,400 followers (https://www.instagram.com/akhbarmeter/) |

| SAHEEH MASR | |
|---|---|
| Country | Egypt |
| Established | 2019 |
| Website | https://www.saheeh.news/ |
| Reach | Local |
| Languages | Arabic |
| Purpose | To fact check statements made by officials, politicians, media professionals, and decision makers<br>To fact check information circulating on social networking sites |
| Methodology | Saheeh Masr has adopted a detailed methodology based on selecting claims and presenting corrections.<br>The types of content they work with include false claims and misleading news reports, images, or videos.<br>The platform has its own code of ethics and correction policy. |
| Nature of work | Fact checking statements made by officials and decision makers and verifying information |
| Social media presence (as of January 2022) | Facebook: more than 554,000 followers (https://www.facebook.com/SaheehMasr/)<br>Twitter: more than 18,200 followers (https://twitter.com/SaheehMasr) |

**Table 9:** Overview of the operations of Saheeh Masr

circulated by media outlets about these issues. Saheeh Masr also corrects information on photos and blogs posted on social media sites as well as news published in newspapers and on news sites. It has published video reports that revealed conflicting statements made by officials on an issue. The platform is currently in the process of establishing a unit that will specialize in producing open-source investigative reports.

The platform prefers to maintain its anonymity and the privacy of its nine-member team. A member of the team who was interviewed by the researchers asserted that the platform's scrutiny of the statements made by Egyptian officials is crucial. The interviewee stated that this "helps citizens arrive at mature opinions and judgments, without succumbing to the falsification and the disinformation circulated by the media owned by the authorities or by those who oppose it. It also helps citizens in forming opinions in an equitable manner to determine the correct and responsible choices during elections" (interview, July 2021).

On a daily basis, the platform checks three or four different statements by Egyptian officials and decision makers. Its level of interaction with members of the public on social media sites is very high. It tries to maintain impartiality through "avoiding political, religious or ethnic biases. The platform also scrutinizes statements and news pieces regardless of the political, religious, or ethnic identity of the speaker."

The platform faces many challenges, including security. Additionally, the fact that the team members cannot reveal their identities makes it difficult to communicate with live sources to obtain information and facts. The lack of legislation on the right to access information in Egypt and the insufficient amount of government and official information available online also hinder the platform's work.

What the platform needs most in order to develop its work is legal protection. According to the team, "Working anonymously limits our capabilities, but working without the security provided by anonymity is not safe in Egypt." According to those in charge of the platform, the reasons why fact-checking platforms in the region tend to steer clear of statements by officials are "the fear of prosecution for security breaches and the fear of confrontations with the authorities, as well as the lack of a culture of liability and accountability."

## 4.5 ARIJ AND THE AFCN

Towards the end of 2020, ARIJ launched the AFCN in order to counter the escalation in mis- and disinformation during the Covid-19 crisis. The AFCN's work focuses on the lack of cooperation among fact-checking organizations and platforms in the Arab world, and also on the challenges these platforms face, especially the lack of Arabic resources and the need for training.

The main objectives of the AFCN are to support organizations to uphold the regulations and principles related to fact checking and to support fact-checking platforms and independent fact checkers in the region. The network also aims to protect fact checkers, develop their fact-checking skills and capabilities, and build their skills in critical thinking and data analysis.

ARIJ has been fiercely combating information disorder in the Arab world even before the launch of the AFCN. It has done so by strengthening investigative and accountable journalism and through applying a strict fact-checking methodology to its investigations before publication. This is in addition to the pre- and post-fact-checking training it provides.

It is crucial to note that there are very few media organizations in the region that fact check their content before publication or that have fact-checking units within their teams. Therefore, the numerous and diverse fact-checking platforms in the Arab world are trying to work with the capabilities available to them under difficult security and political circumstances. These platforms face huge challenges in accessing information and due to a lack of expertise. Additionally, they work under conditions of poor legal protection and restrictions of freedom of opinion and expression. These platforms generally have poor methodologies and limited capabilities, while also facing intense competition from one another. They do not cooperate amongst themselves. Despite all this, there is no doubt that they make a great effort to combat information disorder in the region and that they require substantial development and support in order to contribute more successfully towards the fight against the spread of disinformation.

In the next section of this study, we focus on media and information literacy efforts in the Arab world, analyzing some success stories as well as emerging initiatives. We also answer the following question: When will Arab governments recognize the importance of media and information literacy in raising awareness and combating information disorder?

# 5. MEDIA LITERACY

In 2007, UNESCO (the United Nations Educational, Scientific and Cultural Organization) proposed the concept of media and information literacy. Since then, the world has seen many projects and initiatives aimed at promoting the concept, especially among the youth and students. According to UNESCO's definition, media and information literacy "constitutes a composite set of knowledge, skills, attitudes, competencies and practices that allow to effectively access, analyze, critically evaluate, interpret, use, create and disseminate information and media products with the use of existing means and tools on a creative, legal and ethical basis" (UNESCO IITE n.d.). Today, media literacy and its incorporation into educational curricula are no longer optional. There is no argument about the fact that this strategy can be a sustainable and effective response to counter the explosion of mis- and disinformation in the world.

Building societies that are capable of analyzing and evaluating media content and the information received through all available means is crucial to combating information disorder. The ability of the public to assess the validity of information and to distinguish true information from false news would greatly reduce the potential for the circulation and publication of mis- and disinformation.

The concept of media literacy is not new in the Arab world, but the region is certainly still in the early stages of circulating, promoting, and creating interest in this concept, especially in terms of governments and ministries of education. The countries in the region have no national or official policies or strategies for media and information literacy—with the exception of Jordan, which recently launched a national initiative for the promotion of media and information literacy.

Even though governments in the region do not seem to value the importance of promoting media literacy, it is taught as part of the curricula of many schools and universities. There are specialists and academics in this field in the Arab world, and in many countries initiatives and organizations have emerged that focus on promoting and developing media literacy through preparing local curricula, publishing studies in the field, and engaging in awareness-raising campaigns. They also conduct workshops for the youth and university and school students on the concepts, principles, and skills related to media literacy. These workshops have been partly supported by UNESCO, which considers media literacy one of the basic rights of citizens and therefore recommends its inclusion in curricula.

We identified many initiatives and programs centered on enhancing media literacy in a number of Arab countries, mostly in Lebanon, Jordan, Palestine, and Tunisia (see Table 10). These initiatives vary in terms of size, reach, capabilities, and other characteristics. Most of them were launched by educational, media, youth, and civil

| Initiative/program | Country | Website/social media platform |
|---|---|---|
| Media and Digital Literacy Academy of Beirut (MDLAB) | Lebanon | https://mdlab.lau.edu.lb/ |
| Lebanese Association for Rehabilitation and Awareness | Lebanon | https://laraa.org/home/en |
| Media and Information Literacy Center | Jordan | https://www.jmi.edu.jo/en/mil-media-center |
| The Palestinian Youth Association for Leadership and Rights Activation (PYALARA) | Palestine | https://pyalara.org/projects/25.html |
| Media Literacy Project in Iraq | Iraq | https://mlpiraq.wordpress.com/ |
| DigiTale | Egypt | https://www.facebook.com/DigiTale2.0 |
| Sudanese Center for Media and Information Literacy | Sudan | https://www.facebook.com/Sudanesecentermil/ |
| Media Education Libya | Libya | https://bit.ly/3yiuwKg |
| Media Research and Education Center (CREM) | Morocco | https://www.facebook.com/crem.maroc/ |
| Media and Info Literacy Algeria | Algeria | https://bit.ly/2UORIS3 |
| Tunisian Association for Media Education | Tunisia | https://bit.ly/3y5XE7N |
| Edu Media Tunisie | Tunisia | https://www.edumedia.tn/en/ |
| Alternative Media | Tunisia | https://bit.ly/3y8MVcx |
| Tamakan Media | Oman | https://www.facebook.com/Tamakan.media |

**Table 10:** Media literacy programs and initiatives in the Arab world

organizations. It is evident that media literacy is still underdeveloped in many other Arab countries.

Despite the many efforts and initiatives, media literacy specialists in the region agree that Arab countries are just beginning to initiate and strengthen media literacy. Many obstacles hinder the existing efforts and slow down the introduction of media and information literacy into school curricula. Unfortunately, many Arab governments and educational systems have not yet recognized the benefits of integrating media literacy into basic education. They do not realize that such an education would enhance students' critical thinking abilities when dealing with media outlets and social media, and would therefore help counter the spread of mis- and disinformation.

> In spite of the abovementioned obstacles, a number of important initiatives and programs have emerged in Arab countries. A number of these are presented in the following subsections, along with a discussion of what they have achieved and the challenges they face.

## 5.1 JORDAN

### THE NATIONAL PLAN TO DISSEMINATE MEDIA AND INFORMATION LITERACY

Jordan's national plan to disseminate media and information literacy (2020–2023) was launched by the Ministry of Culture, in cooperation with the Ministry of Education, the Ministry of Higher Education and Scientific Research, the Ministry of State for Information Affairs, the Ministry of Youth, and the Jordan Media Institute. In July 2020, the strategic plan was approved for the adoption of media and information literacy.

The initiative aims to integrate media and information literacy concepts and skills into the educational system at schools and universities and in the activities of youth and civil society organizations, which constitute the target of the initiative. With regard to targeting schools, the aim is to introduce media literacy concepts and skills into the curricula. As for universities, curricula and training manuals for students will be developed. Additionally, the strategic plan for spreading media literacy in Jordan includes establishing media education clubs in a number of schools, universities, and cultural and youth organizations.

The initiative launched an electronic portal, Thekatna, which covers its projects and activities.

The initiative produced a number of awareness-raising videos that tackle various topics, including rumors and false news; verifying photos, videos, and news sources; disinformation; and media ethics. The initiative has also launched many contests targeting a Jordanian audience, including "I Understand," "I Observe," and "I Participate in." In "I Observe," for example, the participant is asked to fact check a local or foreign rumor by following a specific model.[3]

At this point, it is hard to assess the effectiveness of the initiative or the extent to which the strategy has been implemented, since it has just been initiated. However, what is certain is that the Jordanian government's decision to adopt the concept of media literacy is a fundamental step. This will enhance awareness of the concept among young people and students significantly. Once developed, this type of educational initiative will have significant positive effects in the long run. Jordan will also serve as a model for other Arab countries that have not yet realized the importance of adopting media literacy.

### THE MEDIA AND INFORMATION LITERACY CENTER AT THE JORDAN MEDIA INSTITUTE

In 2016, the Jordan Media Institute launched a media literacy project in cooperation with UNESCO and with funding from the European Union (EU). This formed the core of the national project for media literacy adopted by the Jordanian government.

The institute's Media and Information Literacy Center has been working for years to spread and promote the concept among the youth and students. The center focuses on developing educational and training curricula and guides in the fields of media and information literacy. It organizes training programs for the youth and conducts studies, public opinion polls, and periodic surveys regarding the state of media literacy. This is in addition to promoting concepts and skills related to media education among educational and youth organizations.

> The institute's Media and Information Literacy Center has been working for years to spread and promote media literacy among the youth and students.

The institute and the center have issued many publications in the field of media and information literacy (Jordan Media Institute n.d.). The most prominent of these are the following:

- *Media and Information Literacy: Guidebook on Understanding Modern Media and Communications.*[4]
- *Media and Information Literacy: News Literacy Guidebook*:[5] This work focuses on how news is collected and asks the following questions: Is all the news broadcast by the media truthful? What is disinformation? How do we check the credibility of the news? How can we differentiate news from rumors?
- *Media and Information Literacy: Digital Media Literacy Guidebook*[6]
- *Teachers' Guidebook for Media and Information Literacy at MIL School Clubs*[7]
- *Media and Information Literacy Textbook for Universities*[8]

In addition to publishing a number of awareness-raising videos, the center organizes annual training programs on media and information literacy, targeting school students, teachers, graduates, journalists, and government employees.

The former director of the media literacy project at the Jordan Media Institute, Bayan Al-Tal, stressed that the institute has introduced media literacy into school curricula (interview, June 2021). There are units about this concept in the textbooks for grades 7, 8, and 10. Moreover, media literacy will be integrated into the curricula of grades 1 to 12.

Al-Tal pointed out that a partnership has been concluded with two Jordanian universities in the north and south, which have listed a media literacy course as part of their requirements. She also stressed that in its media literacy project, the institute focuses on combating mis- and disinformation through training in information verification and media ethics.

According to Al-Tal, one of the most significant challenges facing the development of media literacy in Jordan is the general lack of competency in Arabic. She believes that the only way to ensure that an entire generation has media literacy skills is to include this in the curriculum at universities and schools; the various projects alone will not have the desired impact.

## 5.2 LEBANON

The Media and Digital Literacy Academy of Beirut (MDLAB) was established in 2013 with the support of the American and Norwegian embassies in Beirut, UNESCO, and other global institutions. The academy is affiliated with the Media Research and Training Institute at the Lebanese American University (LAU), and it promotes media and digital literacy not only in Lebanon but in the entire Arab region by providing training and developing curricula and materials.

Through the academic summer session, which has been held every year since its establishment, MDLAB trains university and school professors, students, activists, and journalists from various Arab countries on media literacy skills. During the sessions, the academy focuses on the verification of information as a foundation of media literacy.

> Media literacy is taught in many Lebanese universities and schools today, even if not as a subject in itself. Through training and curriculum building, the academy's efforts have resulted in the introduction of media literacy courses in more than sixty universities in the Arab world, and in courses like "Introduction to Media and Society" and "Introduction to Communication."

Despite the great effort and progress made by the academy, it still faces significant challenges in promoting media literacy. The Lebanese Ministry of Education has not cooperated with the academy to introduce media literacy into public schools and universities on a large scale, as was the case in Jordan. The reason, according to the founder of the academy, Dr. Jad Melki, is "the great chaos in Lebanon and the confusion over many internal issues and political problems." In his opinion, this led to "limiting progress in the field, although we spearheaded it. Now, many countries have surpassed us" (interview, June 2021).

In terms of academic work and civil society, Lebanon has made good progress in media literacy. However, ongoing political, economic, and security crises continue to hamper development. Melki has called on the Lebanese Minister of Education to prioritize the "adoption and introduction of media literacy in schools and universities."

## 5.3 PALESTINE

In 2014, the Media and Information Literacy Program was launched and implemented by the Palestinian Youth Association for Leadership and Rights Activation (PYALARA), in partnership with the Ministry of Education, the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), and the Deutsche Welle Academy, and with the support of the German Federal Ministry for Economic Cooperation and Development.

The program aims to train and educate people on media and information literacy. It works with schools and teachers, public relations and media education figures in the Ministry of Education, universities, journalists, and civil society organizations. The Ministry of Education has also incorporated media literacy into the national curriculum; so far, it has been integrated into nineteen courses from Grade 5 to high school.

In 2017, PYALARA issued a media literacy guide for teachers,[9] which combines the theoretical framework of media literacy with practical and experiential aspects. The association is also aiming to launch an interactive center for media literacy, which would mainly target school students and teachers.

The program coordinator, Helmi Abu-Atwan, asserted that there are numerous challenges facing the development of media literacy in Palestine. The most significant of these are low budgetary allocations for media and information literacy and the lack of specialists and training in the field. This is in addition to other obstacles, such as the classification of Palestine as a region due to its occupation by Israel (interview, June 2021).

Media literacy is not highly developed in Palestine, but in Abu-Atwan's opinion, the region is on the path to success. He considers "the Palestinian experience as pioneering among Arab countries." He stressed the need to continue training and for the state to provide support for media literacy. It should also be integrated better in schools and universities, and media outlets should focus on launching awareness programs in the field.

PYALARA is not the only organization spreading media literacy in Palestine; there are other institutions and initiatives, such as the Kashif Observatory and the Media Development Center[10] at Birzeit University, among others.

## 5.4 TUNISIA

The Tunisian Association for Media Education[11] was established in 2013 by a group of media professionals and educators to teach and promote media literacy through events, workshops, and seminars. In 2018 and 2019, the association signed agreements with both the Ministry of Youth and Sports and the Ministry of Education to teach a course on media literacy at the primary level. In 2020, the association signed an agreement with the Ministry of Women, Family, Children and the Elderly, with the aim of bringing a focus on the media into children's education clubs (Espace Manager 2020).

Tunisia has other organizations and initiatives that promote media literacy, including the Tunisian Association for Alternative Media,[12] which was established in 2013 by a group of Tunisian journalists and civil society activists to introduce the Tunisian youth in the region to good journalistic practices. There is also the Media Literacy Project in Tunisia,[13] which is a digital educational tool focused on raising awareness about the media and enhancing critical thinking skills. Many videos, resources, and articles on verifying information and sources have been presented through this platform, along with materials on distinguishing accurate information from propaganda, and so forth.

Tunisia has not yet attained an advanced level of media literacy. The director of the Tunisian Association for Media Education, Najih El-Missaoui, explained that despite various attempts, media literacy has not been successfully introduced into educational curricula in schools or universities. El-Missaoui asserted that Tunisia today has only a few clubs, activities, and training courses on media literacy, and there is no tendency at the official level to consider media literacy a priority. In addition to the financial and economic problems in Tunisia, El-Missaoui said that there are "many logistical challenges to the development and promotion of media literacy in the country" (interview, June 2021).

## 5.5 BAHRAIN

In March 2020, the Bahraini Ministry of Education announced that a media course had been devised for the secondary level and would be included in the curriculum in 2022. It will cover general media concepts and elements, media ethics, and media-related skills such as assessment and production. The course will educate students on how media outlets work and on how users can evaluate content and participate on media platforms.

Dr. Fawaz Al-Shorooqi, a Bahraini specialist in media literacy, explained that the course has been designed for students at secondary level. Once the results have been analyzed, plans will be made to expand the course to other levels (interview, June 2021).

Today, media literacy is taught in a number of Bahraini schools and through various courses. Al-Shorooqi explained that what is required is for "private organizations to supplement the role of those in charge of education in Bahrain by promoting media literacy in other sectors of society apart from the student sector." In his opinion, one of the most significant challenges facing the country in the promotion and development of media literacy is the need for permanent and continuous follow-ups "due to the many changes in media work and its nature."

## 5.6 EGYPT

Egypt is still lagging far behind in media literacy, especially due to the suppression of freedom of opinion and expression, the control that the state exercises over media institutions, and the restrictions on civil society organizations. According to El Ghetany (2017), the most significant challenge in terms of the promotion of media literacy in Egypt is that the government does not consider media literacy a priority. This is in addition to overloaded curricula and a lack of resources needed to train teachers.

Najla'a Al-Omari, an Egyptian media advisor and expert in media literacy, stated that Egypt's lack of interest in media literacy is "due to the absence of a serious call by the key actors. Moreover, officials are reluctant about the media and afraid of everything related to it because this is a particularly sensitive topic in Egypt" (interview, June 2021).

## 5.7 CONCLUSION

Based on our analysis and the interviews we conducted with six media education experts from six different countries, we can deduce that the region is not very advanced in media literacy. This is despite the many promising initiatives and developments and despite the many recommendations that national policies be set to promote media literacy and to incorporate it into curricula at both school and tertiary level.

Many logistical and material challenges remain. These include a lack of competencies and a lack of training and resources in Arabic. Additionally, the ministries of education in most Arab countries underestimate the importance of promoting media literacy and integrating it into curricula. This type of literacy would have a significant positive impact on citizens, who are exposed to various types of fake and misleading media content on a daily basis.

It should be noted that in June 2021 the Council of Arab Ministers of Information urged Bahrain to start implementing its proposal to organize and host a seminar on the integration of media literacy in curricula for all levels (Alrai 2021). However, these exhortations will remain hollow unless they are followed up by implementation plans and genuine national policies to disseminate and enhance media education.

The promotion and development of media literacy in the Arab world today is crucial in order to combat misinformation and the spread of false news. Fact checking is not enough, and legislation criminalizing the circulation of false news can be and has been used to suppress freedom of opinion and expression. There are no real official policies in the Arab world to combat information disorder. Media literacy has the potential to build a mature society that understands media messages and knows how to distinguish accurate news from mis- or disinformation.

In the next section of this study, we shed light on the governmental efforts and initiatives in the fight against information disorder in the region. Are these efforts enough? And are they contributing positively, or are Arab governments trying to control information and shield themselves from criticism by launching these initiatives?

> “Promoting media literacy will limit the spread of mis- and disinformation because people will use their critical thinking abilities.”

**Helmi Abu-Atwan**
Coordinator of PYALARA,
Palestine

> “The only way to raise awareness among people is to provide them with media literacy skills so that they are capable of distinguishing misinformation from truthful news stories.”

**Dr. Bayan Al-Tal**
Former director of the media literacy
project at the Jordan Media Institute

**Dr. Jad Melki**
Founder of MDLAB, Lebanon

> “Media literacy helps in combating mis- and disinformation as it helps in many other areas. We push for media literacy and not media education or awareness, because literacy lasts a whole lifetime.”

**Dr. Fawaz Al-Shorooqi**
Specialist in media literacy,
Bahrain

> “The biggest role of media literacy is to raise the level of awareness of citizens so that they are qualified to distinguish truthful from false and misleading news.”

**Najih El-Missaoui**
Director of the Tunisian Association
for Media Education

> “We should raise awareness among school and university students about the dangers of mis- and disinformation and their impact on public safety and behaviour. This requires a clear approach, as well as diligent work at the level of training and awareness.”

# 6. GOVERNMENTS' ROLES IN COMBATING INFORMATION DISORDER

Since the Arab Spring, the MENA region has been in a state of political and economic turmoil, in addition to experiencing security problems. There have been many conflicts and crises; some of these include the outbreak of civil wars in Syria, Libya, and Yemen; the suffocating economic crisis in Lebanon; regime change in Egypt; and a rift between the Gulf region and Qatar. Moreover, the region has witnessed the emergence and decline of the terrorist organization ISIS. This is in addition to many other events that were accompanied by sharp waves of mis- and disinformation, disseminated especially through traditional media, social media sites, and chat applications.

The regimes of the Arab countries might themselves sometimes be a source of disinformation, especially during elections and crises and when people's satisfaction levels with their governments decrease. This is especially the case in countries where freedom of expression and freedom of the media are absent. It is obvious that combating information disorder is not a priority for many Arab governments. However, the Covid-19 crisis prompted the majority of Arab governments to launch awareness campaigns against the spread of mis- and disinformation related to health issues and to promote accurate information about the virus and vaccines.

The largest number of initiatives launched by government organizations or ministries of information and media in a number of Arab countries were launched during the Covid-19 crisis. Before that point, only certain countries had realized the importance of combating rumors and disinformation, and initiatives were launched earlier in countries like Jordan, Iraq, and Egypt. For details of the most prominent initiatives, see Table 11. All these initiatives focus on refuting rumors, correcting false information, and running awareness campaigns through websites or pages on social media sites. We did not observe any other kind of response or any national policies devised to combat mis- and disinformation.

The study examined the official initiatives launched by Lebanon, Jordan, Egypt, Kuwait, and Saudi Arabia. The media center of the Egyptian Cabinet refused to communicate with us for an interview, and the Vision Realization Office in the Saudi Ministry of Information did not respond. We were able to conduct interviews with Fact Check Lebanon, of the Lebanese Ministry of Information; Haggak Taarif (It's Your Right to Know), of the Jordanian government; and Tahaqaq, of the Kuwaiti Ministry of Information.

**Table 11:** Initiatives by government agencies or ministries to combat information disorder in the MENA region

| Initiative | Government organization/ ministry | Country | Website or social media page |
|---|---|---|---|
| Fact Check Lebanon | Lebanese Ministry of Information and the National News Agency (NNA) | Lebanon | https://factchecklebanon.nna-leb.gov.lb/ |
| Haggak Taarif | Jordanian government | Jordan | https://haggak.jo/website/Default.aspx |
| Department of Rumors | Ministry of the Interior | Iraq | https://www.facebook.com/department.rumor |
| The Cabinet Information and Decision Support Center | Egyptian government | Egypt | https://www.idsc.gov.eg/Home/Index |
| Online challenge to detect fake news | Vision Realization Office at the Saudi Ministry of Media | Saudi Arabia | https://twitter.com/media_ksa/status/1372491783683334145 |
| Tahaqaq | Ministry of Media | Kuwait | https://tahaqaq.media.gov.kw/ |
| Guidelines for dealing with rumors, fake news, and disinformation | The media portal of the Ministry of Information | Oman | https://www.omaninfo.om/library/74/show/6136 |

## 6.1 LEBANON: FACT CHECK LEBANON

At the start of the Covid-19 pandemic in 2020, the Lebanese Ministry of Information and the NNA launched the Fact Check Lebanon website, in cooperation with the WHO, the United Nations Children's Fund (UNICEF), and the UNDP (UNICEF 2020). The site specializes in verifying fake news and aims to "help the public and the media access truthful information about fake news and rumors that are circulating, especially on the Internet."[14]

> The site classifies the news it verifies as "true," "unconfirmed," or "fake." Apart from political news, the site scrutinizes news related to health, the novel coronavirus, society, economy, and business. At the time of completion of this study, there were no posts in the technology and culture sections.

The site allows citizens to create accounts and to report rumors to be scrutinized by a team from the NNA, trained in fact checking by Agence France-Presse (AFP). The site does not have any social media accounts; news is published through the accounts of the NNA and the Ministry of Information.

The site does not show evidence of a clear or detailed work methodology for fact checking; only the tools used are indicated. Nor does the site contain a code of principles or a correction policy. An examination of the posted news reveals that the site is not very active and does not publish much apart from a few news pieces and videos.

The site primarily depends on communication with official sources to verify information. It shows a brief write-up of the conclusion of the verification process, but the process itself is not shown and no comparisons or clarifications are provided.[15]

Lebanese people rarely interact with the site, whether with the news posted on the site or with its social media pages.[16] The site may be viewed as an unreliable source by many Lebanese people, especially since it is affiliated with an official body in a country which has been experiencing severe political and economic crises since the end of 2019. Many people lost confidence in the political class after the October 17 Revolution of that year. Nonetheless, the importance of this initiative cannot be ignored, since it has contributed to refuting rumors that caused widespread confusion, especially in the sensitive circumstances that Lebanon finds itself in.

The director of the NNA, Ziad Harfouche, confirmed that the decision was made to launch the site "with whatever capabilities we had and with the work team we had." He stressed that the site "does not claim to be stemming or eliminating sources of false news but tries to limit its spread as much as possible" (interview, June 2021).

According to Harfouche, the most significant challenge facing the agency, besides the lack of certain capabilities, is that "it is an official agency. This means that it has the responsibility to correct false news. The problem is the inability to mention which media outlet published the false news, because this will get us into legal disputes, which we do not need." This challenge prompted the site to focus on scrutinizing news spread through WhatsApp and social media sites instead of focusing on media outlets.

## 6.2 JORDAN: HAGGAK TAARIF

In 2018, the Jordanian government launched an official electronic platform entitled Haggak Taarif (It's Your Right to Know) to verify information and deny rumors. The platform is not very active. It lists rumors and corrects them briefly based on communication with official authorities only. The platform also publishes some awareness-raising messages like "Steps to Dealing with Rumors," "The Harmful Effects of Rumors on Civil Society," and others.[17] The site clearly registers a low number of views.[18]

The platform has an application on Google Play and on the Apple Store. It also has an account on Facebook, which had more than 81,000 followers in July 2021.[19] Its Twitter account boasted more than 60,000 followers in July 2021, but the posts show low interactions.[20]

Besides sending queries, citizens also tend to direct a great deal of criticism towards the platform, questioning its work and its credibility. Some of the information posted by the platform was questioned and later revealed to be false. For example, someone described it as a content-free platform.[21] Another tweeted that Haggak Taarif cannot refute most of the news because it is true, so now it fabricates news and then refutes it,[22] and someone else argued that the platform had stopped denying rumors and turned into a school radio segment under the title "Do you know?"[23] Another citizen questioned the Jordanian Minister of State for Media Affairs about how much the platform costs and what has been accomplished since its creation.[24]

The platform is currently managed by only three part-time government employees. The administrator, Hamza Basbous, confirmed that the most significant challenge it faces as a government platform is the issue of people's confidence in the information it provides, "despite the great care taken to ensure accuracy and credibility." The platform's official nature also limits "its ability to tackle all kinds of rumors, as it focuses mainly on rumors related to official issues" (interview, June 2021).

Basbous explained that the platform is currently under development. He stressed that "official efforts alone are not enough to counter the danger of rumors and false news. This is a participatory and social responsibility that everyone should help to bear from their various positions, whether in the government, in the private sector, or as members of civil society."

## 6.3 KUWAIT: TAHAQAQ

In 2020, during the Covid-19 pandemic, the Kuwaiti Ministry of Information launched the Tahaqaq platform as part of an awareness-raising campaign to combat rumors.[25] This platform is different from others in the Arab region in that it does not fact check the information itself, but instead involves Kuwaiti citizens in the process. This is achieved by introducing people to fact-checking skills and the available tools and asking them to verify the content themselves so that the results can be posted on the website.

The user learns about content verification tools through educational videos and links to content published by a number of ministries. There are also links for communicating with the WHO via WhatsApp as a source of news about Covid-19. The site allows visitors to check any image or video and to send their feedback for publication by including a picture of the rumor, a picture of the correction, the text of the rumor, the text of the correct information, an explanation of how it was verified, and the source of the rumor.

This campaign is important because it allows the public to personally participate in the process of combating mis- and disinformation and encourages citizens to combat information disorder from home. However, the interaction of Kuwaitis with the campaign has not been very good, as the website only shows a small number of news pieces verified by citizens.

Abdul-Aziz Al-Janahi is the former head of the Initiatives Committee in the Kuwaiti Ministry of Information and the founder of the campaign. He said, "Often, government agencies or institutions carry out the task of verifying misleading news, but we have given citizens the opportunity to verify the news for themselves. This reflects a communal partnership between the state and individuals" (interview, June 2021).

Al-Janahi pointed out that sustainability was not the focus of this project. Its success "can be measured by the fact that we have added new investigating citizens who have acquired skills in this area. Success is not necessarily gauged by receiving many posts verified by citizens."

We were not able to find any civil society initiative or organization focused on fact checking in Kuwait, and Al-Janahi points out that there is no genuine national effort to address information disorder in the country.

## 6.4 EGYPT: INFORMATION AND DECISION SUPPORT CENTER

The Information and Decision Support Center was established in the Egyptian Cabinet in 1985 in order to support decision makers to make effective public policies in a participatory manner.[26] The center publishes research, studies, data, and reports. Recently, it has been issuing reports that refute rumors spread on social media sites or on electronic platforms in Egypt. This is done through communicating with official authorities.

> The center identifies controversial topics on social media and news sites and follows up on reactions to these topics. The center then analyses the topics and responses to clarify the facts. These reports are published via videos or photos on the accounts of the Egyptian Cabinet and on the social media pages of the Information and Decision Support Center.

In a 2019 press report, Na'ayem Zaghloul, the head of the Media Center of the Egyptian Cabinet, said, "There is a group of highly skilled youthful researchers, working inside the center to counter rumors over the course of 24 hours. They follow up on everything that is circulated by the media, and the response is published through the center through all available means" (Magdi 2019; authors' translation). Despite our repeated attempts, Zaghloul did not grant us an interview.

The center's social media pages show great interactions on the posts that refute rumors. However, a closer look shows that many of the comments are not related to the rumors being refuted; rather, the comments are complaints by Egyptian citizens about different issues in the country, or contain criticism or praise of the Egyptian leadership.

## 6.5 SAUDI ARABIA: A FAKE NEWS DETECTION CHALLENGE

In March 2021, the Vision Realization Office of the Saudi Ministry of Information launched a challenge to detect fake news in the media and on digital platforms (see Table 11). The challenge aims to generate innovative, legislative, and awareness-focused solutions to limit the spread of fake news. It targeted media professionals and academics as well as researchers in various media fields and university students in technical and media majors.

We tried to communicate with the Vision Realization Office to learn more about the challenge and the ministry's efforts to combat mis- and disinformation, but we received no response. We were thus unable to monitor any national policy or Saudi government initiative to combat information disorder.

## 6.6 OTHER INITIATIVES

Other Arab countries have also launched initiatives. For example, the Iraqi Ministry of the Interior launched an initiative for combating rumors in 2015, in the form of a Facebook page (see Table 11). It focuses on monitoring rumors circulating on the websites of media outlets and on social networking sites in Iraq. This raises important questions: How effective is the intervention of a security entity, such as the Ministry of the Interior, in a civil issue such as combating the spread of mis- and disinformation? And could this be used as a means of silencing government critics?

In 2020, the Omani government also launched a guide for dealing with rumors and false and misleading news (Omaninfo 2019). This was a part of the objectives of the 2019 and 2020 government communication plan targeted at Omani citizens. The guide tackles the concepts of rumors and false and misleading news. It explains how to deal with these and discusses the attendant legal aspects.

## 6.7 ENSURING ACCESS TO INFORMATION IN THE ARAB WORLD: WHERE ARE WE TODAY?

Not all of the initiatives launched by government organizations in Arab countries have achieved their desired goals. This is especially so in countries that do not enjoy freedom of opinion and expression or freedom of the press, such as Egypt and Saudi Arabia, where the state controls the entire media sector and attempts to suppress the few independent media outlets.

It is clear that Arab governments do not give the issue of combating mis- and disinformation the priority it deserves given the difficult political and economic circumstances. Many questions arise about the extent to which citizens trust the existing official initiatives and whether these only refute rumors that may harm the government. Questions can also be raised regarding the credibility of the content published by these initiatives, especially since Arab regimes may themselves be sources of disinformation. This may happen through the regime's control over information, its failure to guarantee the right to access information, and its attempt to protect itself from any criticism, especially when popular movements rise up against it and during periods of elections and crises.

The best action governments can take to mitigate the spread of mis- and disinformation is to ensure freedom of expression, freedom of the press, and the universal right of access to information, and to allow information to circulate freely. Across the region, interviewees confirmed that the difficulty they experience in accessing information greatly hampers their fact-checking work. Often, journalists are unable to work on certain cases because of the difficulty of obtaining information about them, and fact checkers are forced to stop checking some content because of similar challenges.

So far, only seven Arab countries have adopted legislation guaranteeing the right to access information through official organs. These are Jordan, Lebanon, Tunisia, Morocco, Yemen, Sudan, and Kuwait.[27] Laws exist in these countries, but complaints are continuously lodged by global and local organizations as well as by journalists and researchers about gaps in the legislation and about the failure to fully enforce it.

| Country | Website |
|---|---|
| Saudi Arabia | https://data.gov.sa/ |
| Oman | https://data.gov.om/?lang=ar |
| UAE | https://bayanat.ae/ar-ae |
| Qatar | https://www.data.gov.qa/pages/home/ |
| Bahrain | https://www.data.gov.bh/ar/ |
| Egypt | www.egypt.gov.eg |
| Jordan | https://portal.jordan.gov.jo/wps/portal/OpenData |
| Lebanon | https://impact.cib.gov.lb/home |

**Table 12:** Official data portals in various Arab countries

A policy paper titled "Access to Information in the Arab World," published by ARIJ in 2019, highlights the absence of such legislation in Egypt, Iraq, Syria, Algeria, Libya, Mauritania, Somalia, Djibouti, and Comoros. Moreover, there are no indicators that the Gulf states are close to passing laws that guarantee the right to access to information for their citizens. The paper recommends that Arab countries which have not yet passed legislation guaranteeing the right of citizens to access information adopt such laws. It also urges the countries that have approved such legislation to amend it to align with global standards and best practices (Shuqeir 2019).

Naturally, some Arab countries have policies and initiatives that guarantee access to certain types of information that are not restricted by the government and can be accessed and circulated. In addition to the official statistics centers, Table 12 lists a number of portals for official data permitted by a number of Arab countries.

Global and local organizations remain a primary source of information and data for Arab citizens, journalists, fact checkers, and researchers. Often, these organizations provide information on topics and issues that Arab governments do not provide or publish.

Certain policies and practices would effectively contribute to limiting the circulation of mis- and disinformation. These should ensure the right of citizens, journalists, and fact checkers to access information and data and must secure their right to communicate with official entities at all times. Additionally, official administrations should continuously publish on their websites all the data and information that they have regarding issues that concern people.

In the next section of this study, we discuss the legal and regulatory responses to information disorder in the Arab world, and we look into how the fight against disinformation and misinformation is being used as a pretext to suppress freedom of speech and freedom of press in the region.

# 7. THE LEGAL RESPONSE: SUPPRESSION OF THE FREEDOM OF EXPRESSION

In most Arab countries, allegations of "fake news" or "disinformation" are sometimes used as a pretext to suppress freedom of expression and silence government critics. Most of these countries have legislation with at least two or three articles that deal with media laws, publications, electronic and cybercrime, and the associated criminal laws. These combat the dissemination of false news and punish the publishers. The legislation imposes fines and imprisonment ranging from days to years on anyone who spreads false news or rumors, whether during war or in peacetime.

During the Covid-19 crisis, the following countries raised the penalties in their legislation:

- **Sudan:** Article 24 of the amendments to the Cybercrime Law of 2020 states that a person will be punished by imprisonment from one to four years or by flogging, or both, for publishing "false news or reports via the Internet, communications, or any information means or applications, threatening public peace or tranquility, or insulting the prestige of the state" (see Euro-Mediterranean Human Rights Monitor 2020).

- **Qatar:** Article 136 (bis) of Law No. (2) of 2020 amending certain provisions of the Penal Code promulgated by Law No. (11) of 2004 states: "Anyone who spreads, publishes or re-publishes rumors, statements, false or malicious news or sensational propaganda inside or outside the state, whenever it is intended to harm national interest, incite public opinion, or disturb the social or public order of the state shall be imprisoned for a period not exceeding five years with a fine not exceeding 100,000 riyals or by one of these two penalties" (Almeezan n.d.).[28]
- **Mauritania:** Article 3 of Chapter 2 of the Law on Combating the Manipulation of Information of 2020 states: "Anyone who posts misleading information or fake news online shall be punished by imprisonment from three months to a year with a fine ranging between 50,000 to 100,000 ouguiyas" (Republic of Mauritania 2020).
- **Somalia:** Article 29 of the Amendments on the Media Law of 2020 states: "Severe penalties shall be imposed for publishing false information, incitement, or spreading propaganda against the dignity of any citizen, individual, institution or government" (SJS 2020).
- **Algeria:** Article 196 (bis) of the Amendments of the Penal Code of 2020 states: "Anyone who deliberately publishes or promotes false or malicious news among the public for the purpose of harming public security or public order by any means shall be imprisoned from one to three years and fined between 100,000 to 300,000 Algerian dinars. The penalty is doubled in case of recurrence" (Elmouhami 2020).

In the past two years, some Arab countries have also tried to pass special laws related to information disorder or to amend existing articles in legislation, with potentially deleterious effects. These efforts failed due to pressure from civil society and human rights organizations. Below are some of these:

- **Jordan:** In 2021, the Parliamentary Legal Committee deleted the article related to publishing false information against any common person or legal entity with the intention of achieving personal gain. This article was removed from the bill amending the Integrity and Anti-Corruption Law of 2020. The Jordanian Center for the Protection and Freedom of Journalists opposed the amendment of the bill, since it impacted on freedom of expression and of the media (Parliament of Jordan 2021).
- **Iraq:** In 2021, the Iraqi Parliament announced that the Cybercrime Bill would be amended before being passed, to ensure that it protects freedom of expression instead of suppressing it. The bill would have enabled the Iraqi authorities to prosecute anyone for any online post the authorities did not approve of by deeming the content a threat to governmental, social, or religious interests (Sibbald 2021).
- **Morocco:** After heavy criticism in 2020, the Moroccan government decided to postpone the consideration of Bill No. 22.20 on using social media sites. Articles 16 to 19 of the bill state that publishing fake news is punishable by up to five years in prison when the intent is to harm "state security" (Kacha 2020).
- **Tunisia:** After objections were brought by Tunisian human rights organizations and associations, in 2020 Al-Mabrouk Karashid, an MP, retracted Bill No. 29/2020 on electronic slander and publishing fake news. The bill was submitted in a rush with a number of deputies and was presented under the pretext of combating false information (Samaro 2020).

During the Covid-19 crisis, a number of Arab countries saw an escalation of threats directed at citizens by governments, public prosecutors, ministries of interior, and even religious authorities. These were intended to warn citizens not to spread false news by any means. The following are some examples:

- **Syria:** In January 2021, the Ministry of the Interior warned that anyone who leaked or spread rumors or who interacted on suspicious pages would have to bear legal responsibility, in accordance with the provisions of the Penal Code and the cybercrime laws (Sana 2021).
- **Egypt:** According to a Cabinet statement in March 2020, the head of the council, Mostafa Madbouli, was designated to take legal measures against anyone who spreads false news and statements or rumors, related to the coronavirus or otherwise, with the aim of disturbing public security, spreading panic among citizens, or harming the public interest (State Information Service Egypt 2020).
- **Morocco:** In March 2020, as part of the precautionary measures taken by the authorities to combat the Covid-19 crisis, the Moroccan Ministry of Interior urged citizens to be wary of circulating false news attributed to official authorities

through modern communication means (Hespress 2020). Previously, Prime Minister Saadeddine Othmani had warned against publishing incorrect or false information about the spread of the coronavirus (Chef du Gouvernement, Royaume du Maroc 2020).

- **Algeria:** In April 2020, the Fatwa Committee of the Ministry of Religious Affairs issued a religious decree on rumors and exchanging news without verifying the source.
- **Saudi Arabia:** In February 2021, the Public Prosecution "banned the broadcast of rumors, publishing false news and information and everything that would mislead society, impact the security of the community and its health, or disturb the peace and tranquility of its members. Committing such harmful actions over social media sites has become a crime that warrants arrest."[29]
- **The UAE:** In April 2020, the Council of Ministers adopted a decision on the publication and exchange of information regarding health issues and diseases and misinformation related to health. It announced, "It is prohibited for any person to publish, republish or circulate false, misleading or incorrect instructions on health issues or information that is not announced officially … Based on this decision, fines of up to 20,000 Dirhams will be imposed on violators" (Emirates News Agency 2020; authors' translation).
- **Kuwait:** In March 2020, the Kuwaiti Public Prosecution announced a policy of zero tolerance of rumors spread about the coronavirus and stressed that the government would take maximum measures and decisions against anyone who spreads false news and rumors on websites or social media sites, in print media, or through audiovisual media (Kuna 2020).
- **Palestine:** In May 2020, the Attorney General warned against fabricating and circulating false news and rumors on social media sites, because of their harmful impact on society. Anyone who publishes false information, news, statements, or rumors on any website can be punished by law with imprisonment and a fine (Wafa 2020).
- **Oman:** In February 2020, the Public Prosecution issued a statement to announce that sending or resending false news or rumors that may harm the public order through technological means is a crime punishable by imprisonment for three years.[30]

> Arab countries have used the relevant legislation as an excuse to suppress freedom of opinion and expression in the name of combating false information and fake news. This has been carried out by applying pressure on the media; closing a number of outlets; and arresting and imprisoning journalists, activists, opponents and critics of the regimes, or influential political parties.

This has been highlighted in several reports issued by global organizations such as Amnesty International, Human Rights Watch, and Reporters Without Borders, in addition to local human rights organizations. There are plenty of examples, of which the following are only a few:

- **Iraq:** In April 2020, the Media and Communications Commission suspended the license of the Reuters office in the country for three months and imposed a fine of twenty-five million Iraqi dinars on it for publishing a report on the number of coronavirus infections (RSF 2020).
- **Egypt:** In March 2021, human rights activist Sana'a Seif was indicted on charges of spreading "false news" and "misusing social media sites" (Amnesty International 2021). According to the Human Rights Watch 2021 World Report, many arrests in Egypt were based on unfounded accusations, such as "spreading false news" (HRW 2021).
- **Morocco:** In April 2020, a Moroccan court ordered the arrest and prosecution of human rights advocate Omar Naji, under Article 447-2 of the Criminal Code. This threatens "anyone who broadcasts or spreads false claims or incidents with the intent of slandering people or harming their lives" with imprisonment of up to three years and a fine of up to 20,000 dirhams (Kacha 2020).
- **Algeria:** In April 2021, the Tamanrasset court refused to release journalist Rabih Karash, who is in temporary detention due to accusations of "spreading false news," as announced by the *Liberté* newspaper, for which he works (RSF 2021a).
- **Bahrain:** According to a 2020 Amnesty International report, Bahrain used Covid-19 as an excuse to further suppress freedom of expression. The Ministry of the Interior announced that the Cyber Crime Directorate assigned employees to "monitor and track offending [social media] accounts."

Accordingly, dozens of investigations and new prosecutions were conducted under Article 168 of the Penal Code, which criminalizes the circulation of false news (Amnesty International 2020a).

- **Kuwait:** According to a 2020 Amnesty International report, “the authorities detained and prosecuted at least 12 government critics and activists under provisions of the Cybercrime Law and Penal Code provisions that criminalize legitimate speech, including for offending the Emir, criticizing neighbouring countries or spreading false news” (Amnesty International 2020c).

Amnesty International has argued that the Gulf Cooperation Council (GCC) countries, specifically Bahrain, Kuwait, Oman, Saudi Arabia, and the UAE, used the Covid-19 crisis as an excuse to continue the suppression of the freedom of expression. As the virus spread in the GCC countries, all these governments issued statements warning residents of the criminal liability they would face if they spread false news or misleading information. In many cases, these governments have prosecuted people who posted content about the epidemic or about the government’s response to it on social media sites (Amnesty International 2020b).

Combating fake news and rumors has also been used as an excuse to protect the rulers in certain countries. For example, in the UAE, Article 29 of Federal Decree-Law No. (5) of 2012 on Combating Cyber Crimes states,

> *Shall be punished by temporary imprisonment and a fine not in excess of one million dirhams whoever publishes information, news, statements or rumors on a website or any computer network or information technology means with intent to make sarcasm or damage the reputation, prestige or stature of the State or any of its institutions or its president, vice-president, any of the rulers of the Emirates, their crown princes, or the deputy rulers of the Emirates, the State flag, the national peace, its logo, national anthem or any of its symbols. (Government of the UAE 2012)*

Arab countries consistently rank the lowest on the World Press Freedom Index, issued by Reporters Without Borders (RSF 2021b). Table 13 lists the classification of Arab countries in 2021.

The absence of a free press and the suppression of journalistic work lead to the spread of disinformation. Repressing freedom of expression, opinion, and the press—under the pretext of curbing the circulation of false news and by relying on legislation that is drafted using vague language—will never prevent the spread of mis- and disinformation in the region.

In order to analyze the legal status of the fight against misleading and false news in the region, we devised a questionnaire and sent it to eight lawyers who specialize in media and cybercrime law in eight Arab countries (Lebanon, Syria, Jordan, Palestine, Egypt, Yemen, Tunisia, and Mauritania).

All of the lawyers acknowledged that the legislation related to the publication of false news in their countries is used as a pretext to suppress freedom of opinion and expression, to arrest journalists and activists, to shut down websites, and to restrict online material. They also believe

**Table 13:** Rankings of Arab countries according to the 2021 World Press Freedom Index. (Source: RSF 2021b)

| Country | Ranking | Country | Ranking |
|---|---|---|---|
| Tunisia | 73 | Algeria | 146 |
| Comoros | 84 | Sudan | 159 |
| Mauritania | 94 | Somalia | 161 |
| Kuwait | 105 | Iraq | 163 |
| Lebanon | 107 | Libya | 165 |
| Qatar | 128 | Egypt | 166 |
| Jordan | 129 | Bahrain | 168 |
| UAE | 131 | Yemen | 169 |
| Palestine | 132 | Saudi Arabia | 170 |
| Oman | 133 | Syria | 173 |
| Morocco | 136 | Djibouti | 176 |

that the political authorities in their countries are using legislation related to combating false news in order to protect themselves from criticism and from the circulation of information that may be detrimental to them. Seven out of the eight lawyers agreed that the criminalization of "false news" and the imprisonment and prosecution of people who publish it is not a solution that will limit information disorder in society. Finally, all of the lawyers agreed with the standpoint of local, regional, and international human rights organizations, namely that false news must be considered a civil and not a criminal issue.

In assessing the legal status of the fight against false and misleading information in their countries, the eight lawyers view the legislation as contributing more to the stifling of freedom of expression than to the curbing of false news. They also believe that the legislation directly targets freedom of opinion and expression.

When asked about alternative civil solutions to combat false and misleading information, the lawyers suggested cancelling all criminal penalties related to the freedom of publication and adopting clear laws that set up civil retribution mechanisms in publication-related crimes, with the ensuing financial punishment. They also stressed the importance of raising awareness among citizens; supporting a digital culture of training users of social networking sites to deal with information critically; and allowing more freedom of opinion, freedom of expression, and information exchange.

> Tony Michael, a Lebanese lawyer specializing in media law, expressed concern regarding the escalating danger of mis- and disinformation in the Arab world. He emphasized that "the authorities control every part of the media, while the media are either affiliated with the authorities or are supportive of them."

He pointed out that "Arab regimes can fabricate information against the opposition or against those demanding a change in government." He said, "Often, these regimes are not harmed by false news but benefit from it by using it to suppress opposing opinions." Michael stressed that the spread of false and misleading information is increased by a lack of laws that guarantee the right to access information, a lack of transparency, and the failure of official administrations in Arab countries to provide information and data (interview, July 2021).

In discussing solutions, Michael highlighted that "laws in the Arab world must be revised to align with international charters of freedom of opinion and expression." He added that the most effective solution to the spread of mis- and disinformation is "to educate citizens; to have the media bear the responsibility for combating false and misleading news; and to develop a participatory approach towards this process, involving the state, civil society, the media, and academics." Moreover, he argued, "Misinformation and disinformation cannot be countered by laws, and any attempt to pass laws to combat it in the Arab world is futile. We have enough texts to intercept and block information."

In the next section of this study, we answer the following questions: Where is the Arab world today in terms of the use of AI and technology to contribute to the fight against mis- and disinformation? What are the challenges that hinder progress in this field?

## 8. THE ROLE OF TECHNOLOGY AND ARTIFICIAL INTELLIGENCE

The term "artificial intelligence" has recently become a buzz word in the Arab world, especially in journalism. There has been much talk about the need to take advantage of AI techniques in newsrooms, especially in news gathering, news production, and news distribution, in addition to the importance of automating fact checking to assist human fact checkers.

Machine-learning algorithms are used by Google, Facebook, Twitter, and other big tech companies to deal with trolls, detect and remove bot accounts, and proactively identify sensitive information.

Many fact-checking organizations around the world are working to empower fact checkers with the best tools. For example, Chequeabot is an Argentinian tool, developed by Chequeado, that automatically identifies claims in the media and matches them with existing fact checks.[31] The bot helps perform everyday tasks for fact checkers, many of whom are already using it in the newsroom. Full Fact, developed in 2019, is an AI tool that can detect and classify different types of claims and can be used, for example, to help fact check party manifestos.[32]

In some Arab countries, specifically Gulf countries, interest in AI has increased recently:

- In 2017 the UAE became the first country to appoint a Minister of State for Artificial Intelligence, Digital Economy and Remote Work Applications, with the purpose of "enhancing the government performance by investing the latest technologies and tools of artificial intelligence and applying them in various sectors" (UAE Cabinet n.d.). In that same year, the country developed its Artificial Intelligence Strategy 2031.[33]

- Saudi Arabia is the first country to grant citizenship to a robot. In 2019, the country also founded the Saudi Data and Artificial Intelligence Authority (SDAIA).[34]
- Qatar has developed a national strategy on AI (Ministry of Transport 2020).
- In 2019, the Egyptian government established the National Council for Artificial Intelligence.[35]

The 2020 Government AI Readiness Index, issued by Oxford Insights and the International Development Research Centre (IDRC), includes 172 countries. The UAE ranked 16th, Qatar and Saudi Arabia 37th and 38th respectively, Bahrain 43rd, Oman 48th, Kuwait 54th, Egypt 56th, Jordan 79th, and Morocco 99th. The ranking of other Arab countries was above 100, with Syria and Yemen occupying the last two slots (Oxford Insights 2020). Moreover, according to the Global AI Index issued by Tortoise Media, out of 62 countries Saudi Arabia ranked 20th, while the UAE ranked 33rd, Qatar 45th, Bahrain 52nd, Tunisia 55th, Morocco 56th, and Egypt 60th (Tortoise Media n.d.).

In 2018, a report by PriceWaterhouse-Coopers) predicted that by 2030 AI will contribute 320 billion US dollars to the economy in the Middle East—that is, the equivalent of 11 percent of gross domestic product (GDP) (PwC 2018).

The above shows that certain Arab countries, especially those in the Gulf region, are gradually making headway in the field of AI, while others, such as Lebanon, Sudan, Iraq, Libya, Syria, and Yemen, are still behind. However, the question is: What has been done so far in the Arab region in terms of implementing AI and technology to combat mis- and disinformation?

It is obvious that not much progress has been made so far and that the region is still lagging behind in this area. We were able to locate very few initiatives and organizations that use AI to combat disinformation. Two of these are discussed in the subsections that follow. It is important to generate tools that can help detect rumors and fake news and analyze Arabic content. This would save time and money, especially since false and misleading information spreads very fast, while checking information manually is time-consuming.

## 8.1 TANBIH, QATAR

Tanbih is a platform developed in 2019 by the Qatar Computing Research Institute (QCRI) of Hamad Bin Khalifa University.[36] It detects and analyzes mis- and disinformation by using AI and deep neural networks.

> The platform is a news aggregation portal and relies on a series of data-driven analytics to present profiles on media trends. It attempts to discover important information about the position of the media, its centrality, extreme biases, and directions. The news aggregation department primarily collates and analyzes articles that fall into certain themes. Through analysis, the platform arrives at the number of accurate and inaccurate pieces of information.

The platform also has another project about advertising and methods of persuasion.[37] The user sends a piece of text and the corresponding link, and then views the results of the analysis to determine the methods of persuasion used and the misleading elements in the text. In addition to general users, journalists working for Al Jazeera English use the tool to ensure that their material is free from persuasion tactics.

Shadin Sha'ar, a research assistant at QCRI and part of the small team that worked on developing the platform, said that the platform registers only fifteen entries per day and that only four institutions use its application programming interface (API),[38] examples being institutions affiliated with the UK Parliament and with Al Jazeera English. Sha'ar stressed that the institute seeks to "make these tools user-friendly" and to introduce them to a wider public (interview, June 2021).

Most of Tanbih's work so far has been in English. The QCRI aims to develop special tools that support Arabic. According to Sha'ar, the most significant obstacle is the lack of sources and databases in Arabic. Reputable organizations that can be relied upon in collecting verified information operate in English. It is difficult to obtain data in Arabic, and collecting these data for building models and tools takes a long time.[39]

## 8.2 STARS OF SCIENCE, MOROCCO

In 2020, Moroccan engineer Ouail Abroun participated in a program called Stars of Science, which was broadcast on many Arabic television channels. Abroun's project consists of an electronic platform that uses AI to help detect false news written in Arabic by analyzing a set of data that is divided into several sections, such as data that are out of context, and so forth.

This was an individual initiative by Abroun, because he realized that an idea like this "could make a big difference to people, especially during the corona[virus] outbreak and the massive spread of fake news" (interview, June 2021). Abroun designed the project and collected data for it. It has not yet been implemented, nor has anyone invested in it.

Abroun faced financial challenges while working on the project. He also had issues with the lack of data and research resources in Arabic. He stressed that Arabic is still an obstacle in the development of AI, due to the complexity of the language and the multitude of dialects, as well as the lack of data in the language. However, as Abroun pointed out, this also means that there is a good market for investment and development of the field in Arabic.

## 8.3 CHALLENGES IN THE USE OF AI IN THE REGION

Ali Srour, a data scientist and AI innovation consultant, confirmed that there are no prominent initiatives in the Arab world that use AI to combat mis- and disinformation, despite the current focus on research and studies related to the field. Srour stressed that the Arabic language remains a major obstacle, especially given the diverse dialects found among the countries of the region and among the different regions within each Arab country (interview, August 2021).

Other AI-related challenges in the region include a lack of the necessary expertise and a lack of awareness about the topic. Srour believes that organizations should create opportunities for the development of AI solutions by educating the public and the market about the importance of using AI tools to combat mis- and disinformation.

> Other AI-related challenges in the region include a lack of the necessary expertise and a lack of awareness about the topic.

In conclusion, it is clear that the region is lagging behind in the use of technology and AI to combat information disorder. However, the importance of AI in the Arab world is increasing. It is therefore both required and expected that in the future the focus will be on developing tools that use AI to combat the spread of mis- and disinformation in Arabic. Currently, the challenge remains to develop objective media content, develop the work and methodologies of fact-checking organizations, and promote media literacy.

In the next section of this study, we present a brief overview of the training available on information disorder and fact checking in the Arab world, and the studies that have been conducted on this topic.

# 9. TRAINING AND STUDIES ON INFORMATION DISORDER AND FACT CHECKING

Besides the ARIJ network, several organizations in the Arab world provide training on fact checking and combating disinformation. They include the Maharat Foundation in Lebanon, the Center for Studies and Economic Media in Yemen, the Kamal Adham Center of the American University in Egypt, and the Al Jazeera Media Institute in Qatar, in addition to many others.[40] These organizations provide workshops on issues related to mis- and disinformation as well as exercises on the concept and tools for verifying information.

In addition to the Al Jazeera Media Institute's recent efforts and investment in training, the institute has developed many manuals about disinformation and fact checking in Arabic, including the following projects:

- "Finding the Truth amongst the Fakes" (Dubberley, Marai, and Larrea 2017) is a publication that aims to help journalists improve their news verification and social newsgathering skills by drawing on the experience of Arab journalists and experts in the Arab world.
- "News Verification: A Practical Guide for Journalists to Verify Digital Content" (Al Jazeera Media Training and Development Center 2017) is a guide that aims to help journalists enhance their skills in news validation and verification.

Other sources include "Verification Handbook for Disinformation and Media Manipulation" (Silverman 2020), a definitive guide for investigating platforms and online accounts in order to reveal inauthentic activity and manipulated content. Furthermore, the Tunisian Association for Electronic Governance has issued a guide to fact-checking information (Belaid 2021). In the same year, the Jordanian Media Credibility Monitor (Akeed) developed a guide entitled "Media Coverage in the Time of Epidemics: Corona as a Case Study" (Darwich et al. 2021).

Training centers and civil society organizations have in recent years published studies in Arabic that explore information disorder. The following are a few examples from various countries:

- **Lebanon:** Melki, J., E. Hetti, M. Abou Zeid, and A. Takkech. 2020. "Confronting the Information Epidemic: The Uses of Media and Communication Means in Lebanon during the Pandemic." Institute of Media Research and Training at the Lebanese American University (LAU). https://bit.ly/3xbhU6z.
- **Palestine:** Masharka, S. 2020. "Misleading News in Palestine." Hamleh: The Arab Center for the Development of Social Media. https://bit.ly/3faihlI.
- **Jordan:** Atef, N., B. Mahdi, and B. Mostafa. 2020. "Combating Disinformation in the Arab World: Covid-19 as a Case Study." ARIJ. https://bit.ly/3j3blOg.
- **Bahrain:** Bahrain Center for Strategic, International and Energy Studies. 2019. "A Survey of the Bahraini Society's Opinion about Social Media Sites." https://bit.ly/3rEkEbv.
- **Qatar:**
  - Alrajji, M. 2018. "The False News Industry and the Loop of Information Blocking in Public Opinion." Al Jazeera Center for Studies. https://bit.ly/3yho5aw.
  - Al-Tamimi, N. 2018. "The Political Communication Model of Cambridge Analytica: Fabricating News and Engineering an Audience." Al Jazeera Center for Studies. https://bit.ly/3j1GMss.
  - Al-Doulaimi, A. R. 2018. "The Problems of Fabricated News and Its Impact on Shaping Public Opinion." Al Jazeera Center for Studies. https://bit.ly/3xb7CDv.

There are not many studies or manuals in Arabic that discuss and analyze mis- and disinformation. These could potentially foster a culture of critical thinking and fact checking among journalists and the public.

The Al Jazeera Media Institute, the Al Jazeera Studies Center, and the Al-Sahafa Journal[41] have made concerted and continual efforts to address these issues. Muhammad Al-Khamayseh, a researcher at the Al Jazeera Media Institute, asserted that the institute is "a pioneer in its focus on these issues in the Arab world, and it is committed to providing the latest knowledge in the field of media disinformation and verification" (interview, July 2021).

> Al-Khamayseh highlighted that one of the biggest challenges he faces while working on any study related to information disorder is "the lack of Arabic sources that address the various aspects of this issue."

He believes that there is a pronounced lack of studies on misinformation and disinformation in the Arab world and that the West is far more advanced in this area.

What, then, should studies and research focus on over the coming period? Al-Khamayseh believes that the focus should first be on "providing readers and journalists with knowledge on how media disinformation operates, so that they can avoid falling prey to it." Secondly, "studies should be conducted on the extent of journalists' knowledge of the tools, to evaluate that knowledge in order to examine gaps and address them through advanced studies and specialized training projects." Thirdly, "the extent of the decline of the public's confidence in the media as a major source of information has to be measured, and the reasons for this should be understood."

In the next section of this study, we explore collaboration between global and local organizations in the region to enhance fact-checking best practices.

## 10. COLLABORATION BETWEEN GLOBAL AND LOCAL ORGANIZATIONS

Most of the Arab organizations and initiatives that work to combat the spread of mis- and disinformation are supported and funded by global organizations. These organizations have also produced several notable projects in the region through awareness-raising campaigns, training sessions, and activities, and have contributed to the process of educating journalists and the public on the dangers of mis- and disinformation. The following are some examples:

- Meedan works through the Nawa Media project to train students from Yemen, Syria, Lebanon, and Palestine in verifying and monitoring media.[42] The students trace and evaluate media outlets in these countries, their editorial policies, and their affiliations by using the open-source “Check” tool that helps organize the data. The students also work with the Samir Kassir Foundation on a study about the performance of media outlets in these countries during the Covid-19 pandemic.[43] The project provides an open platform for media assessment in these countries to help the public understand information disorder in the region and what the sources of disinformation are.
- In Lebanon, the UNDP cooperated with the Dawaer Association in 2020 to launch a youth initiative, entitled “Truthful News Keeps You Healthy (صحتك من صحة الخبر), to track fake news in ten Lebanese regions.[44] The young people who were trained published a fake news and social stability guide in 2021 (UNDP Lebanon 2021).
- In 2021, the UNDP in Morocco announced a partnership with the Tahaqaq platform in the form of the Healthy Internet Project, which aims to increase citizens’ awareness of the need to verify information before circulating it (UNDP 2021).
- In Lebanon, UNICEF launched U-Report, a platform created to allow for the communal participation of young people, which has worked since the beginning of 2021 to refute rumors about Covid-19 vaccines. It has done so by raising awareness on social media sites and by sending accurate information about vaccines to citizens over Messenger or WhatsApp.[45]
- UNESCO has funded workshops on fact checking news and combating rumors at Birzeit University and Al-Quds Open University in Palestine during 2020.[46]
- In 2020, UNESCO and the Friedrich Naumann Foundation published a journalism training guide in Arabic about journalism and disinformation (Ireton and Posetti 2020).

All the above collaborations emerged with the spread of Covid-19 in the region, and have focused particularly on enhancing local organizations’ responses to the spike in mis- and disinformation in the unprecedented circumstances of the pandemic. These collaborations are critical in terms of sharing experience and expertise, and in assisting local organizations to make greater efforts in the face of a lack of funding and a lack of governmental efforts.

In the final section of this general overview, we close with some recommendations for actions that can be taken to build on the work that is already being done in the region to combat information disorder.

# 11. SUMMARY OF FINDINGS AND RECOMMENDATIONS

The focus of the entities concerned with confronting information disorder in the Arab world is, as we have seen, on fact checking, and all other responses form part of that project. There is a great need to develop and pay more attention to such responses in a region that is severely affected by political and economic crises. These conditions generate the need for a stronger confrontation of information disorder, as the latter usually has devastating effects on the members of societies, their thoughts, and their decisions.

To summarize, the most important findings of this study include the following:

1. The importance of fact checking is growing, but fact-checking organizations, platforms, and initiatives in the region face enormous challenges and obstacles. There is a significant need to develop their methodologies and skills, and a need for more funding to enable them to contribute more in the fight against mis- and disinformation.
2. The region is not very advanced in media literacy. This is despite the importance of media and information literacy, the many promising initiatives and developments in the field, and the many recommendations that national policies be set to promote media literacy and that it be incorporated into curricula at both school and tertiary level.
3. Combating mis- and disinformation is not a priority for many Arab governments. However, the Covid-19 pandemic prompted the majority of Arab governments to launch awareness-raising campaigns about the spread of misinformation related to health issues and to promote accurate information about the virus and about vaccines.
4. In most Arab countries that tend to suppress freedom of expression and the press, legislation criminalizing the publication of fake and misleading information has been used to suppress freedom of expression, silence government critics, and tighten access to information.

5. The region is lagging behind in the use of technology and AI to combat mis- and disinformation. There are many challenges obstructing progress in this regard, despite the increasing importance of AI in the Arab world.
6. Despite great efforts made in the academic world, there is still a huge need to produce more studies and publications in Arabic with a focus on analyzing information disorder in the region.

Based on our findings, ARIJ and the AFCN recommend that greater attention be paid to the following:

1. More support, funding, and training must be provided to fact-checking platforms, organizations, and initiatives in the region to expand their efforts, activities, and projects. They would then be able to contribute more significantly towards refuting mis- and disinformation disseminated through the media and social networking sites.
2. Pre-publication fact-checking units must be established within large and small Arab media organizations, especially independent ones. This would reduce the possibility of these organizations publishing false and misleading content.
3. The concept of media literacy should be promoted more widely in all countries of the region, and the various ministries of education must view this as a priority. Serious work should be done to include this concept in curricula, because of the great role it can play in educating young people and students on how to understand and evaluate media content, verify information before circulating it, and other basic skills.
4. Arab governments and official entities should prioritize combating mis- and disinformation by launching national policies and providing more support and funding. It will be hard to achieve positive results without the adoption and implementation of legislation on the right to access information. In addition, transparency in official administrations must be enhanced and complete data and information must be published for the public to access.
5. Legislation that criminalizes the circulation of false news should be amended, and no special laws to this effect should be enacted. This should be done in tandem with the protection of the freedom of opinion, of expression, and of the press. Civil-law solutions, rather than criminal-law measures, must be found to combat information disorder.
6. The media and the entities combating information disorder should pay sufficient attention to the use of technology and AI and should develop tools that help to verify and evaluate Arabic content in order to save time and costs.
7. More studies and manuals with a focus on analyzing information disorder in the region, its manifestations, its causes, and those benefiting from it should be published in Arabic. It is difficult to combat information disorder without a clear and complete understanding of the issue. It is also important to conduct studies that analyze and evaluate the efforts of the entities active in combating mis- and disinformation, the viability of these responses, and the extent of their impact on societies.
8. Enhancing the efforts of civil society and considering the issue of combating information disorder in the region should be a participatory issue that involves the state, society, civil society organizations, global organizations, academia, and the technology sector.

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# PART 2
# ACADEMIC OVERVIEW

## 1. INTRODUCTION

The term "information disorder" has become widely used to refer to both mis- and disinformation (Wardle and Derakhshan 2017). Disinformation refers to content disseminated with a harmful intent, such as to spark fear amongst the audience or to undermine the security of individuals or entities. Misinformation, on the other hand, is fabricated information disseminated without malicious intent (Ireton and Posetti 2018, 7). In the MENA region, information disorder, misinformation, and disinformation are still subsumed under the wider term of "fake news," which is defined as news that does not meet the criteria of credible news and which is spread without verification (Ireton and Posetti 2018, 7).

Censorship of traditional media prevails in the MENA region. Blum (2005) describes the Arab model as "patriotic," as the censored media play the role of promoting governmental programs and the national development agenda, and support governmental decisions in all cases. Yet, with the arrival of the internet the Arab region witnessed a transformation: from governments having a monopoly on information to an abundance of information being available (Al Najjar 2021, 56). The rate of internet usage at home in Arab states is above the world average, as 58.9 percent of households had access to the internet in 2021 (Gray 2021, 5). The internet has reshaped the media landscape in the Arab region. In the early stages, blogs in particular gave users who were not journalists the opportunity to reach out to an audience. Thereafter, the emergence of social media created new platforms where photos, news, and videos could be posted by citizen journalists, which eventually led to the erosion of legacy media's monopoly on authority (Tando, Lim, and Ling 2017). Arab audiences tend to consume news heavily on social media, as the consumption of news is ranked second of preferred online activities (Allagui and Akdenizli 2019, 1295). The unstructured nature of social media exacerbates the rapid spread of misinformation and disinformation. Consumers of social media are generally aware of the risks of fake news; 43 percent of respondents surveyed in a study indicated that they were very worried about fake news online (Allagui and Akdenizli 2019, 1295).

Over time, the ambit of social media was extended to political affairs, which contributed to the eruption of the Arab Spring revolutions and led authoritarian regimes and their opponents to shift to a strategy of targeting social media through torrents of bots, trolls, and rumors. This was evident during the Gulf Crisis of 2017, when social media turned into a battlefield for political propaganda as the opposing parties launched disinformation campaigns against each other (Al Najjar 2021, 61). In the same year, an Arab social media report was issued to describe the age of social media as the age of fake news, noting that fake accounts on Facebook have increased over time (Mohammed Bin Rashid School of Government 2017).

Fake news is not limited to political issues. In the wake of Covid-19, the WHO criticized the rapid spread of fake news on social media, describing it as an "infodemic," the danger of which should not be underestimated, as it undermines the efforts of health authorities (WHO n.d.). The Arab countries were affected by rumors about the new virus, which spurred media actors to counter these rumors.

On the other hand, technology in general, and particularly social media, cannot be accused of being the sole trigger of fake news. Moreover, technology can deter fake news; for example, Facebook has developed an AI system to detect content containing hate speech. AI is also employed by researchers in the UAE and Jordan to detect fabricated news or photos through the use of algorithms (Atif, Mahdy, and Moustafa 2020, 20).

Technology can deter fake news; for example, Facebook has developed an AI system to detect content containing hate speech.

AI can also be used to check news produced by citizen journalists. Although reports by citizens may contain elements of false news, there is a difference between this type of news and disinformation. In citizen journalism the source of the news is known, and it contributes to the diversity of news sources, whereas disinformation is spread by unknown actors who also use technology to pursue their own agendas (Al Jalabneh and Safori 2020, 9441). Moreover, citizen journalists contribute to hindering the circulation of fake news. Activists and citizen journalists have found that mainstream media steer away from fact checking content (Bailla and Yachoulti 2020, 23). It could be argued that conventional media are under governmental control and that their monitoring processes are associated with political interests, with other issues being marginalized. It follows that civil society leads the project of monitoring fake news (Ben Messaoud 2021, 32).

Through a review of the research focusing on fake news in Arab states, we explore the topics mentioned above. Scholars have focused on the two dimensions of fake news as categorized by Tando, Lim, and Ling (2017): propaganda and satire. The concept of "infodemic" has also sparked the interest of researchers from different Arab countries, who have outlined solutions based on media literacy and media education to train the public and professionals to deal with fake news. Researchers in Arab countries have shone a light on the positive role of social media and AI, and the deterring role of legislation. As traditional media tend to refrain from taking a stand against fake news, research has focused on the independent initiatives that are trying to bridge the gap. However, scholars have raised concerns regarding the sustainability and methodologies of these initiatives. Hence, they propose further research to measure the impact of these independent projects on the public and on traditional media.

# 2. METHODOLOGY AND SCOPE

Because of the low number of academic studies tackling fake news in the Arab world compared to other regions of the world, this review adopted a qualitative approach to explore the multi-dimensional phenomenon of disinformation in Arab countries. For instance, a search for the term "fake news" on Google Scholar returned 582,000 results, while the equivalent in Arabic—الأخبار الزائفة المعلومات الزائفة—generates only 173 results. The Arabic term for "information disorder—الاضطراب المعلوماتي ,الخلل المعلوماتي—does not appear in this academic database at all.

A narrow range of studies was selected to be analyzed.[47] We selected fifty-nine studies out of 173 academic papers contained in Google Scholar database, covering sixteen countries. The selection was done based on three criteria:

1. Studies were selected that address fake news or disinformation in Arab countries, published by Arab education academic institutions and by other institutions.
2. Studies were included that were published in high-profile journals or by recognized academic or research organizations.
3. Studies were selected in such a way that most of the twenty-two Arab countries are represented and all dimensions related to fake news are covered.

Content analysis, as a qualitative tool (Brennen 2013, 1), is applied in this review. The main tool in content analysis is the category system, which is applied to every dimension of the study (Kohlbacher 2006, 15). Based on the concepts discussed in the introduction, the literature review is categorized according to the salient topics in Arab countries: propaganda, Covid-19 and the infodemic, and sarcasm and fake news. This review also attempts to make recommendations for future action and to detect gaps in the literature and suggest avenues for future research.

# 3. LITERATURE REVIEW

## 3.1 PROPAGANDA: THE DOMINANT IDEOLOGICAL PURPOSE OF FAKE NEWS

The aims of fake news can be classified as ideological or financial. Some fake news is generated in order to make profit. In other cases, it is intended as political propaganda (BouMateen 2021, 213). Researchers have posited that by 2017 social media had turned into a hotbed of propaganda and misinformation in the Arab world (Schiffrin 2017, 117). That is why social media have been described as the "motor" of fake news (Mekawy 2021, 280).

In Arab countries, propaganda takes many forms, according to the current affairs in each country. The most significant events that occurred in Arab countries in the last decade were mass protests and conflict between countries and among political groups within countries, all of which fuel the spread of fake news.

### FAKE NEWS AND MASS PROTESTS

Some researchers have praised the role of social media in the Arab Spring: these media catalyzed political change, broke down the monopoly of traditional media, and provided room for marginalized opposition groups. However, scholars also recognize that social media are often exploited by authoritarian regimes to disseminate deception and rumors (Al Najjar 2021, 62). The mass protests in Algeria and Sudan have been used as examples in the literature.

Fake news was spread during the Algerian protests in 2019. Facebook was utilized to activate the popular movement, but it was also abused by certain groups to mislead the public (BouMateen 2021, 216). Many accounts on social media posted fabricated photos about alleged clashes between protesters and the police. Also, deceptive photos of clans raising the French flag were disseminated on Facebook in an attempt to distort the people's uprising (BouMateen 2021, 220).

Sudan witnessed massive demonstrations in 2018 and 2019. Interviews carried out by Daffalla et al. (2020, 1) with thirteen Sudanese activists revealed that the activists were intimidated, arrested, and injured. At same time, the internet was blocked, followed by a flooding of fake news spread by fake accounts on Twitter to target activists. The activists interviewed attributed the misinformation to accounts sponsored by the overthrown regime. Although some activists disregard misinformation and consider it as a low-level threat compared to physical threats, others expressed a great fear of misinformation. For example, in Sudan fake accounts on social media misled people by identifying locations for protests where the police forces were waiting to detain protesters (Daffalla et al. 2020, 6).

The danger of misinformation is not limited to countries where censorship is in force, such as Sudan and Algeria, but also exists in Tunisia, which has been ranked 73rd in the World Press Freedom Index (RSF 2021b). It has been described as a "free" country by Freedom House (Freedom House 2020). However, the scale of fake news and hate speech in Tunisia expanded during the presidential and parliamentary elections in 2019. In Tunisia, the conditions differ from Sudan and Algeria, as Tunisian activists have not been targeted by fake news themselves. They monitor social media for fake news, especially Facebook, which tops the list of most popular social media platforms, with 66 percent of Tunisians having accounts. As Facebook partnered with only one third-party fact checker in Arab states—compared to seven in the USA—political campaigns in Tunisia were launched on Facebook by undeclared parties without official support. This motivated activists to take over the role of fact checking; however, civil society faces obstacles in monitoring the flood of fake news and rumors on social media (Elswah & Howard 2020, 1).

> Researchers who have studied the phenomenon of fake news in Tunisia and Sudan observe that even though Sudanese and Tunisian activists lacked technological expertise, they tried to verify news on social media in an attempt to help stop the flood of disinformation in both countries.

In Sudan, Dafalla et al. (2020) note that the Facebook page of the Sudanese Professional Association (SPA) was a reliable source of first-hand information. Sudanese activists also created a multi-layered network of contacts to provide the audience with verified information. However, they did not utilize sophisticated tools, such as Facebook's info button, to trace fake accounts; instead, they tracked them manually through checking the profiles (Daffalla et al. 2020, 6). In Tunisia, only three civil society organizations were financially equipped to initiate projects to detect fake news on social media, namely I Watch, ATIDE (in partnership with Democracy Reporting International), and Mourakiboun. The latter ran a project called Rasd1 to monitor social media (Elswah and Howard 2020, 3).

## INTERSTATE CONFLICTS AND FAKE NEWS

The MENA region is characterized by interstate and intrastate conflicts (Arab Center Washington DC n.d.). These conflicts must be differentiated from the peaceful revolutions and protests mentioned in the previous section; however, researchers have found that in both cases fake news has been utilized for ideological purposes, especially during the 2017 Gulf crisis, which has been described as the Gulf information war (Allagui and Akdenizli 2019, 1287). In June 2017, Saudi Arabia, the UAE, Egypt, and Bahrain decided to boycott Qatar. This crisis resulted from fake news, as a statement expressing support for Iran was attributed to the Qatari Emir and published by Qatar News Agency. It was claimed that the Qatari Emir criticized other countries' feelings of hostility towards Iran. Qatar announced that the news agency had been hacked and that the statement was fabricated (Al Najjar 2021, 61). Nonetheless, the crisis broke out and piqued the interest of researchers.

Researchers have shed light on the social media accounts that were created immediately to republish the fabricated statement. These accounts claimed that Qatar was financing terrorism. In this crisis, the exploitation of Twitter bots was intensified. Bots are considered an effective propaganda tool that uses AI to automatically disseminate malicious messages. In Arabic, bots are described as *dhabāb iliktrūniya* (electronic flies) (Jones 2019, 1393).

> The flooding of fake news by the fake accounts elicited counter-campaigns that raised awareness of the risk of propaganda. The hashtag #Don'tParticipateInSuspiciousHashtags exemplifies this. However, the war soon extended to traditional media, which devoted considerable time to defending the government position and targeted foreign audiences in order to exert influence on foreign governments. Qatar sponsored campaigns abroad to lobby and improve its image.

Qatar accused its opponents of violating international law. Saudi Arabia and the UAE, for their part, financed TV stations targeting US citizens and other foreigners to persuade them that Qatar was supporting terrorism. Sky News broadcasted a documentary financed by the UAE about aid allegedly provided by Qatar to Al-Qaeda (Allagui and Akdenizli 2019, 1293).

The Gulf crisis was characterized by another phenomenon: Citizens of each respective country expressed support for their government on social media. This can be attributed to fear, since the UAE threatened to punish citizens who sympathized with Qatar with imprisonment of up to fifteen years and a fine of at least 500,000 emirati dirham, while Bahrain threatened people who expressed support of Qatar on social media with imprisonment of up to five years (Allagui and Akdenizli 2019, 1295). In contrast, a study has found that the hashtags that indicated support of Saudi Arabia were authentic and did not result from propaganda bots (Abrahams and Leber 2021, 1192).

## INTRASTATE CONFLICT AND FAKE NEWS

The absence of criticism on social media is normal in a homogeneous country which is tightly controlled by a centralized regime, but some Arab countries are fragmented, and each conflicting group finances media outlets and social media platforms to target others with biased campaigns containing fake news. Two prominent examples are Libya and Syria, whose circumstances are explored in various studies.

In 2014, Libya was riven by a long-standing civil war in which many actors were involved, which created a conducive environment for the promotion of fake news and propaganda. Regional powers also intervened to fuel information disorder in the state (Portero Alférez 2019, 16). Portero Alférez (2019, 11) conducted a simple study by using the search term "Libya + News" on Facebook and Twitter, which led to chaotic and non-reliable news outputs which can be categorized as opinions, preferences, verified information, and unverified information.

Portero Alférez realized that many obstacles face those who seek reliable information about Libya. She attributes these obstacles to the political divide that has caused the situation to deteriorate and which makes it so difficult to monitor and verify fake news. Democracy Reporting International also reported that the widespread propaganda in Libya stemmed from the conflicting groups in the country (Portero Alférez 2019, 9). Portero Alférez (2019, 17) monitored official accounts on Twitter and found that they utilize disinformation techniques to promote their biased stance towards the conflict.

Disinformation in Libya is no less complicated than in the case of Syria, as the ongoing Syrian civil war has opened a new battle ground on social and digital media, to the extent that the International Committee of the Red Cross (ICRC) in Syria described the situation as "chaos of information" (Posetti and Matthews 2018, 6). Each party tries to polarize and manipulate public opinion, which leads to news coverage that is biased and partisan. The news tends to support one group and attack others (Al Feel 2019). This phenomenon is not limited to internal groups; in fact, international groups are deeply involved in the Syrian war, as is highlighted in many academic studies.

One such study (Al Feel 2019) investigated news reports published by leading Arab and international newspapers, websites, and news agencies—such as Al Arabiya, Jordan Times, Al Ahram, Asharq Alawsat, SANA, Al Alam, Al Manar, Sputnik, TASS, Reuters, Etilaf.org, Al Araby, TRT World, Daily Sabah, and the Lebanese National News Agency—and used an AI model to compare these reports to news documented by the Violations Documentation Center (VDC), an NGO. This study found that sectarian language and bias are amongst the most prominent features of the news published by those media outlets (Al Feel 2019).

A well-known example of biased news about the Syrian war occurred when an Egyptian anchor showed visuals from a video game and claimed that it depicted the Russian army fighting against terrorism in Syria (Posetti and Matthews 2018, 7). The spread of fake news led to the launch of an initiative to build up a dataset to identify Syrian fake news based on modern technologies dealing with big data, such as Hbase (Abu Salem et al. 2019). In addition, Taakkad, an observatory platform, was established to provide audiences with accurate information about the Syrian war and to improve media performance. It has corrected about 800 news articles. Most of these came from social media, but state-owned media, media affiliated to opposition groups, Arab media, and foreign media were also shown to be involved in spreading fake news about the war (Ben Messaoud 2021, 34).

## FAKE NEWS USED AGAINST THE STATE

The fourth dimension of the propaganda phenomenon is fake news that is used by unknown forces against the state on social media. Most of the studies about Egypt tackle rumors and fake news from this perspective. Egypt has been ranked 14th among countries where the number of social media users is growing rapidly (Ben Messaoud 2021, 34), and these media have become a source of information (Abdel Hamid 2019, 67), which paves the way for the spreading of rumors. The Egyptian Cabinet issued a report on the spreading of rumors based on the monitoring of 187 rumors that were circulated on social media platforms between August and December 2018 (Abdel Hamid 2019, 71). State entities were most often targeted by rumors, with 20.9 percent of all rumors targeting these organs. Abdel Hamid notes that after the June 30 Revolution of 2013, Egyptian entities were targeted by the Muslim Brotherhood and states which support it. The second most targeted were the public service ministries, at 19.8 percent of the total rumors, since the originators of the rumors wanted to turn citizens against the government and eliminate the trust between them (Abdel Hamid 2019, 76–77).

Another area of research focuses mainly on the correlation between fake news on social media, on the one hand, and Egyptian security entities and public opinion, on the other. An example of this is the study by Eid (2019). Since 2013 the security entities in Egypt have been encountering terrorism attacks, especially in the Sinai Peninsula, and fake news impacts negatively on audiences' view of the security forces (Eid 2019, 702). The study measured the impact of fake news on public opinion and found that 83 percent of the sample surveyed (400 persons) believed that security institutions were targeted on social media, while 52 percent trust news posted about security institutions on social media. It postulates that the increase of fake news reduces trust in Egyptian security institutions (Eid 2019, 735).

Most of the above-mentioned studies were carried out between 2016 and 2019. In this time period, the MENA region was riddled with conflicts, political divides, civil wars, diplomatic crises, protests, and the consequences of revolutions. That is why the studies revolve around politics. In 2020, the Covid-19 pandemic shifted the focus of researchers in the region to the impact of fake news related to the new virus.

## 3.2 COVID-19 AND THE INFODEMIC IN THE ARAB WORLD

It is common during disasters, epidemics, and conflicts for rumors to spread faster than usual (Atif, Mahdy, and Moustafa 2020, 4). After the onset of the Covid-19 pandemic, this occurred to such an extent that the WHO coined the term “infodemic” to refer to fake news associated with the novel coronavirus (WHO n.d.). Researchers in the region have explored many dimensions of the infodemic. They have monitored the spread of fake news on social media in different Arab states, analyzed the nature of the fake news, inquired as to the causes of the rapid distribution of fake news, explored the influence of fake news, and accentuated the efforts that are being made to combat information disorder.

Salama (2020) investigated the origins of the infodemic and concluded that it springs mainly from social media. The reasons for this is that users of these media do not comply with any code of ethics and there is no one to adopt the role of gatekeeper, which in the case of traditional media is played by professionals who filter information before it is published as news (Salama 2020, 167). Salama conducted a survey in Egypt which showed that Instagram is the most popular social media platform, with 30.6 percent of the surveyed individuals relying on it as a source of information. WhatsApp and Facebook come second and third, with 17.4 percent and 15.3 percent respectively. Of the social media users surveyed, 26.8 percent are regularly exposed to fake news. The study showed that social media users depend on social media as a source of news about Covid-19 in an attempt to understand the nature of this new virus (Salama 2020, 162). Another survey, conducted among students in Palestine, found that more than 80 percent of participants resort to Facebook as a source of news about Covid-19 (Radwan, Radwan, and Radwan 2020, 7).

Researchers have also shed light on the shortcomings of the coverage of the pandemic by traditional media. Journalists found themselves faced with a mysterious pandemic, with little information about its source, nature, and dangers. Social distancing also complicated media coverage, and as a result traditional media could not provide viewers and readers with convincing news reports about this multidimensional topic (Al Qasamy 2021, 22–23).

The flood of inaccurate information on social media distorted public opinion, stirred up fears, and led to instability. Social media users circulated claims about the effectiveness of unproven alternative medicines in treating or preventing Covid-19 (Al Qasamy 2021, 20, 22). For instance, claims were spread in Tunisia that garlic was able to prevent Covid-19 infection, with the result that the price of garlic increased (Zamit, Kooli, and Toumi 2020, 2). Some Facebook posts that drew on conspiracy theories regarded Covid-19 as a political tactic serving the interests of a certain country, which had invented it to harm others (Mohammedi 2020, 35). In Morocco, audiences were confused by a post, published and shared on May 28, 2020, claiming that twenty-two new cases had been detected in Tangier and the Tetouan region; the official statement of that day had made no mention of these cases (Maakoul et al. 2021, 4). In Palestine, about 76.4 percent of students who participated in a survey agreed that news published on social media about Covid-19 inspired fear. About 59 percent of the Palestinian students surveyed found that fake news posted on social media and the numbers of infected persons caused panic (Radwan, Radwan, and Radwan 2020, 6).

Researchers have classified efforts to confront information disorder as official and unofficial efforts. In line with the WHO’s warning that fake news is no less dangerous than the virus (WHO n.d.), governments in the Arab world have made great efforts to counter fake news. In Jordan, the spokesperson of the state expressed the government’s concern about the growing threat of fake news during the pandemic. He then appeared on official television to present reliable updates about Covid-19 in the country and to raise awareness about fake news (Al Jalabneh and Safori 2020, 9443). The minister of health also asserted that unscientific information had been distributed on social media, urging people to disregard the new virus and describing it as simply bacteria (Al Jalabneh and Safori 2020, 9437). In Palestine, the Ministry of Health created a website, which it updated on a regular basis with news about the pandemic, to constrain the spread of fake news (Radwan, Radwan, and Radwan 2020, 2).

> Governments in the Arab world have made great efforts to counter fake news. In Jordan, the spokesperson of the state expressed the government’s concern about the growing threat of fake news during the pandemic.

Although the pandemic presented an opportunity for conventional media to take on a social responsibility role by expanding its services to fact check news disseminated about Covid-19 (Ben Messaoud 2021, 25), Atif, Mahdy, and Moustafa (2020, 27) observed that the media in Arab states did not put enough resources in place to fact check suspicious content. In 2018 the Lebanese newspaper *Al Nahar* established a department to verify fake news, an initiative that is important in spite of its limitations (Ben Messaoud 2021, 32). In the wake of the demonstrations in 2019, *Al Nahar* intensified its fact-checking services; in 2019 it checked 338 news reports, photos, and posts. It continues to publish its fact-checking reports using a hashtag that translates as #AlNahar_verify (Atif, Mahdy, and Moustafa 2020, 27).

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To bridge the gap left by mainstream media and to combat the devastating consequences of fake news, many independent efforts have been gathering pace in Arab countries, to complement the above-mentioned governmental efforts. Researchers have studied some of these initiatives:

- In Jordan, journalism students at Zarqa University launched a campaign called Itamin (Do not worry) to warn people against fake content on Facebook. The Facebook group relies on official sources to publish reliable and official news. The students also educate their audience on how to detect non-reliable information. They simplify their content by using animated videos and photos (Al Jalabneh and Safori 2020, 9442).
- Akeed, which is also an independent academic initiative in Jordan, has verified about forty-three rumors related to Covid-19 (Ben Messaoud 2021, 33).
- An independent center in Palestine called Mada released a statement in the wake of the pandemic to announce that it is committed to debunking fake news in the state (Ben Messaoud 2021, 32).
- In 2020, the number of Tunisian fact-checking initiatives that aim to put an end to the infodemic increased from two to eight (Zamit, Kooli, and Toumi 2020, 9). I Watch, a non-profit organization (NPO), launched a platform named I Check to identify fake news.
- Some initiatives are limited to Facebook, such as the Falso page from Libya, which has thousands of followers who interact with its content in order to find out about fake news related to the virus (Zamit, Kooli, and Toumi 2020, 12).
- In Saudi Arabia, the Anti-Rumors Authority, an independent initiative, devotes its social media accounts to combating fake news. They posted seventy-seven posts between March and May 31, 2020 to refute rumors related to Covid-19 disseminated in Saudi Arabia (Alsadiq 2021, 1304, 1306). A study by Alsadiq (2021, 1306) concluded that 90 percent of the monitored rumors were related to health issues, with political issues coming in second place. The Anti-Rumors Authority draws on official sources to debunk rumors. For instance, it shared a statement by the health ministry to deny the detection of a Covid-19 case in a market in Reyad (Alsadiq 2021, 1309).

Researchers who have investigated information disorder related to Covid-19 in the Arab world have recommended measures to be taken to deal with the infodemic. These include the expansion of media literacy, the employment of AI, the drafting and passing of legislation, and the maximization of the role of health journalism. The rest of this section will discuss health media and scientific journalism. The other recommendations will be addressed in section titled "Solutions, Recommendations, and Future Prospects."

The health media discuss health-related issues to raise awareness of these issues and to provide the audience with reliable and relevant information (Mohammedi 2020, 36). For instance, the health media provided information about the number of Covid-19 cases in Algeria and launched a campaign with the hashtag #kahleek_fi_AlBit (Stay at home) to contribute to flattening the curve (Mohammedi 2020, 40).

Mohammedi (2020, 51, 52) has emphasized the role played by health journalism during the pandemic, reflecting the importance of health journalism, and recommends that the media rely on journalists who specialize in health issues to correct fake news spread on social media. Moreover, media faculties at universities should train journalists to deal with health-related issues and newsrooms should allocate resources to train journalists who are already specialized in the health sector and to create health departments that are equipped with the tools to provide audiences with professional health content (Mohammedi 2020, 44).

Another study, by Zamit, Kooli, and Toumi (2020), widens the scope of health journalism and proposes enhancing scientific journalism so that it can function as an intermediary between scientists and the public. The study found that the lack of science departments in Tunisian media outlets has a negative effect on communication about the pandemic, since the lack of fact checkers who are also scientific journalists hinders efforts to counter Covid-19 disinformation (Zamit, Kooli, and Toumi 2020, 13). In a study conducted by Atif, Mahdy, and Moustafa (2020, 34) for ARIJ, the researchers recommend that a manual be developed about health media, discussing the mistakes most commonly made in media coverage of health issues and the ethics related to health media.

### 3.3 SATIRE AND FAKE NEWS

This dimension is distinct from those already discussed, as the spread of fake news is correlated mainly, as seen above in several contexts, with social media and unstructured communication, while satirical media are structured and managed by journalists. Satirical news is defined as news that is published to criticize traditional and real news; it thus imitates the format of traditional news (Aballah 2018, 7). However, some researchers argue that satirical media can be instruments for the dissemination of fake news (Mekawy 2021, 280). Other researchers distinguish between satirical news and fake news, as fake news is deliberately intended to mislead readers (Aballah 2018, 7). While sarcasm and satire are intended to entertain the audience, they can also cause confusion between real and fake news (Mekawy 2021, 278).

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Researchers have investigated this potential confusion; two prominent examples of platforms that have been researched are the Jordanian newspaper *Al Hudood* and the Egyptian online platform Al-Ahram Mexico. For instance, in 2015 the Egyptian army shot twelve Mexican tourists in a vehicle after mistaking them for terrorists. Subsequently, an Egyptian satirical website reported that the Mexican president, Henrico Iglassios, stated that he recognizes the right of the Egyptian army to defend its land against terrorism and accepts its apologies. Subsequently, the hashtag #ThankYouHenricoIglassios trended on Twitter and the Egyptian mainstream media quoted it. However, a statement released by the Mexican presidency denied the report (Saadany, Mohamed, and Orasan 2020, 1). Saadany, Mohamed, and Orasan (2020, 2) note that the writing style of the Al-Ahram Mexico website mimics the style of the official news agency. This caused confusion and made it hard to identify this report as satirical news.

A study by Aballah (2018) concluded that 92 percent of the satirical reports published by *Al Hudood* are based on real news and that it also mimics the style of real news. It publishes mainly news related to current events (84 percent), uses quotes from sources, and also includes photographs along with text (Aballah 2018, 14–15). Saadany, Mohamed, and Orasan (2020, 9) used AI to reveal that the sarcasm or satire is not very explicit and that the news could thus be taken to be real. When sarcasm is not clearly identifiable, it can have misleading consequences, as in the case of Al-Ahram Mexico (Saadany, Mohamed, and Orasan 2020, 2). For this reason, Saadany, Mohamed, and Orasan (2020, 9) recommend the use of AI, as it was able to detect the "deceptive content of the satirical fake news article published by Al-Ahram Mexico, which was the cause of the diplomatic crisis between Egypt and Mexico." Aballah (2018, 36) recommends the promotion of media literacy, which is required to distinguish between untruths, satirical news, and fake news. These are two examples of recommendations that have been made in order to curb fake news in Arab states.

## 4. SOLUTIONS, RECOMMENDATIONS, AND FUTURE PROSPECTS

Scholars have come up with many solutions that could help to get rid of fake news or at least limit its devastating impact on society. Atif, Mahdy, and Moustafa (2020, 28–35), in their study on combating disinformation in Arab countries, propose some solutions for eliminating fake news, namely media education, training for journalists on fact checking, independent media and news verification initiatives, and laws deterring the spread of rumors.

### 4.1 MEDIA AND INFORMATION LITERACY AND FACT-CHECKING TRAINING

Media and information literacy is defined by UNESCO as a mechanism that "provides answers to the questions that we all ask ourselves at some point. How can we access, search, critically assess, use and contribute content wisely, both online and offline?" (UNESCO n.d.). An inability to assess the veracity of information is highlighted as one of the significant factors that leads to the consumption of fake news. Thus, it is important that the audience is able to differentiate between fake news and real news. This can be achieved through media literacy, which improves critical thinking and the capacity to scrutinize media messages coming either from mainstream media or from social media (Mekawy 2021, 263).

In Arab countries, the first organization aimed at building up a culture of media literacy was founded in 2013 in Beirut by Dr. Jad Melki. The organization has held many workshops about media literacy and digital literacy, and strove to convince Arab universities to include media literacy in its academic curricula. In 2015, twenty universities in the MENA region adopted media literacy as part of their curricula. At school level, Jordan became the first Arab country to include media literacy in its curricula, as the verification and countering of hate speech is taught in Jordanian schools. In addition, large conferences devoted sessions to discussing media literacy. The Alexandria Media Forum, which is held annually in Egypt, titled its seventh conference, held in 2019, "Media Literacy and Sustainable Development." In Algeria, the Faculty of Social Sciences at Abdelhamid Ben Badis University discussed the general policies of media literacy during its first conference (Atif, Mahdy, and Moustafa 2020, 25).

In spite of these efforts, Mutsvairo and Bebawi (2019, 143) concluded that the courses and curricula do not meet the urgent need in Arab countries to counter the increase in fake news, especially in those states where propaganda and disinformation dominate. For instance, a lack of media literacy has a negative impact on countries with societies that are highly fragmented, such as Lebanon, where clerics constitute an unreliable source of information. Therefore, Melki et al. (2021, 2–3) infer that Lebanon should adopt media literacy to enable its citizens to deal with content critically. According to Atif, Mahdy, and Moustafa (2020, 24), a lack of media literacy prevails among professionals too, as only 17 percent of a sample of 229 journalists surveyed by ARIJ believed that media literacy is an effective tool to debunk disinformation. This gap can be attributed to the lack of fact-checking courses in media curricula at universities in Arab countries. Mutsvairo and Bebawi (2019) examined the media curricula at Yarmouk University (Jordan), the Lebanese American University (LAU; Lebanon), Birzeit University (Palestine), and the American University in Cairo (AUC; Egypt). They concluded that the syllabi are insufficient to address the phenomenon of fake news, and they proposed including content on the identification and verification of mis- and disinformation, in order to train the next generation of journalists to deal with information disorder (Mutsvairo and Bebawi 2019, 152).

> As journalists are not sufficiently equipped with verification tools, researchers have outlined the importance of media training to enable journalists to differentiate between fake and real news. A worldwide study shows that only 46 percent of the journalists in the MENA region have received technical training on fact-checking tools (ICFJ 2018, 30).

This training is organized by international organizations, such as Google, Facebook, Deutsche Welle, and Thomson Reuters. For instance, the Google News Initiative trained about 2,500 journalists between September 2019 and July 2020 on how to use its toolkit for fake news (Atif, Mahdy, and Moustafa 2020, 26). Although these workshops and courses try to keep up with developments in the media landscape, Zamit, Kooli, and Toumi (2020, 14) highlight that journalists rely mainly on manual tools, such as Google Image, YouTube Data Viewer, and TinEye; these scholars thus propose that training should also improve the skills of journalists in utilizing automated tools to detect fake news. Atif, Mahdy, and Moustafa (2020, 43) recommend that verification tools and manuals be translated into Arabic to make them more accessible to journalists and activists in the region. The integration of activists and technologists in training programs is also required because of their significant role in verification initiatives (Atif, Mahdy, and Moustafa 2020, 43).

## 4.2 RECOMMENDATIONS RELATED TO FACT-CHECKING PLATFORMS

Researchers have noted that the majority of conventional media outlets in Arab countries do not have departments that specialize in monitoring fake news. It can be said that the ministries of information of the various countries control the media; the monitoring processes therefore prioritize political interests and marginalize other issues, such as false photos of women, immigrants, and so forth. Civil society has thus taken the initiative to launch projects to monitor fake news (Ben Messaoud 2021, 32). Ben Messaoud (2021, 33–36) lists eighteen initiatives and projects launched in nine Arab countries. Among these there is only one initiative affiliated with media outlets.

To explore the nature of the work conducted by fact-checking organizations and the tools deployed by them, Abdel Ghany (2020) studied two fact-checking pages on Facebook: Akeed, affiliated with the Jordan Media Institute, and the Egyptian project Matsda2sh. The study observed fifty-four posts on both pages in 2019. The study concluded that both Facebook pages tackle all types of fake news, instead of focusing on only one issue, and that they educate the public on how to verify media content (Abdel Ghany 2020, 28, 29). The pages use only text and static photos. The study showed that interaction is low on the Jordanian page. On the Egyptian page interaction fluctuated between low and medium. On both these pages, interaction took the form of sharing posts that refer to the positive role of the audience in the fact-checking process (Abdel Ghany 2020, 32, 33).

Another study highlights the role of citizen journalism platforms in combating fake news. Al Jalabneh and Safori (2020, 9441) refute the accusation often levelled against citizen journalism, namely that it can also promote fake news on social media. These scholars assert that citizen journalism is created by activists, whereas fake news is spread on social media by unknown sources with unknown agendas. Citizen journalism aims to fill the gap left by traditional media, as independent fact checkers have found that mainstream media do not tend to place emphasis on critical thinking, science, and verification. These individuals have thus established alternative media platforms to fact check content (Bailla and Yachoulti 2020, 23). Bailla and Yachoulti (2020, 11) examined eight fact-checking initiatives in Morocco and found that they all address a variety of issues and contextualize these issues in order to avoid manipulation. The main aim of the fact checkers is to accurately simplify the issues for the audience, without distorting them (Bailla and Yachoulti 2020, 16). Three of the fact checkers focus on piquing the interest of the audience by adding a sense of humor. The quality of sound is also considered (Bailla and Yachoulti 2020, 17). This study also shines a light on the economic dimension. It was found that there are two business models: while Safsafi and Mokhtari are self-funded, Fekkak depends on online revenue. Although the self-funding of citizen fact checkers guarantees their independence, it does not guarantee their sustainability (Bailla and Yachoulti 2020, 21, 26).

The funding of fact-checking platforms affiliated with institutions has also attracted the attention of researchers such as Ben Messaoud (2021), who recommends that fact-checking platforms be independent from funder interference. Independence can be actualized, on the one hand, by the diversity and variety of the content. On the other hand, fact-checking platforms should explicitly divulge the beneficiaries of their monitoring efforts. On a practical level, observers should have expertise and team members should be selected from different disciplines so that they can complement each other. In terms of methodology, the survey method is suitable for measuring audience reception of fake news, content analysis is recommended for verifying content and identifying fake news, and interviews with policy makers can reveal their opinions on fabricated content and current issues. In all cases, Ben Messaoud (2021, 38–39) proposes that the methodology used during fact checking should be published and the team of fact checkers should be open to any feedback.

## 4.3 THE USE OF AI IN COMBATING INFORMATION DISORDER

AI is defined as

> *a branch of computer science and information technology that studies how computers can do thinking, learning and self-development with human intelligence […] it is artificial intelligence that allows computers to imitate human intelligent behavior. Also, artificial intelligence does not exist in its own right, but has much to do with other areas of computer science, directly or indirectly. In particular, attempts to introduce artificial intelligence elements in various fields of information technology to utilize them in solving problems in the field are very active. (Kang and Lee 2019, 51)*

In the fake news field, AI has been seen by researchers as a double-edged sword. AI can be abused to disseminate fake news, through bots which are produced by automated programs. Bots are fake social media users that disseminate predetermined propaganda (Atif, Mahdy, and Moustafa 2020, 7), for example as was seen during the 2017 diplomatic crisis among Gulf states (Jones 2019, 1393). However, AI is also used by IT companies, such as Google and Facebook, in the form of algorithms designed to reveal take content and prevent audience exposure to it (Zhuk et al. 2018, 446).

In Arab countries, researchers from the UAE and Jordan developed a false news discriminator algorithm called News Checker to spot fake news published in Arabic. Atif, Mahdy, and Moustafa (2020, 8) stated in 2020 that the algorithm had screened 12,000 samples and that its accuracy rate had reached 99.4 percent.

> In Morocco, Maakoul et al. (2021, 4) used a logistic regression algorithm for classifying news on Facebook; it generates fifty keywords that would indicate that the information is fake and thirty keywords that would indicate that the information is true.

Another study used a baseline model, XGBoost, with TF-IDF (term frequency and inverse document frequency) values and a deep learning classification model, convolutional neural networks (CNNs), to classify satirical news, with a proven accuracy of 98.6 percent (Saadany, Mohamed, and Orasan, 2020, 7). A more sophisticated and hybrid method was utilized by Sabbeh and Baatwah (2018) in the form of a decision tree, a support vector machine (SVM), and naive Bayesian (NB) classification to assess the credibility of 800 Arabic news items on Twitter. This method, which was implemented using a J48 decision tree classifier, showed an accuracy level of 88.9 percent (Sabbeh and Baatwah 2018, 2327).

In addition to the identification of fake news, AI can be used to measure the impact of fake news on audiences. Albahli et al. (2021) took advantage of this feature to measure the feelings of citizens in Gulf states regarding the pandemic, as expressed on Twitter. The researchers utilized the Tweepy API (application programming interface) to extract the tweets and analyzed them with the help of TextBlob_ar. The results show that positive feelings prevailed in the region, in spite of the fear fueled by fake news spread on Twitter (Albahli et al. 2021, 1615).

## 4.4 LEGISLATION

Legislation has the potential to complement efforts to combat fake news. The parliaments of many Arab countries have enacted laws that criminalize fake news. Egypt enacted a law in 2018 that legitimates the blockage of any platform publishing fake news and penalizes the journalists who manage it; however, this law has been criticized because it can be used to crack down on journalists rather than combating fake news (Mutsvairo and Bebawi 2019, 144). In some other countries there are no laws that can contribute to deterring disinformation. Al Qasamy (2021, 31) found that the lack of relevant legislation in Morocco led to many sectors being targeted by disinformation in the wake of Covid-19. The Moroccan government subsequently passed a law according to which anyone disseminating fake news would be penalized; however, this law is not effective in deterring fake news related to political issues (Al Qasamy 2021, 29–30). In Iraq, the law penalizes the spreading of rumors with fines and imprisonment (Hijij and Hamza 2018, 245). However, this legislation is outdated, as it was enacted in 1969. The same problem prevails in Tunisia, as the relevant law was enacted in 2004 and is unable to keep up with developments. The election legislation also does not deal with the potential of fake news on social media (Elswah and Howard 2020, 5).

Al Qasamy (2021, 28) has proposed the enacting of new laws or the amendment of outdated laws to bridge the gap between legislation and the media that are abused by disseminators of fake news. However, at the same time, Atif, Mahdy, and Moustafa (2020, 37) have raised the fear that amendments could be instrumentalized to impose more restrictions on media freedom. It is probably for this reason that Al Qasamy (2021, 33) emphasizes that the new laws should comply with international criteria. Elswah and Howard (2020, 5) have recommended that the treatment of fake news be incorporated into other laws, such as personal data protection and electoral legislation, to enable this legislation to keep up with the nature of modern political campaigns, where disinformation is often weaponized by opposing parties. Al Qasamy (2021, 26) has also asserted that legislation cannot provide a solution on its own; in addition, journalists should be sufficiently trained to adapt to digital media and use the available technology to counter fake news. Mutsvairo and Bebawi (2019, 153) have proposed that media legislation be covered in courses in media education. The literature thus shows that different methods of combating fake news must be used to complement each other.

## 4.5 SUGGESTIONS FOR FUTURE RESEARCH

In general, the number of academic studies tackling fake news in the Arab world is low compared to the number of the relevant studies globally. For instance, a search for “fake news” on Google Scholar delivers 582,000 results, while the equivalent term in Arabic—الأخبار الزائفة—generates only 173 results. There is no term in Arabic that is equivalent to “information disorder”; therefore, no studies come up on Google Scholar when searching for الخلل المعلوماتي والاضراب المعلوماتي.

At a geographical level, fake news in some countries, such as Yemen, Somalia, Mauritania, Djibouti, and Comoros, is not addressed here. The fact that this literature review does not include any studies from the latter four countries is due to the fact that the researchers were not able to search for terms in French and Somali. In addition, these countries are seen as less prominent in the Arab world than Yemen, where a civil war between the Saudi-backed pro-government forces and the rebel Houthi movement is ongoing. Fake news has escalated in Yemen, and the Yemeni media are polarized; audiences do not trust the media, as shown by a survey conducted by DT Global and ARK Group in 2021. The need for studies on this phenomenon is thus pronounced (ARK 2021).

From a terminological perspective, it can be concluded that, while “fake news” as a term is still accepted academically in the MENA region, it has been criticized and is gradually being replaced with “information disorder.” At a thematic level, Tando, Lim, and Ling (2017) suggest six types of fake news based on their literature review, namely news satire, news parody, news fabrication, photo manipulation, propaganda, and advertising. Based on a meta-analysis of the literature regarding fake news in Arab countries, it can be inferred that scholars have refrained from addressing certain topics and focused mainly on propaganda. For instance, only two studies address satirical news: Aballah (2018) and Saadany, Mohamed, and Orasan (2020).

The studies mentioned above not only bring up prominent topics related to fake news; they also pave the way for further relevant research that can bridge the current gaps in the academic field. Researchers have concluded that greater levels of media literacy would improve critical media consumption. Hence, more studies are required to examine the media literacy skills that can enhance critical practices related to social media (Melki et al. 2021, 9). Melki et al. (2021, 9) assert that level of education affects belief in disinformation; therefore, media literacy must be introduced at different educational levels. Furthermore, Aoun Barakat, Dabbous, and Tarhini (2021) note that users who have high levels of media literacy are better able to identify fake news. Rampersad and Althiyabi (2020, 9) recommend that studies be carried out to explore the correlation between sociocultural aspects and the ability to identify fake news. They assume that the nature of fake news can play a role in how easy or difficult it is to identify, a hypothesis which can be tested in future studies. Aoun Barakat, Dabbous, and Tarhini (2021) also recommend examining the differences between “digital natives” (younger users) and “digital immigrants” (older users) when dealing with fake news.

The knowledge regarding audience interaction with potentially fake content can be complemented by studies about how the audience is affected by fact-checking initiatives. Thus, research that measures the impact of newly launched verification projects on viewers/readers from different backgrounds is needed (Bailla and Yachoulti 2020, 28). Abdel Ghany (2020, 37) hypothesizes that fact-checking pages on social media exert an influence on mainstream media, and that this can contribute to improving the professionalism of different media. Future research can investigate this hypothesis.

As mentioned above, many researchers view technology as a double-edged sword. As such, Daffalla et al. (2020, 19) emphasize the need to focus on investigating how the use of technology could impact different groups, especially vulnerable ones, and how it could empower activists. To counter the abuse of technology, Jones (2019, 1410) suggests that more studies be carried out to learn about mechanisms that can be deployed to identify bots and how bots can be abused to disseminate propaganda. Collaboration among researchers and experts from different disciplines can help to determine the source of bots as well as their nature and influence.

## 5. CONCLUSION

This literature review has revealed the intersection of several issues. In summary, social media have reshaped the media landscape in Arab countries. Researchers praised the role of social media during the early stages, as they gave a voice to voiceless people who had been marginalized by traditional media controlled by authoritarian regimes. However, studies have also explored the disadvantages of social media, one of which is that they can be utilized by authoritarian regimes and opposing parties to spread fake news. This danger intensified during the Covid-19 pandemic, since social media contributed to the spread of the infodemic. At the same time, researchers have noted that traditional media are not able to deter this amplified risk, as their restrained editorial policies do not address fact checking; in fact, some of the traditional media houses are themselves involved in spreading fake news.

Scholars have shone light on the alternatives represented by independent initiatives, affiliated with civil society organizations and academic institutions, dedicated to debunking fake news in Arab countries. Studies have been carried out to explore their tools and methodology. As educational level and expertise affect the ability of both viewers/readers and professional journalists to identify fake news, studies have investigated the current state of media literacy, the role of media education, and the training available to journalists to enable them to identify and counter fake news. Those efforts cannot replace the role of governments and legal entities, which are among the actors highlighted by researchers.

Scholars have also recommended the promotion of media literacy and media education in Arab states, and the provision of support to independent initiatives so that they can fulfill their roles with full independence. For instance, researchers have examined how fact-checking projects can integrate AI into their processes.

The literature does not ignore the gaps that exist in this academic sphere, and there are calls for further academic efforts to be made. While there is general agreement among researchers regarding the importance of media literacy, no study has been carried out to identify the characteristics of effective media literacy courses. Scholars have examined the impact of education on dealing with fake news, but the impact of sociocultural dimensions and age on vulnerability to fake news has not been investigated. Researchers have studied the independent fact-checking platforms and initiatives, but the impact of these platforms on audiences and their role in improving traditional media remain unexplored.

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# LIST OF INTERVIEWS

- Abdel-Haq, Bakir (Kashif, Palestine), July 5, 2021, via Zoom
- Abroun, Ouail (engineer and AI specialist, Morocco), June 21, 2021, via Zoom
- Abu-Atwan, Helmi (Palestinian Youth Association for Leadership and Rights Activation [PYALARA], Palestine), June 12, 2021, via Zoom
- Al-Janahi, Abdul-Aziz (Tahaqaq, Kuwait), June 19, 2021, via Zoom
- Al-Khamayseh, Muhammad (Al Jazeera Center for Studies, Qatar), July 12, 2021, via email
- Al-Masoudi, Abdullah (Sidq, Yemen), July 8, 2021, via Zoom
- Al-Omari, Najla'a (expert in media literacy, Egypt), June 22, 2021, via email
- Al-Saadi, Aws (Tech 4 Peace, Iraq), July 14, 2021, via Zoom
- Al-Shorooqi, Fawaz (expert in media literacy, Bahrain), June 21, 2021, via email
- Al-Tal, Bayan (Jordan Media Institute, Jordan), June 20, 2021, via Zoom
- Anonymous (Saheeh Masr, Egypt), July 7, 2021, via email
- Basbous, Hamza (Haggak Taarif, Jordan), June 17, 2021, via email and Zoom
- El Masri, Azza (Meedan, Lebanon), June 4, 2021, via Zoom
- El-Missaoui, Najih (Tunisian Association for Media Education, Tunisia), June 15, 2021, via Zoom
- Harfouche, Ziad (Fact Check Lebanon, National News Agency [NNA], Lebanon), June 15, 2021, via Zoom
- Ibrahim, Dina (Akhbar Meter, Egypt), July 13, 2021, via Zoom
- Ja'afar, Asia (Falso, Libya), July 8, 2021, via Zoom
- Jaloud, AbdelRahman (Yemeni and Syrian Archive), August 2, 2021, via Zoom
- La'abi, Yasmin (Tahaqaq, Morocco), July 4, 2021, via Zoom
- Melki, Jad (Media and Digital Literacy Academy of Beirut [MDLAB], Lebanon), June 10, 2021, via Zoom
- Michael, Tony (lawyer specializing in media law, Lebanon), July 17, 2021, via email
- Primo, Ahmad (Verify, Syria), July 1, 2021, via Zoom
- Sha'ar, Shadin (Tanbih, Qatar), June 23, 2021, via Zoom
- Srour, Ali (data scientist and AI innovation consultant, Lebanon), August 3, 2021, via Zoom
- Taha, Khalid (trainer, MENA region), July 8, 2021, via Zoom

# NOTES

1. Tech 4 Peace, August 30, 2020, https://www.facebook.com/Tech4Peace/videos/628551638050562/.
2. All quotations from interviews have been translated by the authors from Arabic to English.
3. https://thekatna.gov.jo/watch
4. https://www.jmi.edu.jo/en/MIL-Book-1
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15. For two examples, see https://bit.ly/3i5qteN and https://bit.ly/3rF2SVu.
16. The following are two examples of members of the public interacting with the platform on Twitter: https://twitter.com/NNALeb/status/1359555279722061833; https://twitter.com/NNALeb/status/13548186523488952232.
17. https://haggak.jo/website/AwarenessMessages.aspx
18. https://haggak.jo/website/Questions.aspx
19. https://www.facebook.com/HaggakJO
20. https://twitter.com/HaggakJO
21. Muath Mbaidheen, May 9, 2021, 22:22, https://twitter.com/Muath_Mbaidheen/status/1391488686315999232.
22. @meezo_86, January 13, 2019, 12:34, https://twitter.com/meezo_86/status/1084217073264414721.
23. Farah Alkaabneh, January 18, 2019, 13:23, https://twitter.com/farahkaabneh/status/1086222449639911426.
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36. https://www.tanbih.org/
37. https://www.tanbih.org/propagandasubmit
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# LATIN AMERICA AND THE CARIBBEAN

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# PART I
# GENERAL OVERVIEW

## 1. INTRODUCTION

Disinformation has become a global concern. In the second half of the 2010s, this phenomenon entered public debate because of its impact on political processes, especially elections. With the Covid-19 pandemic, the spread of fake news has gained even more attention due to the potential impact on people's lives of the discrediting of preventive measures and treatments, especially the vaccine against the new coronavirus.

Fake news has also been on the rise in Latin America and the Caribbean, although the phenomenon is far from new. The region is marked by a close association between media outlets and politics, not only in electoral disputes but also in discussions of various national issues, such as support for dictatorial regimes in the second half of the twentieth century.[1] Disinformation is a historical phenomenon that has been propagated by politicians, public authorities, and the traditional media over decades. Unfortunately, these practices have also been consolidated as a political strategy among groups supporting certain candidates or parties.

Another characteristic of the region is strong levels of concentration in various media sectors. The media systems were developed by a limited number of economic actors in the telecommunications field, such as cable TV and internet service providers, as well as in radio, TV, and printed media.

As researchers and freedom of expression reports point out, this concentration impacts on public debate, hindering the development of a plural and democratic public sphere that could allow for discussions with a diversity of views on issues. It also prevents this public sphere from being able to question disinformation when it is disseminated by traditional vehicles (Mastrini and Becerra 2017).

The growth of the internet has not only brought new agents to the communication ecosystem; it has also led to new forms of concentration within digital platforms. Google and Facebook, whose services and applications are very popular in Latin American and Caribbean countries, reflect this concentration. These agents are the new gatekeepers of public debate (Observacom 2018), conditioning information flows and access to and the reach of cultural and political debates.

The emergence of digital platforms has also impacted how disinformation is produced and disseminated. In the past, disinformation was more strongly associated with authorities and traditional vehicles. In Latin America, it was used as a political strategy, especially during the reigns of the dictatorial regimes in the second half of the twentieth century (Llorens, Maronna, and Dúran 2021). More recently, authorities and media outlets have spread misleading content to support the anti-grassroots political agendas of the continent's neoliberal governments. And with the advancing popularity of social media, politicians have gained new channels for distributing misleading content, channels which have also been used by supporters and collectives of the most diverse shades.

At the same time, digital platforms have created an environment that allows for the amplification of false discourses. Their business models, which are based on the large-scale collection of data, the construction of profiles, and personalized services aimed at predicting and modulating user behavior, serve as fertile grounds for disinformation. Extremist, appealing, and informative content fosters engagement which, in turn, enhances the surveillance that the platforms carry out over the users.

The growth in the power of these agents and their role in the circulation of disinformation gave rise to a series of public demands for policy measures. Some of these measures were subsequently adopted, but have been heavily criticized by researchers and civil society entities as being inadequate. In addition to demands for more concrete answers, the scenario has also provoked reactions from governments and parliaments, which have proposed new regulations focused on these agents and the practice of disinformation.

The spreading of disinformation is encouraged by these platforms' recommendation systems, which may amplify extreme discourses. The authors of misleading messages also make use of the platforms' targeting capabilities, enabled by the profiling of billions of users. Such strategies have also been used by political groups and during electoral campaigns.

The monetization potential of viral content has allowed disinformation to become a profitable business. Initially, agents began to produce and disseminate misleading messages to raise funds using monetization mechanisms. On the other hand, disinformation practices have also become a robust market funded by political and economic groups that seek to push their agendas through the use of political ads as a tool to reach users.

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It is important to understand the specificities of this phenomenon in different regions of the globe in order to avoid an analysis that takes into account only the Global North's perspective and the modus operandi of large platforms in their host countries. The present report offers a Latin American perspective, pointing out the manifestations of and rationale behind this phenomenon in the region, with the aim of contributing to the development of an approach to the problem from the Global South.

Just as important as the space where misleading content circulates is the identification of the agents that produce and disseminate these messages. Although this conduct is found across the political spectrum, there is evidence of its use by far-right groups as a political strategy in recent years.[2] Groups denying science, such as anti-vaccine movements, have also been pointed out as active agents of disinformation.

In order to discuss possible responses to this phenomenon, some clarifications are required. The first dimension is conceptual, since there are several different terms in use, such as "fake news," "misleading news," "disinformation," and "junk news," among others. In this report we follow Bontcheva and Posetti's (2020) view of the term "disinformation," namely that it is information intentionally produced by emulating formats such as news writing or documentary in order to obtain certain advantages or cause damage of a political or economic nature. A report by AlSur (Álvarez Ugarte 2020), a network of civil society organizations whose work is focused on digital rights in certain countries, points out that disinformation is not to be confused with satire, with other usages in which false information is protected by freedom of expression because it is not intended to deceive, or with propaganda, which is understood as speech that tries to persuade people to act or think in a certain way and which may not be false.

Due to the rise of the disinformation issue as a problem with distinct repercussions, the responses to it have also grown. Such responses have been developed following various approaches, from media education courses to legislation, from fact checking and the correction of false information to the undertaking of research to understand the phenomenon. The current report focuses on these efforts, looking at initiatives developed by organizations and institutions from countries in Latin America and the Caribbean. The project aims to analyze the methods and tools developed by organizations of different types to respond to disinformation in the region and to map the actors involved in these efforts.

The report is divided into two parts. Part I details the study carried out in the region. The objectives of the study are listed and the methodological approach used to map the actors in the region, and the strategies, tools, and methods employed in their initiatives against disinformation, is explained. This is followed by the results of the regional analysis. We further present case studies of five countries: Argentina, Brazil, Chile, Colombia, and Mexico. In each one, we address the general scenario of disinformation in the national context, followed by a mapping of the actors involved in combating disinformation and the methods, tools, and strategies employed. Next, we focus on legal aspects related to disinformation and public sector initiatives launched by governments, parliaments, or judiciaries. A comparative analysis is used to explore the methods, tools, and strategies adopted by the actors in the region based on four categories of approaches: fact checking, media education and training, research and production of information on the subject, and political advocacy. The final section of Part I deals with the challenges that actors face in expanding efforts to combat disinformation and analyzes the results of actions in the region.

Part II addresses the academic literature on disinformation that has been produced in the region. We analyze the general approaches followed in the studies, the conceptualizations and characterizations of the phenomenon, and the topics dealt with in the research, and we identify gaps and underexplored themes that merit greater attention in future studies.

# 2. OBJECTIVES

This study aims to identify and assess how each stakeholder in the region constructs (or misconstrues) the nature of the problem and possible solutions. Consequently, the research is structured around two interconnected objectives:

1. To map the actors currently working to counter disinformation and to identify the frameworks upon which interventions are currently based
2. To learn from the approaches, tools, and methods currently used to counter disinformation.

## 2.1 MAPPING THE ACTORS

Our first goal was to map the actors working to combat disinformation and to explore how they perceive the problem and what interventions they have developed to combat or mitigate it. The actors selected include civil society entities, research groups and institutions, fact-checking agencies, digital platforms, media companies, communication vehicles, government agencies, parliaments, and courts.

## 2.2 EVALUATING THE ACTORS' APPROACHES, TOOLS, AND METHODS

The second objective was to evaluate the approaches employed by the actors identified in the region, including the interventions, tools, and methods used to contain disinformation. Tools and methods are understood as action strategies to combat disinformation. They include checking and verifying information; providing context and reliable information; moderating content; encouraging accountability for disinformation practices that are considered inappropriate or illegal; running media education projects; conducting research into and producing information about the phenomenon; promoting debates on the theme; and making proposals related to public policies, from the discussion to the implementation phases.

We explore how appropriate these responses are and what impact they produce, in order to present the lessons that have been learned through projects and initiatives carried out by the actors in the region. In order to assess the appropriateness and the impact of these methods and tools, we used indicators and objectives set by the actors themselves and sourced from international documents on the subject. We also include proposals on public policies or influence on policymaking. The analysis also seeks to identify conflicts and tensions between interventions carried out by different actors.

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# 3. METHODOLOGICAL APPROACH

## 3.1 REGIONAL AND NATIONAL PERSPECTIVES

We approached the study from two perspectives:

1. **The region:** The study covers the whole of Latin America and the Caribbean, including the subregions of the Caribbean, South America, and the Andean Community.
2. **National case studies:** Argentina, Brazil, Chile, Colombia, and Mexico were selected as case studies based on their economic and political relevance in the region and the abundance of initiatives combating disinformation found in those countries. We analyze the actors in these countries according to the scope noted above—from civil society and research groups to government bodies, parliaments, and the courts.

## 3.2 DATA COLLECTION

### NATIONAL CASE STUDIES

In terms of the five countries selected as case studies, data collection was carried out through three methodological procedures:

1. **Document analysis:** Information was collected from norms (legislation, decrees, administrative

guidelines), reports, surveys, news reports, and institutional material so as to build a national picture of the problem and efforts to combat it.

2. **National workshops:** One workshop was held in each country, with civil society organizations and researchers considered to be the most representative of each nation. The workshops seeked to encompass different dimensions so as to account for the diversity found in each country, in terms of regions and of race, gender, class, and origin. The objective was to map, together with participants, the tools and methods employed in their initiatives against disinformation, the impact these tools and methods have, and the lessons that they have learned.
3. **Interviews:** Representatives from civil society organizations, government authorities, commercial entities operating initiatives to combat disinformation, and digital platforms were interviewed. The intention was to map the frameworks that guide their work, the tools and methods employed in their initiatives, the impact these methods have had, and the lessons they have learned.

The analysis aimed to identify those points common to all countries and those which are specific to each country, in order to create a picture of the situation regarding disinformation in the region.

### REGIONAL SITUATION ANALYSIS

The data collection process for the regional situation analysis included three methods:

1. **Document analysis:** This was carried out using surveys, reports, and information made available through primary and secondary data sources. During this process, we looked for sources that present information and analyze the region as a whole or that report on a comparative investigation of a group of countries. National examples can be used to illustrate phenomena considered relevant in the region.
2. **Workshop:** One workshop was held with regional actors—representatives of civil society organizations and researchers whose actions are considered relevant at the regional level—to obtain information on the situation of disinformation in the region and the efforts to combat it. The selection of participants was aimed at ensuring diversity in terms of types of actors (organizations with different focuses, themes, and sizes), gender, race and color, and countries.
3. **Survey:** A survey was conducted with the actors invited to the workshops.

## 4. REGIONAL ANALYSIS: DISINFORMATION IN LATIN AMERICA AND THE CARIBBEAN

Latin America and the Caribbean is a region with particularities that shape the ways in which disinformation circulates. Public agents as well as political groups, which have gained new channels to amplify their discourses in the form of social media, have disseminated disinformation. The propagation of misleading content in the region has increased with the rise of far-right political parties, despite the limitations on internet access that affect part of the population.

> In 2020, the rate of internet access in Latin America was 73 percent (Kemp 2021). In 2015, it was 56 percent in South America and 43 percent in Central America (Kemp 2015).

The region, despite not figuring among the top five most populated regions in the world, such as China, India, and the USA, has become a major market for the main platforms. Brazil is Facebook's fourth-largest market, with 130 million users, and Mexico is its fifth, with 93 million users. Spanish is the second most spoken language on the platform, with 340 million users, second only to English, with 1.1 billion users. Brazil is Instagram's third-largest market, with 99 million users, and Mexico is its eighth, with 32 million users. Brazil is YouTube's third-largest market, with 127 million users, and Mexico is its eighth, with 74.1 million users. Brazil is Twitter's fifth-largest market, with 16.2 million users, and Mexico is its ninth, with 11 million (Vasconcellos et al. 2020).

According to the "Digital News Report 2021" (Reuters Institute 2021), the most used platforms in the region in 2020 were Facebook (59 percent), WhatsApp (40 percent), YouTube (32 percent), Instagram (24 percent), Twitter (15 percent) and Facebook Messenger (12 percent). These data indicate the continued importance of Facebook and the significant role that messaging services have assumed in the region, being major channels for access to and dissemination of information.

## 4.1 THE DISINFORMATION LANDSCAPE IN THE REGION

Disinformation in Latin America and the Caribbean is a long-standing phenomenon, and it has been mainly disseminated by authorities, politicians, and media outlets. However, as already pointed out, the growth of the practice, driven by digital platforms, has led to greater attention being focused on it in the region. Concern regarding this matter has arisen not only among civil society actors, researchers, and governments, but also among the general population.

According to a report entitled "Digital 2021: Global Overview Report" (Kemp 2021), four of the main countries in the region had an index of concern about disinformation above the world average (56.4 percent), with Brazil being the country in which this fear was most pronounced (84 percent of citizens interviewed), followed by Chile (64.6 percent), Argentina (60.4 percent) and Mexico (59.9 percent). This concern with disinformation must be viewed in a broader sense since, as has been stated earlier, this phenomenon is not new in Latin America and extends not only to digital platforms, but also to media outlets and authorities. As such, the concern expressed by interviewed individuals pertains to several types of disinformation, originating from different actors and spread through different media outlets and platforms.

According to the 2018–2019 "Latin American Communication Monitor" (Moreno et al. 2019), which collected data from communications professionals in nineteen countries, 65.2 percent said they pay attention to the topic, 62.7 percent commented that this practice influences the public sphere in their countries, and 42.3 percent reported that the subject is often discussed in their country. The countries whose professionals pointed more often to disinformation as a subject of discussion are Brazil (67.9 percent), Mexico (61.1 percent), Colombia (48.1 percent), and Costa Rica (43.1 percent). Overall, 83.8 percent said that social media are the main channels for the circulation of such content, while 37.8 percent also noticed this practice in traditional communication vehicles.

One of the most often recurring types of disinformation is that promoted in electoral contexts. In recent years, examples have been recorded in several countries in the region. For example, in analyzing the 2018 presidential elections in Brazil, Colombia, and Mexico, a study commissioned by the Atlantic Council pointed out the recurrent dissemination of disinformation by candidates and supporters as a tactic in political disputes and as an attempt to generate influence over citizens' voting decisions:

> *A rapidly evolving information environment—wherein innovation often outpaces traditional security measures and governance at the private and public levels—became a catalyst and a vector for the spread of rumors and false information. Disinformation actors, whether through organic disinformation or by employing artificial amplification, provoked fear and anxiety and sought to illicitly influence voters, undermining the electoral process along the way. (Bandeira et al. 2019, 3)*

In Uruguay, for example, as in other countries, the 2019 elections were marked by the dissemination of fake news. The fact-checking project Verificado published a balance sheet with seventy-six items that were analysed by them. Of these, twelve were from debates and sixty-four were messages disseminated across the web. Of the latter, thirty-eight were classified as false, seven as misleading, seven as inaccurate, and twelve as true.[3]

This phenomenon has also manifested in other political processes. In the 2019 coup d'état in Bolivia, which ended in the overthrow of the government of Evo Morales, the Special Rapporteur for Freedom of Expression of the Inter-American Comission on Human Rights (IACHR) of the Organization of American States (OAS) registered violations of the right to freedom of expression and deliberate disinformation dissemination campaigns both during the elections and afterwards, including through the use of false accounts (RELE 2020). In Ecuador, also in 2019, during the October protests, there were several cases of disinformation being circulated, with the aim of inciting the population against the protesters (RELE 2020). The Ecuador Chequea agency reported having identified more than sixty fake news stories and having disproved more than 140 pieces of content.[4]

> In Ecuador, also in 2019, during the October protests, there were several cases of disinformation being circulated, with the aim of inciting the population against the protesters (RELE 2020).

During the workshops and interviews with actors working to combat disinformation, representatives of organizations also addressed the characteristics of disinformation in the region. One of the characteristics already mentioned is the participation of political figures, including presidents, representatives, and state and local governors. According to Juan Carlos Lara (interview, August 2021) of Derechos Digitales, "First of all, the scenario is one of an increasing and expansive use of social media for disinformation in the last ten years, especially by public figures.”[5]A similar concern was voiced by Veridiana Alimonti (interview, August 2021) from the Electronic Frontier Foundation (EFF): “It’s important to take into consideration the role of political actors in this dissemination and to think about how this interacts with other elements that we see in other countries, like Honduras, like the armies of trolls that attack people not only through disinformation but through political violence.” Paulo José Lara (interview, August 2021) of Article 19 also highlighted this aspect, extending it to political forces associated with rulers: “We see that political actors are responsible—not only public authorities but also people connected with them. In Brazil, religious people who have a lot of influence in groups, public security agents who already have some kind of authority.”

The Covid-19 pandemic has brought to light forms of disinformation related to health issues. The world has experienced what researchers and authorities have called an “infodemic,” or the intense circulation of misleading messages related to the pandemic, including regarding the origins of the virus, its severity, symptoms, the responsibility of public agents, guidelines from health authorities, vaccination, and ostensibly miraculous cures.

A report released by Diálogo Interamericano (Christie, Lanza, and Camilleri 2020) pointed out the risks of disinformation produced in the context of the pandemic and also drew attention to the role of government leaders. In Venezuela, President Nicolás Maduro reproduced the narrative about the pandemic being a Chinese creation. The government of Nicaragua disseminated speeches that downplayed the severity of the pandemic. In Brazil, President Jair Bolsonaro talked about the supposed Chinese origin of the virus and called it a “little flu.” A survey on misinformation in Latin America by Fundación Bruno Kessler (López-Calva 2020) pointed out that 59 percent of news items in the sample published on social media could be considered reliable. The rate was lower than the world average, which stood at 71 percent.

## 4.2 ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

In Latin America and the Caribbean, responses to disinformation have come from actors of different origins and institutional profiles, including civil society organizations, fact checkers, universities and research centers, public institutions, international organizations, and digital platforms. These actors have developed initiatives which involve fact checking, the monitoring and correction of false content, the production of research and information, media education and public awareness campaigns, advocacy in the executive and legislative branches, strategic litigation, and the provision of assistance to victims of disinformation.

### CIVIL SOCIETY ORGANIZATIONS

In civil society, there are a number of actors that are active in fields such as digital rights, freedom of expression, and access to information. A number of them have started to look closely at the problem of disinformation and developed initiatives to search for solutions to the phenomenon.

There are a number of international civil society networks active in the region, such as the Association for Progressive Communications (APC). More recently, regional coalitions, such as AlSur, have also been created. There are organizations with an international scope that run projects in the region, such as Article 19, Access Now, the EFF, and Reporters Without Borders, and there are Latin American entities with a regional scope, such as Observacom (based in Uruguay), the Centro de Estudios en Libertad de Expresión y Acceso a la Información (CELE, Center for Studies on Freedom of Expression and Access to Information, based in Argentina), and Derechos Digitales (based in Chile).

#### APC

APC[6] is an international network that tackles various issues associated with communication, from access to information to freedom of expression. The organization participates in global debates about communication, including disinformation, alongside international bodies such as the UN (in the figure of the UN Special Rapporteur on Freedom of Opinion and Expression), presenting contributions and participating in events on the subject. It is specifically concerned with disinformation that targets vulnerable segments, such as women and environmental activists. The association also supports member entities in debates about the issue in their respective countries, as in, for example, Brazilian civil society's fight to change Bill No. 2630 of 2020 (discussed in greater detail in the section on Brazil later in Part I). Another front on which this association is active is the efforts to get digital platforms to change their business models and align their internal norms with international human rights guidelines.

### ALSUR

The AlSur network[7] is a consortium of civil society organizations that aims to strengthen human rights in the region's digital environment. Among the network's main issues of concern are access to culture and information and to digital technologies, surveillance and personal data protection, cybersecurity, intermediary liability, and artificial intelligence (AI). The coalition seeks to promote the regional coordination of efforts in order to exercise influence on these issues. They work on several fronts, such as strengthening communication among members, sharing experiences and technical capacities, analyzing public policies that may have a regional impact, and generating joint knowledge and strategies to influence arenas that contribute to the efforts of members in their countries.

One of the foci of AlSur's work is the production of knowledge, and disinformation has become one of the consortium's research topics. In 2019, a report was released on these practices in electoral contexts in the region, as a contribution to the public consultation organized by the Special Rapporteur for Freedom of Expression of the IACHR with a view to drafting a guide on the subject (AlSur 2019). In 2020, AlSur published a report addressing the dissemination of disinformation during the Covid-19 pandemic from a human rights perspective, reflecting on its specificities compared to this practice in electoral contexts (Álvarez Ugarte 2020). In August 2021, a study was launched that analyzed the propagation of misleading content by political authorities (AlSur 2021a). Also in 2021, AlSur released a policy paper discussing intermediary liability and the moderation of content by these agents, mapping legal initiatives and making recommendations on the subject from a human rights perspective (AlSur 2021b).

### OBSERVACOM

Observacom[8] is an observatory with a regional scope. It is based in Uruguay, with researchers in different countries. The organization monitors various aspects and topics related to media regulation, including disinformation. The group has been engaged in digital platform regulation, and has coordinated the formulation of a document with proposals to increase transparency and denounce processes—such as a lack of transparency, harms produced by algorithmic decision making, and attacks on freedom of expression—in these spaces, which also addresses the problem of disinformation (Pallero et al. 2020).

In addition to its research, Observacom produces technical notes and statements related to the issues it works with. Based on these statements, Observacom has an impact on public and private actors. In the public sector, the organization addresses statements and documents to governments and legislators, such as proposals for the regulation of disinformation in various countries, such as Brazil. As regards the private sector, Observacom also develops campaigns and seeks to raise awareness about abuses committed by digital platforms.

### DERECHOS DIGITALES

Derechos Digitales[9] is an organization based in Chile and active across Latin America. The organization addresses issues related to communication in the digital environment, aiming at promoting a fairer and more inclusive environment. It works with issues such as freedom of expression, privacy and personal data, copyright, and access to knowledge. The association carries out research and analysis, promotes campaigns, and advocates in political processes.

Regarding the issue of disinformation, it works mainly with advocacy strategies and the production of knowledge and research. The entity participates in regional efforts, such as AlSur. In this network, it has contributed to research on disinformation in the region (RELE 2019). According to Juan Carlos Lara (interview, August 2021), director of the organization, "AlSur's research was conducted through consultations with entities to determine how much knowledge these entities have of both regulation and practice." Derechos Digitales also monitors legislative initiatives, especially within the Chilean Congress but also in other countries, such as Brazil. Legislative advocacy is carried out through partnerships with other organizations on the continent, and through this Derechos Digitales seeks to contribute to the advocacy actions and public campaigns carried out by the actors in each country in relation to legislative initiatives.

> Derechos Digitales engages in legislative advocacy through partnerships with other organizations on the continent.

In terms of lessons learned, Lara (interview, August 2021) notes that the scenario in the region is diverse and quite politicized, and that legal solutions are approached in a superficial way. Therefore, according to him, it is important to act immediately, when bills are being discussed or even earlier.

### ARTICLE 19

Article 19[10] is an international organization founded in England that focuses on issues related to freedom of expression and access to information. The entity has offices in nine countries, two of which are in Latin America (Brazil and Mexico). Among the issues it addresses are the right to protest, promotion of access to information, media freedom, support for human rights defenders, and the protection of digital rights.

> On the issue of disinformation, Article 19 runs programs to support independent media in the most remote regions of Brazil. In the Amazon region, it is acting to stimulate exchanges between individuals and collectives that produce and disseminate information based on the demands of people in their territories. In 2022, a campaign to support community communicators in these locations will be launched.

The organization has also followed legislative debates on the subject of disinformation, such as the debates in Brazil around the bill that became known as the "fake news bill." The team also monitors the production and dissemination of disinformation aimed at institutions, which impact on democratic processes. According to its digital rights coordinator in Brazil, Paulo José Lara (interview, August 2021), one of the difficulties experienced is "fighting a process that is not institutional from within institutions. A lot of what goes on originates in small groups, small companies, groups that in many places you can't identify."

### CELE

CELE, which runs a legislative observatory on freedom of expression in Latin America,[11] is an academic center for research on issues concerning expression and information, linked to the University of Palermo in Argentina. The center's research is aimed not only at producing knowledge but also at stimulating public debate on these issues. CELE created the legislative observatory to monitor legislation, bills, and changes in the current legal framework in order to analyze the possible impacts on freedom of expression and access to information.

On the topic of disinformation, the observatory gathers information about legislation on the subject, and analyses some of it. The laws and legal initiatives are evaluated according to the tripartite test of the international framework on freedom of expression: legality, necessity, and proportionality. On its blog, the observatory publishes analyses of legislation and projects, as well as analyses about specific subjects. The project team prepared a paper for the AlSur network on public officials and disinformation, emphasizing the responsibility of the actors that disseminate speeches containing false content in the public sphere (AlSur 2021a). CELE also participates in consultation processes with international bodies. In the consultations convened in 2021 by the UN Special Rapporteur on Freedom of Opinion and Expression, Irene Khan, the organization presented a report on disinformation on the internet and the responses obtained from three platforms: Facebook, Twitter, and Google (CELE 2021).

### ACCESS NOW

Access Now[12] is an international organization that works in Latin America and the Caribbean. It covers a broad scope of issues, ranging from internet access and functioning to data protection, encryption, and freedom of expression. Access Now contributes to each of these issues by developing campaigns with other civil society organizations, as well as supporting campaigns initiated by entities in different regions and countries. The organization participates in debates about international guidelines and documents on these topics. In the field of disinformation, it has contributed to discussions and debates held by the European Union (EU), the United Nations Educational, Scientific and Cultural Organization (UNESCO) and the UN Human Rights Council, and the UN Special Rapporteur on Freedom of Opinion and Expression.

### EFF

The EFF[13] is one of the oldest organizations active in the field of issues related to the internet. Founded in the 1990s and based in the USA, the organization works to strengthen human rights related to the use of technologies, such as promoting freedom of expression, combating surveillance and violence, defending personal data protection, supporting free technologies, and encouraging innovation.

On the issue of disinformation in Latin America, the organization participated in the consultation process convened in 2019 by the Special Rapporteur for Freedom of Expression of the IACHR, with the aim of preparing a guide on the issue of disinformation in electoral contexts. According to Veridiana Alimonti (interview, August 2021), the guide contains "a diagnostic part, and there are a series of recommendations that deal with the issue of how to balance the issue of freedom of expression." The EFF has also been involved in electoral discussions, for example in Brazil. It has analyzed the possible impacts of solutions, such as the Brazilian proposal to implement measures to ensure the traceability of viral messages in messaging applications and its possible effects on the right to the protection of individuals' data (discussed later in this report).

## FACT CHECKING

In terms of fact checking, Latin America and the Caribbean has seen an increase in organizations and projects aimed at monitoring content, analyzing it, and publicizing the results of such examinations—either refuting the content, pointing out specific corrections, or confirming it. According to the Duke Reporters' Lab at Duke University in the USA,[14] forty-nine data verification agencies and projects exist in the region. The countries with the most initiatives are Chile, Brazil, and Ecuador. We arrived at a slightly higher total of organizations in the region, namely fifty-seven.

Table 1 provides details of the initiatives explored in this report, including the scope of each initiative—whether it is international or limited to the country it is based in—and the profile of each initiative: whether it is an agency or an independent project created by individuals, whether it is linked to a media outlet, whether it is related to a non-governmental organization (NGO), whether it was developed by a group of professional communicators, or whether it maintains a relationship with an academic institution.

**Table 1:** Initiatives working with fact checking in Latin America and the Caribbean

| Country | # | Initiative | Scope | Profile |
|---|---|---|---|---|
| Chile | 12 | AFP Factual Chile | International | Linked to media outlet |
| | | Cazadores de Fake News | Local | Independent |
| | | Fact Checking | Local | Related to educational institution |
| | | Fast Check | Local | Independent |
| | | Bío-bío Comunicaciones | Local | Linked to media outlet |
| | | Mala Espina Check | Local | Independent |
| | | *El Dínamo*'s Chequeo | Local | Linked to media outlet |
| | | *La Tercera*'s fact-checking service | Local | Linked to media outlet |
| | | El Polígrafo | Local | Linked to media outlet |
| | | Meganotícias Notícias Falsas | Local | Linked to media outlet |
| | | Observatório de Datos del Periodismo y la Comunicación | Local | Related to educational institution |
| | | Chequeando | Local | Independent |
| Brazil | 9 | Boatos | Local | Independent |
| | | Estadão Verifica | Local | Linked to media outlet |
| | | Comprova | Local | Linked to media outlet and professionals |
| | | UOL Confere | Local | Linked to media outlet |
| | | Fato ou Fake | Local | Linked to media outlet |
| | | Aos Fatos | Local | Independent |
| | | Agência Lupa | Local | Independent |
| | | E-farsas | Local | Independent |
| | | AFP Checamos | International | Linked to media outlet |

| Country | # | Initiative | Scope | Profile |
|---|---|---|---|---|
| Mexico | 4 | Verificado | Local | Independent |
| | | Escenario Tlaxcala | Local | Linked to media outlet |
| | | El Sabueso | Local | Linked to media outlet |
| | | AFP Factual | International | Linked to media outlet |
| Ecuador | 4 | UDLA Channel Chequea | Local | Related to educational institution |
| | | Ecuador Chequea | Local | Linked to media outlet/NGO |
| | | Ecuador Verifica | Local | Linked to media outlet/NGO |
| | | El Verificador | Local | Linked to media outlet |
| Peru | 4 | Verificador | Local | Linked to media outlet |
| | | OjoBiónico | Local | Linked to media outlet and to professionals |
| | | Salud con Lupa Comprueba | Local | Linked to professionals |
| | | ConvocaVerifica | Local | Linked to media outlet and to professionals |
| Colombia | 3 | Colombia Check | Local/Int | Independent/Linked to NGO |
| | | AFP Factual | International | Linked to media outlet |
| | | Detector de Mentiras (La Silla Vacía) | Local | Linked to media outlet |
| Venezuela | 3 | Cotejo | Local | Independent |
| | | EsPaja | Local | Independent |
| | | Cocuyo Chequea | Local | Linked to media outlet |
| Costa Rica | 3 | No Coma Cuento | Local | Linked to media outlet |
| | | Double Check | Local | Independent |
| | | La Voz Chequea | Local | Linked to media outlet |
| Argentina | 2 | Chequeado | Local | Independent |
| | | AFP Factual | International | Linked to media outlet |
| Guatemala | 2 | Fáctica | Local | Independent |
| | | ConPruebas | Local | Independent |
| Bolivia | 2 | Bolívia Verifica | Local | Independent/linked to educational institution |
| | | Chequea Bolivia | Local | Independent, linked to professionals, related to educational institution |
| Uruguay | 2 | AFP Factual | International | Linked to media outlet |
| | | UyCheck | Local | Independent |
| Panama | 1 | TVN's Bien Checado | Local | Linked to media outlet |
| Cuba | 1 | El Toque | Local | Linked to media outlet |
| Nicaragua | 1 | El Gato Encerrado | Local | Linked to media outlet |
| Paraguay | 1 | El Surtidor | Local | Linked to media outlet and to professionals |
| Dominican Re.p | 1 | PolétikaRD | Local | Independent/Linked to NGO |
| Costa Rica | 1 | La Voz de Guanacaste | Local | Independent |
| Nicarágua | 1 | Despacho 505 | Local | Independent |

In addition to the five countries analyzed in later sections of this report, other countries in the region have developed important verification initiatives. Ecuador, for example, is among the countries with the most fact-checking initiatives: four. The UDLA Channel Chequea project was created by students from Universidad de Las Américas (University of the Americas) and is linked to the university TV channel. The project has received financial support from the US Embassy. Media and professionals in Ecuador also participate in combating disinformation through Fundamedios, which was formed by journalists and has on its boards directors of communication media in the country. The group coordinates the Ecuador Verifica project, which brings together journalists from various types of media.

There are also examples of collective projects that bring together different actors. The website PolétikaRD, based in the Dominican Republic, was created to monitor the speeches of politicians, and now also does fact checking. The project is managed by a network of civil society organizations that work with issues such as housing, budget, gender, children and adolescents, and transparency.

> Fact-checking agencies on the continent have joined forces in an alliance, called Latam Chequea, formed by thirty-four organizations from seventeen countries and coordinated by the Argentinian initiative Chequeado. The goal of the alliance is to bring together organizations working on the issue so that they can exchange experiences and enhance joint action.

Latam Chequea is supported by Google News Initiative. The group includes AFP Factual and Salud con Lupa, which operate in several Latin American countries; Aos Fatos and Estadão Verifica, from Brazil; Bolívia Verifica, from Bolivia; Mala Espina Check, from Chile; La Silla Vacía and Colombia Check, from Colombia; No Coma Cuento (La Nación) and La Voz de Guanacaste, from Costa Rica; Periodismo de Barrio and El Toque, from Cuba; Ecuador Chequea and GK, from Ecuador; EFE Verifica, Maldita, and Newtral, from Spain; Agencia Ocote, from Guatemala; Animal Político, Spondeo Media, and Verificado, from Mexico; Despacho 505, from Nicaragua; El Surtidor, from Paraguay; Convoca, OjoPúblico, and Verificador (La República), from Peru; Observador and Polígrafo, from Portugal; PolétikaRD, from the Dominican Republic; UyCheck, from Uruguay; and Cotejo, Efecto Cocuyoy (also known as Cocuyo Chequea), and EsPaja, from Venezuela.

Latam Chequea has launched a special website on the Covid-19 pandemic, called CoronaVerificado ("Verified Corona"), in partnership with a global initiative carried out by the International Fact-Checking Network (IFCN). The portal reports on findings and corrections of information about various topics related to the pandemic, such as prevention measures, guidelines from health authorities, vaccination, and characteristics of the virus. In addition, it monitors the measures taken by the governments of the region in relation to the pandemic.

## MEDIA LITERACY

A third front of action in Latin America is media education and audience sensitization. UNESCO has promoted events and released materials aimed at encouraging media education both at the international and at the regional level. More recently, it has also directed efforts at initiatives to train audiences and information producers in critical skills, based on concerns around the issue of fake news. UNESCO has launched a global initiative, called MIL Clicks, focused on critical information and communication competencies related to various internet usage practices, such as searching for and accessing information or producing and publishing content.[15] The initiative's training and awareness materials have been disseminated in the region and translated into the languages spoken in the countries (Spanish and Portuguese). UNESCO also coordinates an international network of actors involved in media education, called GAPMIL. The group promotes events and develops initiatives. Each year, there is a week in which the topic of media education is addressed by the members of GAPMIL in each region and country.

In 2018, UNESCO released a guide called *Journalism, Fake News, and Disinformation*, which describes and analyzes the phenomenon and points out ways to confront it (Ireton and Posetti 2018). UNESCO's offices in Latin America disseminated the material and used it in their initiatives, as did other actors in the region. The organization has also committed itself to reflecting on the responses to the problem in the region, in a more recent publication that analyzes the regulatory initiatives related to disinformation and hate speech (Pita 2021). In the context of the pandemic, media education materials related to Covid-19 and public health were also translated. In Brazil, UNESCO supported a project of the São Paulo City Hall to train young people to combat disinformation.

The OAS, through the IACHR, deals with the issue of freedom of expression through its own Special Rapporteur, Pedro Vaca, from Colombia, appointed in 2021. The current rapporteurship and the previous one, held by Edison Lanza from Uruguay, were both dedicated to the topic of disinformation. The subject is now included in the Rapporteur's annual reports, which assess events that may have a significant impact on freedom of expression in the countries of the region. Various topics are covered, ranging from the identification of disinformation campaigns, judicial processes, and legal initiatives proposed by parliamentarians or governments to address the issue of fake news. In each of these reports, recommendations are presented to various actors, especially governments.

The IACHR Special Rapporteur for Freedom of Expression also produces studies and publications that aim at gathering information about a particular topic. In 2013, it released a publication on freedom of expression and the internet, which deals with a range of issues related to disinformation (Marino 2013). In 2017, the OAS published "Estándares para una internet libre, abierta y incluyente" (Standards for a free, open, and inclusive internet), with recommendations based on the benchmarks of the inter-American human rights system (Lanza 2017). In 2019, the Special Rapporteur for Freedom of Expression launched "Guia para garantizar la libertad de expresión frente a la desinformación en contextos electorales" (Guide to guaranteeing freedom of expression in the face of disinformation in electoral contexts) (RELE 2019), a document that was produced based on an extensive dialogue with organizations in the region. The text reviews the literature on the phenomenon of disinformation in electoral processes, discusses the contours of the problem, and presents a series of recommendations on how to confront it.

In the field of civil society, the network of civil society organizations IFEX (Intercambio Internacional por la Libertad de Expresión; International Freedom of Expression Exchange), which works to promote freedom of expression as a fundamental right, runs a chapter for Latin America and the Caribbean. In 2020 this chapter launched an awareness-raising campaign aimed at combating the dissemination of misleading content.[16] In its materials, the campaign provides examples of untruths that have become widespread "urban legends." The texts and videos call on citizens to "break the chain" of disinformation and to deal with information on the internet in a more conscious and critical way.

In 2020, a group of civil society organizations from Latin America and the Caribbean, in partnership with Google News Initiative, launched the Digimente project.[17] Among the organizations are international entities, such as Teach for All, and national ones, such as Enseña por Argentina, Enseña por Colombia, and Enseña por México. The initiative's aim is to educate young people to critically evaluate the information they receive and to create and consume quality content. The project has created a repository of educational content and methodologies related to information and communication technologies (ICT). This repository includes what the team calls "best international practices," from which elements organized into curricula are offered. The method has been applied in schools in Argentina, Colombia, and Mexico. The site also publishes content on media education, such as reflections about the anti-vaccination movement in the context of the Covid-19 pandemic.

## 4.3 THE RESPONSES OF DIGITAL PLATFORMS

In recent years, digital content platforms have also drawn up responses—in the face of events such as the Cambridge Analytica scandal and also due to the spread of disinformation in the region, especially during elections, as will be explored in Part II of this report. Facebook and Instagram (apps controlled by the conglomerate that was rebranded Meta in 2021) have developed a framework to detect false news. Facebook and Instagram make use of fact-checking agencies to analyze potentially false news. The platforms then implement measures to limit the reach of the content or takes it down in specific cases (such as when it goes against scientific conclusions or guidelines from health authorities). Another strategy the company has announced is the provision of contextualized information.

> Facebook has also announced that it will implement limitations for advertisements containing disinformation as well as transparency rules for electoral advertising, such as the reservation of a space—an ad library of sorts—for ads of this nature.

Some information about these messages, such as their authors, has also been made available. A study by Privacy International, in partnership with InternetLab and ELSAM (2021), points out that the mechanisms in place are still not very efficient, and that there is a lack of clarity about the country-specific criteria for regulating advertising; there are also disparities among nations with respect to the timing of implementations.

One of Facebook's measures that generated controversy was the establishment of exceptions and greater tolerance for political leaders. This occurred in several countries, such as the USA and also Brazil. After several posts and live broadcasts in which Brazilian President Jair Bolsonaro contradicted the guidelines established by health authorities, Facebook and Instagram took down the live broadcast in which Bolsnonaro compared Covid-19 vaccines to contracting HIV/AIDS (Souza 2021).

Facebook has established a purportedly independent oversight board, comprised of researchers from different fields and equipped with the prerogative to alter the moderation measures taken, for the purposes of analyzing cases that are deemed complex. One of the first decisions announced in 2021 pertains to a post by Brazil's Federal Council of Medicine, in which it spoke against lockdown as a measure to combat the pandemic. The oversight board upheld Facebook's decision not to take any measures against this post. During the review process, the Brazilian organization InternetLab recommended measures such as the application of a disinformation label (Péricles and Santos 2021).

> WhatsApp, a messaging app also controlled by Meta, has invested in measures to limit the potential for messages to go viral, such as restricting the forwarding of messages that are being reposted frequently. The company has also established partnerships to deal with content disseminated by electoral or health authorities.

Studies such as those by Chagas, Modesto, and Magalhães (2019) and by Santos et al. (2019) illustrate how the platform was heavily used to disseminate disinformation during the 2018 Brazilian elections. Following a report in the newspaper *Folha de Sáo Paulo* (Mello 2018) on the dissemination of bulk messages containing false content during the elections, WhatsApp took down bot accounts engaged in bulk messaging (Valente 2018).

YouTube has adopted a policy to reduce the spread of harmful disinformation and what it calls "borderline content." Channels that falsify their identity and manipulate material (i.e. by editing it to mislead users) are also banned. The platform has begun removing content that violates its policies on elections and, more recently, on the Covid-19 pandemic. It has also announced that it is offering contextualized information from "authoritative sources." However, after banning the monetization of videos associated with disinformation during the pandemic, the company has gone back to allowing this practice, collecting and paying content creators who have profited off of disinformation (Yahoo!Noticias 2021).

In its response to a survey that was conducted as part of this research, Twitter affirmed that its focus is not to determine whether information is false or not, but rather to curb the potential harm of misleading or deceptive content. The platform's actions include taking down fake accounts, removing posts that contain certain types of disinformation (e.g. health-related), and offering context along with information. The platform also has a policy to restrict manipulated media, such as deepfakes. "With respect to preventive solutions, we have sought to disseminate information about media education in partnership with non-governmental organizations in this field and more broadly in the field of human rights," the company said in its answers to the survey.

A study by the Brazilian organization Coletivo Intervozes (Barbosa, Martins, and Valente 2021) analyzed the measures undertaken by platforms to counter disinformation and concluded that these measures are poorly structured, insufficient, and generally adopted because of great societal pressure and pressure from public authorities. The study also found that these companies don't generally have their own structures in place to deal with this issue, their rules are unclear and hard to find, and they don't adopt substantial solutions that get to the root of the problem, which is in fact associated with their business models.

The release of Facebook's internal documents in October 2020 and investigations by media outlets have shown that, in terms of combating disinformation, the company's focus, which is already weak, has been on English-language content. An investigation by *The Washington Post* (Valencia 2021) showed how not just Facebook but also other platforms like YouTube have dealt feebly with the issue of disinformation in Spanish, which strongly affects Latin America, the Caribbean, and Hispanic communities in other countries, including the USA.

## 4.4 CONCLUSION

Latin America has seen the emergence of several initiatives spearheaded by various actors to analyze and tackle disinformation in the region. Data cited previously show that the problem has spread, causing great worry among users. Platforms have been trying to react to the growth of this practice, though still in very inefficient ways, especially as regards Spanish-speaking regions and audiences. In light of these weaknesses, international and civil society entities and fact-checking projects have been active in the region. A significant number of these initiatives are financed or supported by governmental institutions from the Global North; this points to the influence of these organizations on the work that is carried out in Latin America and the Caribbean, a situation which warrants deeper research.

As regards international entities, institutions such as UNESCO and the IACHR Special Rapporteur for Freedom of Expression, which have a track record of engagements with the issue of freedom of expression, have begun to direct efforts at countering disinformation. Fact-checking projects have emerged in Latin American countries, though in an uneven way, and in many cases these initiatives are still tied to media conglomerates. Latin American civil society has a vibrant tradition of defending freedom of expression, and long-established organizations are now addressing disinformation, along with new networks and entities that have been created to deal with the issue.

# 5. CASE STUDY: ARGENTINA

## 5.1 THE DISINFORMATION LANDSCAPE IN THE COUNTRY

Like other Latin American countries, Argentina has a very concentrated media landscape. The Clarín Group is the main conglomerate in the country, being the leader in pay-TV, internet access, and mobile access, besides being active in the field of content production through its own vehicles.

In terms of the internet, there are other portals with a broad reach, such as Infobae. According to a report by researchers associated with the Global Disinformation Index (Szewach and Freuler 2020), two-thirds (twenty-one out of thirty-two) of a sample of sites analyzed presented high risks of misinforming their readers. These portals did not meet the basic editorial and operational policy requirements adopted as a reference by the study. Another ten were classified as medium risk: Although they publish non-sensationalist and unbiased content, they had problems with issues such as subscription and transparency about funding sources. However, the authors of the study ascribed their conclusions less to content and more to poor performance on operational criteria—for example those of the Journalism Trust Initiative (JTI)—such as not publishing authors' signatures and lack of transparency about ownership.

Abdala, Scherlis, and Tchintian (2020) analyzed the political disinformation scenario in the country and listed certain characteristics, such as the presence of cyber-trolls,[18] which were related to government actors in both the administrations of Cristina Kirchner (center-left) (2007–2015) and Mauricio Macri (right) (2015–2019). In addition, fake accounts had a strong presence during the 2019 elections. During that period, the fact-checking agency Chequeado disproved 170 items. One example was an edited video in which the then candidate and now president, Alberto Fernández, supposedly criticized his vice president, Cristina Kirchner. The video was shared 220,000 times on Facebook. Also during the 2019 elections, a campaign was launched that made claims of electoral fraud without any proof, using the hashtag #FraudeK (a letter used in reference to Cristina Kirchner). These messages, according to the researchers, went viral mainly via WhatsApp.

> According to a report by researchers associated with the Global Disinformation Index (Szewach and Freuler 2020), two-thirds (twenty-one out of thirty-two) of a sample of sites analyzed presented high risks of misinforming their readers.

In 2020, the Entrelíneas website (Nimer 2020) listed what it labelled as major examples of disinformation in the country. For example, a TV station (A24) released a video showing the social activist Milagro Sala at a party, supposedly during the lockdown; however, the celebration had in fact taken place before the pandemic. Videos circulated claiming that government employees would not pay taxes for the year, which was untrue. Other messages suggested the return of superinflation because of supposedly unnumbered bills, a claim which was denied by the Argentinian Central Bank.

The pandemic has been a driving factor of disinformation in the country. In July 2020, a little over three months after the first Covid-19 cases were reported, Consejo Nacional de Investigaciones Científicas y Técnicas (CONICET, the National Council for Scientific and Technical Research) released a report according to which it had already refuted more than one-hundred lies related to the coronavirus (*La Arena* 2020). These false assertions included claims about the origin of the virus, about how the virus spreads, and about miraculous cures.

## 5.2 ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

### CIVIL SOCIETY ORGANIZATIONS

Argentina has a number of civil society organizations that work in the area of freedom of expression, civil rights, and digital rights. Some of these have also begun to address the issue of disinformation.

### CELE

One example is the aforementioned CELE, which, in the framework of its Latin American legal observatory, conducts monitoring activities in Argentina. The center also conducts studies on the subject, not only to map legislation but also with the aim of influencing regulatory debates. One of these initiatives is the production of documents discussing possible strategies to counter disinformation, such as a report released in 2017 (Cortés and Isaza 2017). According to Morena Schatzky (interview, August 2021) of CELE, the general approach advocated by the organization is to expand freedom of expression and critical awareness with regards to information: “Disinformation is combated through more and better information, so that more and better information can circulate through the distinct mediums, instead of having platforms remove more content. On the other hand, media literacy helps a person think twice before publishing and sharing a news item.”

CELE develops training activities for civil society leaders on the topic of freedom of expression and the internet:

> *We have a workshop aimed at human rights and civil society activists who are not so knowledgeable about the topic of digital rights. We work on the issues, to give them an overview. Many of the civil society entities ask for content removal and anonymity bans when they are affected by online speech. And we discuss how this can impact the work of activists. (interview, Schatzky, August 2021)*

### DESCONFIO

Desconfio[19] focuses on research and training, but with an emphasis on the issue of disinformation. One of its published studies explores the accessing and sharing of information by the elderly on WhatsApp (Clarín 2020). The team also develops technologies to combat disinformation, such as systems based on machine learning.

In 2020, a thirty-hour course titled “Estrategias periodísticas contra la desinformación” (Journalistic strategies to counter disinformation) was made available in partnership with the SIP Institute (Interamerican Press Association).[20] The organization has entered into partnerships with associations from specific segments, such as librarians and environmental entities: “We work with alliances. For example, we do transversal work. We are in contact with a network of librarians in the province of Buenos Aires to discuss how to incorporate skills and knowledge to help combat misinformation” (interview, Arréguez, August 2021).

### ADC

The Asociación por Los Derechos Civiles (ADC, Association for Civil Rights) runs numerous initiatives related to digital rights. Its plan for 2020–2024 focuses on digital transformation in the fields of rights and guarantees, the democratic system, and inclusion.

The association also produces research and policy documents on fake news. In 2021, it released a report titled “La protección del espacio cívico en línea” (The protection of the civil space online), which addresses various aspects of the problem, lists the responses of various actors, and makes recommendations for the protection of freedom of expression online (Ferreyra 2021). The organization contributes to international debates on the problem, such as the consultations carried out in 2021 by the UN Special Rapporteur on Freedom of Opinion and Expression, Irene Khan, on the subject. The ADC also forms part of AlSur, a network that was discussed earlier in this report as an actor working with disinformation at the regional level.

### FATPREN

In 2019, the Federación Argentina de Trabajadores de Prensa (FATPREN, Argentinian Federation of Press Workers) proposed an initiative which it called “Pacto Ético Contra la Desinformación” (Ethical pact against disinformation). The pact calls press workers to commit to “an agreement not to disseminate false or malicious news and to conduct responsible campaigns, based on the proposals that the candidates offer to voters" (FATPREN 2021). Daniela Monje (interview, August 2021), professor of communication in Argentina and member of the Political Economy of Communication Working Group of the Latin American Council of Social Sciences (CLACSO), highlighted the importance of the proposal:

> *It is a campaign that brings together journalists from Argentina against bad practices of disinformation. There is a base document, released a few weeks ago, from different organizations, both union and university organizations, that seeks in some ways to reduce the levels of aggression and hatred, which are forms of production of disinformation.*

## FACT CHECKING

### CHEQUEADO

In Argentina, there are two verification initiatives, with the more well-known one being Chequeado.[21] The project was created by the foundation La Voz Pública. The goal is to contribute to improving the quality of public debate by offering facts and data to support the formation of opinions.

The project checks statements made by politicians, businesspeople, and public figures, and content circulating on social media. The group also conducts investigations into specific themes (such as government performance on certain topics, like economics) and carries out analyses regarding disinformation related to certain topics. In the context of the pandemic, for example, Chequeado published texts exploring and refuting misleading messages on various topics, such as scientifically proven treatments and miraculous cures.

Chequeado has created a feature on its website called "Explicador," which it uses to provide information of public relevance on diverse topics, such as public health, elections, and the Argentian economy. Chequeado has created channels for receiving requests for fact checking from the community, called "Chequeado Coletivo" (Collective check).[22] It has also developed projects to give greater visibility to corrected information, such as "Museo de la Desinformación" (Museum of disinformation),[23] a webpage where the biggest untruths spread in the country during the last decade are collated, together with the facts that refute them.

Another one of Chequeado's action fronts is what the project team calls innovation. Technological resources are tested and implemented with a view to automating the production process and seeking new ways to interact with audiences. In 2019 Chequeado led a coalition of more than one-hundred media outlets, called Reverso, that was active during the electoral process.

The agency has also developed initiatives in the area of media education. It conducts training with journalists and communicators to teach fact-finding and fact-checking techniques. It promotes educational initiatives for citizens in general, with a focus on young people. Materials are made available, online and on social media, to teach people how to check information. Chequeado has developed projects presented in the form of specific episodes and themes. During the pandemic, for instance, content was created for teachers to use with primary- and secondary-school students.

> During the 2021 legislative elections, a project was launched to support teachers in working with teenagers and young people who were going to vote for the first time. Chequeado has also created a course that covers fact checking, data journalism, and feminist economics, aiming to approach these themes from the perspective of fighting gender inequalities. It has established partnerships with international organizations, such as UNESCO, to act on the theme of disinformation.

### AFP FACTUAL

AFP Factual is an international project of Agence France-Presse, organized by world regions (Latin America, North America, Europe, Asia and the Pacific, the Middle East, and Africa) and by themes (health, environment, science, politics, and sports). The website is also organized by country, and here it publishes the checks carried out by the agency's team in a particular nation, such as Argentina.[24]

> For the 2019 elections, associations of communication professionals, political parties, internet platforms, and the National Electoral Chamber signed the "Compromiso Ético Digital" (Digital ethics commitment), an agreement to combat disinformation and disseminate truthful information as a way to strengthen the democratic process (Cámara Nacional Electoral 2019).

## PUBLIC INITIATIVES

### CONFIAR

In 2020, the Argentinian government launched the Confiar[25] platform. The initiative aims to inform citizens about actions of the federal executive branch of the government, especially in the context of the pandemic. It also makes available official data, checks fake news, and publishes notices of messages circulating with misleading information related to the government and official data. The project has been made available through the public news agency Télam, and also works as a data-checking platform.

### NÓDIO OBSERVATORY

In 2020, the Nódio Observatory (Observatory for Disinformation and Symbolic Violence in the Media and on Digital Platforms) was created, linked to the Office of the Public Defender in Argentina. According to the agency, the objective is to identify, verify, and dismantle disinformation. The initiative has received criticism from civil society and media organizations, but the Defender's Office argued that there was no intention of restricting freedom of expression. According to Adrián Pino (interview, August 2021) from Desconfio, concerns about the initiative arose "in part because [civil society and media organizations] understood that the government itself, often due to the dynamics of official communication, could not independently monitor journalism. It was inverting the equation: journalism should be in a position of control, but it was put in a position of being controlled."

## LEGAL INITIATIVES

In 2019, a bill was presented in the House of Representatives to modify the Electoral Code (Law No. 19945) to prohibit the extensive publication of news that contains misleading claims or that would affect the integrity of a candidate or party. A party that commits this offense could lose the right to public funding for one to four years and the individual could be fined.

In 2020, another bill was presented to the Senate, Bill No. 848, which regulates the dissemination of "illegal content" on social networks, such as fake news, hate speech, false accusation of crime that results in a lawsuit, and the promotion of panic or incorrect conduct during a pandemic or infectious epidemic. The project imposes obligations on platforms with more than 1 million users, such as creating channels to receive complaints and blocking or eliminating illegal content. In the case of fake news, the indicated procedure is to mark the publication as disinformation. Bill No. 1453 of 2020 prescribes penalties for the dissemination of false news within the digital spectrum for the purposes of promoting panic, undermining the credibility of official authorities, or fomenting disorder or riots.

However, CELE's Matías González (interview, August 2021) argues that the solution to the problem is more complex than criminal law:

> *We see potential negative effects of criminalizing expression. In this sense, we start from this basis. The particular project that has been presented has vague definitions; it does not comply with the principle of legality of the Inter-American system. The Salta State Bill talks about disseminating and propagating totally or partially false news. We don't know what is partially false, what is "disseminate" and "propagate." The bill did not prosper; there was no debate about these projects. We saw them as a reaction to demands from society to solve the problem.*

# 6. BRAZIL

## 6.1 THE DISINFORMATION SCENARIO IN THE COUNTRY

Brazil follows the Latin American trend of highly concentrated media markets. The country has a system based on large national groups, especially TV and radio networks, associated with regional oligopolistic groups, in both cases with cross-control of radio and TV stations, print media, and websites. The largest group in the country is Globo (TV, radio, cable TV, printed media, internet), with other big players being Record (TV, cable TV, and internet), Folha (print, internet), and Band (TV, cable TV, print). In addition, the country has strong religious networks, especially Catholic and Neo-Pentecostal.

The country has experienced disinformation episodes throughout its history, linked to both private and public media.[26] In recent years, however, the phenomenon has grown due to the circulation of misleading content on digital platforms. A landmark episode in this regard was the 2018 elections. A commission of external observers classified disinformation during the 2018 general elections as "unprecedented" (Galhardo 2018). Days before the first round, the fact-checking agency Agência Lupa labelled as untrue twelve pieces of information that, combined, had been shared more than 1.17 million times on Facebook. In the second round, the agency Aos Fatos denied fourteen false items that had been shared 1.12 million times on Facebook (Aos Fatos et al. 2018).

In 2018, an article in *Folha de S. Paulo* (Mello 2018) denounced an illegal financing scheme worth 10 million reais for the extensive distribution of disinformation with electoral content. These services, offered by digital marketing companies, would have been illegally procured by the private sector in favor of the then candidate Jair Bolsonaro. Based on the complaint, the Superior Electoral Court (TSE) opened an investigation into an alleged bulk messaging scheme associated with Bolsonaro. A survey conducted by the IDEA Big Data Institute after the 2018 elections found that 90 percent of voters who voted for Bolsonaro believe in fake news (Pasqualini 2018). According to research conducted by Avaaz in 2020, seven out of ten Brazilians believe in fake news (Congresso em Foco 2020).

The Covid-19 pandemic has exacerbated this scenario, combining denialist narratives with political disinformation, since a significant portion of the false information about Covid-19 came from President Bolsonaro or ministers or politicians close to him, such as his sons. Bolsonaro questioned the need for social distancing and the use of masks, promoted drugs with no proven effectiveness for Covid-19 (such as chloroquine and ivermectin), and attacked the Brazilian states that sought to implement the recommendations of the World Health Organization (WHO).

> A study by the Oswaldo Cruz Foundation (Fiocruz), published in April 2020, concluded that 73.7 percent of the fake news about the pandemic circulated on WhatsApp, 10.5 percent on Instagram, and 15.8 percent on Facebook. The survey was based on an analysis of reports and fake news received by the application Eu Fiscalizo between March 17 and April 10, 2020 (Fiocruz 2020).

Another topic that was the subject of an intense disinformation campaign, led once again by President Bolsonaro, was the electoral system. The president and his supporters began to claim that there had been fraud in the 2018 elections and launched a campaign against the country's current system, based on electronic ballot boxes, advocating in favor of printed ballots and verification of vouchers.

A study by the Getúlio Vargas Foundation (FGV) revealed that the phenomenon of disinformation has persisted, with an increase in election years (Ruediger et al. 2020). Paulo José Lara (interview, August 2021) from Article 19, a digital rights coordinator in Brazil, stated that "disinformation about the electoral process has increased greatly in Brazil—the distrust in institutions. If there is a coordinated attack on the electoral courts—politics as it is traditionally done—all this contributes a lot to the degradation of the democratic process."

## 6.2 ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

### CIVIL SOCIETY ORGANIZATIONS

Brazil has a vibrant landscape of civil society organizations that work with the issue of disinformation. A large number of the entities that work with digital rights are organized around the Coalizão Direitos na Rede (CDR, Rights Online Coalition), a network that brings together more than forty organizations, established in the context of the struggle for the approval of "Marco Civil da

Internet” (Law No. 12965 of 2014). This forum of entities is mainly active in the areas of access to information, freedom of expression, protection of personal data, and privacy. The CDR and various other civil society organizations are discussed in the following subsections.

### CDR

The CDR has a working group on freedom of expression and a task force to deal with the issue of elections.

> The working group has been a key player in the debating of legislation related to disinformation, as is the case with the main bill under debate in Brazil, No. 2630 of 2020, titled “Freedom, Accountability and Transparency on the Internet,” but known popularly as the “fake news bill.”

Furthermore, the CDR was also active regarding Provisional Measure No. 1068, recently rejected by the legislature, which intended to amend the “Marco Civil da Internet” to make it more difficult for platforms to moderate content. In addition, it proposed changes to other legislative proposals that would have had ramifications for online discourse and disinformation, such as Law 14197 of 2021, which dealt with measures related to the Brazilian political system.

The CDR also works with the production of materials on the topic or subjects related to it. In 2020, it released a guide titled “Eleições e internet: Guia para proteção de direitos nas campanhas eleitorais” (Elections and the internet: A guide for the protection of rights during electoral campaigns) (CDR 2020). The document discusses the phenomenon of disinformation in electoral contexts and lists a series of tips that can enable candidates and voters to deal critically with content; to avoid passing on misleading messages; and to report potential false content by referring it to fact checkers, among other measures.

Although many organizations mentioned in this report form part of the CDR, they also run their own projects on the subject of disinformation. Some of these initiatives are presented in the sections that follow.

### INTERNETLAB

InternetLab[27] is a digital rights and internet policy think tank that carries out evidence-based and impact-oriented studies on topics related to freedom of expression, copyright, privacy and surveillance, data protection, discrimination and online violence, inequalities, political communication, and disinformation, among others. The institution has researched the disinformation phenomenon from a variety of perspectives: analyzing how disinformation relates to the new emerging dynamics of political communication brought about by news ICT, investigating the gender dynamics behind the disinformation narratives in the country, examining the computational propaganda elements of disinformation campaigns, and evaluating the regulatory approaches proposed to counter online disinformation. It also aims to inform and contribute to the policy debates around the issue. To this end it has published policy papers and technical contributions to regulatory debates, such as in the case of the “fake news bill.”

### IP.REC

The Instituto de Pesquisa em Direito e Tecnologia do Recife (Technology and Law Research Instiute of Recife, IP.Rec)[28] works with a variety of topics related to digital rights. The group conducts research on topics related to disinformation, such as an investigation into the models of intermediary liability in countries of the Global South, along with the production and online publication of technical notes, opinions, and materials about disinformation. On its blog, IP.Rec publishes content aimed at citizens, such as guidance on how to deal with disinformation. Like other organizations, IP.Rec also intervenes in political processes, as it did, for example, in the case of Bill 2630/2020, also known as the “fake news bill.”

### COLETIVO INTERVOZES

Coletivo Intervozes[29] has developed initiatives on several fronts to protect and promote the right to information. The organization has created an internal working group on the issue of disinformation and has been working mainly on advocacy and the production of informative materials. Together with other entities that are also members of the CDR, Intervozes has participated in the discussion around legislative initiatives such as Bill 2630 and the Parliamentary Commission of Inquiry into Fake News, which was opened in the Brazilian Congress in 2019. It has also developed a project, in partnership with Sleeping Giants Brazil, to combat misleading messages about climate change issues.

It is also relevant to highlight some of the research on the matter conducted by Intervozes, such as a book edited by Martins (2020) which discusses responses to the phenomenon, and a study by Barbosa, Martins, and Valente (2021) in which the organization critically analyzes the measures taken by digital platforms to combat the circulation of misleading content and presents recommendations. They also released a booklet with proposals to deal with the problem.

### BARÃO DE ITARARÉ

The Centro de Estudos da Mídia Alternativa Barão de Itararé[30] is an entity that advocates on behalf of and supports independent media outlets. The center has participated in discussions about the "fake news bill" and other legal initiatives with implications for online speech, including disinformation. It also promotes debates and produces material about digital rights aimed at social movements, including topics related to false content, access to information, and protection of personal data.

The aim is to bring those in content production closer to the discussions on digital rights protection, in order to strengthen journalistic activity. As Renata Mielli (interview, August 2021), the entity's director, explains:

> Checking facts is important, but it's like drying up ice. On the other hand, we have been working to strengthen journalistic activity, and especially the alternative media. The arrangements are diverse, and we need to understand this new information ecosystem that has emerged and that can be an important environment for us to confront disinformation, strengthening spaces for reliable information.

### AVAAZ

Avaaz, an international organization, has an office in Brazil that promotes action in relation to disinformation, among other issues. The organization has conducted research on topics related to disinformation and the Covid-19 pandemic, and opinion surveys among the population to understand how people access information and disinformation. Avaaz has also researched the reception of misleading anti-vaccination content, in partnership with the Brazilian Immunization Society.

One of Avaaz's aims is to support employees of digital platforms and victims of disinformation: "We try to cooperate with employees of social media to amplify their voices in relation to the demands they have, to help them have access to the media. We also try to amplify access to the voices of the victims, trying to get them to find spaces to publicize their demands" (interview, Moraes, August 2021). Avaaz mediates, for example, between representatives of disinformation victims and platform executives at their headquarters in the USA.

### INSTITUTO VERO

Instituto Vero[31] is a recently established organization associated with one of the country's biggest digital influencers, Felipe Neto. The entity developed and launched a global survey on youth trust in vaccines during the Covid-19 pandemic, in partnership with an alliance associated with UNESCO (Bonami and Soh 2021). Another subject studied by the institute is the buying and selling of likes on Instagram. In 2021, Vero released a report on the strategies used by politicians in Parliament to disrupt the moderation of disinformation content (Machado and Durigan 2021). The survey analyzed fifteen bills, evaluating the possible consequences of the measures provided for in each to deal with the production and dissemination of disinformation in the country.

### DATA PRIVACY BRAZIL

The Data Privacy Brazil Research Association was created with a focus on personal data, and is active at the intersection of this theme and other subjects, such as disinformation. One of its focuses is the analysis of the data market and its agents, especially digital platforms and data brokers. The entity evaluates the relationship between data protection and competition, or the antitrust measures to guarantee competition, and the implications of violation of data protection and anti-competitive measures on freedom of expression. The organization also develops research on issues related to data protection and produces analyses such as technical notes. In the debates on Bill 2630, the association elaborated an analysis document on the impacts on privacy of the measures foreseen in the proposal approved by the Federal Senate.

## FACT CHECKING

### THE EARLIEST INITIATIVES: BOATOS AND E-FARSAS

Brazil has a long-standing history of fact checking. One example is Boatos,[32] an independent site created by a journalist several years ago, before the establishment of fact-checking agencies. E-farsas[33] was also established as an independent website in 2002 to publish corrections of false information and additional information. Since 2012 it has been hosted by and has received revenue from the R7 portal, linked to the Record group, owner of the third-largest TV station in the country.

### MORE RECENT DEVELOPMENTS: AOS FATOS AND AGÊNCIA LUPA

Several agencies have been established more recently, a trend that seems to follow the growth of disinformation on social media. Two examples are Aos Fatos[34] and Agência Lupa,[35] both of which have become well known and developed partnerships both with digital platforms and with public bodies, such as the TSE. These agencies work not only with verification, but also with the production of information. During the 2018 elections, they started to mobilize advocacy efforts through institutional dialogues with the TSE, proposing measures to mitigate the profusion of disinformation.

### FACT-CHECKING INITIATIVES ASSOCIATED WITH TRADITIONAL MEDIA

In Brazil, there are also verification initiatives associated with traditional media. During the presidential elections of 2018, the Comprova[36] project was created as a data verification network, driven by the Brazilian Association of Investigative Journalism. Today it has representatives from thirty-three media outlets and is supported by funding from Facebook and Google. Fato ou Fake[37] is an initiative of the largest media group in the country, Grupo Globo. Estadão Verifica[38] is a blog published on the website of *O Estado de São Paulo*, one of the most traditional newspapers in the country. UOL Confere is the fact-checking project of UOL,[39] one of the largest content companies in the country, which is controlled by one of the main print groups, Folha. There is also a verification initiative run by AFP, which is called AFP Checamos.[40]

## MEDIA EDUCATION

### INSTITUTO PALAVRA ABERTA

The Instituto Palavra Aberta is one of the organizations in Brazil focused on media education. It was responsible for the development, in partnership with Google, of the EducaMídia program, a project that aims at training teachers and education managers on the subject. The EducaMídia website[41] provides content, resources, and documents for education workers to apply in their daily training activities. The project also explains what media education is and the importance of this approach in the education of citizens. The topic is addressed in a guide, which presents the organization's educational perspective regarding ICT.

Besides working with educators, the EducaMídia project also offers activities for different audiences, with a focus on vulnerable communities, such as courses for the elderly. The Instituto Palavra Aberta has been defending the practice of media education as a new form of literacy, according to Daniela Machado (interview, August 2021) of EducaMídia: "We have been considering media education as a new way of dealing with information. The very concept of literacy changes as technologies and the way we relate to information change. What is literacy today? It goes beyond reading words printed on a piece of paper."

### INCT.DD

Regarding media education and research, it is also worth mentioning the Instituto Nacional de Ciência e Tecnologia em Democracia Digital (INCT.DD, National Institute of Science and Technology for Digital Democracy), a network of researchers from several educational institutions coordinated by the Federal University of Bahia (Universidade Federal da Bahia). The institute brings together multidisciplinary teams for the analysis of disinformation practices. A diverse range of professionals are involved in the projects, from linguists to programmers, and also social scientists, who bring together the quantitative and qualitative aspects of the analysis of social media and the circulation of misleading content in these environments. The institute has carried out research on false content associated with democratic institutions, such as content that targeted the Electoral Justice as well as content targeting the press and and media professionals. INCT.DD also offers training on disinformation through a six-hour course consisting of twelve classes, offered on digital platforms. The target audience of the course is diverse and includes journalists, fact checkers, researchers, and other interested people.

> INCT.DD brings together multidisciplinary teams for the analysis of disinformation practices.

### FGV DAPP

Another renowned research center in the country is FGV DAPP, linked to the Getúlio Vargas Foundation, an educational institution. It organizes studies on various types of content related to different kinds of disinformation practices. The group has prepared research on disinformation about the electoral system on Facebook and YouTube, in partnership with the TSE. FGV DAPP also promotes training events with diverse actors, from both public and civil society organizations. One example is workshops during which the methodology for identifying disinformation is presented so that it can be applied by the workshop participants.

## PUBLIC INSTITUTIONS

One of the strategies employed by public authorities involves verifying information, refuting fake news, and providing additional information. This method has been adopted by the Chamber of Deputies[42] and by the federal government, particularly the Ministry of Health, during the Covid-19 pandemic.[43] In the course of the 2018 attacks against the Electoral Justice by candidates and political groups (with allegations of electoral fraud), the TSE launched a series of campaigns and initiatives to combat false content. In 2017, it promoted a set of debates to generate proposals for the rules of the 2018 elections. In that same year it created a group with the participation of civil society entities and the Brazilian Internet Steering Committee (CGI.br, Comité Gestor da Internet no Brasil).[44] The institution also held dialogues and signed partnerships with digital platforms to combat disinformation during elections.

> In 2019, the Federal Supreme Court (STF) opened an investigation into the production and dissemination of fake news with content that is detrimental to democracy, the Court itself, and some of its members. The narratives are allegedly promoted, in general, by supporters of President Jair Bolsonaro. The inquiries began in 2020 and were ongoing at the time of writing, in 2021. The process has already resulted in arrests and the issue of search-and-seizure warrants for politicians, bloggers, and businesspeople allied with President Bolsonaro.

## LAWS AND LEGAL INITIATIVES

In Brazil, there are laws that directly or indirectly address disinformation practices. The Criminal Code contains a section referring to crimes against honor, which comprise the crimes of *difamação* (imputing to someone a fact that is offensive to his or her reputation), *calúnia* (falsely portraying someone as the author of a crime), and *injúria* (offending the dignity of another person).

The electoral legislation also prohibits the spreading of false information. The Electoral Code (Law No. 4737 of 1965) makes it a crime to advertise facts about parties or candidates that are known to be untrue and that have the potential to influence voters, or to slander someone in electoral propaganda by falsely claiming that the person has committed a crime. The law also defines as a crime any attempt to provoke the instigation of judicial or administrative proceedings by attributing a crime to someone when the complainant knows that the accused is innocent.

Furthermore, Brazil has many bills that regulate disinformation, directly or indirectly. Based on the narrative that the country's institutions are being attacked and that something needs to be done, the passing of legislation to address disinformation and regulate social media has become the object of significant political pressure from different sides of the opposition to the government of Bolsonaro.

The "fake news bill" (Bill No. 2630/2020) can be read like a description of the political crisis Brazil is going through. Still, it has the potential to be weaponized beyond its current capacity to resolve the crisis or to address authoritarian trends within the public sphere. It poses certain risks to fundamental rights, such as data retention and the "traceability measure" in instant messaging applications. The bill obliges applications to store for three months all the data necessary to identify the author of content shared between users whenever the message is "mass forwarded." This covers all messages that were sent by more than five users to groups and transmission lists, in a period of fifteen days, and that reached over 1,000 users. This measure will target every viral message as suspicious and will endanger users who forward content for a number of reasons. There is also a risk that social movements and activists will end up being targeted if a court requests the data associated with their messages.

The bill also establishes certain conditions to enhance "user identification." For example, platforms may have to require users to identify themselves by presenting a valid ID in case they receive "reports" of illicit behavior—a very generic and open-ended requirement that triggers the obligation to collect personal user data. These provisions, and the requirement of a valid contract with an ISP to access certain messaging services, could create barriers for accessing the internet and its applications. Moreover, some aspects of the proposal need improvement, such as content moderation. The bill seeks to establish protections for free speech within content moderation, including the obligation to notify users when their content is acted on, and providing them with appeal opportunities. However, the parameters are not clear, and the wording may lead to confusion—there are a few exceptions, there is a broad “right of reply” to be granted by platforms in the case of “offenses,” and there are other unclear obligations for social networks.

On the other hand, the bill has some positive aspects. It introduces new transparency requirements for platforms, compelling them to regularly publish reports containing metrics regarding content moderation, including the number of pieces of content that the platform has acted on, the number of profiles suspended or erased, the number of user reports, and so on. Moreover, it also requires platforms to present more data on ads, especially political advertising. As a result of steady advocacy from civil society against the provisions in the previous versions of the bill, which had the potential to lead to content filtering, these conditions were excluded from the current version, giving space to rules dedicated to tackling abusive and inauthentic behavior such as malicious bots and bulk messaging. We consider this a positive shift, especially because user criminalization or general mandates to filter content have been ruled out.

# 7. CHILE

## 7.1 THE DISINFORMATION SCENARIO IN THE COUNTRY

The Chilean media market follows the Latin American pattern of concentration and centralization in the form of large business groups based in the main metropolitan regions, especially the capital, Santiago. The Mercúrio Group controls the country’s two main newspapers, *El Mercúrio* and *Las Últimas Noticias*, in addition to more than twenty regional newspapers and radio stations such as Universo and Positiva FM. Another conglomerate is the Copesa Group, which controls print media such as *La Tercera* and *La Hora* and websites such as La Cuarta, and which has published many magazine titles in the last decade. It also has associated itself with radio stations such as Duna and Zero. The Luksic Group is active in several areas, including media and telecommunications. It controls the TV channel Canal 13 and radio stations such as Oasis, Sonar, and Play. The Bethia Group has a similar profile, with subsidiaries in different sectors, including TV channels (ETC TV) and radio stations (Carolina, Infinita, Romântica, and Tiempo).

The country went through a process of intense political protests in 2019 and 2020, which resulted in a new constituent process, held in 2021. According to the “Digital News Report 2020” (Reuters Institute 2020), in that year Chile saw a 15 percent drop in trust in the news, reaching a point at which only 33 percent of respondents expressed belief in the news. Among the forty countries analyzed, Chile was ranked twenty-eighth in terms of the proportion of the population that trusts the news (Reuters Institute 2020). Among the reasons for this low level of trust in the media is the view of media vehicles as being linked to economic elites and criticism of the coverage of the protests, pointing to a lack of representativeness.

A report by the Observatório do Direito à Comunicação (the Right to Communication Observatory) and Fundación Datos Protegidos (Protected Data Foundation) about freedom of expression in the country in 2020 noted several problems in media coverage of the protests, which led to citizens accusing the media of spreading disinformation and manipulation (García, Baeza, and Peña 2021). This illustrates a trend in Latin America, where disinformation practices are not restricted to social media but have long been discerned in the work of the so-called traditional media.

> A study conducted by researchers at the Pontifical Catholic University of Chile (Pontificia Universidad de Chile) and published in an international journal in 2019 (Valenzuela et al. 2019) pointed out high levels of perceived exposure to false content among respondents. More than 75 percent of the sample said they had received some of the messages used as examples in the survey, including content concerning fires and the supposed risks of vaccines. Among the 75 percent mentioned above, 24 percent found claims that vaccines can cause autism to be very or extremely credible.

According to a regional study prepared by the information security company Kaspersky and released in 2020, 70 percent of Chileans could not tell the difference between false and true news. In this respect the country ranked third among the nations evaluated, behind Colombia and Peru.

Chileans were also among those who are most informed by social media, with a rate of 32 percent (Diazgranados 2020).

In Chile, the pandemic has also been a mobilizing force for the production and circulation of disinformation. According to Juan Carlos Lara (interview, August 2021) from the NGO Derechos Digitales, certain individuals gained notoriety for the dissemination of false content:

> *There have been some figures who have gained public relevance from conspiracy theories. They are not often taken seriously by the population. A publication that calls itself "the health guardian" [contains] a lot of disinformation: it speaks against vaccines; it gives a platform to people who spread information about miracle cures.*

There has also been great discussion on and questioning of the veracity of the Chilean government's data on Covid-19 cases and deaths.

## 7.2 ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

### CIVIL SOCIETY ORGANIZATIONS

### DERECHOS DIGITALES

Chile has a number of civil society entities that work with disinformation. One of these is Derechos Digitales, which is based in the country but also has a regional scope. The organization produces research and reports on digital rights, discussing, issues such as intermediary liability and others that impact on disinformation, including net neutrality and zero rating. The team is also involved in researching disinformation in political contexts, more specifically the use of electoral advertising on Facebook, in collaboration with the electoral service of the country.

Derechos Digitales engages in advocacy in terms of legislative initiatives and processes in public institutions, and on digital platforms.

In addition, Derechos Digitales engages in advocacy in terms of legislative initiatives and processes in public institutions, and on digital platforms. In relation to Parliament, the organization focuses on the discussion of bills that aim to combat disinformation or are in some way related to this practice, seeking to problematize the consequences for freedom of expression and digital rights that these measures may have.

Regarding platforms, Derechos Digitales maintains a dialogue with several companies about challenges to freedom of expression on their platforms. According to Juan Carlos Lara (interview, August 2021), "with platforms, the conversations are largely driven by the companies themselves, specifically Facebook, Twitter and Google. There is a conversation about content moderation with Facebook. In the case of Twitter, the AlSur alliance is one of the social network's safety partners."

### FUNDACIÓN DATOS PROTEGIDOS

Fundación Datos Protegidos[45] is active in the area of digital rights, covering topics such as privacy and freedom of expression, including disinformation. In partnership with academic institutions, the entity prepares an annual national report on freedom of expression, in which it maps the violations of this right and the situation in Chile. The organization also promotes debates and campaigns related to pluralism and the fight against media concentration, important elements in the mitigation of disinformation. In the context of the protests related to the Constituent Assembly, the foundation contributed to gathering information about and highlighting human rights violations committed by state forces, to combat a situation of disinformation about these abuses against the population and human rights defenders. One example was the "Testigo em línea" campaign, which aimed to collect reports and evidence of such violations.

### FACT CHECKING

Chile is home to the largest number of fact-checking initiatives, with a total of twelve. As shown in Table 1 earlier in this report, these include independent agencies, projects associated with large media outlets, and initiatives linked to universities.

The independent agencies are initiatives that were created with the primary purpose of conducting verification. Some of them emerged in the context of the 2019 social protests, such as Mala Espina Check,[46] which also partnered with Chequeado in Argentina. Fast Check[47] also emerged as a result of the street demonstrations that began that year. Cazadores de Fake News[48] works with a collective analysis model and focuses on disinformation about Venezuela.

The initiatives associated with large media outlets include projects linked to international vehicles, such as AFP, and those linked to national media. AFP Factual divides the work into regions and themes, such as health, environment, science, politics, and sports. El Polígrafo is associated with *El Mercurio*, the largest newspaper in the country. The newspapers *La Tercera* and *El Dínamo* also have their own fact-checking projects. In the case of *La Tercera*, there is no separate, dedicated website;

instead, verifications are published under a "fact-checking" section. There are also verification projects associated with TV stations and websites. Bío-bío Comunicaciones is one example of a conglomerate associated with a radio station in the country. The initiative also does not have a dedicated webpage; instead, verifications are published on the website of the radio station. Another case is Meganotícias Notícias Falsas, an initiative derived from the news program *Meganotícias*, of the Mega TV station.

Initiatives linked to universities include the Observatório de Datos del Periodismo y de la Comunicación (Observatory of Data related to Journalism and Communication),[49] a program that was created at the Adolfo Ibanez University in the capital, Santiago. Fact Checking[50] is a project run by students and professors at the Pontifical Catholic University of Chile, also in Santiago. Chequeando was developed by students and professors at the University of Conception (Universidad de Concepción). As in the case of other independent agencies, the project was created to monitor information about the 2019–2020 protests.

## MEDIA EDUCATION

The country also has a number of media awareness and education initiatives. In the context of the constitutional referendum in 2020, the National Electoral Service (Servel) met with civil society entities, including Derechos Digitales and others from diverse areas, such as Chile 21 and the Associación Chilena de Ciencia Política (ACCP, Chilean Association for Political Science), to discuss measures to ensure a "secure" process (*La Tercera* 2020). Also in the framework of the plebiscite process, the Chilean office of the United Nations Development Programme (UNDP) and the Instituto Milenio de Investigación Sobre los Fundamentos de Los Datos (IFMD, Millennium Institute for Foundational Research on Data) have signed an agreement to evaluate information contamination related to the constitutional process. The project involved the writing of materials and content aimed at drawing attention to the problems of misinformation and what the entities called "informational contamination."

Another initiative that has brought different actors together against information disorder is the campaign "Protégete de la información contaminada" (Protect yourself against contaminated information), which was launched in October 2020 by the Organização dos Estados Iberoamericanos (OEI, Organization of Latin American States), Ahora nos Toca Participar del Nuevo Pacto Social (NPS-Chile, It Is Time to Participate in the New Social Pact), Ciudadania Inteligente (Intelligent Citizenry), and Derechos Digitales. The initiative has developed resources for society to critically relate to the information disseminated about the process, with guidelines to avoid believing and sharing "contaminated" information (OEI 2020).

## PUBLIC INSTITUTIONS

In 2020 the Consejo para la Transparencia (CPLT, the Transparency Council), an autonomous public institution, launched a campaign against disinformation focused on the elections, called DESComparte (Epicentro Chile 2020). The initiative produces and disseminates materials that contain guidelines and tips for identifying misleading content and that highlight the importance of not sharing this type of message. DESComparte is thus active in raising awareness among the population about the risks and harms of accessing and sharing false content.

## LEGAL INITIATIVES

> In 2018, a bill was presented to the Chilean Senate that provides for politicians (such as presidents, senators, deputies, mayors, and councilors) to be removed from office if found guilty of producing, disseminating, and financing fake news. In 2020, a new proposal was brought to the Chamber of Deputies that would include in the Penal Code the crime of publishing or disseminating fake news aimed at hindering the work of health authorities during health crises. Michele Bordachar (interview, August 2021), a member of Derechos Digitales, argues that these initiatives have been presented as a form of political response in an effort to gain visibility: "Projects have been presented, but they haven't advanced. Representatives file the project, call the press. It is very profitable to present a project. But they were done without much effort and were abandoned."

# 8. COLOMBIA

## 8.1 THE DISINFORMATION SCENARIO IN THE COUNTRY

Colombia is no different from other countries in Latin America when it comes to media concentration. This concentration grants the main media conglomerates great influence over public debates, an influence which has been used to set political agendas and support certain groups, including through disinformation strategies. According to the Media Ownership Monitor Colombia project survey,[51] promoted by the international organization Reporters Without Borders, the eight largest media groups occupy 78 percent of the Colombian media market. One of the main media conglomerates in the country is Ardilla Lulle, which controls more than fifty media outlets, including TV RCN, RCN Radio, and NTN24h. El Tiempo controls various TV stations, such as CityTV and El Tiempo Televisión; newspapers, such as the eponymous newspaper and ADN; and websites, including an eponymous one and DiarioADN, Metrocuadrado, and Portfolio. In print media, the El Tiempo publishing group had a market share of 31 percent of Colombian readers in 2019; in the same year Grupo Nacional de Medios (GNM) had 30 percent.

> In Colombia, disinformation is associated with the political situation in the country and the historical conflict involving the state and the political organization FARC (Fuerzas Armadas Revolucionarias de Colombia; Revolutionary Armed Forces of Colombia). The 2016 referendum, which led to the rejection of the peace agreement between the government and FARC, was marked by a profusion of misleading content. This was not restricted to social media; it was quite prominent in traditional media and was spread through other communication mechanisms as well, such as loudspeaker systems, which were used in poorer areas (Worley 2018).

The Detector de Mentiras ("lie detector") feature of the website La Silla Vacía conducted a mapping of the disinformation regarding the peace agreement. The most widespread untruths were related to the resources available to FARC, or claimed that the agreement was detrimental to farmers, that it would exonerate the kidnappers, and that FARC would buy the elections with resources gained through corruption. Even after the peace agreement was rejected, disinformation spread about the post-conflict period (Jaramillo 2017).

During the 2018 elections, fake messages, also spread through social media, were common. The leftist candidate Gustavo Petro was the target of fake news, with allegations that he would force families to divide homes if these were larger than 65 m$^2$. It was alleged that the rightist candidate Iván Duque, who was eventually elected, would raise the tax on motorcycles, amongst other things (Worley 2018). In 2019, the IACHR's Special Rapporteur for Freedom of Expression recorded several examples of disinformation against opponents of the federal government.

Organizations that were interviewed during this study confirmed the use of disinformation in Colombia, for example in the form of cyber-patrols targeting and attacking the press and political opponents. This type of conduct raises concerns about the impacts on freedom of expression.

According to the Iceberg Digital survey, carried out by the information security firm Kaspersky, 73 percent of Colombians could not tell the difference between false and real information. Among the five Latin American countries analyzed, Colombia was the second-worst performer in this question, second only to Peru (where 79 percent of respondents could not differentiate between fake and real content) (Diazgranados 2020).

## 8.2 ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

### CIVIL SOCIETY ORGANIZATIONS

### LINTERNA VERDE

In Colombia, there are a number of organizations active in the area of freedom of expression and digital rights. One of them is Linterna Verde,[52] which acts as a technical support group in the area of communications. They engage in the production of knowledge as one of their strategies. The team has developed research about disinformation involving Venezuelan migrants in Colombia and health, analyzing Facebook groups made up of migrants, as well as Twitter and Instagram profiles. The organization works together with journalists and investigative reporting projects, such as Colombia Check and La Silla Vacía. Based on the information gathered, including through social network monitoring methodologies, the organization encourages journalistic vehicles to combat disinformation on certain topics, such as migration.

Linterna Verde also has initiatives to provide technical support to civil society organizations, such as gender justice, environmental, and drug policy organizations. According to Cristina Vélez (interview, August 2021) from Linterna, "they come with different needs; there are campaigns on social media, or there are online attacks on certain individuals. We make a diagnosis of whether it is worth a response or not, and we provide information to civil society on the actors and actions that spread disinformation."

The organization has joined another important initiative in digital rights in the country, Fundación Karisma, to conduct research on knowledge gaps concerning internet-related topics. One of the projects involves monitoring the internal policies of platforms and changes in these, which includes allowed and prohibited conduct and sanctions regarding disinformation. Another topic analyzed from the perspective of informational gaps is vaccines in the context of the Covid-19 pandemic: "We researched consumption and distrust in vaccines and information on social media. We did an analysis of the anti-vaccine groups on Facebook and Twitter, and we are looking to follow up on this," adds Vélez.

Organizations like Linterna Verde and Fundación Karisma also act in a joint manner to influence the executive branch and Parliament. One example was the reform of the Electoral Code, which ultimately included provisions related to disinformation among the new rules.

### FLIP

The Fundación para la Libertad de Prensa (FLIP, Press Freedom Foundation) acts on several fronts to fight disinformation. One of them is analyzing the responses of public institutions to the phenomenon according to international and national human rights parameters, especially regarding freedom of expression. FLIP has articulated a dialogue with the Bogotá City government on the issue, bringing together civil society and journalists: "This is an example of how to respond to institutionality. We have to monitor how public bodies and agencies respond institutionally to disinformation. The process with public bodies is always collaborative, but we can't ignore the risks of the way institutions deal with disinformation, especially the internet," explains FLIP's Juan Pablo Madrid (interview, August 2021).

FLIP also runs projects in the areas of training and capacity building. The organization has sought to promote these formative actions in different areas in the country: "We have opted for training practices and to create arenas to talk about the theme, in different territories. We attempted to understand the features outside our bubble and outside the capital," says FLIP member Maria Paula Concha (interview, August 2021). Among its awareness-raising and training activities, FLIP has promoted spaces for dialogue with journalists, during which these professionals discuss the challenges and problems they face in their daily work. This information supports the creation of good practices and tools, which can then be applied by journalists and other press workers.

> FLIP acts on several fronts to fight disinformation. It also runs projects in the areas of training and capacity building.

### PACT FOR PRESS FREEDOM OF THE ANTONIO NARIÑO PROJECT

In 2019, political parties and civil society organizations in Colombia signed a pact for press freedom to combat information disorder in that year's elections. The pact forms part of the Antonio Nariño Project, led by the Fundación para un Nuevo Periodismo Ibero-Americano (FNPI, Foundation for New Latin American Journalism), and brought together several political parties and foundations, such as FLIP, the FNPI, the Asociación Colombiana de Medios de Información (AMI, Colombian Association of Information Media), and Germany's Friedrich Ebert Foundation (Proyecto Antonio Nariño 2019).

The signatories to the pact made a commitment to (Fundación Gabo 2019):

- respect freedom of speech during election time
- not promote false information nor fund or engage in any disinformation practice
- promote good practices of engagement on social media
- provide true, objective, and complete information about parties, candidates, and movements
- promote public debate free from threats, violence, or stigmatization.

## FACT CHECKING

### COLOMBIA CHECK

This fact-checking initiative verifies messages and speeches delivered by authorities and public figures. The site publishes verified content organized by subject. Like other initiatives, it provides a section for explanations about issues of national relevance, such as the functioning of public services for the population and for migrants. The site dedicates special coverage to events of national importance, such as the 2021 strikes. The project is associated with the organization Consejo de Redacción (Newsroom Council), which is made up of Colombian journalists and receives funding from Google, Facebook, and Microsoft, as well as from state organizations such as the National Endowment for Democracy (NED).

### LA SILLA VACÍA

The "lie detector" feature of the website La Silla Vacía[53] checks politicians' speeches, especially statements from political authorities and during elections. It also checks messages circulating on social media platforms such as Facebook, Instagram, and WhatsApp. During the Covid-19 pandemic, the service also started checking content on the pandemic. La Silla Vacía also runs courses, although not on the topic of disinformation, but rather on digital journalism and journalistic work for websites, as well as on female leadership, confirming the focus on gender equality seen amongst other fact-checking projects in the region.

> The "lie detector" feature of the website La Silla Vacía checks politicians' speeches, especially statements from political authorities and during elections.

### AFP FACTUAL

The AFP Factual fact-checking project of Agence France-Presse is also active in Colombia. It promotes the verification of false statements and combats disinformation practices in different countries in Latin America. It collaborates with AFP's editorial team to select relevant false news and offer verified information about the subject in question.

## MEDIA EDUCATION

### ENTRETANTO CUENTO

In the field of media awareness and education, Telefónica Movistar, linked to one of the main telecom operators in the region, Spanish Telefónica, has developed the project "Entretanto Cuento."[54] The initiative's website explains how and why people receive and share disinformation and discusses the impacts of the circulation of misleading content on society. The site also offers a game in which internet users can assess their skills and knowledge on various topics. The project has developed training materials, such as a guide for teachers and families with suggestions and guidelines on how to work with children and adolescents on this topic (Entretanto Cuento n.d.).

### CONSELHO DE REDAÇÃO

The Conselho de Redação (Newsroom Council), responsible for the Colombia Check project, has developed a series of courses for journalists on how to cover certain themes. The course received financial support from Facebook, which also provides resources to Colombia Check. Among other things, online training was offered to journalists on techniques, tools, and sources that can be used to verify information about the Covid-19 pandemic, the coronavirus, and alleged treatments. Basic fact-checking methods in general and tips on how to cover health emergencies were covered, with the aim of improving fact checking of scientific content about Covid-19. The association also held a course on how to verify claims in electoral contexts.

## PUBLIC INSTITUTIONS

At the state level, one of the responses adopted by the government has been the implementation of cyber-patrols—specialized groups of security forces set up to monitor the internet, including digital platforms, with the purpose of investigating crimes and holding accountable people who commit these abuses in the online environment. Carolina Botero of Fundación Karisma (interview, August 2021) points out that this initiative is problematic: "The idea of cyber-patrols as a whole is very complicated. Colombia started with this in 2015, and the main element was that cyberthreats were linked to cybersecurity. It's been very much tied to disinformation and profiling. It is the government's intention to control the narratives in the public space of the internet."

Another regulatory initiative that is not directly related to information disorder but has an impact on it was the publication in 2020 of a set of recommendations by the Superintendency of Industry and Commerce (SIC) to regulate advertising and commercial practices carried out by influencers (SIC 2020). This guide points out aspects of transparency in terms of sponsorship and other forms of payment for publishing posts about a brand or a certain topic. Carolina Botero from Fundación Karisma (interview, August 2021) argues that this publication has relevance for the issue of fake content:

> *This regulatory trend in digital marketing is linked to disinformation because there is a strategy on the part of the [SIC] to create certain liabilities regarding forcing digital influencers to disclose when they receive money to speak. There is a link with disinformation because there is a wide range of practices, including manipulating the public space with digital influencers through payment, performing an advertising agenda.*

### LEGAL INITIATIVES

In 2020 the Senate approved a proposal to change the Electoral Code (Bill No. 234). The bill now punishes content that is critical of politicians and parties and gives the National Electoral Council the power to investigate and sanction citizens for their posts on social networks. Civil society organizations raised their voices after the approval of the change, pointing out that the procedure was irregular in that there had been no debate or transparency, and that it could promote censorship by making it difficult to criticize candidates and political parties.

# 9. MÉXICO

## 9.1 THE DISINFORMATION LANDSCAPE IN THE COUNTRY

The media landscape in Mexico is composed of large conglomerates. One of them, América Móvil, has operations in twenty-six countries in Latin America and Europe, maintaining large telecommunications operators and pay TV services. The conglomerate, headed by one of the richest men in the world, Carlos Slim Helú, has as its main media vehicles Uno TV and Contenido and websites focused on municipalities, as well as print media such as the magazines *Contenido* and *FASTMag*. The Televisa group has one of the largest TV stations in the country, Las Estrellas, in addition to some of the most popular websites, such as Televisa, SPD Notícias, and El Deforma. The Multimedios group controls TV stations such as Canal 12 and Milenio Televisión, thirty-seven radio stations, newspapers such as *Milenio Diario*, and websites such as Milenio, while the Grupo Empresarial Ángeles owns Imagem Televisión TV station and a radio station with the same name, as well as the *Excelsior* print and online newspaper.

Kaspersky's Iceberg Digital survey indicated that 66 percent of Mexicans had difficulty in distinguishing between true and false elements in messages—one of the lowest percentages among the nations analyzed. According to the survey, 42 percent of Mexicans do not question, or question only marginally, what they read on the internet—the lowest proportion among the nations examined. The study found that 35 percent of the country's citizens use social networks as sources of information (Diazgranados 2020).

According to the Global Disinformation Index risk survey of 2021, among thirty-one Mexican websites analyzed, five were identified as having a high risk of disinformation and twenty-five as having a medium risk (Lara and Jimenez 2021). Among the aspects considered in the evaluation is poor transparency (about owners and funding sources).

There have even been cases in Mexico where disinformation led to deaths. In 2018, in the state of Puebla, two men were lynched and burned alive by a mob after false messages stating they were child kidnappers were spread among residents of the town (Martinez 2018).

Against the backdrop of Covid-19, the country has also seen political officials spreading fake news. In March 2020, the governor of Puebla claimed that Covid-19 would affect only affluent people and that poor people would be immune to the disease (Forbes 2020). The country's president, Andrés Manuel López Obrador, has advocated the use of amulets against the disease and has claimed that refraining from lying and stealing would help against Covid-19 (*El Universal* 2021).

> During the pandemic, disinformation led citizens to take medicines with no scientific basis and even motivated aggressive behavior towards health workers (Hardy 2020). In Chiapas and the State of Mexico, disinformation led to people vandalizing local hospitals and burning police cars. Fake news common to several countries also circulated in Mexico, such as claims that messenger RNA vaccines, such as those of Pfizer and Moderna, would affect the genetic material of those receiving the vaccine, or that the vaccines were developed so quickly because they did not go through the clinical trials necessary to ensure safety and efficacy (Toche 2020).

In the opinion of Vladimir Chorny (interview, August 2021) of R3D, the problem cuts across different political groups: "The interests represented by disinformation come from different political and ideological spectrums. The problems and sources of disinformation have to do with, among other things, party issues. We see that there is biased handling of information that misleads, on the part of both the opposition and the government."

## 9.2 ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

### CIVIL SOCIETY ORGANIZATIONS

There are various civil society organizations in Mexico with different ways of combating the phenomenon of disinformation.

### ARTICLE 19

An office of the international civil association Article 19 has been set up in Mexico. The entity monitors the legal and regulatory debate on issues related to freedom of expression, including disinformation. According to Martha Tudón (interview, August 2021) from Article 19, different bills have been presented in Mexico with the purpose of fighting disinformation, but these have been problematic for freedom of expression. The organization is leading this discussion in society and among members of congress and political actors.

Faced with the difficulty of influencing Parliament, civil society organizations have sought different strategies, such as communication with the public. Tudón (interview, August 2021) states:

> *There is no process in Parliament open to the public, neither in the House nor in the Senate. But what has worked in collaboration with other organizations is to organize strategic communication campaigns about the initiatives and also to highlight that they are emerging from a lack of technical understanding. It depends on senators who are not part of the majority group—if they want to open up and act as a kind of brake.*

One of the lessons learnt by the organization, according to Tudón, was that they needed to address legislators' lack of technical knowledge about how the internet works, which was reflected in the contents of the proposals for new legislation: "[Their own lack of knowledge] generated unease among legislators. At the same time, as part of a communication campaign, it has served to share knowledge and to ensure the message reaches the press."

Another subject that Article 19 is monitoring is the use of public resources and their possible employment in disinformation practices. One of the cases monitored by the organization is that of the state news agency, Notimex, which at one point was being used for disinformation campaigns against journalists who criticized the government.

### R3D

R3D (Red en Defensa de Derechos Digitales; Network for the Defense of Digital Rights) works with issue analysis and information production. The organization produces documents, such as articles about disinformation and ways to combat it, which are disseminated to try to influence public debate and decision makers.

R3D also works with training. One of its activities is a course aimed at judges on topics related to digital rights, such as freedom of expression in the digital environment, privacy, and access. Workshops have also been held for civil society organizations and citizens.

According to Vladimir Chorny (interview, August 2021), different civil associations are cooperating to react to initiatives, such as legal measures, which supposedly aim to combat disinformation but that put freedom of expression and other rights at risk. An example is legislation which may have a negative impact on citizens' rights and on a free and open internet. The positions formulated by these organizations are disseminated through various channels, and traditional media are employed to amplify these discourses. The organizations also take part in events promoted by institutions, such as public hearings, although according to Chorny this type of situation is more exceptional.

This collective effort takes place not only among Mexican entities but also with international organizations. These civil society networks thus seek to exert pressure from the outside towards the inside, with the aim of making local political actors back down on projects or change their content.

Chorny says that one of the lessons learnt through the organization's work is that, in terms of human rights violations and disinformation, left-wing governments do not necessarily have more appropriate or democratic attitudes. In the case of Mexico, President López Obrador's administration has been marked by attacks against journalists and persecution of critics of the government. These attacks have included the dissemination of false content, for example about the pandemic.

The organization's work has also made clear the importance of increasing collective action in the fight against human rights violations. This collective action must be taken not only by entities in the area but also by other organizations and professionals from different sectors, such as journalists and lawyers. According to Chorny, "collective work and coordination are indispensable. In other times and in certain contexts, organizations acted as protagonists and there was specialization, but this has become less and less desirable."

### FUNDAR

Fundar, Centro de Análisis e Investigación (Center for Analysis and Research) works with several topics and has recently worked with other initiatives on disinformation, for example through verifying information; promoting events; sensitizing audiences to the issue of disinformation through seminars, debates, and other public campaigns; problematizing the phenomenon; and discussing ways to counter it. Since the start of the Covid-19 pandemic, the group has held events to discuss the infodemic and how to mitigate the circulation of fake news related to Covid-19. The center, together with other civil society organizations, has developed a campaign to monitor official spending on advertising. The campaign also contributes to monitoring whether resources are used by public authorities to enable the spread of false content.

## FACT CHECKING

### VERIFICADO

Verificado[55] is run by volunteers and checks statements and messages disseminated in the media and on social networks, with a focus on statements by public figures that have an impact and go viral in Mexican society. The team also produces journalistic investigations on topics of national interest. During the pandemic, one such investigation focused on the CanSino vaccine, including what was referred to as controversies in clinical trials and irregular vaccination. The organization has also investigated digital influencers who have spread disinformation about Covid-19 and Covid-19 denialist movements that disseminated misleading content about public health.

Verificado offers courses and workshops to promote media education. These courses and workshops have covered basic fact-checking activities, guidelines on how to communicate without stigmatizing people and communities, and specific themes such as gender equality. The group offers a course on data journalism for journalists, with support from the Google News Initiative.

### AFP FACTUAL

Mexico also has its own branch of AFP Factual, which is present in many other Latin American nations.

### ESCENARIO TLAXCALA: FICCIONES INFORMATIVAS

The website Escenario Tlaxcala runs a project called Ficciones Informativas[56] ("Information fictions") through which it carries out its data verification work, focused on the state of Tlaxcala. The portal is funded by the Google News Initiative.

### EL SABUESO

El Sabueso[57] ("The bloodhound") is also a project associated with a website, Animal Político. In addition to data verification, the team produces articles and analyses in the "Te Explico" section. During the pandemic, a special website was created to monitor data about the coronavirus in Mexico, with fact checking of information related to Covid-19 and messages about the topic.[58]

## PUBLIC INSTITUTIONS

The federal government has acted as a watchdog regarding cases of disinformation. In 2020, the Secretariat of the Government stated that it would open administrative proceedings against two print newspapers owned by the same company in the state of Chihuahua for spreading false information. The newspapers published photographs about alleged Covid-19 deaths that were not from Mexico but from Ecuador. The measure was withdrawn by the Mexican government in response to criticism from civil society.

## LEGAL INITIATIVES

In 2020 a bill was presented in the Federal Senate by Senator Claudia Anaya Mota to address mechanisms of rights of reply to false information disseminated by the president of the republic, as a reaction to statements by President López Obrador, especially during the pandemic. The analysis of the right-of-reply requests would be carried out by the Institute of Transparency, Access to Public Information, and Accountability (INAI). The responses would be broadcast at a new executive branch conference and on the digital platforms where the speech or statement had been disseminated (Anaya Mota 2020).

In 2021, a new project, by Senator Ricardo Ávila, proposed a set of rules for social networks, such as operational authorization and terms of service as set by the Federal Telecommunications Institute, requirements for suspension and exclusion of accounts and profiles, and a provision that the terms and conditions must provide measures to prevent the spread of false news (Ávila 2021).

# 10. REGULATORY INITIATIVES BY GOVERNMENTS AND PUBLIC AGENCIES

Some countries in Latin America and the Caribbean already have legislation related to disinformation, although not necessarily dedicated solely to this topic. In Venezuela and Brazil, the regulation of disinformation is dealt with in the legal framework for electoral processes. In Bolivia, a law was passed after a coup d'état against President Evo Morales.

Many of these legal initiatives advanced measures to combat disinformation related to Covid-19 and associated topics, as was the case in Nicaragua, Belize, and the Bahamas. In the Bahamas, for example, the legislation was directly linked to combating the pandemic, while in other countries, such as Nicaragua, the prohibitions had a broader character. However, in most cases, the legal treatment of disinformation falls within the scope of proposals for new regulations. In several countries, especially those focused on by this study, representatives have presented bills seeking to criminalize the production and dissemination of disinformation. In the case of Brazil, the proposed legislation contains devices to combat disinformation, such as the prohibition of certain practices and mechanisms and surveillance measures that would supposedly favor the investigation of crimes, including disinformation practices.

## 10.1 LAWS AND REGULATIONS

In the countries that have passed legislation related to disinformation, the latter has generally been defined as a crime, such as in the case of Nicaragua and Belize, or as an electoral offense, as in Brazil and Venezuela. There is also legislation that prohibits the spread of disinformation related to the Covid-19 pandemic, as in the Bahamas.

Since 2005, disinformation has been criminalized by Venezuela's Electoral Code. The reform of that same year included a new article (297-A) which stipulated a punishment of imprisonment for two to five years for anyone who discloses false information that causes panic in the community. If this offense is committed by a public official using the anonymity or identity of a third party, the penalty is increased by one third.

In Nicaragua, the Cybercrime Act No. 1042 was passed in 2020. It criminalizes several practices, among them the dissemination of "false and/or misleading information" when it "produces alarm, fear, distress;" harms "honor, prestige or reputation;" or "incites hate and violence, endangers economic stability, public order, public health or sovereign security."[59]

In Belize, the Summary Jurisdiction (Offenses) Act provides for a fine of up to 300 Belize dollars or, in the case of the commission of multiple offenses, a higher fine and a jail term of up to one year for anyone who "maliciously fabricates or knowingly spreads abroad or publishes, whether by writing or by word of mouth or otherwise, any false news or false report tending to create or foster public alarm or to produce public detriment."

In the Bahamas, the Governor-General issued an Emergency Proclamation, an Emergency Powers Regulation, and an Emergency Powers Order. The first includes restrictions on the making of false false statements: "No person shall publish or cause to be published, posted or re-posted, over any media platform including social media, any purported news or report, or alleged statement of fact, knowing reasonable cause to suspect that the same (a) is untrue or false; (b) may incite public fear, panic or ethnic hatred."

Bolivia's interim government, which took over after the coup d'état in 2019, issued Decree 4231 in May 2020, positing the possibility of punishment of one to ten years in jail for anyone who misinforms or generates "uncertainty" amongst the population: "The people who incite noncompliance with this Supreme Decree, who disinform, or who generate uncertainty amongst the population will be subjected to a criminal procedure for the commission of crimes against public health." The measure was criticized by entities such as the Committee to Protect Journalists (CPJ). President Janine Yañez, however, issued another decree, expanding the scope of criminalization to information that endangers or affects public health, generating uncertainty in the population.

A survey by Pita (2021) revealed that during the pandemic authorities in Peru asserted that spreading false news could be punished through the application of legislation that was already in place. The dissemination of false messages to gain advantage or generate harm to others would be considered a crime punishable by a three- to six-year prison sentence.

## 10.2 BILLS AND PROPOSALS

In the case studies discussed earlier, several bills were identified that propose different solutions to tackle disinformation. There are instances that include prison terms (Costa Rica, Brazil, Argentina, and Chile) or sanctions and fines (Paraguay) for the creation and dissemination of disinformation. Some provide for requirements around content moderation (Mexico, Brazil, and Argentina), due process and the right to respond (Mexico, Brazil), rules for public agents (Mexico, Brazil, Chile, and Argentina), and the reform of electoral legislation to include mechanisms regarding disinformation (Colombia and Brazil). In Brazil, Bill 2630 gained support even though it does not contain concrete prohibitive treatment of disinformation. It does contain transparency provisions and prohibitions against certain related behaviors, such as unidentified automated accounts and inauthentic behavior. It also specifies mechanisms to expand data collection and calls for the creation of a council with the prerogative of drafting a code of conduct that provides for more concrete measures to combat disinformation.

In Costa Rica, Bill 21187, known as the "Law to Combat Cyber Delinquency," was presented in 2019. The proposal provides for punishment with sentences of one to four years for "those who produce or disseminate, through an informatic medium, false news capable of harming the safety and stability of the financial system and its users." The Bill also imposes this punishment on those who "produce or disseminate, through an informatic medium, false news with the goal of influencing voters' decisions during a national or foreign plebiscite, referendum, or electoral process."

In El Salvador, a bill introduced in March 2020 proposes a sentence of three to six years for claims regarding nonexistent disasters, accidents, or dangers and for arousing alarm among authorities or particular people (Asamblea Legislativa de El Salvador 2020). In Paraguay, Bill S-209341, presented in 2020, prescribed sanctions for conduct that, through either action or omission, endangers or affects the health of persons within the framework of epidemiological alerts or emergency situations declared by the Ministry of Public Health and Welfare or by law (Congresso do Paraguai 2020). This bill was withdrawn.

In its 2020 annual report, the IACHR's Special Rapporteur for Freedom of Expression questions solutions that employ the criminalization of the dissemination of disinformation: "The establishment or use of criminal offenses to punish disinformation or dissemination of false news could have a strong chilling effect on the dissemination of ideas, criticism and information" (Vaca 2020, 222). During the workshops and interviews held for this study, and from the data collected on the methods and tools used by the actors, several concerns emerged about the risks of these responses to freedom of expression and the impacts they may have for internet users. These concerns were raised especially by civil society entities.

# 11. AN ANALYSIS OF ACTORS AND STRATEGIES TO COMBAT DISINFORMATION

In this section, we conduct an analysis of the actors engaged in combating disinformation and the different strategies they use, based on the methods and tools employed. This evaluation is structured according to four categories: fact-checking, media education, research and information gathering, and advocacy.

## 11.1 CONCEPTUALIZATIONS OF DISINFORMATION

First, it is important to address how the actors understand disinformation, based on their conceptualization of the phenomenon. During the collection of data on the actors and their initiatives, and during the workshops and interviews, we noted differing perceptions of what constitute disinformation practices. During our research, it also became clear that disinformation is defined differently by different actors and initiatives. The absence of a clear consensus on a definition of the phenomenon makes a categorization of responses difficult.

Among the actors we engaged with, there was strong criticism of the concept of "fake news" and a preference for the term "disinformation." A very common aspect was the factor of deliberateness in the creation and dissemination of content (as found in the definitions used by APC and Observacom). This dimension is relevant in that it differentiates disinformation from the unintentional dissemination of content and contributes to an understanding of the problem and

> Among the actors we engaged with, there was strong criticism of the concept of "fake news" and a preference for the term "disinformation."

ways to address it. When intentionality is taken into account, the focus turns to combating the large-scale production of false content, although it is still important to frame solutions (such as fact checking and media education, which will be explored later) for those who consume false information.

Another feature of the concept involves the promotion of harm. However, the object of harm varies: it can be unspecified (as in the concept used by APC) or society as well as individuals. The collective nature of the harm caused (to electoral processes, to democracy, or to society) implies that it is necessary to understand how responses must contribute to making public debate more informed.

Agência Lupa’s definition of disinformation—as confined to content that is not consistent with the truth—opens up quite a large scope, and might include satire or journalistic error. AFP’s definition, on the other hand, which includes manipulated but not necessarily false content, also has a broad scope. This kind of definition comes closer to a broader approach to harmful content, but can make it more difficult to differentiate what is and what is not disinformation.

Both among the actors and in the academic literature (which will be discussed in Part II of this report), it is possible to perceive the influence of the concept of information disorder (as in the case of FGV in Brazil), widely propagated by the Global North through the work of the First Draft Coalition. João Guilherme dos Santos (interview, August 2021) from the Brazilian research center INCT.DD calls attention to the inadequacy in Portuguese (and the same applies to Spanish) of the differentiation between disinformation and misinformation as adopted in English. In their responses to our survey, the APC referred to the report “Disinformation and Freedom of Opinion and Expression” by the UN Special Rapporteur on Freedom of Opinion and Expression, Irene Khan (2021), and characterized the practice of disinformation “as false information that is deliberately created to harm.” It is therefore “organized, well resourced, and reinforced by amplification techniques, including automated technology.”

Following a trend in the international debate, the APC distinguishes disinformation from misinformation, with the former being marked by the intention to deceive and the latter by the absence of such intention. The use of information that is not necessarily false but is used with the intention to confuse or manipulate would constitute “malinformation.”

Santos (interview, August 2021) of INCT.DD problematizes the importation of these terms into the Portuguese language: “*Desinformaçao*, in Portuguese, has to do with an uninformed person, but in English it is information passed on to confuse and deceive.” Hence, the use of the term *desinformaçao* (“disinformation”) in Portuguese can generate confusion, he warns. He stresses that it is necessary to build common understandings among the actors involved: “If there is no conceptual alignment, people end up producing distinct and incompatible things.”

According to Observacom (interview, Goméz, 2021), disinformation can be defined as

> *deliberate strategies of using false information and knowledge to cause harm to people, institutions, elections or democracy itself. It also includes the element of intentionality and the use of false content consciously, as well as the provocation of damage, which can range from an individual aspect to something applicable to society as a whole.*

In his answers to our survey, Gilberto Junior from Agência Lupa, a Brazilian data verification agency, classifies the phenomenon as “the use of communication and information techniques to mislead or give a false image of reality, by suppressing or hiding information, minimizing its importance or changing its meaning.” In this case, aspects other than falsehood are included, such as the modification of meaning or the minimization of importance.

In her responses to our survey, Elodie Martínez from AFP Factual described this practice as something that contains elements of falsehood but also encompasses different forms of manipulation as well: “Disinformation is content that resembles news or information, which seems plausible, but contains false data or elements, taken out of context, manipulated, invented.”

Tatiana Dourado from FGV responded to our survey questions by stating that they approach the concept of information disorder from the perspective of digital technologies: “We consider online disinformation as the result of the disordered flow of harmful content, which is propagated through the use of computational propaganda techniques and through the mobilizing force of segmented audiences and cohesive online networks.”

Adrián Pino (interview, August 2021), from the Argentinian project Desconfio, highlighted the criticism levelled at the term “fake news.”

The organization uses the definition of the High-Level Expert Group on Fake News and Online Disinformation of the EU, which leaves out, for example, hate speech. The group produced a report with an analysis of the problem that has served as the basis for strategies adopted in the bloc in recent years (European Commission 2018). According to Pino, "disinformation appears on social media as a falsified idea, a WhatsApp audio that is not real. There is a distinction between what in English is called misinformation and disinformation, the latter having an economic objective or seeking to damage reputation or identity."

According to Martha Tudón (interview, August 2021), from Article 19 in Mexico, "disinformation" will never be a precise concept. She notes that rumors have always existed and points out the difficulty of assessing intentionality, a central aspect of the practice, as well as the effects these strategies seek to achieve, especially in the case of political authorities:

> *When there is an intention to lie on the part of the public authorities in order to manipulate society, this is what worries us the most. Those who are in public office have an obligation to always speak the truth. What worries us most, therefore, is the public money used for this, the contradictions that come from the different discourses between the state and government apparatuses.*

## 11.2 FACT CHECKING

The survey undertaken for this study revealed a large number of fact-checking initiatives in the region. The number of fact-checking initiatives vary greatly by country, as shown in Table 1 earlier in this report. Chile leads the way, with twelve, followed by Brazil, with nine. Mexico and Colombia, both countries with economic weight in the region, have four and three respectively, and Argentina has two. Smaller countries still have only one, as in the cases of Paraguay, Nicaragua, Panama, and the Dominican Republic.

In terms of the territorial dimension, it was evident from the research that there is an enormous concentration in the countries' capitals or largest cities. The existence of groups outside the capitals is an exception, as in Chile and Mexico. Although most of the projects are run by national organizations, there is one international initiative in the region: AFP Factual. There is also an international presence through funding and support. Here two types of agents stand out: digital platforms and foundations from the USA and from European countries. This carries the risk of the local projects' work being influenced by the outlook of northern institutions, which could compromise an independent approach from a regional perspective.[60]

Regarding profile, there is a mix of institutional structures. Most initiatives are linked to media outlets (thirty projects in total). In general, these types of initiatives are established as branches of traditional media outlets. Some of them are more structured, with their own names and websites, while others merely consist of news presented through keywords or tags. In some cases, communication vehicles cooperate on joint fact-checking projects, such as Comprova from Brazil.

> There are also examples of autonomous initiatives created by civil society organizations, such as PolétikaRD from the Dominican Republic, or by academic institutions (five initiatives), such as Bolívia Verifica. Initiatives developed by collectives of journalists or workers from different categories include Chequea Bolivia and El Surtidor in Paraguay.

In some instances, these collectives have set up websites or created associations, but in others, they joined forces expressly for the purpose of creating a verification project, as is the case with Salud con Lupa Comprueba in Peru.

Many of these agencies go beyond fact checking. Several of them produce their own investigations and journalistic content on topics of interest. Examples include Chequeado's contextualized stories in the section called "El Explicador"[61] and the investigations carried out by Verificado in Mexico.

Fact checkers in Latin America have also joined forces to create Latam Chequea. The sharing of experiences and the networking opportunities presented by this network can be an important element in the fight against false content, which, in many cases, crosses national borders.

## 11.3 MEDIA LITERACY

In the region as a whole and in the countries analyzed for this report, several initiatives related to media education and public awareness raising on the problem of disinformation have emerged. As for the type of intervention, these initiatives can be divided into five types:

1. **Networks:** One example is the global alliance GAPMIL, coordinated by UNESCO, which also has a Latin American branch and promotes activities in the region. The network organizes events and various projects, including a week of meetings and debates globally and also in Latin American and Caribbean countries.
2. **Campaigns:** These go beyond just disseminating content. One example is MIL Clicks, a campaign promoted by GAPMIL and UNESCO.
3. **Projects:** One example with an international scope is Digimente, which brings together different organizations from different countries with the Google News Initiative to provide information, materials, and resources that can be used by both families and educators. Another example is Colombia's Entretanto Cuento.
4. **Materials:** The production of materials is one of the most common types of intervention in the region. This can take the form of information posted on websites or social media sites, or more elaborate publications that combine research and recommendations. The UNESCO guide *Journalism, Fake News and Disinformation* (Ireton and Posetti 2018) is one example. Other initiatives use different formats, such as Entretanto Cuento, which has created a game to test citizens' skills regarding disinformation. Materials can be aimed either at the general population or at specific audiences, such as teachers, journalists, or certain categories.
5. **Training activities:** These involve courses, workshops, and other types of training and qualification processes. Activities are offered for interested citizens, such as the distance-learning course of the Brazilian research center INCT.DD, which can be accessed by different audiences. Another modality is courses focused on a specific group, such as journalists; an example is the Colombian organization Conselho de Redação. The Argentinian entity Desconfio has attempted to reach other audiences, such as through projects aimed at librarians.

Our research has shown that media education activities are often closely intertwined with data verification organizations and projects. Several initiatives combine data verification with educational campaigns, events, the production of materials, and even the promotion of courses. AFP Factual, an international project with a presence in many countries in the region, is one example. In her responses to our survey, Elodie Martínez of AFP Factual noted that explaining how verification is done and what methodology is used is seen by the team as a form of education: "We hope to contribute to media literacy by explaining our methodology step by step; we hope to offer verified information aiming to settle doubts that the population might have about political, health, and migratory issues, among others."

Veridiana Alimonti (interview, August 2021) from the EFF highlights various efforts in the region to sensitize audiences:

> *The different ways that are disseminated via networks include tips on how to check content, how to check other sources, and how to check where the information is from. This can be seen in the work of different entities that have campaigned about this issue. Derechos Digitales and R3D have been encouraging people to verify information.*

For some of the organizations focused on in this study, media education is the focus of the fight against the problem. It is seen as a more robust and structural solution as compared to trying to remedy the issue through verification alone. This is the case with Desconfio, which works with this type of response in Argentina:

> *It is important to work with prevention more than the cure. We have to take steps earlier to prevent this content from spreading as we promote more information, more and better information and journalism. We have to work strongly on education. We are not thinking only of schools and universities, but rather of transversal work. Lawyers, accountants also have to know about this dynamic. (interview, Arréguez, August 2021)*

## 11.4 RESEARCH AND INFORMATION PRODUCTION

The emergence of the phenomenon of disinformation and its impact on societies have led to the desire to understand its causes, contributing factors, and consequences. In Latin America and the Caribbean, research and information production activities have gained strength and are carried out by various actors, not only by academic institutions, although the attention paid to the topic by the latter has also increased.

Among the actors analyzed for this study, there are diverse research initiatives addressing different topics. The first topic involves coming to an understanding of the phenomenon itself. The Brazilian organization Intervozes published a book on the theme, dealing with conceptual aspects, the strategies adopted by those who spread disinformation, and the debate about responses to the issue (Martins 2020).

Some organizations with more resources have managed to move towards audience opinion surveys. Avaaz, in partnership with public opinion institutes, has conducted surveys to identify behavior associated with receiving false content and the perceptions around false content.

Another common practice among the analyzed actors is the elaboration of technical reports on specific aspects of the issue. The AlSur network, for example, has formulated two documents, one about disinformation and the pandemic, and the other regarding the strategic use of false content by political authorities (Álvarez Ugarte 2020; AlSur 2021a).

The Argentinian organization Desconfio has done research on the accessing and sharing of information on WhatsApp by the elderly (Clarín 2020). In 2021, Chile's Derechos Digitales conducted an investigation into electoral advertising on Facebook, in partnership with the country's Electoral Service. Research centers have also carried out investigations. Also in 2021, FGV in Brazil studied false content related to the electoral process, such as untrue claims about electoral fraud. One study even took place through a partnership with the Brazilian Superior Electoral Court (Ruediger et al. 2020).

Research has also been carried out on how various actors respond to the phenomenon. IP.Rec, for instance, has analyzed the responsibilities of intermediaries (Fernandes et al. 2021). Intervozes has published a book evaluating the policies of platforms and the measures taken by them to mitigate the circulation of disinformation (Barbosa, Martins, and Valente 2021). InternetLab has produced documents discussing regulatory proposals in Brazil (Monteiro et al. 2021).

Important facets of the production of information are continual monitoring and periodic reporting. An important example of this is the annual report of the Special Rapporteur for Freedom of Expression of the IACHR. Chile's Fundación Datos Protegidos prepares an annual report on freedom of expression in Chile.

Observacom is an observatory that tracks communication-related news and developments in the region, and reports on them through its website. It also publishes a periodic email newsletter. The organization has carried out research and published technical reports on various topics, including disinformation, either independently or in partnership with other institutions.

CELE also monitors and produces ongoing information on the subject. The center analyzes bills on issues related to freedom of expression, including disinformation. As previously mentioned, the center produces analyses of these bills in different countries in the region, supporting the activities of actors in the advocacy field.

## 11.5 ADVOCACY AND POLICY EFFORTS

Political advocacy is a recurrent element in the activities of the actors analyzed for this study. Civil society organizations are strongly active in Latin America and the Caribbean on various issues, both in conjunction with public institutions and in direct dialogue with platforms.

> At the regional level, many organizations have contributed to the debates convened by the IACHR's Special Rapporteur for Freedom of Expression, such as the process that resulted in the guide to combat disinformation in electoral contexts (RELE 2019). The APC and AlSur have contributed to this process, as well as entities such as Observacom, Access Now, Derechos Digitales, and the EFF.

Regionally active organizations also engage in advocacy in national processes, such as the approval of norms at the executive level or legal initiatives. This form of advocacy consists in gaining international support to put pressure on political decision makers. Several regionally active organizations reported using this type of strategy, such as Derechos Digitales, Access Now, the APC, and the EFF.

The advocacy strategy was used in each of the five case study countries. It is a common strategy among the majority of civil society actors and research centers. In all countries, legal initiatives have been identified in recent years, and organizations in each of the countries have developed different advocacy strategies. Derechos Digitales mentioned interaction with politicians, members of congress, and senators in the early stages of proposals to make sure that certain types of content are not included in the proposals. This strategy was also mentioned by CELE in Argentina, Article 19 in Mexico, and Linterna Verde, FLIP, and Fundación Karisma in Colombia.

Another method employed is the elaboration of analyses, technical notes, and documents evaluating legal initiatives based on the construction of policy positions. The organizations then disseminate these documents through their communication channels and also seek to distribute them through the media, in the form of published reports or interviews.

> A frequently used strategy is to conduct campaigns about a certain proposal, either to change it or to oppose it. A well-cited example is the campaign carried out in 2020 and 2021 by CDR in Brazil against Bill 2630. The coalition carried out activities on different fronts, both in the executive branch and in Parliament, where the Bill was, at the time of writing, being considered.

Although cooperation between civil society organizations is a common method among the actors included in this study, only in Brazil has a formal network been established, in the form of CDR. At the regional level, even though different types of partnerships have been formed, the only civil society network of regional scope we found was AlSur.

The organizations surveyed for this study also reported advocacy work directed at digital platforms. Derechos Digitales reported holding conversations with these agents on various topics, including disinformation. Some platforms have established partnerships with civil society organizations, as in the case of AlSur. Avaaz reported holding meetings with executives to discuss demands from segments such as the workers employed by these companies.

# 12. CHALLENGES FACED IN COMBATING DISINFORMATION

Based on the experiences of and lessons learned by the actors in the fight against disinformation in Latin America and the Caribbean, as explained by representatives of civil society organizations during the workshops and interviews and in the survey conducted, a set of challenges has been identified. The following challenges hinder the expansion of the efforts to combat disinformation in the region:

1. The lack of a common definition of the phenomenon
2. The region's internet access model
3. Individuals' attitudes to disinformation
4. The multinational nature of the phenomenon
5. Fragmented solutions
6. The context of political polarization
7. The limits of and challenges related to fact checking
8. The limits of and challenges related to media education
9. The limits of and challenges related to research
10. The limits of and challenges related to regulatory solutions
11. The role of digital platforms
12. The use of technology.

## 12.1 DEFINITION OF THE PHENOMENON

The first challenge consists in the very definition of the phenomenon. As previously discussed, there is no common understanding amongst the actors in the region on how to define disinformation. This lack of alignment appears to make it difficult for the actors to act against false content, especially in an articulate manner. Renata Mielli (interview, August 2021) from Centro Barão de Itararé called attention to this issue:

> *Faced with the complexity of conceptualizing and establishing a clear formulation of "fake news," we are working with an umbrella concept that society uses as terminology for all kinds of problematic speech: hate speech, homophobia, racism. These are different problems. The cause is multifaceted—it has cultural, social, economic origins, and it is related to new paradigms of information circulation and the organization of*

> *society itself based on the new digital platforms that have changed the ways people behave towards content.*

Juan Carlos Lara (interview, August 2021) from Derechos Digitales argues in a similar vein about the importance of understanding how disinformation is related to social processes that go far beyond social media and the internet: "It is important to have a social understanding of the phenomenon that is not limited to the digital; it is expressed digitally but responds to deeper characteristics."

This multifaceted dimension was pointed out by several participants in this study. And as a consequence, there is not only one answer but rather multiple approaches to deal with the various aspects of the problem:

> *The nature of the phenomenon manifests in different ways. It is not something that is concentrated in one point and that is solved there, and that's it, it is solved. We are more used to looking for solutions in the digital. It is something that is reflected in the digital, driven by the digital, but it is something that is also spread by discourses in other media. (interview, Alimonti, August 2021)*

Alina Fernández (interview, August 2021), from CLACSO's Political Economy of Communication Working Group, which brings together researchers from different countries in the region, raised the importance of observing the phenomenon from perspectives of differences in power and access to resources. These aspects distinguish the problem in the Global North from that in the Global South and in regions like Latin America and the Caribbean, marked by both inequalities in relation to richer countries and disparities between its nations:

> *It's critical to read the asymmetries. We are not all present in the digital landscape in the same way. What happens is not the same, nor are the strategies and weight of the actors in the public space to question these situations. The consumption [habits] of women, [of] economically vulnerable sectors, of [different] generations, with social markers of race and color and cultural belongings, are not the same.*

Juan Pablo Madrid (interview, August 2021), from Colombia's FLIP, emphasized that an analysis of the problem must take into account these asymmetries, since the problem manifests differently in different places:

> *We have the challenge of centralism, and of understanding information flows in regions. We have a very universalizing stance but end up ignoring these other particularities in territories where there is insufficient access to the internet and information media, but where people do use social media. We have to think about information in local contexts and how to enter discussions with people who have particular projects and consume information locally.*

## 12.2 THE REGION'S INTERNET ACCESS MODEL

The challenge of dealing with restricted-access models is relevant to the region, as people in several countries in Latin America and the Caribbean rely on mobile access to the internet, limited to specific packages of data. The use of zero rating has implications for the practice of disinformation, as users are often allowed to access only social media, without the possibility of checking information on a website or resorting to any other source of information.

## 12.3 CITIZENS' ATTITUDES TO DISINFORMATION

João Guilherme dos Santos (interview, August 2021) from INCT.DD lists people's attitudes as a great challenge in terms of understanding the phenomenon. For some, the choice of consuming and passing on misinformation is not related to a lack of knowledge about the veracity of that content, but to a lack of concern:

> *There is little care also in differentiating between skepticism and cynicism in this debate. It is not a scenario in which skepticism is weighed—that she has no proof; can't read the evidence; and therefore believes something that is demonstrably wrong. This is closer to cynicism—you don't believe in something but, even so, you take it into consideration. If we understand that it is cynicism, there is no point in adding more information.*

## 12.4 THE MULTIDIMENSIONAL NATURE OF THE PHENOMENON

The representatives of Avaaz, an organization with projects around the world, highlighted that the fight against disinformation could not be carried out only within national borders, because the production and dissemination of disinformation are international and involve the importation or exportation of disinformation from one nation to another: “We did a publication on how disinformation about Covid-19 crossed different borders. We looked at the phenomenon of vaccination hesitancy, with people looking at ineffective treatments without scientific proof and using disinformation content as a basis for that” (interview, Weyne, August 2021).

## 12.5 FRAGMENTED SOLUTIONS

The challenges of understanding the phenomenon reveal the complexity of approaching a multifaceted phenomenon. Among the actors who participated in this study, the views on strategies and methods for combating disinformation reflect the focuses of the various organizations. Fact-checking initiatives favor verification, as they see it as fundamental, while other entities are dedicated to media education and also emphasize the role of prevention in combating disinformation. There are only a few initiatives with an integrated approach.

This study has revealed the wide, diverse, and fragmented character of the repertoire of methods and tools being employed.

This study has revealed the wide, diverse, and fragmented character of the repertoire of methods and tools being employed. This reflects the different concerns and emphases brought to bear when dealing with this problem and the factors that favor it, from knowledge production to regulation, fact checking, and various forms of education, to training and sensitization of both employees involved in the production of information and users in general.

If fact checking and media education are well-recognized methods, there are divergent assessments of their effectiveness and the limits of their role in mitigating the problem. A less common and quite controversial intervention in combating the wave of disinformation in the region concerns regulatory initiatives, as discussed earlier.

## 12.6 POLITICAL POLARIZATION

Several actors who participated in this study have called attention to the difficulty of responding to disinformation in a situation of political polarization. These responses, strategies, and tools are sometimes associated with a particular political group, which creates obstacles to the analysis of the content and its implications, whether positive or negative. Patrícia Blanco (interview, August 2021), from the Brazilian project EducaMídia of the Instituto Palavra Aberta, described the issue as follows:

> *We see as a challenge this environment, this diverse and polarized climate that does not allow dispassionate debate on these issues. All the debates about fighting disinformation end up gaining political bias, with relativization of the right to freedom of expression. This disrupts the environment needed to build regulatory solutions.*

Renata Mielli (interview, August 2021), from Centro Barão de Itararé, pointed out that there is also a great deal of confusion and a lack of knowledge among the diverse political currents found in the countries of the region. These groupings often end up defending solutions that reinforce the power of digital platforms by imagining an easy way out through expanding the platforms’ responsibility for oversight and content moderation. This was done by the NetzDG in Germany. Mielli (interview, August 2021) explained:

> *What we have identified is that there is a very dangerous common sense regarding how to confront the phenomenon of misinformation. And this is in all camps, from left to right. What is the common sense prevailing among people who don’t understand the business model of the platforms, who don’t understand the architecture of how they work? It is this: If disinformation is circulating on the platforms, they should remove the content. We have tried to have this discussion.*

## 12.7 CHALLENGES RELATED TO FACT CHECKING

In the context of fact checking, various concerns were raised. One is the strong presence of traditional media among data verification projects. This reflection was made by Juan Carlos Lara (interview, August 2021) from Derechos Digitales:

> *In Chile, there has been fact checking not only by agencies but also by the media. There are two journalistic consortiums that tend to be influential. In one of them, they spread a lie about one of the proposals within the regulation committee of the constitutional convention. But nobody controls the fact checkers of that duopoly, of right-wing or center-right tendencies.*

The tendency is that these projects gain more strength and visibility since they are promoted by the media vehicles with which they are associated and by the websites of these groups, as is the case with Globo's Fato ou Fake in Brazil or the project linked to *La Tercera* in Chile. This is because fact checking implies a human, subjective analysis of content.

Verifying what is true and what is not is not always easy, and the biases of fact checkers, as well as the frames of reference they use for content evaluation, can also vary. This brings into play differences in worldviews and editorial stances, as is also evident in communication vehicles:

> *When fact checking is in media hands, there are always reservations of who does it, how, and with what parameters. It is something that we see as positive, the work that Animal Político in Mexico does, very exemplary work. This work by civil society is very important. Fact checking can encounter the same problems of bias depending on where it is done. Fact checking can encounter problems. (interview, Chorny, August 2021)*

## 12.8 CHALLENGES RELATED TO MEDIA EDUCATION

Various actors highlighted the relevance of the area of media education; however, they do not fail to recognize its challenges. Patrícia Blanco (interview, August 2021) says it is necessary to work with schools so that this type of training is incorporated in a comprehensive way:

> *What we have realized is that the fight against misinformation needs to be incorporated all the time in schools in all subject areas. We thought about doing specific workshops on how to read the news. But this has a very limited place. It happens in one workshop or another. Sometimes there is confusion about where I put this if it is an elective, about which teacher would embrace the cause.*

## 12.9 CHALLENGES RELATED TO RESEARCH AND KNOWLEDGE PRODUCTION

Another set of challenges that was postulated during the course of this study is related to different attitudes towards information, as already pointed out—whether there is a predisposition or not to consume and share certain messages regardless of their veracity. This a very common attitude in polarized scenarios and in so-called "bubbles," which are stimulated by the architectures of digital platforms. Juan Carlos Lara (interview, August 2021) from Derechos Digitales said: "It is difficult to pinpoint the causes that make a person circulate misinformation. There may be many factors that go beyond the field of disinformation. One has to deal with those issues." Another challenge discussed was how actors can go beyond the audiences with whom they normally communicate, be it their followers, members, or people close to them by virtue of networks or affinities: "A big challenge is to break through the bubbles. Organizations have a more massive, more significant reach" (interview, Bordachar, August 2021).

Among the actors who conduct research and produce information, various concerns were raised. One of them is access to information about the platforms to better understand how they work and how the circulation of content, including false content, occurs. Adrián Pino (interview, August 2021), from the Argentinian entity Desconfio, is one of those who demand better access to data: "It is necessary to open the API and data of the platforms for research. We are having difficulty with some tools. It is necessary to talk to Twitter so that the API is easier to access. We don't have access to that content, which ends up being proprietary on the platform. It should be more public." João Guilherme dos Santos (interview, August 2021), from the Brazilian institute INCT.DD, highlights that this is key in the face of the opacity of the platforms and the restrictions that initiatives face when they try to obtain data: "We have access to very limited data. On Twitter one can see how many likes were given, but we don't know how many people saw a certain post. We have no parameter to say that false information is seen more often and more engaged with, and this vitiates all the analyses."

> One of concerns raised was access to information about the platforms to better understand how they work and how the circulation of content occurs.

In terms of research topics, the relevance of understanding not only the platforms but also the agents that create and disseminate false content was raised by the actors in this study. In Latin America and the Caribbean, the role of political authorities was strongly emphasized by several researchers and civil society organizations as an object of study, currently and in the future:

> *Political authorities are a key point. If we can achieve more transparency, more controls, more accountability on the part of officials, I think that no matter how decentralized these controls*

> *are, they play an important role in pushing the officials forward. Mapping these officials and their funding and how the money gets distributed by them to other parties is an easier path in this decentralization scenario than trying to map every message. (interview, Alimonti, August 2021)*

## 12.10 CHALLENGES RELATED TO REGULATORY SOLUTIONS

As pointed out above, regulatory responses have pushed actors to react, for example to various proposals and distinct positions taken regarding these proposals. These debates involve the complex task of balancing access to information and freedom of expression, and preventing bills, regulations, and the provisions contained in them from generating new problems.

Paulo José Lara (interview, August 2021) from Article 19 highlighted this challenge:

> *On the subject of legislation and laws, it is a matter of doing the best we can without putting freedom of expression and individual or collective expressions at risk. That in itself is very difficult and we will have to take into account the need to legislate in a democratic way. Important questions must be posed regarding the dissemination of harmful content.*

Juan Carlos Lara (interview, August 2021), from Derechos Digitales, also commented on the issue: “It is extraordinarily complex to regulate without it being restrictive in terms of expression. We know there are other measures. We are not sure, and we have divergent views. We tend to think that the decisions about content moderation made by the platforms are transparent and fair.”

Thinking about regulation of disinformation poses the problem of who defines what is or is not disinformation and who defines the measures to apply to content that has been found to be false. While Juan Carlos Lara (interview, August 2021) pointed out that it might be better to reserve this prerogative for the platforms, other actors questioned who would have the prerogative to inspect or supervise these decisions when abuse or mistakes occur. Soledad Arréguez (interview, August 2021) of Argentina’s Deconfio noted:

> *Every time one thinks about regulations, whether it’s the observatory or the committee that Facebook has formed, and which news items are fake or not, I think the question is who is going to watch over this committee or body that is going to define the truth. That leads to a philosophical issue of what truth is—what can one regulate? What happened during the last months of Trump’s presidency was a lesson in what we can delimit and work on.*

Veridiana Alimonti (interview, August 2021) from the EFF pointed out that data protection should also be considered in order to achieve the necessary balance. Thus, regulatory proposals should avoid mechanisms that extend surveillance. She also discussed the way that responses to fight misinformation can affect data protection rules. She noted that the fight against disinformation is not carried out only through legislation targeting the issue; data protection legislation is key in preventing the abusive collection and processing of data that are then used in order to target audiences with false messages: “We need to make better use of data legislation. We can explore further how to use the guarantees offered by data protection laws as something we already have and that works well in electoral and non-electoral moments” (interview, Alimonti, August 2021).

## 12.11 THE ROLE OF DIGITAL PLATFORMS

In the participants’ reflections on how to gain a better understanding of the phenomenon of disinformation, the role of digital platforms was mentioned. However, problems related to these platforms were also highlighted as challenges. These environments favor the circulation of fake content; consequently, one obstacle is how to deal with them so that they fulfill the role of opening space for these practices:

> *Digital platforms are largely part of the problem, not the solution. They profit from anti-vaccine groups who put out content, who pay for Facebook advertising. In Latin America, ethically, it is quite complicated, because many do research with the support of Facebook resources. It would also be interesting to start joining forces on a regional level in terms of this issue. Do we accept resources or not? If not, who funds our work? (interview, Pino, August 2021)*

The business models of the digital platforms and the way they structure information flows are seen by several experts and researchers as amplifying factors in the spread of false content:

> *Some time ago, the platforms didn't want to do anything like moderate disinformation content, and today there are distinct discussions on a global level. With the pandemic, they are more comfortable in moderating messages about health. There are actors who believe that the responsibility and power to remove content should rest with platforms, as in the case of content that causes harm. This brings up debates about whether to go for regulation or not. We would be creating a problem; I don't think this is the way to look at this issue. (interview, Schatzky, August 2021)*

Laura Moraes (interview, August 2021) from Avaaz highlighted the lack of transparency of these agents and the way informational flows work: "More and more, transparency for researchers and for civil society has decreased. We need to advance in the debate on transparency and the regulation of algorithms and AI."

The concentrated ownership of digital platforms was also raised as a concern. There are conglomerates that dominate several market segments on the internet, and even in offline media. In Latin America and the Caribbean, large groups such as Facebook, Google, Amazon, and Apple have significant market shares. Stakeholders are concerned about how this competitive landscape impacts on disinformation. Juan Carlos Lara (interview, August 2021) noted: "There is the challenge of media ownership and concentration, including the issue of platforms—the economic issue. The media industries, which are very much funded by advertising, lose funding that goes to internet platforms." And in the opinion of Paulo José Lara (interview, August 2021): "It's an economic phenomenon. It's critical to look at resources to understand the phenomenon and the campaigns. That is one of the most important investigations to carry out: who finances the digital platforms; what the economic powers are."

Another aspect of concern is transparency about the operations of the platforms and the measures adopted by them. Ramênia Vieira (interview, August 2021), from Coletivo Intervozes, highlighted this concern based on research done by Intervozes about the responses of the main platforms to disinformation. Veridiana Alimonti from the EFF (interview, August 2021) noted initiatives that entail cooperation with public entities: "In some countries, such as Brazil and Mexico, we see greater cooperation between electoral authorities and platforms. It is important to know how these agreements are made and how they develop. Because many times they only take place with the authorities and platforms, and it is important to have transparency."

## 12.12 USING TECHNOLOGY TO COMBAT DISINFORMATION

Adrián Pino (interview, August 2021) from Desconfio pointed out the significant challenge of using technology such as AI in the fight against misinformation:

> One thing that seems little explored is AI and machine learning. We have some experience with automated news analysis. Not many data science or engineering experts are working on projects about the news. It seems like an important topic to delve into. It is [one] of our intentions as a project, but we are going slowly because we are a small team, and we don't have funding.

# PART 2
# ACADEMIC OVERVIEW

## 1. INTRODUCTION

With the consolidation of the internet as the dominant communication medium in various contexts, the production and dissemination of false content has become an object of global concern. These practices have aroused attention due to their impact on several societal domains. In recent years, their influence in public debates and especially in elections and political processes (such as referendums, popular consultations, and mobilizations) has sparked concerns about possible threats to democratic political regimes in several countries. Episodes of violence against individuals and groups in countries such as India and Myanmar have revealed how false messages can have consequences for people's lives and physical integrity. The Covid-19 pandemic has provided further evidence of the risks of disinformation to public health and to the lives of individuals, which are directly affected by the dissemination of false claims about miracle treatments or the questioning of measures aimed at combating the coronavirus.

This phenomenon has attracted the attention of researchers from different fields of knowledge, with a plethora of studies conducted in several countries resulting in distinct approaches to and perspectives on the theme. The terms used are manifold, including "fake news," "post-truth," "disinformation," and "false news," inter alia. The characterization of these practices also involves varied emphases, be it in relation to the phenomenon's constitutive elements or its historical specificities.

This part of the report presents a review of the literature on the theme by researchers from Latin America and the Caribbean. Accordingly, this part aims to identify the conceptual milestones and to explore the characterization of the phenomenon of disinformation, the approaches and themes associated with the issue, instances of the spread of disinformation in Latin American and Caribbean countries, and the gaps and challenges facing researchers in the region.

The current review analyses a body of work gathered from Google Scholar and Web of Science. Searches were done using terms associated with the theme, such as "fake news," *desinformación/desinformação* ("disinformation"), *pos-verdad/pós-verdade* ("post-truth"), and *notícias falsas* ("false news"). Works were analyzed to ascertain whether they were by researchers from Latin American and Caribbean countries and whether they featured the theme as a central issue. Finally, 102 works were selected, including articles, book chapters, and books.

The methods employed in the selected works were diverse, the most common being content analysis (Copa and Peredo Rodríguez 2020; González 2017; Gutiérrez-Coba, Coba-Gutiérrez, and Gómez-Díaz 2020; Monsiváis 2018; Pérez, Calderón, and Coronado 2021; Rodríguez-Hidalgo, Mier-Sanmartín, and Coronel-Salas 2020) and literature reviews (Guallar et al. 2020; Rodríguez 2013; Silva 2020). Reception studies (Garcés-Prettel et al. 2021), case studies (Cusot and Palacios 2020; Recuero and Soares 2021), comparative studies (Ceron et al. 2021; Falomir et al. 2019), virtual ethnographies (Crawford-Visbal, Osman, and Navia 2020), and surveys (Cobos 2020) were also identified.

Ninety-eight of the 102 works were published from 2016 onwards. The older studies mainly address disinformation in traditional media and in political contexts, such as elections and during political procedures. Examples are studies focusing on the armed conflict in Colombia involving the government and FARC (Botero 2002) or referendums such as the 2005 disarmament referendum in Brazil (Sorj 2006).

As regards origin, at least half of the works were produced by authors from the largest countries in the region, especially Brazil, Argentina, Colombia, and Mexico. A smaller number of works originated from smaller South American nations (such as Uruguay, Paraguay, and Peru) and countries in the Caribbean.

In terms of territorial scope, some of the studies addressed the theme in general, without necessarily being limited to a given territory. A smaller number of studies addressed the phenomenon at the regional level (Latin America, South America, or the Caribbean). We identified a few studies covering a set of countries in the region, and another portion of the studies focused on phenomena in a specific country.

This review is divided into three sections. In the first section, we present a summary of the region's academic literature, with a focus on conceptual milestones and the characterization of the phenomenon. Thereafter, we address the different approaches, themes, and focal points found in the research. Lastly, we problematize the gaps and challenges facing further research in the region.

# 2. CONCEPTUAL MILESTONES

## 2.1 CONCEPTUALIZATION AND CHARACTERISTICS OF DISINFORMATION

In the works selected for this literature review, various terms are used to designate the phenomenon of disinformation. A number of authors have used the concept of *pos-verdad/pós-verdade* ("post-truth") (Busaniche 2020; Cruz Jr. 2019; Fernández-García 2017; Marino 2019; Monsiváis 2018; Vila de Prado 2018). Others have opted for the English term "fake news" (Cobos 2020; Flax 2020; Hegenberg 2019; Hernández 2020b; Pineda et al. 2019; Salinas 2020; Vila de Prado 2018; Zaniboni 2019). Some authors adopt the term *desinformación/desinformação* ("disinformation") (Albuquerque 2020; Delmazo and Valente 2018; Neto et al. 2020; Pérez, Calderón, and Coronado 2021; Pérez 2019). To a lesser extent, references to *notícias falsas* ("false news") appear (Gómez 2020; Sued and Kedikian 2020). Often, more than one term is used synonymously, such as "fake news," *desinformación/desinformação*, and *notícias falsas* (Gómez 2020), or *pos-verdad/pós-verdade* and "fake news" (Clavero 2018; Sacramento and Paiva 2020).

Some authors have worked with even broader concepts that encompass false content and other manifestations, such as *desorden informativo* ("information disorder") (Crawford-Visbal, Osman, and Navia 2020; Fernandes and Montuori 2020; Guallar et al. 2020; Silva 2020) and *malestar informativo* ("informational malaise;" disinformation and hate speech) (Hernández Pérez 2018). Among the works referred to in the studies, those by authors from the Global North are quite prevalent, such as Allcott and Gentzkow (2017) (cited in Pérez, Calderón, and Coronado 2021; Silva 2020) and Wardle and Derakhshan (2017) (cited in Aglantzakis 2020; Cobos 2020; Hernández 2020b; Pérez, Calderón, and Coronado 2021; Recuero and Soares 2021). The strong presence of these works suggests a reaffirmation of the Global North's main conceptualizations, although in some cases efforts to conceptualize have been identified in the Global South (Copa and Peredo Rodríguez 2020; Pérez 2019).

> Among the works referred to in the studies, those by authors from the Global North are quite prevalent.

The different conceptualizations carry different emphases. Authors who adopt the concept of post-truth, such as Fernández-García (2017) and Busaniche (2020), emphasize that this practice is not about knowing or not knowing the veracity of a fact, but rather about disregarding the very facts to assert one's own stance. Some authors, such as Hernández (2020a) and Valenzuela et al. (2019), point out the insufficiency of terms such as "fake news" and advocate the use of "disinformation." Recuero and Soares (2021) and Laguna (2020), for example, argue that the element of intentionality is a defining characteristic of disinformation. Silva Jr. et al. (2020) list contrived information and the generation of harm to third parties as necessary components of disinformation.

Divergences also appear in the circumscription of the phenomenon. Pérez (2019) argues that disinformation encompasses fraudulent information (fake news), misleading content, hate speech (malinformation), deliberately spurious speech (false speech), and unintentional informational errors committed by journalists (misinformation). Hernández (2020b) also considers errors and forms of manipulation as part of the phenomenon. Other authors (Barbosa, Martins, and Valente 2021; Delmazo and Valente 2018; Recuero and Soares 2021) offer a more restricted understanding, pinning down the practice as one with a factually false dimension, marked by the intention to produce damage or to obtain political or economic advantages.

Authors such as Lazcano (2020) and Copa and Peredo Rodríguez (2020) describe disinformation as a far-reaching phenomenon, not limited to messages and one-off campaigns. It is a cyclical process that extends beyond elections or political procedures, with impacts on the construction of imaginaries in society.

## 2.2 PERSPECTIVES ON DISINFORMATION

A recurrent assessment among Latin American scholars is that disinformation is a historical phenomenon with manifestations long predating the most recent episodes (Bisbal 2020; Hernández Pérez 2018; Zaniboni 2019). Botero (2002), for example, discusses disinformation in Plan Colombia, the US initiative aimed at combating drug cartels in that country, between 1998 and 2002.

Effectively, one aspect of the approaches found in the region is to analyze disinformation not only on digital platforms, but also in traditional communication media. There is also a focus on the relationship between these institutions and political groups, for example during elections and in terms of their support for or opposition to governments (Falomir et al. 2019; Jaramillo 2007; Rodríguez 2013; Serra 2016).

Another characteristic of the Latin American and Caribbean approach examined in the literature is the role of political authorities and governments themselves as promoters of disinformation. Through a comparison of Argentina, Brazil, and Mexico, Bizberge and Segura (2020) highlight the role of these political agents at the state level, especially during the Covid-19 pandemic. Viscardi (2020) examined the false claims in Brazilian President Jair Bolsonaro's Twitter posts from 2019 to 2022.

Although this practice is linked to traditional communication media, several authors emphasize the role of the internet, and especially of digital platforms, in the formation of new environments that have driven the production and diffusion of misleading content. This is facilitated by these platforms' business models and modes of information circulation, which are powered by the collection and processing of user data (Cobos 2020; Ceron et al. 2021; Mielli and Romanini 2021; Hernández Pérez 2018; Hernández Pérez 2021; Pérez 2021; Rodríguez-Hidalgo, Mier-Sanmartín, and Coronel-Salas 2020; Schneider and Valente 2021; Valente 2021).

Other authors accentuate the relevance of algorithms used by platforms as systems that drive disinformation (Sued 2021; Zaniboni 2019). Sued and Kedikian (2020) list algorithms and other technologies such as bots as elements employed to drive an ecosystem of disinformation. Some authors (Calzado, Cirulli, and Lio 2021; Crawford-Visbal, Osman, and Navia 2020; Cusot and Palacios 2020) point to the role of users and recipients as audiences who have come to take on a more active role in the production and dissemination of content, including disinformation.

A number of authors situate the phenomenon within a broader context, such as political polarization (Marino 2019) or attacks on democracy (Cañabate, Rosa, and Rojano 2020; Carvalho 2020; Flax 2020; Pineda et al. 2019). Ribeiro and Ortellado (2018) posit what they call *mídia hiper-partidária* ("hyper-partisan media," instead of false news) as an outcome of the polarization of the public sphere. Magrani and Oliveira (2018) underscore how disinformation impacts not only on political events, but on public debate as a whole.

Osuna and Soforza (2020) note that the phenomenon has grown in the face of the credibility crisis in journalism and the traditional media. Some authors ascribe a key role in the credibility crisis to changes in communications, especially with the advent of the internet and digital platforms, while others see the changes in the media landscape and the rise of information disorder as a consequence of or as linked to processes of political polarization (Flax 2020; Marino 2019).

Albuquerque (2020) stresses that behind the phenomenon is the dispute over the very definition of truth. The institutions and the practices found in the fight against fake news through fact-checking agencies and within multilateral institutions and academia involve a domination of the Global North over the Global South.

## 3. APPROACHES TO RESEARCH ON DISINFORMATION IN THE REGION

Among the approaches of the papers that were evaluated, three major categories can be identified. The first involves a debate about the phenomenon itself and its constitutive features, examples of which were discussed in the previous section. The second consists in exploring concrete examples and cases of disinformation in different territories and time periods. The third approach focuses on efforts to combat the problem and the different responses used to mitigate or eliminate this practice and its effects.

In the second group (studies on specific disinformation practices and cases), a prevalent theme is political processes, especially electoral ones. Some of the works are comparative studies; for example, Falomir et al. (2019) analyzed cases in Colombia, Mexico, Brazil, and Paraguay, and Sued and Kedikian (2020) compared Argentina and Mexico. Other works investigate events in particular nations: Copa and Peredo Rodríguez (2020) assessed the 2019 elections in Bolivia; Rodríguez-Hidalgo, Mier-Sanmartín, and Coronel-Salas (2020) focused on the 2019 elections in Ecuador; and Sánchez (2021) investigated the 2018 elections in Mexico.

Other types of political processes, such as referendums and protests, have also been the object of attention. Pérez, Calderón, and Coronado (2021) analyzed disinformation in the so-called "paro nacional de Colombia" (national protest of Colombia) of November 21, 2019. Salinas (2020) and González (2017) address the spread of disinformation in Colombia's 2016 peace referendum. Piaia (2018) evaluated misleading content in the process that led to former Brazilian President Dilma Rousseff's impeachment in 2016. Dourado (2020) discusses the spread of false news during the 2018 elections in Brazil.

Despite the recency of the advent of the Covid-19 pandemic in late 2019/early 2020, the prevalence of disinformation practices related to the pandemic has given rise to several articles and chapters by Latin American researchers (Neto et al. 2020; Rodríguez, Viloria, and Torrealba 2020; Vasconcellos-Silva and Castiel 2020; Venturini and Souza 2020). A number of scholars have analyzed what has come to be considered the "infodemic" (Bacci 2020; Becerra 2020; Cobos 2020; Gómez and Orozco 2021), defined as a profusion of false content related to various aspects of the pandemic, from miracle cures to false information about vaccines and non-pharmacological measures. Ceron et al. (2021) point out a strong relationship between false content related to Covid-19 and political motivations and conflicts. Gutiérrez-Coba, Coba-Gutiérrez, and Gómez-Díaz (2020) analyzed the infodemic phenomenon in Latin American countries and found that the most common types of false content were ideological and misleading messages from governments and political authorities. Garcés-Prettel et al. (2021) identified one effect of disinformation consumption to be the generation of anxiety or stress among respondents who have received such content.

Both during the pandemic and more generally, some studies have focused on audiences' habits. Moreira et al. (2021) evaluated 938 publications that circulated in Brazil during the first year of the pandemic, which was 2020. Calzado, Cirulli, and Lio (2021) evaluated information consumption behavior in Buenos Aires, Argentina. Recuero and Gruzd (2019) analyzed the streams of fake news on Twitter during the trial and arrest of former Brazilian President Luís Inácio Lula da Silva. Valenzuela et al. (2019) examined information consumption habits and the spread of disinformation in Chile.

> Both during the pandemic and more generally, some studies have focused on audiences' habits.

Themes beyond politics and the pandemic were also identified in the literature. Also within the health field, Sacramento and Paiva (2020) investigated false content related to yellow fever vaccination in Brazil. Fernandes and Montuori (2020) examined the claims of the anti-vaccine movement in Brazil. Maldonado (2020) discussed disinformation on Mexico's southern border. Roque (2020) problematized environmental and climate denialism in Brazil and how it is being driven by Jair Bolsonaro's administration. Pasquim, Oliveira, and Soares (2020) evaluated disinformation about illicit drugs that were verified by fact-checking agencies in Brazil.

Mena-López and Ramírez Aristizábal (2018) discuss the rise of disinformation about so-called gender ideology and how it gained centrality on the political scene in Colombia by being used to propagate the vote against the peace agreement in the 2016 referendum. Osuna and Soforza (2020) evaluated the correlation between gender ideology and disinformation spread by the new right (such as Jair Bolsonaro in Brazil and Donald Trump in the USA). Rosa, Souza, and Camargo (2020) investigated disinformation associated with gender ideology in the form of a claim about the Brazilian government distributing a so-called "gay kit," which allegedly contained materials that would foster a homosexual sexual orientation in children. Aguirre (2020) discusses disinformation as a strategy to trivialize reports of gender-based violence in El Salvador.

In the third group, which focuses on responses to the problem of disinformation, the literature review found works primarily oriented toward four different types of initiatives, focusing on fact checking, raising public awareness and media education, analyzing the responses of digital platforms, and regulation.

Fact-checking projects are the subject of several research studies (Cusot and Palacios 2020; Pabón and Viloria 2020; Palacios, Paz, and Torrealba 2021; Pérez 2021). Pérez, Calderón, and Coronado (2021) differentiate journalistic verification from the a posteriori data verification done by fact checkers. Some of the articles analyzed projects. For example, Palacios, Paz, and Torrealba (2021) looked into the experience of the Venezuelan fact-checking project Cotejo; Cusot and Palacios (2020) discuss the experiences of Ecuador Chequea; Cañabate, Rosa, and Rojano (2020) focus on the Reverso initiative during Argentina's 2019 elections; and Galhardi et al. (2020) investigated Brazil's Fato ou Fake project.

Fact-checking projects are the subject of several research studies.

While a number of the papers aim to describe or evaluate specific fact-checking initiatives or episodes, there are also critical problematizations of various aspects. These include the limits of fact checking, the subjective nature of content evaluation, and the lack of transparency in the selection of the news chosen for verification (Albuquerque 2021; Ceron et al. 2021; Clavero 2018).

Other authors have devoted their attention to media education initiatives (Costa and Romanini 2019; Cruz Jr. 2019; Fernández-García 2017; Luna 2020; Parchen, Freitas, and Cavalli 2020; Vianna and Carvalho-Mendonça 2021). Fernández-García (2017) posits this response as "more necessary than ever" to combat disinformation. Luna (2020) also emphasizes the relevance of educating the public to understand what they read, citing this effort as all the more important in the context of the Covid-19 pandemic.

Also among the responses to the disinformation phenomenon that are discussed in the reviewed articles are those employed by digital platforms. Barbosa, Martins, and Valente (2021) evaluated the internal rules of and measures taken by the major platforms (Facebook, Instagram, Twitter, YouTube, and WhatsApp) between 2018 and 2020, a period which included elections as well as the first year of the pandemic. Rodríguez, Viloria, and Torrealba (2020) list the actions taken by platforms during the pandemic to combat disinformation.

The regulation response is also a subject of discussion in the literature (Amato 2021; Campinho 2019; Hartmann and Iunes 2020; Rais 2018). Vianna and Carvalho-Mendonça (2021) argue that regulation proposals have stirred controversy. Some authors have conducted analyses of regulatory experiences globally and in the region. Veronese and Fonseca (2018) compared regulations in the EU and the USA. Valente (2019) undertook a mapping of various regulatory models globally. Sanchez Cifuentes (2019) compared legislation in Brazil and Colombia. Rigther (2018) evaluated the Mexican legal framework and the possibilities of applying previously established rules, such as censorship and the right to reply, to false content.

Other authors discuss avenues for the appropriate regulation of the problem, giving special weight to the complexity and risks of tackling the phenomenon from the standpoint of existing regulatory models. Marino (2019) is critical of handing over the responsibility to assess the veracity of content to states, arguing that regulation should respect international human rights parameters. Maldonado (2020) lists the duties of the state in the face of disinformation. Campo (2020) discusses paths to a legal solution, drawing attention to the state not only as a regulator of disinformation in society, but also as a disseminator of false content. Making the connection with electoral regulation, Brito Cruz (2020) underscores how the legal arrangements created for broadcasting come up against structural limits in dealing with the networked dissemination of disinformation, resulting in inefficiency and a series of risks for digital rights.

## 4. GAPS IN THE RESEARCH AND CHALLENGES

This review aimed to present a synthesis of the Latin American and Caribbean academic literature on disinformation and related concepts. It must be acknowledged that the problem has gained relevance and become the object of a significant volume of research in recent years. However, it is evident that most academic studies still originate in the region's largest nations, and it is important to evaluate how to stimulate this type of research in smaller countries, especially in the Caribbean.

Media manipulation is certainly not a new theme in the region, especially in studies on media and politics, which focus on the role of traditional communication media and political agents. Recognizing the fact that disinformation has been a phenomenon in the region for quite some time is important, as it confronts an often limited view on the part of authors from the Global North, namely that disinformation has emerged mainly through digital platforms. The literature from the Global North thus ultimately espouses the conclusion that merely "more journalism" will solve the phenomenon and its negative impacts. This, however, minimizes the history of practices involving the use of traditional media to promote the interests of certain individuals or those of political allies. Conversely, some of the works reviewed here mention the phenomenon as present even in traditional media. The latter can therefore not be the "solution" or the only counterpoint to the circulation of content on digital platforms; rather, what is required is a move towards a multi-pronged response.

Although the perception outlined above is a key aspect of the Latin American and Caribbean view, one of the gaps that exists in the literature is a deeper inquiry into how "traditional" forms of disinformation are linked to the new forms and to the actions of traditional media agents. In fact, many of the media groups examined in the studies on manipulation and the media are currently sponsors of projects to check and combat disinformation.[62] This is a relevant area for future analysis in the countries of the region.

> Regarding conceptual frameworks, the studies analyzed are generally anchored in literature from the Global North, with some referencing Latin American authors (more so in nations with Spanish as an official language—access to output in this language allows for greater exchange, as it is an official language in many countries of the region). The most cited works are the ones frequently recommended on academic search engines and databases, which heightens their visibility and their use for referencing purposes.

The inadequacies of this attempt at transposing Global North approaches to the Global South are related to language differences. In English a distinction is made between "disinformation," "misinformation," and "malinformation," but the same does not hold for either Spanish or Portuguese. Attempts at using the Spanish or Portuguese equivalents of these English terms have thus resulted in difficulties. However, more than a translation problem, this is a conceptual importation that is done without regard for a more critical evaluation of the phenomenon from the perspective of the region. Such an evaluation would incorporate the specificities of the region and problematize the philosophical and epistemological aspects associated with the concept, such as the very issue of defining the conditions for assessing truth as a counterpoint to that which is false or misleading.

The literature examined does not fail to take notice of the changes in the pattern of disinformation, especially as related to digital platforms. Notwithstanding the fact that the topic has been addressed in a significant number of papers (with debates on the direct correlation between the platforms' operational dynamics and the circulation of disinformation), there is a need for more research on the impact of this architecture. Further research could seek to more concretely examine the mechanisms made available by each of the intermediaries found on the internet, from algorithms and recommendation systems to products and functionality.

Studies from a Latin American perspective on the adequacy or lack thereof of the rules of platforms headquartered in the Global North, as well as on the application of these guidelines in Latin American countries, would also be worthwhile. This approach could include linguistic aspects, such as content monitoring of automated systems in Spanish and Portuguese, and the limitations of the definition and application of such rules as they relate to the specificities of Latin America and the Caribbean. Such studies may contribute to an understanding of how these agents regulate public debate and the nature of their impact on democracies in the region.

Another concern that emerges in the literature is the role of agents that produce and disseminate disinformation, especially when it comes to political authorities. However, the mapping of these networks and the analysis of authorities as promoters of disinformation are still more prevalent in research carried out by civil society than in academic work (such as periodicals, books, and theses and dissertations).

> Some authors have connected the risks of disinformation with its wider impacts on public debate and democracy. The measurement of these risks and consequences is an epistemological and methodological challenge, but it is necessary to evaluate them in a regional context in order to improve the understanding of this phenomenon's impacts and ways to combat it. In the literature explored for this academic review, there are studies focusing on political processes, such as elections, mobilizations, and referendums.

But the phenomenon is broader, and there is fertile ground for a more systematic analysis of its impact on elections, especially in terms of propaganda practices and the programming of public debates and influencing voting patterns. The dynamic character of the phenomenon (as there are elections every year or two in the region) represents a constant challenge for academics in the region, who must continue to analyze the impacts of disinformation and the evolution of its patterns in political processes.

The studies selected for this review evidenced a significant and justifiable concern with the Covid-19 pandemic. Research on phenomena such as the "infodemic" and the spread of disinformation about the origins of the virus and about treatments is an important way to identify risks and problems in the health field as a whole, since many of these initiatives, such as those of the anti-vaccine movement, are not restricted to the pandemic. In this case, we noted a lack of empirical studies analyzing disinformation consumption habits in countries of the region. There are a few studies that aimed to take a general look at Latin America and the Caribbean, and a few comparative studies between countries. The establishment of networks that can develop joint research in the region represents a challenge.

With respect to the responses to disinformation, we identified studies on the different avenues pursued by governments, parliaments, civil society, and companies. However, given the scale of the problem and the demand for effective solutions, research on the effectiveness of ongoing projects remains a challenge. Such an effort must be made in all four areas—fact checking, media education, policies of digital platforms, and regulation—since they all represent weaknesses that need to be evaluated in order to improve initiatives. As regards fact checking, for example, questions about the effectiveness and dynamics of content selection and routine checks point to the importance of further studies in this vein. In media education, an assessment of the strengths and weaknesses of the methods employed could indicate where changes need to be made. As for the policies of digital platforms, scrutinizing their formulation and effectiveness is key to bringing about improvements. With regard to regulation, the expansion and improvement of academic research is highly pertinent. The challenge here lies in articulating multidisciplinary perspectives, in fields such as law, political science, sociology, and communication, which still suffer from a lack of dialogue in the region. Legislative initiatives on the matter have increased in the region in recent years, with the approval of new laws, especially with the advent of the Covid-19 pandemic. An analysis of the impact on disinformation of this legislation, where it has already entered into force, can be extremely relevant for countries debating new regulatory proposals.

In the areas mentioned above, research carried out by civil society entities has made important contributions.[63] In order to focus on role of the academic literature, this review did not include technical reports and other studies, such as policy papers, carried out by these organizations. However, Part I of this report reveals important systematic research work that in many cases fills the gaps that still remain in the research published in academic journals.

In summary, this literature review identified a thriving field of research on the subject in Latin America and the Caribbean. However, there are still significant gaps and challenges, and there is room to expand research in the field in terms of both quantity and diversity of themes. Of especial importance is the creation of Latin American and Caribbean benchmarks in the definition and conceptualization of the phenomenon of disinformation, in order to contribute to building a perspective from the Global South.

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- Arréguez, Soledad (Desconfio), August 19, 2021, online
- Blanco, Patrícia (Instituto Palavra Aberta), August 27, 2021, online
- Bordachar, Michele (Derechos Digitales), August 26, 2021, online
- Botero, Carolina (Fundación Karisma), August 20, 2021, online
- Chorny, Vladimir (R3D), August 24, 2021, online
- Concha, Maria Paula (FLIP), August 20, 2021, online
- Fernández, Alina (CLACSO), August 30, 2021, online
- Gómez, Gustavo (Observacom), 2021, online
- González, Matías (CELE), August 19, 2021, online
- José Lara, Paulo (Article 19), August 30, 2021, online
- Lara, Juan Carlos (Derechos Digitales), August 30, 2021, online
- Machado, Daniela (EducaMídia), August 27, 2021, online
- Madrid, Juan Pablo (FLIP), August 20, 2021, online
- Mielli, Renata (Centro Barão de Itararé), August 27, 2021, online
- Monje, Daniela (CLACSO), August 30, 2021, online
- Moraes, Laura (Avaaz), August 27, 2021, online
- Pino, Adrián (Desconfio), August 19, 2021, online
- Santos, João Guilherme (INCT.DD), August 27, 2021, online
- Schatzky, Morena (CELE), August 19, 2021, online
- Tudón, Martha (Article 19), August 20, 2021, online
- Vieira, Ramênia (Intervozes), August 27, 2021, online
- Vélez, Cristina (Linterna Verde), August 20, 2021, online
- Weyne, Luciana (Avaaz), August 27, 2021, online

# NOTES

1. The work of Bolaño (2004), which is focused on media studies, explores the support provided to regimes by large media groups, like Grupo Globo in Brazil. An analysis of the Southern Cone (Brazil, Argentina, Chile, Uruguay, and Paraguay) was carried out by Llorens, Maronna, and Dúran (2021).
2. In Brazil, in July of 2020, Facebook took down pages linked to a support group of far-right President Jair Bolsonaro that were spreading disinformation (Romani, Turtelli, and Lindner. 2020). Gutiérrez-Coba, Coba-Gutiérrez, and Gómez-Díaz (2020) analyzed false content in Latin American countries during the pandemic and showed that political motives, especially the far right's, were an important factor.
3. See https://verificado.uy/publica%C3%A7%C3%B5es/verificado-uy-primera-fase-culminada/.
4. Ecuador Chequea. October 15, 2019, 10:40, https://twitter.com/ecuadorchequea/status/1184116770812104706?lang=eu.
5. All quotations from interviews carried out in Spanish and/or Portuguese have been translated into English by the authors of this report, and subsequently edited for clarity.
6. https://www.apc.org/
7. https://www.alsur.lat/
8. https://www.observacom.org/
9. https://www.derechosdigitales.org
10. https://artigo19.org/
11. https://observatoriolegislativocele.com/
12. https://www.accessnow.org/
13. https://www.eff.org/pt-br
14. See https://reporterslab.org/fact-checking/.
15. See https://en.unesco.org/milclicks.
16. See https://ifex.org/alc/#campaign.
17. https://www.digimente.org/
18. Individuals and groups on the internet that attack opponents online and use aggressive postures and hate speech in online public debate
19. https://www.desconfio.org/
20. See http://www.amidi.org/combatir-desinformacion/.
21. https://chequeado.com/
22. See https://chequeado.com/proyectos/chequeado-colectivo/.
23. See https://www.chequeado.com/museodeladesinformacion/museo.
24. https://factual.afp.com/afp-argentina
25. See https://confiar.telam.com.ar/.
26. Commercial media played a role in supporting the 1964–1989 military dictatorship (Bolaño 2004) and in spreading discourse in support of authoritarian and neoliberal regimes in the country, including through the use of disinformation (Brittos and Bolaño 2005).
27. https://www.internetlab.org.br/en/
28. https://ip.rec.br/
29. https://intervozes.org.br/
30. https://baraodeitarare.org.br/site/
31. https://www.vero.org.br/
32. https://www.boatos.org/
33. https://www.e-farsas.com/
34. https://www.aosfatos.org/
35. https://piaui.folha.uol.com.br/lupa/
36. https://projetocomprova.com.br
37. https://g1.globo.com/fato-ou-fake/
38. https://politica.estadao.com.br/blogs/estadao-verifica/
39. https://noticias.uol.com.br/confere/
40. https://checamos.afp.com/
41. https://educamidia.org.br/
42. See https://www.camara.leg.br/comprove.
43. See https://antigo.saude.gov.br/fakenews/.
44. https://www.cgi.br/
45. https://datosprotegidos.org/
46. https://www.malaespinacheck.cl/
47. https://www.fastcheck.cl/
48. https://www.cazadoresdefakenews.info/
49. https://observatoriodedatos.com/category/fact-checking/
50. https://factchecking.cl/quienes-somos/
51. http://colombia.mom-rsf.org/en/
52. https://linternaverde.co/en/
53. https://www.lasillavacia.com/la-silla-vacia/detector-de-mentiras/
54. https://www.entretantocuento.com/
55. https://verificado.com.mx/
56. https://escenariotlx.com/ficcionesinformativas/
57. https://www.animalpolitico.com/sabueso/
58. See https://www.animalpolitico.com/coronavirus-covid-19/,
59. All quotations from legislation and other official sources have been translated to English by the study authors for the purposes of this report.
60. Further studies would need to be conducted in order to explore this relationship, something worth considering.
61. https://chequeado.com/el-explicador/
62. An example is the Globo Group, in Brazil, which runs Fato ou Fake and which is examined in studies such as those by Brittos and Bolaño (2005) and Lima (2001).
63. Examples include AlSur's (Álvarez Ugarte 2020) and El Diálogo's (Christie, Lanza, and Camilleri 2020) research on disinformation and the pandemic, and country situation reports such as those on Chile (García, Baeza, and Peña 2021), Mexico (Lara and Jimenez 2021), and Argentina (Szewach and Freuler 2020).

# SUB-SAHARAN AFRICA

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# PART I
# GENERAL OVERVIEW

## 1. INTRODUCTION

In today's digital world, characterized by the use of wireless media and social media that know no borders or limits, misinformation and disinformation can be distributed to scores of people in a split second. Studies have shown that false information tends to spread faster and more broadly online than the truth does (Vosoughi, Roy, and Aral 2018). Social media's global reach, coupled with improved internet connectivity, means that it has become increasingly difficult for online aggregators and social media companies to stay abreast of what kind of information is shared over their platforms. The resulting "infodemic," or the phenomenon of "information disorder," is considered by some to be more pronounced in economically disadvantaged countries than in richer nations (Singh et al. 2021). This is largely owing to disparities in socioeconomic factors, such as the quality of information and communication technology (ICT) systems in rural and urban communities, that negatively impact on the information ecosystems in many African countries.

Sub-Saharan African countries have had their fair share of infodemics—a situation of "too much information including false or misleading information in digital and physical environments during a disease outbreak" (WHO n.d.). These have mostly been limited to within national or regional boundaries. For example, during the HIV/AIDS and Ebola epidemics in Africa, false rumors and conspiracy theories were rife, hampering public health efforts to contain the diseases (Allgaier and Svalastog 2015; Fung et al. 2016; Furman 2020; Hellweg 2008; Islam et al. 2020; Sell, Hosangadi, and Trotochaud 2020; Stadler 2003). However, in recent times, there has been a qualitative change in the nature and flow of mis- and disinformation, as the phenomenon has taken on global proportions. This has brought about a new urgency and renewed efforts to address it.

Information disorder in Africa predates what is referred to as the "post-truth era" in the Global North, which has been caused largely by the proliferation of contemporary media. The media distrust underlying information disorder in Africa has its roots in the political exploitation of media by repressive governments (Mare, Mabweazara, and Moyo 2019). The current level of information disorder has been accompanied by the dissolution of concentrated state power over the media, resulting in an influx of information which citizens can access to curate their own news consumption, instead of depending on traditional media (Ncube 2019; Ogweno, Oduor, and Mutisya 2021). Unfortunately, while social media have fostered access to important information, they have also been used to spread falsehoods related to many different sectors, such as health (e.g. Covid-19), politics (e.g. elections), and society (e.g. social instability, xenophobia) (Mutahi and Kimari 2020).

Information disorder in Africa, much like in the Global North, manifests as modern-day propaganda. Back in colonial times, states used propaganda as a weapon to quell political unrest. This practice was later adopted by democratic governments to entrench political power. Governments were thus, traditionally, the main producers of disinformation, and journalists had to learn to treat journalism as a contested area vulnerable to manipulation by governments (Mare, Mabweazara, and Moyo 2019). However, the push to privatize state-owned media and the emergence of independent media organizations over the last few decades have not only failed to dismantle state-sponsored propaganda but also made both private and public organizations vulnerable to manipulation (Nyabola 2018). In fact, some point to the failure of journalists and traditional media outlets to fulfil their role as bastions of truth as a key enabler of information disorder (Mare, Mabweazara, and Moyo 2019; Wasserman 2020). This can be attributed to capture by political or business institutions, abdication of the responsibility to verify information before publication, the need for media outlets to compete for audiences, a reliance on online media business models, and poor reporting, amongst other things.

> The push to privatize state-owned media and the emergence of independent media organizations over the last few decades have not only failed to dismantle state-sponsored propaganda but also made both private and public organizations vulnerable to manipulation.

While social media and online content are significantly implicated in the growth of information disorder, digital access is still low in many parts of sub-Saharan Africa. In 2019, mobile internet adoption stood at 26 percent, while average individual internet use in the region was reported to be 29 percent (GSMA 2019; ITU 2019). Further, data from a 2018 survey by Research ICT Africa, titled "After Access 2018: A Demand-Side View of Mobile Internet from 10 African Countries," show that several of the African countries surveyed had a critical mass below 15 percent, less than the 20 percent threshold required to enjoy network effects such as enhanced information flows (Gillwald and Mothobi 2019). This points to the possibility that the information ecosystem in sub-Saharan Africa functions differently from that in highly connected environments. Subnational differences in infrastructure, basic and digital literacy, economic opportunity, and language groups further complicate the landscape. In some Western countries, increasing levels of political polarization are fueling people's preferences for social media echo chambers, creating a formidable barrier to the acceptance of corrected information, since notions of "credible" information sources have been distorted. It is unclear to what extent such echo chamber effects exist in sub-Saharan Africa, but any attempts to address mis- and disinformation in the region must consider this possibility, especially in view of ethnic divisions in many parts of the continent, which are often aligned with political groups and reflected in partisan media and online spaces.

State-led efforts to ameliorate the spread of "fake news" in sub-Saharan Africa have led to the introduction of laws that have done more to repress freedom than to lessen mis- and disinformation. In fact, such actions have further contributed to information disorder, as they are often justified by claims that are themselves forms of mis- or disinformation. For example, Kenya and Zimbabwe have witnessed press censorship and election manipulation, while in Uganda independent media houses have been shut down and minority rights have been suppressed through legislation. Although legislation could be used to curb information disorder, since 2012 there has been an exponential increase in the regressive use of legislation by governments in the region, ostensibly to counter falsehoods and mis- or disinformation. A particularly steep spike in such legislation occurred in 2020, in the form of regulations related to Covid-19. However, the impact of penal and media and communication laws on curbing the spread of falsehoods is unknown (Mare, Mabweazara, and Moyo 2019; Yadav et al. 2021).

Triggered by the acceleration of mis- and disinformation during the Covid-19 pandemic, certain high-profile national elections, and the resurgence of threats to press freedom, several initiatives have emerged in recent years to confront information disorder in sub-Saharan Africa. This report identifies actors working to counter information disorder in sub-Saharan Africa and the approaches they are using. It also discusses the legal, regulatory, and human rights contexts within which these actors are working. While the emergence of the internet has changed the way information (and mis- or disinformation) is produced and consumed, the situation is often more nuanced than what is portrayed in both the media and the academic literature. In particular, information disorder in sub-Saharan Africa cannot be viewed from a Western perspective, which assumes wide access to digital technologies and where a great deal of fake news can be attributed to the rise of alt-right political groups. Rather, it should be viewed in the context of conditions such as highly uneven digital access, rural/urban economic divides, and underdeveloped democratic systems.

# 2. METHODOLOGY

This study seeks to answer the following research questions:

1. How is information disorder understood and defined in sub-Saharan Africa?
2. What types of organizations are working to combat information disorder?
3. What types of responses and key methodologies are used by these organizations?
4. What are the main organizational, resource-related, and operational challenges faced by organizations in the region?
5. Which policy and legal environments circumscribe the work of these organizations?

Considering the expansiveness of the African continent and the number of countries involved, we decided to primarily adopt a regional approach. In the search for actors, we therefore focused on identifying as many initiatives as possible across the continent, without attempting to obtain comprehensive coverage of any particular country. Further, in order to ensure that francophone regions were not overlooked, a French-speaking team member was assigned to gather information on francophone countries.

The data collection process consisted of three steps:

1. **Collection of publicly available information from websites and other sources:** Actors were identified mainly through online searches between April and August 2021. Due to the lack of publicly available information on actors working to counter information disorder, we also followed up word-of-mouth leads, based on our own personal networks and recommendations from the actors we interviewed. The definition of an actor was kept very broad—other than the requirement that the actor had to be working to counter mis- or disinformation, there were no exclusion criteria. Having a broad definition enabled us to explore a variety of actors, including those who do not fit the typical mold. For example, some of the actors do not explicitly classify their work as countering information disorder; rather, their main objectives might include promoting access to information, promoting democracy, or ensuring the right to press freedom or freedom of expression generally.
2. **Coding of information:** Basic information about the actors and their initiatives was collected from their websites and a coding scheme was developed to capture various characteristics. It must be noted that coding was mostly based on the research team's interpretation of information from websites and therefore might not be 100 percent accurate.
3. **Interviews with actors:** All seventy-nine initiatives identified were contacted with a request for an interview. We did not receive responses from all initiatives; it was particularly difficult to secure interviews with the actors based in Africa. Ultimately, twenty-five of the initiatives were interviewed in August and September 2021. Interviews were conducted on the Zoom and Microsoft Teams platforms, and the standard ethical protocols of the University of Cape Town (UCT) and Research ICT Africa were adhered to. The names of all interviewees are withheld in this report to preserve anonymity.

# 3. INITIATIVES TO COUNTER INFORMATION DISORDER

Overall, we identified seventy-nine initiatives or organizations in sub-Saharan Africa (see Annex A), although not all were confirmed as active. While this group does not necessarily represent the total number of initiatives in sub-Saharan Africa, the analysis in the following sections gives a picture of general trends and the distribution of certain characteristics among initiatives in the region.

## 3.1 HOW ACTORS PERCEIVE INFORMATION DISORDER

The actors participating in our interviews generally agreed that information disorder in sub-Saharan Africa has both global and local dimensions. There were mixed views, however, on whether there are uniquely African aspects to this phenomenon. For example, some actors believe information disorder is worse in sub-Saharan Africa than in other world regions, due to high levels of distrust in governments and media. Others argue that information disorder is worse in other world regions because of higher levels of digital access and use. Yet others believe that there is no difference. Overall, there are possibly more similarities than differences in terms of the basic forms of mis- and disinformation and the underlying motivations for the spread of these. Some distinctions do appear in a few areas.

> As on the global scene, information disorder in sub-Saharan Africa has escalated as a result of global connectedness and people's increased reliance on social media for news. The spread of false information is also driven by fear, prejudice, and a poor understanding of the issues.

On the other hand, in many sub-Saharan African countries, a lot of false information is spread by word of mouth, even if the information originated online. This is partly due to the relatively low levels of digital access across the continent, and it reinforces the need for information disorder strategies to have both online and offline components. In countries with high levels of digital access, such as in the Global North, information disorder is generally associated with having too much information. Conversely, in sub-Saharan African countries, there is the perception that a key enabler of information disorder is insufficient information or lack of access to credible information sources.

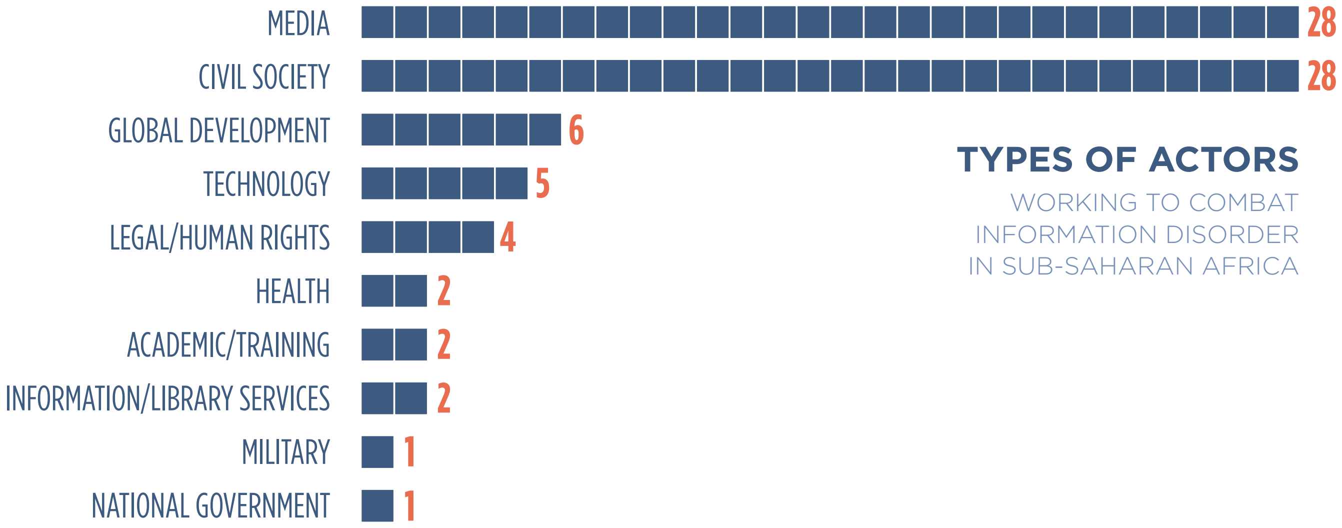
Further, the spread of false information by word of mouth can also be associated with the tradition in many African societies of using satire, humor, and gossip as forms of political resistance. For instance, in Kenya[1] and Zimbabwe[2] non-traditional forms of political criticism played a big role in strengthening democracy by creating a space for political criticism aimed against oppressive ruling parties or regimes (Hammett 2011; Hendricks 2019; Nyabola 2018). However, this critical space can also facilitate the spread of viral mis- or disinformation online, as witnessed during the Covid-19 pandemic.

The poor data culture in sub-Saharan African countries is also seen as exacerbating information disorder, as there are limited or even in some cases no national data to fill knowledge gaps in areas such as politics, the economy, health, and education. Most countries have weak or under-resourced national statistics offices, data collection activities are sporadic, and both state and industry actors are generally reluctant to openly share data on their activities. This makes it difficult or sometimes even impossible to use facts to refute false information or fill knowledge gaps.

## 3.2 TYPES OF ACTORS

Media and civil society organizations are by far the most prevalent types of actors, at 35 percent each of the seventy-nine identified actors. The remaining actor types (see Figure 1) make up the other 30 percent (ranging from one to six in number). Notably, with the exceptions of Ethiopia's state-led fact-checking initiative to combat information disorder in national and international media and South Africa's response to the ongoing Covid-19 infodemic, there are limited indications of active government-led efforts to combat information disorder. This could be due to the nature of government efforts (such as internet shutdowns), which are typically seen as repressive rather than constructive.

**Figure 1:** Types of actors identified as working to combat information disorder in sub-Saharan Africa



The actors identified fall into the following categories:

- **Academic/training:** These are initiatives that emerged from departments located within institutions of higher learning or from journalism or other media-related training institutes (e.g. Check Global, founded by Meedan in partnership with Birmingham City University).
- **Civil society:** These are non-profit organizations that promote democracy or advocate some other social cause (e.g. the Center for Democracy and Development [CDD] in Nigeria).
- **Global development:** This includes recognized global agencies such as the World Health Organization (WHO), the United Nations Children's Fund (UNICEF), and the United Nations Educational, Scientific and Cultural Organization (UNESCO). Some of their initiatives are designed specifically for Africa; others are generic programs or information platforms.
- **Health:** This includes actors, such as the WHO or the Africa Centers for Disease Control and Prevention (Africa CDC), that already have a health-related mandate and whose activities center on health-related misinformation.
- **Information/library services:** This category includes, for example, the African Library and Information Associations and Institutions (AfLIA), a non-profit organization established to advance the interests of the library and information sector in Africa.
- **Legal/human rights:** These organizations include legal firms or coalitions as well as human rights organizations. They approach mis- and disinformation from a legal perspective and in terms of potential human rights violations (e.g. Amnesty International, Lawyers Hub Kenya).
- **Media:** This includes traditional media houses/newsrooms, news agencies, social media entities, journalism associations, and foundations. They include national, continental, and global actors (e.g. Bloggers of Zambia, African Center for Media Excellence, the BBC).
- **Military:** These actors include military units such as Special Operations Command Africa.
- **National government:** This category includes governments and their agencies.
- **Technology:** This refers to technology developers or training organizations (such as Code for Africa).

## 3.3 TYPES OF MIS- OR DISINFORMATION TARGETED

Politics, especially election-related, is one of the main areas of mis- or disinformation targeted by the actors surveyed in this study. Unsurprisingly, a large share of activity is also directed at Covid-19 and other health-related mis- and disinformation. A small number of initiatives focus on hate speech and stigmas faced by certain social groups (women, sexual minorities, children, and people with albinism). Overall, however, more than half (65 percent) of the identified organizations and initiatives have agendas that cover multiple types of mis- or disinformation. In a sense, this demonstrates that the phenomenon being targeted is information disorder generally, although this is done through addressing some of its specific manifestations.

## 3.4 GEOGRAPHIC FOCUS AND LANGUAGE

The majority (43 percent) of initiatives are national in scope, followed by continental and regional initiatives (23 percent and 20 percent respectively). There are no noticeable trends in the distribution of national initiatives (they cut across subregions). Continental programs tend to indicate that their activities are geared generically towards the African continent, whilst regional programs either target a particular subregion of Africa (West, East, southern, central) or a number of specific countries. Despite the preponderance of domestically focused initiatives, most of them appear to be run or funded by global organizations based in Europe or North America. The implications of this are as yet unclear; however, the significant funding challenges faced by most initiatives is likely both a contributory factor and an outcome of this trend.

The vast majority (over 73 percent) of actors work with content in a single language (primarily English and, to a lesser extent, French). TogoCheck, for instance, mainly monitors and fact checks content in French, and Africa Check fact checks content in both English and French. However, the fact that most online content related to sub-Saharan Africa is published in English or French does not mean that the actors only operate in those languages.

> Over 73 percent of actors work with content in a single language (primarily English and, to a lesser extent, French).

The following actors indicated that they also monitor and fact check content in multiple local languages:

- PesaCheck: Swahili, Amharic, English, French
- Umati: Kikuyu, Luhya, Kalenjin, Luo, Swahili, Shengi, Somali, English
- Media Monitoring Africa: The Real411 platform receives complaints in all eleven of South Africa's official languages
- Africa Check Nigeria: Hausa, Yoruba, Igbo, Pidgin

Additionally, offline activities and platforms such as community radio communicate using the relevant local languages.

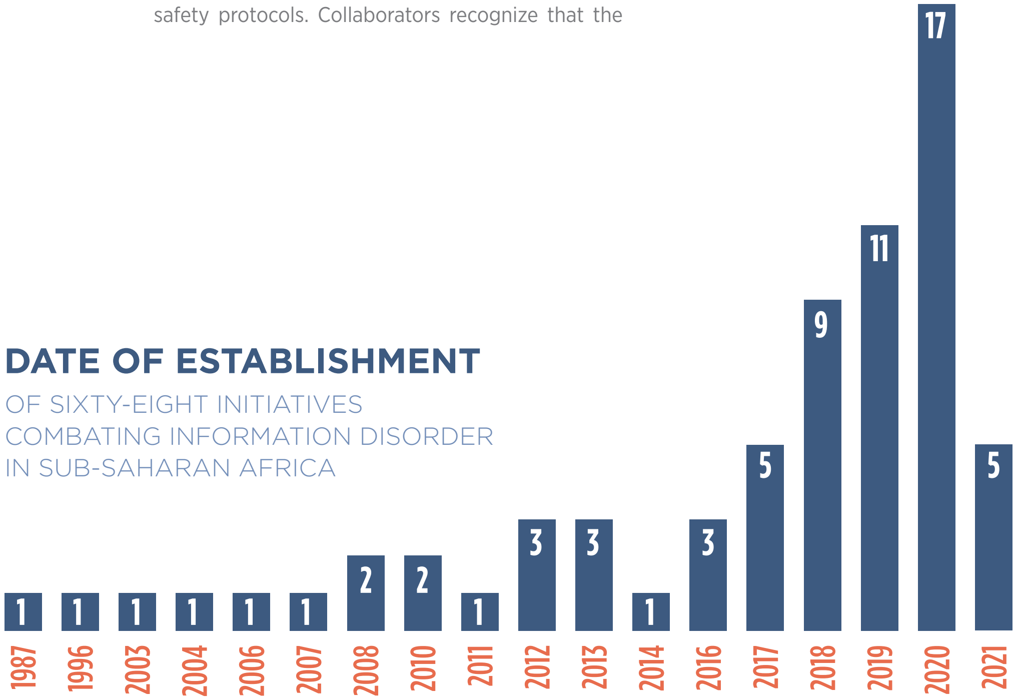
## 3.5 ORGANIZATIONAL STRUCTURE

Most initiatives are being implemented either by partnerships or networks (41 percent) or by individual organizations (37 percent). Coalitions such as the Africa Infodemic Response Alliance (AIRA), the National Democratic Institute (NDI), and the African Network of Centers for Investigative Reporting (ANCIR) (supported by the International Center for Journalists [ICFJ], Code for Africa, and the World Bank) have adopted a multistakeholder approach to coordinate the efforts of state and non-state actors to inform media strategies and campaigns. Various UN agencies are also using multidisciplinary approaches, such as the #DontGoViral campaign which uses art to raise awareness of Covid-19 safety protocols. Collaborators recognize that the increased circulation of false information is due to both institutional mistrust and digital illiteracy. Thus, some fact-checking initiatives are collaborating with media or national organizations to promote information credibility.

## 3.6 TIME FRAME

The bulk of initiatives in sub-Saharan Africa date back only a few years (see Figure 2); most of them were founded in 2020 and appear to be responding to the relatively recent emergence of mis- and disinformation spread via social media. A handful were established in the early 2010s and a few as early as the 1980s. Considering the history of political propaganda in Africa, one might expect to find a greater number of older initiatives. The absence or low visibility of older initiatives are likely a reflection of the political and technological environments at the time, including the dominance of state-owned media and the inability to reach the public directly through social media tools. This absence may also be because different terminologies (such as political propaganda, rumor-mongering, or gossiping) were used to refer to mis- and disinformation before 2016 (before the "post-truth" era). For example, the Electoral Institute for Sustainable Democracy in Africa (EISA), which has been promoting democratic governance since 1996, stated during an interview that they had only recently begun to refer to their work as countering disinformation.

**Figure 2:** Date of establishment of sixty-eight initiatives combating information disorder in sub-Saharan Africa[3]



# 4. THE STRATEGIES ADOPTED BY ACTORS

The majority of actors (fifty-three) in the region are directing their efforts at the general population or social environment; a further eighteen target media professionals. Only four appear to focus primarily on policymakers. Most (forty-six) incorporate or address multiple media types (traditional and online) in their work. A few of them concentrate on online media (twenty) or social media (six). As with the types of false information targeted, most initiatives use multiple strategies and methods to tackle different dimensions of the problem.

## 4.1 TYPES OF RESPONSES

Based on Bontcheva et al.'s (2020, 37) typology of disinformation responses, we identified examples of all four primary categories of responses:

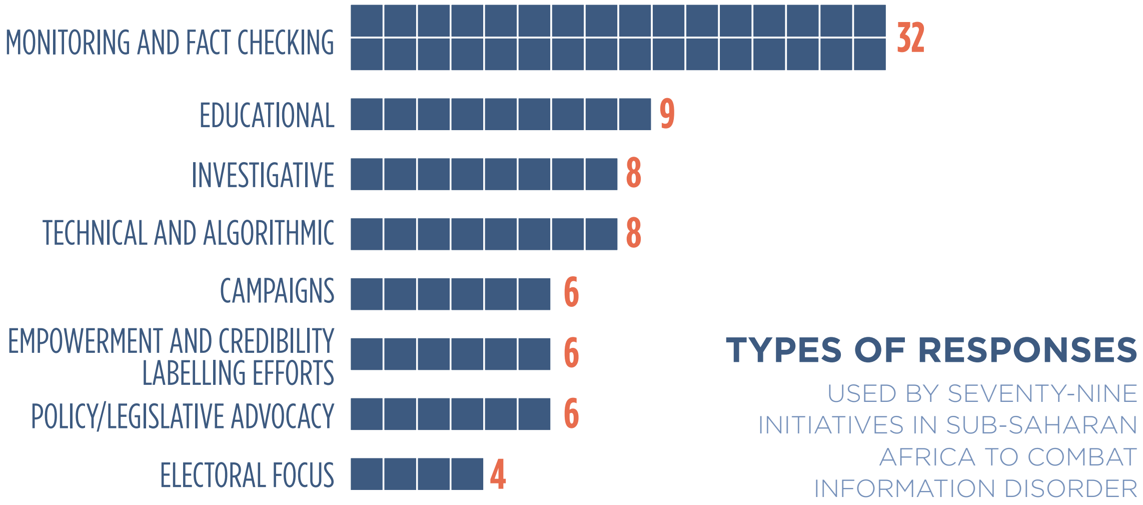
1. Identification responses (monitoring/fact checking, investigative)
2. Responses targeting producers and distributors (campaigns, policy/legislative, electoral)
3. Responses aimed at production and distribution mechanisms (technical/algorithmic, curatorial)
4. Responses aimed at the target audiences of disinformation campaigns (educational, empowerment/credibility labelling, and ethical/normative responses).

These categories are not mutually exclusive; therefore, the analysis that follows classifies actors based on the nature of their primary response. Overall, identification responses are the dominant core activity (see Figure 3), while a few actors use identification responses as a secondary activity. Forty initiatives focus on fact checking and investigation as a primary activity. Responses directed at the production and distribution environment are second highest in frequency (sixteen in total engaging in campaigns, policy and legislative engagements, and election-focused activities). A slightly lower number are working to support the target audiences of mis- or disinformation (fifteen initiatives focused on education and empowerment). Although the majority of actors are targeting online mis- and disinformation and using online approaches, the use of technical or algorithmic responses to target production and distribution mechanisms is rare (eight initiatives).

### IDENTIFICATION RESPONSES

This response primarily identifies mis- or disinformation by monitoring targeted platforms or populations, confirming or disproving the claims made, and providing credible sources for the information. The process might consist of basic fact checking or it could involve deeper investigation of foundational information about the content as well as its impact.

**Figure 3**: Types of responses used by seventy-nine initiatives in sub-Saharan Africa to combat information disorder



Most of the thirty-two actors using the monitoring and fact-checking response are media houses or independent fact-checking organizations working in the public interest. They primarily target mis- and disinformation on online platforms, and most are signatories to the standards of the International Fact-Checking Network (IFCN) and other local media councils. This means they have strict correction policies which require them to publicly account for any errors in the fact-checking process. Other actors include Sexual Minorities Uganda (SMUG), which specifically fact checks information related to the LGBTQI+ community in Uganda and abroad. Umati in Kenya was a once-off fact-checking response (part of a research project) which significantly informed subsequent research on information disorder in East Africa.

> Eight of the actors do in-depth investigations to provide insight into the content of mis- or disinformation that is in circulation. Investigative responses are distinct from fact checking in that they provide foundational information about the false content with the intention of facilitating further action.

For example, Africa Check, whose primary response is monitoring, used investigation as a secondary response at the time this study was carried out; this inspired the "What's Crap on WhatsApp?" initiative (a micro-podcast that debunks fake news). Organizations such as AFP Fact Check use the reverse search method on Google and other tools to determine where online content originated and which communities are affected by untrue information. AFP Fact Check is also part of Facebook's third-party fact-checking program, which uses insights from partners to make further investments to support the larger fact-checking ecosystem (Facebook 2021).

Although there are fewer organizations doing investigative work as a primary response, it does appear that fact-checking methodologies are maturing into the realm of these deeper investigative efforts. This level of analysis is critical to unearthing the sources, drivers, and impacts of information disorder, which could give actors stronger ammunition to get policymakers in particular to pay attention to the dangers of ongoing mis- and disinformation trends.

### RESPONSES TARGETING PRODUCERS AND DISTRIBUTORS OF INFORMATION

This response aims to alter the social and legal environment that governs and shapes the behavior of information producers and distributors. It includes national and international campaigns that focus on constructing counter-narratives, regulatory interventions, and responses specifically targeting mis- and disinformation during elections.

Six initiatives make use of campaigns that aim to make available factual, reliable information from credible sources. Campaigns are usually responsive to circumstances, and it is no surprise that several of the campaigns identified specifically focused on Covid-19-related information. The majority of actors deploying this response are founded or run collaboratively by local and international organizations such as UN agencies.

Among the six initiatives using a legislative/policy response is Amnesty International and Lawyers Hub Kenya. Amnesty International's Freedom of Expression program advocates against repressive laws threatening freedom of expression. The program combines advocacy with investigative journalism by targeting instances where speech/expressive rights or media freedom is threatened by states. These stories are published on an online repository. Lawyers Hub Kenya provides consultations on legislation related to ICT in Kenya.

There are four initiatives which use electoral engagements. Africa Check and the CDD, for example, have developed online trackers which monitor whether politicians fulfill promises made during election periods. The trackers aim to counter deceptive electioneering tactics employed by politicians to gain votes. Regions covered are West Africa (with responses in French) and Nigeria, South Africa, and Kenya (in English). Digital Africa Research Lab also provides election monitoring support in addition to fact-checking activities.

### RESPONSES AIMED AT PRODUCTION AND DISTRIBUTION MECHANISMS

This category focuses on the process of producing and distributing mis- or disinformation. Two response types have been identified. The first is technical/algorithmic, and it makes use of algorithms (natural language processing) and/or artificial intelligence (AI) technology to detect mis- or disinformation. The second is curatorial, and it focuses on editorial and content policy as well as strengthening community standards. The actors who were found to use this type of response did so as a secondary activity only.

All eight initiatives who use a technical/algorithmic response are using or plan to use natural language processing methods to train algorithms to pick up false information. They are mostly funded or run by foreign companies in Europe and North America and operate in English only. Two of the identified initiatives (RoveR and Know News) are self-funded.

Digital Africa Research Lab is the only organization that seems to use a curatorial response directly targeted at big tech companies. This initiative is pushing for accountability by ensuring that these platforms adhere to global policies and products whilst taking into consideration the needs and concerns of African users.

## RESPONSES AIMED AT SUPPORTING THE TARGET AUDIENCES OF DISINFORMATION CAMPAIGNS

This category aims at supporting potential victims of disinformation campaigns. Actions include drafting guidelines, making recommendations, issuing resolutions, promoting media and data literacy, and running content credibility labelling initiatives. Among the initiatives surveyed in this study, educational responses promote critical thinking, verification of information, and safe internet use, while empowerment efforts are practical aids used to empower the public or journalists to avoid falling victim to online disinformation. There is a further component, namely ethical and normative responses. These constitute efforts on the part of governments or international organizations, and include national or international condemnations of disinformation or researched recommendations on how to ameliorate the violations.

The earliest fact-checking responses to false information adopted an approach where citizens were assumed to have low levels of literacy. The educational approach, utilized by nine initiatives in this study, is a more mature response (compared to fact checking) derived from an understanding of the falsehood in question and where it might have come from. It seeks not only to expose falsehoods but also to provide audiences with the tools to assess information for themselves (for example, through media literacy programs) or to understand the topical area. Promoting critical thinking among citizens by educating them is popularly used by actors who are targeting issue-specific mis- or disinformation, such as health-related information or information related to stigmatized or vulnerable communities. Two examples are SMUG and Standing Voice, which works with people living with albinism. An interesting underlying assumption of this approach is that "cultural stereotypes"/myths are assumed to be due to a lack of information, whereas "fake news" is seen as a result of too much information or of mistrust in credible news sources due to the blurring of boundaries between consumers and producers of news. This is also the approach prominently used by organizations focusing on electoral mis- or disinformation.

Empowerment and credibility labelling efforts, utilized by six initiatives in this study, are mostly targeted at ameliorating online mis- or disinformation by empowering the public and media professionals or strengthening the credibility of organizations as trusted sources of information. Pollicy, based in Uganda, has developed an online interactive game which re-enacts how ordinary Ugandans can fall victim to insidious forms of mis- and disinformation. Other projects, such as YALIChecks (sponsored by the USA-run Young African Leaders Initiative, with centers in Kenya, South Africa, Ghana, and Senegal), target youth and young leaders, while Open & Disclose (an initiative of Media Monitoring Africa) and 263Chat (a media company in Zimbabwe) are working towards establishing a credible media environment through training programs and trust building.

Among the ethical and normative responses profiled, two governments are actively implementing programs to combat mis- and disinformation.

> The Ethiopian government is running a program to condemn disinformation fueled by the ongoing state of emergency in the Tigray region. The governmental fact-checking platform on Facebook and Twitter monitors national, regional, and international news platforms for false information—as defined by the government—and debunked news is posted in the form of statements on these social media platforms.

In the Ethiopian context, the implementation of fact-checking efforts was accompanied by internet shutdowns at the beginning of the Tigray conflict. For this reason, government critics argue that in addition to blatant disregard for basic human entitlements, the government appears to resort to internet shutdowns and communication restrictions as its first option and at the slightest provocation.

Thus, critics are of the opinion that the government's efforts are not genuine, but rather that the state is attempting to control the war narrative and to position itself as the sole provider of reliable information while disrupting the communication lines of "opponents."

South Africa, on the other hand, has a state-run Covid-19 resource platform intended to counter mis- and disinformation by providing a trustworthy source of information on the pandemic. Through the Disaster Management Act 57 of 2002, South Africa has also criminalized the publication of any statement made "with the intention to deceive any other person" about Covid-19, about the infection status of any person, or about any measure taken by the government to address Covid-19 (also see Annex B).

The other organizations which fall in this subcategory are international organizations, such as Amnesty International, who have formed collaborations to advocate against repressive governments that threaten freedom of expression or of the press or to capacitate third-party organizations to speak out against mis- and disinformation in their respective regions.

### OTHER TYPES OF RESPONSES

In addition to the responses discussed above, which are largely institutional, there are also more organic initiatives emerging from citizen activism. Less attention has been devoted to examining these public-led responses. A prominent example is the #KenyaDecides and #KOT hashtags, which were aimed at educating citizens and raising awareness of the possible manipulation of facts designed to incite violence during Kenya's 2016 elections.

## 4.2 TYPES OF METHODS

Beyond the broad categories of responses outlined above, actors working to counter information disorder draw on a variety of methods to implement their responses. This section presents a brief discussion of some of these methods and the initiatives using them. The descriptions here are based on information from interviews and from the initiatives' websites. The methods used include:

**Table 1:** Overview of the operations of Africa Check

| **Africa Check** | |
|---|---|
| About | Africa Check is a network of nonprofit fact-checking organizations with offices in South Africa, Kenya, Senegal, and Nigeria. It focuses on checking statements of fact, especially those made by public officials, with a heavy focus on data as the source of evidence. Its main goal is to distinguish fact from fiction, encourage critical thinking in information consumption, and foster a community of nonpartisan fact checkers. The main targets are political disinformation and general misinformation on social media. |
| Established | 2012 |
| Reach | Africa |
| Languages | English, French, local languages |
| Partners | Subject matter experts, media training organizations, community radio stations, international radio stations, social media platforms, global foundations, global non-governmental organizations (NGOs) |
| Methods and activities | The team monitors statements made by public officials and submissions from the public. Claims to fact check are selected by considering the importance of the topic, who made the claim, and its potential impact.<br>Fact checking is done by verifying the precise wording of the claim, giving the person who made the claim the opportunity to provide evidence to back up what they said, checking other sources of evidence, assigning a rating to the claim, and publishing the findings. If the information is found to be false, then a final step is to contact the person who made the claim, explain the findings, and request a public correction.<br>Fact-checked information is updated as necessary, including when errors are identified. Africa Check also does investigative research and reports on the extent and impacts of information disorder. It also publishes independent evaluations of its work. |
| Other activities | Journalist training and community building, media literacy campaigns, fact-checking and verification workshops, repository of facts, helpdesk for journalists |
| Challenges | • It is difficult to access data and information from government officials and businesses.<br>• There is a lack of tools designed by Africans, for the African context, and based on local languages. |
| Perspectives on information disorder | "Misinformation is everywhere and it can cause significant harm depending on the region or the context. Digital coverage plays an important role in amplifying the reach and impact of misinformation. Also, certain topics such as health or politics are prone to a lot of misinformation." |

| **Les Verificateurs** | |
|---|---|
| About | Les Verificateurs is an initiative of Radiodiffusion Télévision Ivoirienne (RFI), the Ivoirian television broadcasting group, based in Côte d'Ivoire. It was established in response to the rise of information disorder on social media, especially in relation to elections and Covid-19 vaccines. However, the organization addresses all types of mis- and disinformation, sourced from both traditional and social media. It aims to provide a source of reliable and verifiable information. |
| Established | 2019 |
| Reach | Côte d'Ivoire |
| Languages | French |
| Partners | Other fact-checking organizations, journalists, civil society organizations |
| Methods and activities | The initiative has set up a platform for the general public to submit potentially false information. The information is researched, and the findings are shared via a "True or False" section on the organization's website. In consideration of the speed at which mis- and disinformation spreads, the initiative tries to make its fact-checking process as simple as possible in order to get the verified information out quickly. For instance, sometimes the opinions of experts will be sought, and at other times the fact check may be as simple as contacting any person(s) involved to verify the information. |
| Other activities | Media education to teach basic fact-checking skills |
| Challenges | • There is a multiplicity of fact-checking initiatives in the region, with little or no collaboration happening amongst them.<br>• There has been limited efforts made to educate the political class on mis- and disinformation and its impacts, due to insufficient resources and difficulties in accessing resources.<br>• Access to material, financial and human resources, as well as sources of information, is a challenge. |
| Perspectives on information disorder | "For some information, we don't need to go into hard fact checking. We just try to check or call the people involved to verify the information."<br>"The limits are the software; it doesn't always do the job and therefore can't replace human work."<br>"Laws can be effective, but more so in the repression phase and not in the awareness or education phase. In addition to repression, education and awareness are needed." [4] |

**Table 2:** Overview of the operations of Les Verificateurs

**Next page, top: Table 3:** Overview of the operations of CDD Fact Check

**Next page, bottom: Table 4:** Overview of the operations of Section 27

- tracking, monitoring, and debunking mis- and disinformation
- providing a platform for complaints or reporting of mis- and disinformation
- research and information sharing/analysis of narratives and trends
- education
- capacity building
- gamification
- platform-specific content creation
- social group advocacy
- policy advocacy
- legal action
- fact-checking software services
- strategic support.

## TRACKING, MONITORING, AND DEBUNKING MIS- AND DISINFORMATION

As the most common form of response, fact-checking initiatives generally use information tracking, monitoring, and debunking as their primary methodology. As the description suggests, this method involves actively seeking out potentially false information and conducting either basic or in-depth investigations to find out whether the information is true or false. Organizations do so by using human fact checkers, technological means (especially for fact checking images and video), or a combination of both. See Table 1 for an overview of Africa Check, which employs this methodology.

## PROVIDING A PLATFORM FOR COMPLAINTS OR REPORTING OF MIS- AND DISINFORMATION

This can be considered a method within the fact-checking response. It provides a means for actors to obtain leads to investigate instead of having to seek out false information themselves. Drawing on the general public for reports of mis- or disinformation enables some actors to overcome low-resource constraints and operate on a slim budget or with a skeleton staff. See Table 2 for an overview of Les Verificateurs, which provides a platform for the reporting of mis- or disinformation.

## RESEARCH AND INFORMATION SHARING/ ANALYSIS OF NARRATIVES AND TRENDS

This method involves research more broadly on trends in mis- and disinformation, ranging from studies mapping the information ecosystem to investigations of the strategies used by politicians to generate and spread false information. Initiatives

| **CDD Fact Check** | |
|---|---|
| About | CDD Fact Check is the fact-checking arm of the CDD, a Nigeria-based not-for-profit organization promoting sustainable democracy and development in West Africa. The CDD Fact Check unit was set up in 2018 to monitor and respond to political disinformation ahead of Nigeria's 2019 elections. The unit has subsequently extended its focus to various types of mis- and disinformation, including related to Covid-19. |
| Established | 1997 |
| Reach | West Africa |
| Languages | Hausa, English, French |
| Partners | Media organizations, civil society organizations, national democracy agencies |
| Methods and activities | In addition to basic fact checking, CDD Fact Check sometimes does more generalized research on information disorder issues. For example, in an effort to understand the nature of disinformation and fake news, the unit examined the news ecosystem in Nigeria and produced reports on Nigeria's fake news ecosystem and facts and fictions associated with the country's 2019 elections. |
| Other activities | Fact checking, repository of facts, capacity building for journalists |
| Challenges | • Limited capacity to continually scan traditional and online media<br>• Insufficient financial resources<br>• A lack of tools to capture online content, which tends to be ephemeral |
| Perspectives on information disorder | "The information age, which ought to be a blessing to democracy, has been undermined by peddlers of mis/disinformation. However, even with its negative externalities, the information age is helping to promote democratic norms and values. It has enabled a borderless world; we are able to hold our leaders accountable, providing the right real-time information for local and global organizing." |

| **Section 27** | |
|---|---|
| About | Section 27 is a public interest law center dedicated to equity and social justice in South Africa. Their work veers into the area of tackling information disorder because they deal with a lot of controversial issues (such as Covid-19 vaccines) or taboo issues (such as reproductive health) where people hold strong, often inaccurate, views. |
| Established | 2010 |
| Reach | South Africa |
| Languages | Multiple South African languages |
| Partners | Civil society, media organizations, health organizations, education NGOs, public interest law firms, legal consultants |
| Methods and activities | Section 27's educational activities include developing self-help materials and information which are shared via the organization's social media pages, website, and mailing lists. It also interacts with people via WhatsApp and community forums.<br>In addition to social media, Section 27 collaborates with mainstream media, for example by writing articles or information fact sheets that are published online or in print newspapers. The organization is actively trying to strengthen work in community radio. To this end, it has run awareness-raising campaigns and held information-sharing sessions on community radio stations in different South African languages, including a recent campaign about Covid-19 and vaccines on twelve community radio stations across the country. The campaigns take the format of a talk on a particular topic, after which listeners can call in with questions, thus facilitating an open dialogue with community members.<br>Some activities are done in person, such as Covid-19 literacy training workshops with communities alongside other NGOs. In these forums, questions from community members are used to shape the discussions and to share relevant information. |
| Challenges | • The organization's responses are reactive rather than proactive, as most of its efforts go into creating content based on questions/issues raised by the public.<br>• There are insufficient human resources available to translate materials into different languages.<br>• There is limited digital access among the population.<br>• The public distrusts information generally. |
| Perspectives on information disorder | "The damage done by disinformation at times like this puts organizations in charge of disseminating accurate info in a tough position."<br>"If such limitations [regulatory restrictions on information sharing] are done in a way that follows the right tests and is proportional and reasonable and justifiable and time-bound, then regulation of information can effectively deal with the disorder." |

might do this type of research to provide context for specific mis- or disinformation or to sensitize policymakers, media institutions, and the general public to the extent and dangers of information disorder. See Table 3 for an overview of the operations of CDD Fact Check, which engages in research on information disorder issues.

Such information sharing has been demonstrated to lead to policy change on some platforms—for example, according to one interviewee, research on political tactics such as Nigerian politicians' use of "data boys" to create and spread messages may have contributed to WhatsApp's decision to limit the number of messages that can be forwarded. Though not well documented hitherto in the academic literature, the data boys or girls phenomenon is on the rise in Nigeria and other African countries. Data boys and girls are mostly youths who are hired and paid a data stipend every month by the political and business elites for digital public relations purposes (Iyanda 2021). The ultimate goal is to create a favorable status for these elites. In some Nigerian states, data boys and girls are believed to be promoters and online defenders of government policies and programs (Kogi Reports 2019). Far from being an effective means of combating mis- and disinformation, data boys and girls can in some cases deliberately contribute to the spread of false information.

## EDUCATION

Educational methods seem to be aimed at filling gaps in knowledge or understanding that are considered to be contributory factors to the spread and acceptance of false information. They include general media or digital literacy and community outreach or campaigns on specific topics. See Table 4 for an overview of Section 27, an organization that employs educational strategies.

Educational responses aim at not only educating but also empowering citizens by giving them online tools or platforms to respond to mis- or disinformation. For instance, the RIPOTI platform created by the Paradigm Initiative network educates citizens on what mis- and disinformation are and allows them to submit content they suspect to be untrue or malicious. These methods approach mis- and disinformation from the demand side and therefore focus on the audience. Educational methods are a key approach for organizations working on democratic governance, since countering mis- and disinformation often overlaps with voter education. It is also used by institutions seeking to change negative social and cultural beliefs and practices. Some activities have a narrow scope (such as supporting journalism), whilst others are more broadly in support of the information ecology.

**Table 5:** Overview of the operations of Verifox and Desinfox

| **Verifox and Desinfox** | |
|---|---|
| About | Verifox and Desinfox were introduced by CFI Media to provide training and education. Verifox was launched in 2019 and focuses on fact-checking training and support for journalists in Burkina Faso, Benin, and Côte d'Ivoire. The initiative is scheduled to end in 2022. As a result of the achievements of Verifox, a larger operation, Desinfox, was established in 2020. It is expected to run until the end of 2023. Desinfox covers three additional countries: Senegal, Central African Republic (CAR), and Cameroon. |
| Established | 2019 and 2020 |
| Reach | West and Central Africa |
| Languages | French, English |
| Partners | Media institutions |
| Methods and activities | Desinfox's program consists of five activities: forums and meetings, fact-checking training, content production training, fundraising support, and introduction to the IFCN. Trainers provide on-site coaching and networking support for journalists and media directors to strengthen the quality and quantity of fact checking. The program does not target any particular type of mis- or disinformation. Considering that sometimes media institutions contribute to the spread of false information due to their profit motives, the training includes helping to develop sustainable economic models. In addition, the program helps media institutions to expand their networks to gain access to business opportunities. Through annual meetings with regulators, Desinfox also tries to sensitize media regulatory bodies. |
| Other activities | Public awareness raising |
| Challenges | • It is difficult to find media partners.<br>• Developing sustainable fact-checking models is challenging.<br>• Providing daily support from head office in Europe is challenging. |
| Perspectives on information disorder | "If we only do training and leave the directors and journalists in the dark, we risk not having concrete results. Beyond simple (theoretical) training, it is important to offer both technical support through appropriate coaching and financial support for sustainable fact-checking models." |

| EISA | |
|---|---|
| About | EISA is a not-for-profit organization, currently with field offices in eight countries in Africa: CAR, Côte d'Ivoire, Democratic Republic of the Congo (DRC), Madagascar, Mozambique, Niger, Somalia, and Gabon. Its main objective is to promote fair elections, democratic governance, human rights, and citizen participation. The organization is moving towards doing more extensive work on information disorder during elections and has only recently started categorizing its work as countering mis- and disinformation. |
| Established | 1996 |
| Reach | Africa |
| Languages | Various national and local languages |
| Partners | Traditional media organizations, organizations working with vulnerable groups |
| Methods and activities | EISA conducts "training-the-trainer" sessions at field-office level to support organizations delivering voter education, especially those working with vulnerable groups such as women, in Somalia, Madagascar, and Mozambique. EISA does not work directly with the public; rather, it targets organizations that are pivotal in promoting fair electoral processes (such as media professionals, civil society organizations, and religious organizations). Target audiences are sometimes also determined by funding organizations. EISA's programs are intended to go beyond simply pointing to information—they aim to empower the public as well as vulnerable groups. |
| Other activities | Research |
| Challenges | • Finding funding is an ongoing challenge.<br>• There is limited capacity in terms of infrastructure, human resources, and technology.<br>• Expanding training to more languages is something EISA wishes to do, but they have not yet been able to achieve this due to limited resources. |
| Perspectives on information disorder | "The extent of information disorder in a particular region is impacted by barriers to credible information, such as urban and rural differences, maturity of democracy, access to the internet, and language barriers." |

**Table 6:** Overview of the operations of EISA

### CAPACITY BUILDING

Rather than directly targeting specific forms of information disorder, some initiatives try to enhance the capacity of media institutions to do effective fact checking. This approach assumes that one of the reasons for the spread of false information is that journalists do not have the appropriate skills or economic incentive to identify and debunk mis- and disinformation. See Table 5 and Table 6 for some examples of capacity-building strategies used by initiatives in sub-Saharan Africa.

### GAMIFICATION

Some actors have sought innovative ways to create content that can combat mis- and disinformation while having the same capacity to go viral as false information does. They use game-like products to engage the public, either in the process of identifying false information or in learning about how mis- and disinformation works. For an example of the use of gamification, see the overview of Choose Your Own Fake News in Table 7.

### PLATFORM-SPECIFIC CONTENT CREATION

This is a fairly unique response that consists of creating messages in a format meant to match the way information is shared on a specific platform such as WhatsApp or Twitter. As with the gamification method, it aims to deliver content which is as captivating as that created by people producing false information. Following the compressed format of social media, actors tend to condense fact-checked information into digestible, eye-catching formats such as videos, infographics, and GIFs. They may target a specific platform or multiple platforms. For example, "What's Crap on WhatsApp?" (see Table 8) designs its content for WhatsApp, while the Viral Facts Africa initiative, managed by Fathm, tries to make content that is shareable across various platforms such as Facebook, Twitter, and WhatsApp.

### SOCIAL GROUP ADVOCACY

This method tends to be used by actors responding to social stigma, such as the ostracizing of women in Ghana who are suspected to be witches and children in Zimbabwe living with albinism, as well as the targeting of African women in politics through gendered mis- or disinformation. Although the term commonly used to refer to mis- and disinformation in these cases is either "cultural stereotypes" or "myths," the responses are methodologically similar to demystifying fake news—that is, publishing factual information and promoting understanding and critical thinking. The main difference is that fake news spreads more rapidly and is responded to as it arises, whereas myths have existed and become entrenched over decades. See Table 9 for an overview of the operations of the Ghana Association of Persons Living with Albinism (GAPA).

## POLICY ADVOCACY

Initiatives focusing on policy advocacy seek to lobby government and institutions to adopt policies that promote democracy and digital rights in general or that address information disorder in particular. Alternatively, they might seek to advocate the elimination of discriminatory or oppressive laws and the improper use of existing legislation for bad-faith attempts to address information disorder.

While some of these actors try to build the capacity of individuals and media professionals to stand up for their rights, others focus directly on political authorities. Some opt for more subtle methods, such as the Working Group on Infodemics of the Forum on Information and Democracy, that developed a policy framework. For an example of an organization using this methodology, see the overview of Paradigm Initiative in Table 10.

**Below: Table 7:** Overview of Choose Your Own Fake News

**Bottom: Table 8:** Overview of "What's Crap on WhatsApp?"

| **Choose Your Own Fake News** | |
|---|---|
| About | Choose Your Own Fake News is an interactive media project developed by Pollicy, a technology consulting and development firm based in Uganda. |
| Established | 2020 |
| Reach | East Africa |
| Languages | English |
| Methods and activities | The project developed a storyline with three African characters in scenarios that Africans would be familiar with. The Choose Your Own Fake News game prompts users to make decisions about how they would act in a proposed situation, giving them the opportunity to think about how mis- or disinformation works and the role they play in spreading it as secondary amplifiers. The game is based on three themes: employment (as people often fall victim to online scams promising employment), vaccine hesitancy (especially related to measles, which has been identified as a growing concern in Africa), and electoral violence (how to avoid falling victim to polarization around elections). The aim is to contextualize mis- and disinformation and also to highlight the role AI plays in spreading mis- and disinformation. |
| Other activities | Capacity building, research |
| Challenges | Online business models motivate media and other platforms to prioritize clicks and likes over truthfulness. |
| Perspectives on information disorder | "The idea that the quality of journalism has decreased over the years is not proven; contemporary news channels may just have exposed poor reporting."<br>"People are prone to believe the information available if they do not have access to credible news or information sources."<br>"A grassroots approach, such as training members of Parliament on how to use the internet, and promoting internet safety and basic digital skills, will not only encourage them to take an interest in policy issues relating to the internet but also promote effective solutions (instead of responses like shutdowns)." |

| **"What's Crap on WhatsApp?"** | |
|---|---|
| About | "What's Crap on WhatsApp?" is a mini-podcast production by Africa Check, Volume, and the IFCN. It is specifically designed to be accessed and shared by users of the WhatsApp platform. |
| Established | 2019 |
| Reach | Africa |
| Languages | English |
| Methods and activities | Subscribers can forward potentially false content they have received on WhatsApp. The claims are investigated by the team, after which they create a mini-podcast (five to ten minutes) validating or discrediting selected claims. The show usually covers three topics at a time and is distributed to subscribers monthly.<br>The short, voice-based format is easy for people to access and share on WhatsApp. The voice notes also constitute a repository of messages that users can forward to people who share misinformation with them. Although the shows can be accessed online, the initiative encourages people to subscribe to have it delivered automatically to their WhatsApp account. Through being designed in this way, "What's Crap on WhatsApp?" is able to bypass the challenges posed by WhatsApp's encrypted platforms to reach audiences whose main media outlet is a particular social media platform. |
| Other activities | Fact checking |

## LEGAL ACTION

The actors who are working in the legal realm focus mainly on advocacy at the intersection of digital and human rights, including sounding the alarm about abuse of legislative powers or the potentially detrimental effects of government action against mis- and disinformation. They are particularly concerned with ensuring that legislative responses respect fundamental human rights and are not disproportionately applied. See Table 11 for an overview of Lawyers Hub Kenya, which is active in the legal realm in sub-Saharan Africa.

## FACT-CHECKING SOFTWARE

This method involves the use of technological solutions to monitor and respond to mis- and disinformation. It includes the development of software, usually AI-based, to simplify, speed up, or deepen fact-checking processes or to enable verification of more technical components such

**Below: Table 9:** Overview of the operations of GAPA

**Bottom: Table 10:** Overview of the operations of Paradigm Initiative

| **GAPA** | |
|---|---|
| About | GAPA is an NGO working to promote the rights of people with albinism. From the association's viewpoint, myths about albinism, some of which are based on superstition, can be considered a form of mis- or disinformation, because they have no moral or legal basis. These myths can be used to discredit people with albinism, contribute to their ostracization from society, or even cause them physical harm. The objective of the association is therefore to demystify albinism and break the myths and misconceptions related to persons with albinism in Ghana, to sensitize and create awareness about the challenges facing them, and to advocate inclusive policies. |
| Established | 2003 |
| Reach | Ghana |
| Languages | English, local languages |
| Partners | Social media and traditional media |
| Methods and activities | GAPA uses online and offline means to educate the public on albinism as a medical condition, share messages about the experiences of people with albinism, and advocate inclusive social practices and policies. Its Facebook page, for instance, features videos of formal communication events as well as candid videos of incidents demonstrating bias against this social group. It monitors traditional media such as radio for instances of mis- and disinformation. Furthermore, if a particular misconception is circulating, a media person might contact the organization directly for clarification or education.<br>In addition to general education, GAPA identifies communities that discriminate against people with albinism and targets educational campaigns at those communities to call for cultural reform. Other modalities used are press conferences, press releases, and dialogue sessions with opinion leaders. When funding is available, GAPA is able to run specific programs, such as on cultural banishment of people with albinism. |
| Other activities | Skills training, healthcare services, education |
| Challenges | Inadequate funding |

| **Paradigm Initiative** | |
|---|---|
| About | Paradigm Initiative works in digital rights advocacy, specializing in the policy field. It has representation in six African countries: Cameroon, Kenya, Nigeria, Senegal, Zambia, and Zimbabwe. |
| Established | 2021 |
| Reach | West, East, and southern Africa |
| Partners | Social media companies, media organizations, academia, civil society organizations |
| Methods and activities | The primary method used is workshops to educate and build capacity on issues of digital rights. For example, following the announcement of the proposed social media bill in Nigeria (the Protection from Internet Falsehood and Manipulations Bill SB132), Paradigm hosted media campaigns and several awareness-raising events with civil society organizations, media organizations, and social media users in general who would be affected by the bill. The chief concerns were around the potential stifling of media freedoms and freedom of speech in general in the country. Pressure from Paradigm and others resulted in the bill not being passed into law. |
| Other activities | Capacity building, education |
| Challenges | Inadequate funding<br>Lack of technical and technological capacity |

as images and videos. Organizations such as eyeWitness, Amnesty International, and Bellingcat use this approach to validate visual information for documentation of human rights violations or for criminal proceedings. This method is relatively rare in sub-Saharan Africa. Check Global (see Table 12) is an example of a tool used in the region. In addition, Table 13 provides an overview of eyeWitness Global.

## STRATEGIC SUPPORT

Some actors focus on providing a broad base of support services to strengthen the information ecosystem in general and to facilitate the work of stakeholders trying to counter information disorder. An example is AIRA, discussed in Table 14.

**Below: Table 11:** Overview of the operations of Lawyers Hub Kenya

**Bottom: Table 12:** Overview of Check Global

**Following page, top: Table 13:** Overview of the operations of eyeWitness Global

**Following page, bottom: Table 14:** Overview of the operations of AIRA

| **Lawyers Hub Kenya** | |
|---|---|
| About | Lawyers Hub is a Kenya-based legal-tech organization offering technology solutions for legal professionals as well as research on digital policy. |
| Established | Unknown |
| Reach | Africa |
| Methods and activities | Lawyers Hub Kenya monitors the legal environment and advocates appropriate legislation on mis- and disinformation. In 2019, they made submissions to Parliament to highlight the undesirable effects of the government's proposed social media bill, the Kenya Information and Communications (Amendment) Bill, 2019. While the bill was intended to control mis- and disinformation by regulating content on platforms, it also had provisions that Lawyers Hub believed would have a detrimental effect on freedom of expression. Their memorandum to the National Assembly regarding the African Charter on Democracy, Elections, and Governance also highlighted the impact of political mis- and disinformation on free speech, transparency, and the fairness and credibility of elections in the country (Lawyers Hub Kenya 2020).<br>In view of the proliferation of political and Covid-19-related mis- and disinformation across platforms in Kenya, Lawyers Hub is planning to partner with organizations to monitor and study the spread of mis- and disinformation during election periods. Political mis- and disinformation is the main target, because elections are particularly emotive in Kenya and have led to post-election violence, as happened in 2007/2008.<br>The organization publishes a newsletter that shares information on the nature of mis- and disinformation. It also uses its platform to call for stronger media content moderation. Following an internal capacity-building program, the team identified some technological tools that they can use to facilitate their fact-checking work. The main target audience for this is civil society for informational purposes, but the goal is to also to target Lawyers Hub members and legislators in order to have practical and policy influence. |
| Other methods | Research, policy analysis |

| **Check Global** | |
|---|---|
| About | Check Global is a technological resource provided by Meedan, a non-profit organization that develops technology to promote digital literacy and enhance access to quality information around the world. Meedan awards micro-grants to organizations to support research, data collection, networking, training, and technology development, all in the interest of improving access to information. Its primary concern is with countering disinformation, although it does not focus on any particular type of disinformation. The organizations it works with commonly target electoral and/or political disinformation, disinformation threatening the rights of minority groups (sexual minorities, women, disabled groups, refugees), doxing attacks, and reproductive and mental health myths. |
| Established | 2013 |
| Reach | Kenya, Zimbabwe, and globally |
| Partners | Technologists, newsrooms, fact checkers, public health professionals, NGOs, academic institutions, platforms |
| Methods and activities | Meedan builds open-source software for fact checkers that uses bots and algorithms to streamline the repetitive aspects of curating and fact checking online information. Check Global is a repository of checked facts, is linked to a WhatsApp tipline, and serves as a collaboration platform for fact checkers. The tool is provided free of charge to Meedan grant recipients. |
| Other activities | Fact checking, capacity building, funding, education, digital literacy |
| Challenges | Insufficient human resources relative to the scale of the problem |

| **eyeWitness Global** | |
|---|---|
| About | Focused primarily on conflict zones and areas experiencing human rights violations, eyeWitness Global is an entity that assists in the collection of data to document human rights abuses and facilitate justice. In these contexts, mis- or disinformation tends to present itself mostly in the form of videos and images of human rights violations and abuses that are captured and distributed with inaccurate information pertaining to their origin and the involved parties. eyeWitness contributes to preventing distrust in documentary evidence by compiling corroborated dossiers that can be presented in court with confidence. |
| Established | Unknown |
| Reach | Conflict zones globally |
| Partners | Human rights organizations, investigators, the International Criminal Court (ICC), European war crimes units, national prosecutors, UN bodies |
| Methods and activities | eyeWitness equips individuals who are trying to obtain accurate and authentic information with a tool that can help document the authenticity of visual information. Users download a photo/video app that embeds the necessary metadata when an image is captured. The metadata identify where and when the footage or image was taken and whether or not it has been edited.<br>The footage or image is transmitted and stored in a secure manner, documenting the chain of custody, to ensure it can be used as evidence in court. This is done by utilizing the metadata that the app has been designed to collect. Thereafter, the information is stored within the app, so that neither the photographer nor a third party can intercept it or make any changes to it. From within the app, it is uploaded to a server that eyeWitness maintains. The evidence is reviewed and processed by lawyers to ensure it meets the requirements of investigating bodies. eyeWitness identifies which agencies the information can be sent to. The organization thus passes on verified information to investigators who can use it for further investigations. |
| Other methods | Capacity building |
| Challenges | • The initiative is dependent on content provided by the public.<br>• Technology becomes redundant at a rapid rate. |

| **AIRA** | |
|---|---|
| About | AIRA is a coalition founded by the WHO Regional Office for Africa in response to the Covid-19 infodemic. It aims to debunk mis- and disinformation and boost credible health information about the novel coronavirus and Covid-19 vaccines. Members consist of eight regional and global agencies and five participating fact-checking entities (Africa Check, AFP Fact Check, PesaCheck, Dubawa, and Meedan). |
| Established | 2020 |
| Reach | Africa |
| Partners | Fact-checking organizations, national health services, media organizations, local CDC offices |
| Methods and activities | The work of the alliance is based on a misinformation management framework developed in 2020 (identifying information gaps, simplifying technical knowledge, amplifying correct information, and quantifying impacts). Within this framework, the alliance provides a suite of strategic activities and resources to bolster the information ecosystem. It includes fact checking via the Viral Facts Africa campaign using social media listening tools (tools to monitor and analyze social media conversations).<br>Although the campaign focuses on social media, it is cognizant of the fact that social media are not representative of offline spaces and it aims to leverage the flow of information between online and offline spaces to amplify messages. AIRA holds a weekly working group with national health departments to share social listening results in each region, discuss the decisions and actions taken, and share ideas on how to tackle each issue. The alliance is in the process of developing and testing tools to listen to web radio and is hoping for resources to listen to offline radio.<br>In addition, messages are augmented via relationships with journalists and the media community, frontline health workers, community workers, religious leaders, and “micro-influencers.” The approach used varies depending on the level of internet access. For instance, where internet diffusion is high, AIRA recruits micro-influencers, and where internet diffusion is low, focus is directed towards community leaders to disseminate messages printed on pamphlets and brochures. The alliance provides capacity-building activities for journalists, media professionals, frontline health workers, and those assisting to disseminate information in various countries. Capacity-building training includes the creation of communication material, fact checking, and training in the technical skills required to enable countries to run their own campaigns. |
| Challenges | It is difficult to obtain adequate information for monitoring and evaluation of programs. |
| Perspectives on information disorder | “The ‘logic of fear,’ on which conspiracy theories build their success, has always existed and has been used as a successful weapon to drive masses and communities thought history. In the most recent times, terrorism, migration, or national security has formed the fear-base, which is now contributing to the Covid-19 infodemic, with the spread of health mis/disinformation directly affecting and undermining the implementation of public health measures to counter the spread of the disease.” |

# 5. CHALLENGES IN THE FIGHT AGAINST INFORMATION DISORDER

Financial and material resource constraints are major challenges for most initiatives in the region. Organizations lack funding for day-to-day operations as well as for the specialized activities needed for fact checking and related functions. Some specific areas of need mentioned during the interviews were for resources to provide training on fact checking, to expand training to more languages, and to acquire computers and office space. High levels of dependence on donors and term-limited funds also lead to sustainability problems, for example when funded projects end before the target issues are resolved. As one respondent put it, “Our projects come to an end while the pandemic and the subregional crisis are still with us.” Reliance on foreign donors could also lead to perceptions of foreign influence and lack of independence; however, interviewees did not raise this as a critical issue.

Linked to financial constraints is the challenge of human resource capacity. Several respondents indicated that inadequate staffing was a significant factor inhibiting their work. It limits their ability to consistently scan media and respond to false information. Staff size varies widely, ranging from as few as three full-time employees to over 300 employees. Generally, the smaller organizations are those whose core activity is fighting information disorder, whereas the larger organizations have a broader and pre-existing mandate. As such, even for the larger organizations such as the WHO and the German Society for International Cooperation (GIZ), there could be capacity constraints, since employee time is not solely dedicated to countering information disorder. Dependency issues arise here also, with several organizations noting that they are dependent on interns, volunteers, and the general public to get their work done. For example, some organizations cannot do their own environmental scanning and therefore only fact check content that is submitted to them by the public.

Organizations lack access to data and information sources for fact checking due to a lack of regulation and unwillingness on the part of public officials to share information. Data culture is poor in general and governments do not systematically collect economic, political, and social data that could provide the foundation for debunking falsehoods. On the industry side of things, many organizations do not make relevant information public and some do not even have websites. Other barriers include little or no access to subject matter experts for consultation, and lack of physical access to particular locations, for example in conflict zones.

A critical constraint is the availability of tools to respond to constantly changing trends related to information disorder. Technological capabilities are constrained in several ways. These include a lack of tools for more sophisticated tracking and analysis, inadequate equipment to check images and video content, and the rapid redundancy of tools as new forms of mis- and disinformation emerge. Although technology plays a crucial role for some actors, others noted the limits of software and the need for sustained human involvement. In the African context, organizations are unable to target false information spread on encrypted platforms such as WhatsApp. Since these encrypted platforms also tend to be more popular in Africa, organizations resort to volunteers to monitor and provide information on these types of platforms.

The lack of a holistic approach to addressing issues contributes to sustainability challenges. As a result, most initiatives can only address certain aspects of information disorder, for example by providing fact-checking training for journalists. However, as one respondent noted, sustainable models need to include post-training activities or resources if they expect to demonstrate an impact and thereby maintain the momentum created by efforts made. Despite the fact that most actors we interviewed combine various tactics to tackle different dimensions of information disorder, there was a general view that more coherent and cohesive efforts are needed. Further studies must be carried out to understand what components would be required for initiatives to be adequately holistic.

> The lack of a holistic approach to addressing issues contributes to sustainability challenges.

Developing effective networks also presents difficulties. For instance, it is not always immediately clear who the right actors are to partner with to ensure common interests and genuine commitment to project goals. Partnerships also need to be flexible to respond to changing environments and partner needs, which can put a strain on resources, timelines, and relationships. Greater collaboration is needed, as the multiplicity of initiatives is making it difficult to build and establish credibility.

Partly due to the rapidity with which mis- and disinformation emerges, spreads, and disappears, initiatives tend to be reactive rather than proactive. In general, fact-checked information is less dramatic than false information and so does not receive as much attention. Organizations are still struggling to figure out how to create counter-content that is as appealing in format or style as the associated false information.

Although low trust in media channels is common in Africa, the barrage of information from all around the world, combined with constantly changing narratives on different issues, has led to increased distrust in traditional information sources and also in information more generally. This makes it difficult to counteract false information with accurate information, because all information might be considered suspect.

Monitoring and evaluation of the impact of responses to counter information disorder is difficult to conduct, in part because of the intangible and diffuse nature of information disorder and the general difficulty in tracing the direct impact of certain efforts, such as policy advocacy. A related monitoring and evaluation challenge for global organizations is that extra effort might be needed to obtain accurate information on the state of affairs on the ground (especially as regards program problems and weaknesses).

Other challenges raised were the following:

- There is a lack of local tools that take into account local context and languages. The multiplicity of African languages adds yet another layer of complexity. Most monitoring tools are developed outside Africa.
- Media incentive structures that reward audience engagement metrics such as the number of likes and ad clicks lead to journalists prioritizing those metrics over accuracy.
- Low digital access in some parts of the region means that people cannot access corrected information that is published online.
- Political leaders lack understanding of what information disorder is and what impact it has. There is thus a need for education, not only of the general public but of the political class as well.
- Actors are sometimes vilified by opposing interests, for example through being labelled purveyors of false information themselves.
- Global organizations face additional challenges in managing projects from afar, since their head offices are generally not located in Africa.
- It is sometimes not worth fact checking particular items, for example due to the amount of time elapsed since the falsehood started spreading.

# 6. THE LEGAL ENVIRONMENT

In sub-Saharan Africa, much like the rest of the rest of the world, responses to information disorder span a number of sectors. While it is mostly not-for-profit organizations that have taken charge in combating the disorder through strategies such as media literacy and fact checking, various state authorities are also involved in combating information disorder, mostly through legislative and policy interventions. This study examined the legislative efforts of forty-six countries in sub-Saharan Africa.

> The use of the law as a viable strategy has been questioned and met with skepticism in different jurisdictions in the region. This is not surprising, as sub-Saharan Africa is known for authoritarian regimes who repress human rights and the media fraternity through restrictions on the right to information, freedom of the press, and freedom of expression.

It is due to this grim history that most civil society and non-governmental actors view governmental legislative efforts with skepticism. The general feeling is that such laws are put in place to silence government critics and that they will thus be applied or enforced selectively, resulting in the violation of fundamental human rights and the stifling of the right to freedom of speech and, in certain instances, press freedom. In this sense, some critics argue that the law should be considered as an intervention only where strong democratic principles are evident and the rule of law is observed without fear or favor.

In this section, we provide an overview of the relevant legislation in sub-Saharan Africa, and we also discuss some case studies to illustrate how these laws have been applied, often with detrimental effects for press freedom or freedom of expression.

## 6.1 LEGAL MAPPING IN SUB-SAHARAN AFRICA

In most of the forty-six countries focused on in this study, legal bases exist for the different ways in which information disorder has manifested. However, bar Ethiopia, none of the countries currently have specific legislation focusing exclusively or explicitly on mis- and disinformation; instead, they rely on legislative clauses aimed at mis- and disinformation contained in other types of legislation. These include cyber-security laws, laws against falsehoods, laws relating to information about Covid-19, sectoral laws, and/or a combination of these laws. Only Ethiopia has legislation that addresses information disorder, in the form of the Hate Speech and Disinformation Prevention and Suppression Proclamation No. 1185/2020.

> Data show that the majority of countries have instituted legislation addressing information disorder under their penal codes, with the second most common type of legislation being cybercrime legislation. The most common type of information disorder legislated is disinformation, with twenty-two laws passed against it.

This is followed by laws against falsehoods[5] and cybercrimes. The majority of laws passed are concentrated in southern Africa, with thirty laws in sixteen different countries. This is followed by West Africa, where sixteen laws have been passed in thirteen countries. The central African region has the least coverage, with only three out of seven countries having legislation against any type of information disorder. The following subsections provide an overview of the legal environment, based on different categories of legislation.

## CRIMINAL LAW

Data from the study revealed that of the forty-six countries, only four—Gambia, Ghana, Mauritius, and Zimbabwe—made use of criminal law to combat information disorder. Of the four countries, Gambia and Ghana criminalize the spreading of disinformation, while Mauritius legislates against falsehoods and Zimbabwe against misinformation. Gambia makes use of the Criminal Code Act 25 of 1993 to criminalize the publication of false news. Section 59 of the Code prohibits the publication of any statement, rumor, or report "which is likely to cause fear and alarm to the public or disturb the public peace, knowing or having reason to believe that such statement, rumour or report is false." Section 181A prohibits the willful, negligent, or reckless publication or broadcasting of any information or news which is false. On the other hand, in Ghana, Section 208 of the Criminal Code Act 29 of 1960 (as amended) prohibits "the publication or reproduction of any statement, rumor, or report which is likely to cause fear and alarm to the public, or to disturb the public peace when knowing or having reason to believe that the statement is false."

In Mauritius, Section 299 of the Criminal Code (Supplementary Act) Cap. 196 makes it an offense to publish, diffuse, or reproduce false news or news which, though true in substance, has been altered in one or more parts or falsely attributed to some other person if it stands to disturb public order or public peace. In Zimbabwe, the Criminal Law (Codification and Reform) Act (Chapter 9:23) criminalizes the publication or communication of false statements that are prejudicial to the state. It covers false statements that are "wholly or materially false." According to Section 31, statements are considered prejudicial to the state when they either risk or cause public disorder, adversely affect the defense or economic interests of the country, or interfere with any essential service. It is worth noting that in the case of Gambia, Ghana, and Mauritius, the element of intention is present in the wording of the legislation, while in Zimbabwe, intention is not considered; rather, the focus is on the effect that the false information will have on public peace and the economic interests of the state.

## PENAL CODES

The majority of sub-Saharan countries maintain and make use of penal codes to combat information disorder. It is worth noting that while some jurisdictions and scholars may consider penal law/codes as being synonymous with criminal law, this study has opted to separate the two. This is primarily because this study subscribes to the school of thought that criminal law is the designation assigned to the body of law that defines what kind of conduct is prohibited by the state and sets the penalties for such conduct (Pirius n.d.). Penal law, on the other hand, refers to a particular written code of statutes defining what the elements of various crimes are (US Legal n.d.). In short, penal law deals with the punishment of one who has been proven guilty of a crime defined by criminal law.

From the data, it was found that in the forty-six countries studied, a total of twenty Acts had been passed under the umbrella of penal codes. Two countries legislate against falsehoods; nine countries address disinformation, specifically focusing on the intent to mislead or deliberately spread false information; while eight countries penalize misinformation. The diction found in these penal laws does not vary much; some examples from the region are presented below to synthesize the general sentiments found in the penal laws.

Angola and Benin are the only two countries that use penal laws against falsehoods. In Angola, Article 224 of the Penal Code 2019 criminalizes the abuse of press freedom and the dissemination of information that encourages secession; the creation of organized groups of crime; the instigation of racial, tribal, ethnic, and religious hatred; and apologies for fascist and racist ideologies. It also criminalizes the intentional promotion of a campaign to persecute or defame any person through the systematic and continuous dissemination of false information regarding facts, attitudes, or the professional, administrative, or commercial performance of that person. It further criminalizes the intentional publication of false news. It also prohibits propaganda against the national defense force and the armed forces. Article 322 covers the divulging of false statements or the distortion of true facts that may disturb the actions of the armed forces.

Burkina Faso legislates against disinformation in its penal law (No. 025-2018/AN) by criminalizing, in Articles 312–13, the intentional dissemination of false information which is likely to make others believe that the destruction of property or an attack against persons has already occurred or is likely to take place. Mozambique's penal code (No. 35/2014) provides for an offense of disturbing public order or attempting to do so. Articles 398(2) (a) and (b) cover the instigation or provocation of collective disobedience against the laws of public order or essential public functions, or any attempt to disturb public order or the peace by any means. This is further qualified by adding that such an offense may be compounded by publishing false or biased news which may cause alarm or unrest, or distributing or attempting to distribute written material which leads to the same result.

On the misinformation front, Section 66 of Kenya's penal code (Chapter 63 of 2009) criminalizes the publication of false statements, rumors, or reports which are likely to cause fear and alarm amongst the public or to disturb the public peace. Uganda's penal code (the Penal Code Act Cap. 120, 1950), which criminalized the publication of false statements, rumors, or reports which were likely to cause fear and alarm amongst the public or to disturb the public peace, was declared null and void by the Supreme Court in 2002 (Charles Onyango & Anor v Attorney General – Supreme Court Constitutional Appeal No. 2 of 2002). However, since the beginning of the Covid-19 pandemic, Section 171 of the Penal Code has been used to prosecute individuals for the dissemination of false information. Section 171 prohibits an individual from unlawfully or negligently doing anything which that person knows or has reason to believe is likely to spread the infection of any life-threatening disease.

## PUBLIC HEALTH/COVID-19 LAWS AND REGULATIONS

For the better part of 2020 and into 2021, the world has been confronted by a public health crisis of unprecedented proportions in the form of the Covid-19 pandemic. In their efforts to get the disease under control, most authorities were confronted by what the WHO (n.d.) termed an "infodemic"—the availability of "too much information, including false or misleading information, in digital and physical environments during a disease outbreak." Because the stakes are high in such situations, many countries have passed laws and regulations that deal with the communication of information surrounding the pandemic.

> Of the forty-six countries studied, five have enacted Covid-19 regulations, all of them in southern Africa: South Africa, Zimbabwe, Lesotho, Eswatini, and Namibia. South Africa has, through Section 11(5) of the Disaster Management Act 57 of 2002, criminalized the publication of any statement made "with the intention to deceive any other person" about Covid-19, the infection status of any person, or any measure taken by the government to address Covid-19.

The "intention to deceive" is understood to mean that, even if the content used is not false or fabricated, the way that it is used or published is misleading or deceptive. In Namibia, according to Regulation 16 of the Covid-19 Regulations (published under Proclamation No. 9 of March 28, 2020, as amended), it is an offense to publish any false or misleading statement about or in connection with Covid-19, or any statement that is intended to deceive any other person about the Covid-19 status of any person or about measures to combat, prevent, and suppress Covid-19. In Zimbabwe, Section 14 of the Public Health (Covid-19 Prevention, Containment and Treatment) (Amendment) Regulations 2020 (No. 1) criminalize the publication of false news about any public official involved in enforcing or implementing the national lockdown, or about any private individual "that has the effect of prejudicing the State's enforcement of the national lockdown." Any such publication should be considered "a false statement prejudicial to the State" for the purposes of Section 31 of the Criminal Law (Codification and Reform) Act.

## COMMUNICATIONS AND E-COMMUNICATIONS ACTS/POLICIES

Communications legislation or policies are commonly found in southern Africa, in Lesotho, Madagascar, Mauritius, and Tanzania. These laws tend to share a common goal, which is maintaining peace and criminalizing the undermining of state-led initiatives. In total, seven countries have communications laws or policies addressing mis- and disinformation and falsehoods. Generally, communications legislation vaguely addresses the spreading of false messages (the exchange of information), without any specification or distinction between the media type or the service provider distributing the message. In Lesotho, for instance, Section 44(1)(e) of the Communications Act, 2012, refers to a message circulating via a communications service.

Communications legislation tends to share a common goal, which is upholding peace and criminalizing the undermining of state-led initiatives.

Press legislation and media legislation are also categorized under "communications," as the two are closely related and often reflect the same principles. In Tanzania, Section 50(1)(a) of the Media Services Act 12 of 2016 makes it an offense for actors rendering media services to intentionally or recklessly publish or circulate false information. In addition, Section 50(2)(c) criminalizes the dissemination of false information without reasonable justification. Section 118(a) of the Electronic and Postal Communications Act, 2010, distinguishes between the use of "network or content services" to spread false information, and Section 10 of Regulation 16 of the Electronic and Postal Communications (Online Content) Regulations of 2020 has a clause specifically prohibiting the publication of content that is false, untrue, misleading, or which is likely to mislead or deceive the public unless it is stated that such content is satirical or preceded by a statement that it is not factual. In Uganda, according to the Uganda Communications Act, 2013, news broadcasts should be "free from distortion of facts." Article 21 of Burundi's Press Law, 2018, is similar to media legislation in that it requires the media to "convey information honestly and faithfully" in accordance with constitutional principles and legal and professional ethics. Article 62 requires media houses to refrain from publishing content that is contrary to morality, but morality is not defined. In addition to institutions, Article 54 of the Press Law specifically addresses journalists, requiring them to "demonstrate moral integrity and to be guided by facts" and "not to distort the texts and documents used to present the facts or comment on them," and to "correct in a timely manner any published information which proves to be false or inaccurate." In the DRC, Articles 76 and 77 of the Press Freedom Law broadly criminalize disinformation through any communications medium which incites specified acts such as theft, murder, pillage, or arson, or which threatens state security; these articles can even be applied to instances where the defined actions do not take place.

The legislation may be aimed at strengthening journalistic practices by holding media service providers to account for spreading false information; however, vague definitions, such as of "false information" which threatens public peace or incites civil unrest, can potentially threaten media freedom. Furthermore, the legislation is unclear as to whether individuals working for these institutions or entities will be tried for these offenses. With the exception of Nigeria and Chad—the former has no communications legislation, and the latter's Law No. 014/PR/2014 on e-Communications prohibits the intentional transmission of false information using distress signals or calls on radio—it can be inferred that e-communications legislation is viewed as an extra measure to combat and account for information disorder online. Previously, communications legislation mostly made reference to offline media.

## CYBERCRIME LEGISLATION

Cybercrime can be defined as criminal activities that are carried out by using a computer or the internet. In some jurisdictions, cybercrime is regulated under normal criminal law, but in others, cybercrime is regulated by standalone laws that specifically relate to cyber activity. This study revealed that a total of ten countries make use of cybercrime laws to counter information disorder; however, in some instances, cybercrime laws are used in addition to already existing laws and serve as addenda rather than as the main legislation against information disorder. Of the ten countries, only Cameroon and Nigeria refer to mis- and disinformation in their cybercrime legislation. The remaining eight generally regulate cybercrime as a whole and emphasize the use of electronic media.

In Cameroon, Section 78(1) of Law 2010/012 of December 21, 2010 on Cybersecurity and Cybercrime criminalizes the use of electronic communications to “publish or propagate a piece of information without being able to attest its veracity or prove that the said piece of information was true.” On the other hand, Section 24(b) of Nigeria’s Cybercrimes (Prohibition, Prevention, etc) Act of 2015 makes it a criminal offense to knowingly or intentionally publish a message online, or to cause such a message to be sent, when the individual knows the message “to be false, for the purpose of causing annoyance, inconvenience, danger, obstruction, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to another.” This is also the only law which vaguely makes reference to some form of malinformation—the deliberate alteration of online content or information for personal gain, for example revenge porn or doxing.

When talking about cybercrime in general, Sections 22 and 23 of Kenya’s Computer Misuse and Cybercrimes Act 5 of 2018 criminalize “false publications” and the “publication of false information.” Section 22 prohibits individuals from intentionally publishing false, misleading, or fictitious data, with the intent that the data be considered or acted upon as authentic. Section 23 prohibits individuals from knowingly publishing—in print, through a broadcast, or over a computer system—false information which “is calculated or results in panic, chaos, or violence among citizens of the Republic, or which is likely to discredit the reputation of a person.” On the other hand, Article 25 of Togo’s cybercrime law (Loi 2018-026 sur la cybersecurity et la lutte contre la cybercriminalité) outlaws the electronic dissemination of false information which would make it appear that the destruction of property or harm to another person has been (or will be) committed, or regarding an emergency situation.

### INSULT LAWS

A debatable paradigm of the legal response to mis- and disinformation is the use of colonially inherited “insult laws.” Post-independence governments have continued to enforce these laws, despite the Resolution on Repealing Criminal Defamation Laws in Africa of the African Commission on Human and People’s Rights (ACHPR 2010). Insult laws were enacted for the specific purpose of criminalizing any insults directed at public officials. Therefore, while these laws are related to mis- or disinformation laws in that the central concern is limiting freedom of speech and expression, for the purposes of this study, we did not focus on them, because of their subjective nature. For example, calling a president a fool is not necessarily a false statement. The veracity of such a statement cannot be ascertained objectively. The offensive nature of such a statement is evident, but the veracity is not.

For example, In Zimbabwe, Article 33 of the Criminal Law (Codification and Reform) Act (Chapter 9:23) states that anyone found guilty of undermining the authority of or insulting the president will face a fine and/or one year in prison. In Rwanda, Law No. 22/2009 on Media also outlaws any expression of contempt for the head of state and specifies a prison sentence of three months and/or a fine for anyone found guilty. In the absence of guidelines on what constitutes contempt for the head of state or the undermining of authority, subjective opinions about authority figures can be labelled both false and offensive. In this sense, this study did not delve deeper into insult laws; nonetheless, we recognize that they may be used in conjunction with other laws directly relating to mis- and disinformation.

> In the absence of guidelines on what constitutes contempt for the head of state or the undermining of authority, subjective opinions about authority figures can be labelled both false and offensive.

## 6.2 CASE STUDIES: THE APPLICATION OF LEGISLATION TO ADDRESS INFORMATION DISORDER

As has been highlighted earlier in the report, most sub-Saharan African countries do not explicitly legislate against information disorder (i.e. in terms of mis- and disinformation). Bar Ethiopia, most countries rely on secondary legislative provisions to cater for mis- and disinformation, predominantly through press freedom and cybercrime laws. Therefore, when it comes to law enforcement case studies, the majority of case studies concern journalists and, as of late, false information related to the Covid-19 pandemic. Some of these cases are hard to find, as they have been dismissed for lacking substance. However, sites such as www.disinformationtracker.org have assisted us to identify instances in which legislation has been applied. Some examples are discussed in the subsections that follow.

### ETHIOPIA: YASEYEW SHIMELIS

In April 2020, journalist Yaseyew Shimelis was arrested and charged for violating the Hate Speech and Disinformation Prevention and Suppression

Proclamation 1185/2020, Articles 5 and 7(4), by disseminating disinformation. He had posted on his personal Facebook page that in anticipation of Covid-19 deaths in Ethiopia, the government was actively preparing 200,000 burial spaces. Shimelis was sentenced for deliberately and recklessly disseminating false information without an attempt to verify the authenticity of the information and without taking into consideration the prevailing circumstances. He was also charged with violating Article 74, which applies to disinformation offenses where the individual has a social media account with over 5,000 followers or where the offense is committed through a broadcast service or print media (Ayene 2020).

### TANZANIA: SEBASTIAN ATILIO

In 2019, Sebastian Atilio was arrested for his posts in a WhatsApp group meant for commentary on politics and social issues. In his post, Atilio claimed that villagers in an area known as Iringa may be forced to relocate to accommodate land claims made by Unilever Tea Tanzania, a private company. Atilio was arrested and charged with publishing false information, as per Section 16 of the Cyber Crimes Act, 2015, and for performing journalistic activities without a permit from the Tanzania Journalists Board, as per Section 50(2)(b) of the Media Services Act, 2016. Prosecutors argued that Atilio disturbed the peace and should not be granted bail. Unilever's East Africa corporate affairs director, Joseph Sunday, told the Committee to Protect Journalists (CPJ) in an email that "Unilever Tea Tanzania is neither a complainant nor an interested party in the case against [Atilio]" (Said 2019). The journalist was held for nearly three weeks before he was released on bail. The charges were later withdrawn, in March 2020.

> In 2019, Sebastian Atilio was arrested for his posts in a WhatsApp group meant for commentary on politics and social issues.

### TANZANIA: THE *MWANANCHI* NEWSPAPER

The *Mwananchi* newspaper was banned from publishing online content for six months and fined five million Tanzanian shillings over the alleged publication of false news in April 2020. It was alleged that the newspaper had circulated an online video in which Tanzanian President John Magufuli was shown buying fish in an open market, which was considered irresponsible given the Covid-19 pandemic. The legal action was based on the alleged violation of Regulation 12(l) of the Electronic and Postal Communications (Online Content) Regulations, 2018. Regulation 12 contained a prohibition against "prohibited content," similar to Regulation 16 in the 2020 Regulations (Rweyemamu 2020). On April 13, 2020, *Mwananchi* posted an apology to its Twitter page, saying that the video was old and had been published erroneously, and that the company would take action against those responsible.[6] In its notice, the regulatory authority said that it summoned the newspaper on April 15, and that the paper's representatives admitted that they had contravened the online content regulations.

### ZIMBABWE: HOPEWELL CHIN'ONO

Well-known award-winning journalist Hopewell Chin'ono was arrested three times in a space of six months for charges relating to a series of posts on Twitter. Initially, he published an exposé on Twitter in which he alleged corruption involving a purchase of personal protective equipment for health workers to the value of 60 million Zimbabwean dollars. He was arrested in July 2020 and charged with "incitement to participate in public violence," an accusation that was thought to be linked to a forthcoming protest against corruption organized by activists and opposition politicians. After that he was arrested again and released on bail on charges of inciting violence after he voiced support for an anti-government protest in July and also on contempt of court charges for allegedly claiming corruption within the country's national prosecution agency (Burke and Chingono 2020). Finally, in January 2021 he was arrested once again after tweeting that police had beaten an infant to death while enforcing Covid-19 lockdown rules. Police later said the information was false. Chin'ono posted on his Twitter account that police had taken him from his house and said they were charging him with "communicating falsehoods." This was later dismissed, as the High Court found that the law under which he was charged had been struck down by the Supreme Court in 2014 (Al Jazeera 2021). Amnesty International said the arrests were "designed to intimidate and send a chilling message to journalists, whistleblowers and activists who draw attention to matters of public interest in Zimbabwe."[7]

### NIGERIA: ROTIMI JOLAYEMI

The poet Rotimi Jolayemi was arrested and charged in May 2020 for sharing a poem that was critical of Lai Mohammad, Nigeria's Minister of Information and Culture. An audio recording of this poem was shared on WhatsApp and subsequently went viral. It referenced corruption by the government and was critical of the government's response to Covid-19. Jolayemi was later released on bail. He was charged under Section 24(1)(b) of the Cybercrimes (Prohibition, Prevention, etc) Act of 2015. The charge sheet noted that Jolayemi posted the audio message with "the purpose of causing annoyance, insult, hatred and ill will to the current Hon. Minister of Information and Culture." An amended charge sheet was produced in June which expanded on the rationale for this charge (Sahara Reporters 2020).

### KENYA: ROBERT ALAI

Blogger Robert Alai was arrested and charged in March 2020 for publishing false information on his social media account. His posts accused the Kenyan government of concealing information about the extent of Covid-19 in the country. The blogger was charged for violating Section 23 of the Computer Misuse and Cybercrimes Act, which prohibits individuals from knowingly publishing false information that is calculated to cause panic or that results in panic (Ogila 2020).

### SOUTH AFRICA: STEVEN BIRCH

Steven Birch was arrested and charged in April 2020 for spreading false news about Covid-19. This individual posted a video on Facebook in which he claimed that Covid-19 test kits were contaminated. He warned people against getting tested and said that the medical swabs used by fieldworkers were already contaminated with the virus. This video was widely shared online. The individual was arrested and charged under Regulation 11(5) of the Disaster Management Act 57 of 2002. Holding up what looked like an earbud, he called on people to not allow community testing teams or the police into their homes for testing. He claimed that this was being used to spread the virus globally. He also called Covid-19 a "total lie," claimed that 5G cell phone masts would kill people worldwide, and said that people would be microchipped for movement monitoring (Evans 2020).

### BENIN: IGNACE SOSSOU

On the morning of December 19, 2019, Sossou, a journalist with Benin Web TV and a member of several groups, such as the International Consortium of Investigative Journalists (ICIJ) and the 3i Network (Initiative, Impact, Investigation), was arrested at his home by agents of the Central Office for the Repression of Cybercrime, and placed in custody. On December 24, he was sentenced to eighteen months in prison and fined 200,000 CFA francs for three tweets and an undisclosed number of posts on Facebook which were considered by the Beninese justice system as "harassment through electronic communications."

On December 18, the journalist posted, on Facebook and Twitter, comments attributed to the public prosecutor, Mario Metonou (the author of the complaint). The comments were ostensibly taken from a speech delivered by Metonou at a conference organized in Cotonou by CFI to discuss "fake news." These three comments, now deleted, criticized the attitude of the Beninese government towards freedom of expression. According to a document obtained by *Le Monde Afrique*, the prosecutor's comments, as reported by Sossou online, were as follows: "Benin's legislation as it stands does not offer judicial security to those subject to trial", "The cutting off of the internet on the day of the 28 April elections is an admission of weakness on the part of the government," and "The Digital Code is like a gun to the head of every journalist"[8] (Lepidi 2020).

### NIGER: SAMIRA SABOU

Samira Sabou is a human rights defender, journalist and blogger. She is the president of the Association of Bloggers for Active Citizenship (ABCA), which organizes awareness-raising campaigns, along with other organizations, to promote the role of women in the public arena and ensure freedom of expression for women in the media. She is also the administrator of the information website Magazine d'Information sur le Développement Économique et Social (MIDES).

On June 10, 2020, Sabou was arrested and charged with defamation following a complaint by the son of the President of the Republic of Niger, Sani Mahamadou Issoufou. According to the human rights defender, her arrest was linked to a social media post on May 26, 2020, in which she referred to an audit of the Ministry of Defense concerning overcharging and misappropriation of funds in the purchase of military equipment for the army. One of the comments below her publication linked the president's son to the case, although Sabou did not mention him in her publication. A complaint for defamation was filed against the journalist by Issoufou, and she was subsequently arrested and detained in Niamey civil prison.

> On June 10, 2020, Samira Sabou was arrested and charged with defamation following a complaint by the son of the President of the Republic of Niger, Sani Mahamadou Issoufou.

Although Sabou is a journalist, she was not charged under the provisions of the press freedom law, which provides for a fine. Instead, she was charged with defamation under Article 29 of the Cybercrime Law of June 25, 2019, and therefore faced a prison sentence of six months to three years and a fine of 1 million to 5 million CFA francs. On July 28, 2020, Sabou was acquitted by the Tribunal de Grande Instance Hors Classe of Niamey on the grounds of "non-constituted offenses," and released the same day.

It should be noted that Sabou's arrest for posting an article of this kind is not an isolated case. On July 12, 2020, the editor of the *Courier* newspaper, Ali Soumana, was arrested and taken into custody under the cybercrime law as well. He was released two days later following a judge's decision. Such arbitrary persecution, arrest, and detention of journalists for online comments are a violation of Niger's press freedom laws (Article 19 2021).

## 6.3 OBSERVATIONS ON THE LEGAL ENVIRONMENT

Based on the above data and examples, various conclusions can be drawn about legislative efforts in sub-Saharan Africa. Firstly, laws that specifically address mis- and disinformation remain rare in the region. Much of sub-Saharan Africa has relied on ancillary legislative pieces to cover areas such as mis- and disinformation. For example, in most cases, the relevant laws deal with other aspects of media or communication, such as press freedom and cybercrime. The fact that a number of these laws have been constructed in a vague way has been criticized by non-state actors; however, a number of authorities have justified why vagueness in legislation is preferred, as explained below.

> There is a recurring theme in most of the legislation of the forty-six countries in this study: Many laws are unclear on how to determine what is considered a "false rumor" or "false news," or what the threshold is for deciding that information is likely to alarm the public, worry them, or provoke them against "the established powers."

There is often a failure to provide clear guidance for individuals, and a tendency to leave too much to the discretion of those charged with the enforcement of these laws. Those that are in favor of vague language—often authorities—argue that it enables the authorities to limit the media's potential to influence divisions along racial or ethnic lines and/or to influence violent uprisings or other related violent activity. On the other hand, human rights defenders and lawyers have often argued that the use of vague language in legislation enables authorities to apply laws selectively to penalize government critics without the need to show that harm was caused. As has been shown in many of the case studies above, government critics, whistleblowers, and journalists alike have often been detained by authorities without good cause or where there is little certainty that charges will be brought against them. In addition, there is a lack of clarity on restrictions in the law in instances where the individual reasonably believed the information to be true.

Both arguments raise important concerns from a human rights perspective. Because a number of these laws are loosely defined in their scope, authorities could interpret the legislation as giving them power to restrict a wide range of speech. The authorities might then pursue aims which would not be considered legitimate according to international human rights standards—for example, as seen in the case studies discussed in the previous section in which legislation restricts speech which might alarm the public, worry them, or provoke them "against the established powers."

Another aspect that is not explored within this discussion but which is detailed in Annex B is the penalties prescribed by legislation. A number of these laws carry penalties which seem to be disproportionate in their severity, with potentially detrimental effects on freedom of expression. Generally, speech should only be restricted where some clear, objective public harm might be caused. The aim pursued by most of these laws seem to be the protection of public safety and public order. While the restriction of speech or content in pursuance of this aim may be legitimate, the scope of what might cause alarm amongst the public, worry them, or provoke them against "the established powers" is potentially much broader than "public order." In cases such as these, restrictions would not be pursuing a legitimate aim.

Discussions are ongoing on the relevance, scope, or limitations of legislation that is currently being drafted to counter information disorder. Most of the actors and stakeholders interviewed for this study are of the opinion that legislation can play an important role in the fight against information disorder. However, for this to happen, the legislation must be less ambiguous. It must be impartial and, above all, it must be used as an instrument of regulation rather than repression. Various of the case studies discussed above show that the law can be used to restrict freedom of expression or to settle political scores. Some of the experts interviewed for this study also argued that the laws are more suitable as repressive measures than as tools for education and awareness raising. For laws against mis- and disinformation to be effective, repression is not enough—education and awareness are also needed.

## 7. CONCLUSION

Information disorder is recognized as a severe problem which is further complicated by the interaction between global and local politics and economics. Notwithstanding the long history of politically motivated mis- and disinformation in Africa, the new dimensions added to this problem by social media have led to a recent upsurge in actors trying to counter its effects.

These actors range from existing media and civil society organizations to new, independent initiatives. They focus primarily on political and health-related mis- and disinformation, either in general or within specific contexts such as national election periods. Fact checking is the type of response most often implemented; however, most actors deploy multiple responses (such as public education and media capacity building in addition to fact checking) to address the multidimensional nature of information disorder. This suggests the perception that multifaceted approaches will be more effective than single-prong initiatives, although there is currently insufficient monitoring and evaluation data to assess this.

Even considering the different sociopolitical and economic landscapes in Africa as compared to other world regions, most of the actors we interviewed believe that the manifestations of information disorder are not dramatically different in sub-Saharan Africa compared to other regions of the world. However, actors in sub-Saharan Africa arguably face greater constraints in achieving their goals than do actors in other world regions, chiefly due to financial and human capacity limitations and an underdeveloped data culture.

Securing adequate resources, leveraging existing capacity by combining efforts, and finding ways to measure and demonstrate impact might prove critical to building effective systems to counter information disorder. More information is also needed to understand the flow of mis- and disinformation between online and offline audiences to account for the areas in sub-Saharan Africa that have low digital access but are still vulnerable to mis- and disinformation originating from online platforms. Although the role of legislation and the need for government support are recognized by the actors interviewed for this study and by the literature reviewed, state involvement in controlling mis- and disinformation is generally looked upon with suspicion. This is the legacy of decades of media and political repression by authoritarian governments.

# PART 2
# ACADEMIC OVERVIEW

## 1. INTRODUCTION

Interest in mis- and disinformation has grown considerably around the world in recent years, and sub-Saharan Africa is no exception. This report presents a review of the literature on mis- and disinformation in the context of sub-Saharan Africa. The review included ninety-two articles written in English and ten articles in French. The research that is the subject of this review emerges in a context marked by two important dynamics: the development of ever more accessible digital technologies and the Covid-19 pandemic. The review is presented in five main parts: an introduction and background overview, the research approaches undertaken, perspectives on information disorder in sub-Saharan Africa, a summary of the ways to counter mis- and disinformation, and the research gaps identified.

### 1.1 GEOGRAPHIC COVERAGE

Our sample shows that the majority of studies on information disorder include multiple locations (twenty-five) in sub-Saharan Africa; that is, individual studies include countries in multiple regions within sub-Saharan Africa. South Africa, Nigeria, and Zimbabwe tend to be particularly popular in studies featuring countries from multiple regions. The region most studied is West Africa, with twenty-eight out of the 102 articles focusing on countries in West Africa, particularly Nigeria, followed by Ghana. The sample included eleven articles that focus on countries in southern Africa, although these were split between South Africa and Zimbabwe. Eleven studies classified as "global studies" include at least one country in sub-Saharan Africa; this is notable, as forty-six of the 102 articles were written by authors in the Global North or by authors in the Global North in collaboration with authors in the Global South. Studies by authors with African affiliations are, however, more common, with fifty-four out of 102 studies conducted by authors originating from African institutions.

The paucity of academic articles published in French that explore information disorder issues in francophone Africa is mainly due to the hegemony of the English language in the field of international journals. Indeed, French-speaking researchers are increasingly publishing or aiming to publish in international journals using English. Another factor is the low publication rate in francophone Africa, particularly in the emerging field of information disorder. Most of the French-language publications focus on the European context (e.g. France, Belgium, Switzerland). In addition, some of the research on francophone Africa published in French has been produced by researchers based in institutions outside the continent.

### 1.2 FIELDS OF STUDY

For the purposes of this study, 102 academic articles that explored themes related to information disorder were analyzed. The articles present a total of nine distinct fields of study: anthropology and human behavior (eleven articles); computer science (five); health science (sixteen); information science (ten); media, communication, and journalism (forty); legal and policy studies (three); peace and conflict (five); political communications and elections (eleven); and religion (one). The sample collected shows that the majority of efforts made in sub-Saharan Africa to study and understand information disorder are by individuals and organizations in the media space. Another interesting finding is that from our pool of articles, seventy-one were authored between 2020 and 2021, a period which coincides with the Covid-19 pandemic and during which information disorder reached a peak. It comes as no surprise that the field of media, communication, and journalism has the most publications in terms of information disorder. This is because of the elevated role that the media have had to assume in dispensing accurate and timely information at a time when much of the world was uninformed.

## 1.3 DIGITAL TECHNOLOGIES

While sub-Saharan Africa faces a variety of challenges in terms of digital illiteracy, poor infrastructure, the high cost of installing ICT infrastructure, volatile political environments, and limited electricity supply (Bakibinga-Gaswaga et al. 2020), the use of digital technologies has contributed to the reconfiguration of communication tools. Indeed, even through traditional communication tools (radio, television, etc.) remain popular, a growing number of communities in sub-Saharan Africa are increasingly using digital technologies, notably through applications such as WhatsApp or social networks such as Facebook, Instagram, Twitter, and LinkedIn. Nevertheless, while digital technologies play an important role for communities in terms of access to useful information or goods and services, they also have negative effects. Most of the reviewed papers acknowledge the influence of the media in general in the proliferation of false information; social media platforms in particular have been identified as a key vehicle for information disorder (Chenzi 2020).

> The use of digital technologies has contributed to the reconfiguration of communication tools in sub-Saharan Africa.

## 1.4 COVID-19 AND INFORMATION DISORDER

A large number of the studies on information disorder in sub-Saharan Africa focus on either the impact of digital technologies or the context of Covid-19. Almost all of these researchers argue that information disorder has been exacerbated by the Covid-19 pandemic. Indeed, as many people have turned to social media as their primary source of updates about the virus, these media have become known as platforms for the dissemination of both false and true information (Durodolu, Chisita, and Dube 2021). In terms of mis- and disinformation related to Covid-19, some well-known examples of false information that have been spread include claims that the virus is a secret attempt by the global elite to reduce overpopulation, that the virus is a bioweapon manufactured by the Chinese state to control the world, and that the virus is a plan by greedy "big pharma" firms to make money from vaccines (Nguyen and Catalan 2020).

# 2. RESEARCH APPROACHES

The majority of the studies reviewed adopted qualitative research methods, collecting data via interviews, through surveys, or by reviewing literature. These studies were interested in the epistemology of mis- or disinformation. Quantitative methods were less well represented; however, studies such as that of Seo et al. (2021) tested correlations and applied network and regression analyses to examine the relationship between a country's position in the global internet network and the impact of media, information, and digital education programs. Wasserman and Madrid-Morales (2018) also used statistical analysis to explore the relationship between "fake news" and media trust. As mentioned above under "Fields of Study," phenomenological approaches related to public health, specifically Covid-19, also feature heavily in the literature. In terms of the general policy and legislative environment, there are studies that present a comparative legal analysis and others where authors have produced commentaries that make a theoretical contribution to the discourse (Offer-Westort, Rosenzweig, and Athey 2021; Pierre 2018; Pomeranz and Schwid 2021; Radu 2020).

The mixed-methods approach is often used to analyze social media. This includes the use of data-driven technologies to scrape data from the internet for analysis with descriptive statistical tools such as R-Stats (Islam et al. 2020). Studies carried out from a communication point of view often develop conceptual frameworks to understand the data they have collected. A study by Barua et al. (2020) combined the stimulus–response theory and resilience theory to examine individual responses towards Covid-19 misinformation on social media and the resilience of these individuals to the misinformation. The framework considered general misinformation as the stimuli and used the individual's ability to evaluate information credibility as a resilience response. Another study, carried out in Nigeria, investigated the effects of public relations messaging used by companies that sell sanitizers. The study sought to account for the varying psychological needs that may influence the uptake of a message, such as seeking information or connection to a group based on similar interests, affect, or the need for an avenue to release pent-up emotions (Dyikuk and Dapiya 2020).

## 3. PERSPECTIVES ON INFORMATION DISORDER

Misinformation, disinformation and, to a lesser extent, malinformation have been identified as the key components of information disorder (Wardle and Derakhshan 2017). There is general consensus that the term "misinformation" is commonly used to refer to information that is created or spread without necessarily being intended to mislead (Cunliffe-Jones 2021). Disinformation, on the other hand, commonly refers to false or misleading information that has been deliberately created or spread with the intention to mislead. Malinformation, which is not as prevalent as the preceding two, has been defined as information that is based on reality but is deliberately used to inflict harm on an organization, person, or country (Wardle and Derakhshan 2017). General studies on the topic adopt "misinformation" as an umbrella term for falsehoods circulating in the public sphere. The distinction between mis-, dis-, and mal information seems to be particularly important for researchers focusing on matters incidental to the regulation of information where authorities take intent into account (Cunliffe-Jones 2021).

There are an array of factors that have been identified to have engendered the current level of information disorder in sub-Saharan Africa, the most popular being low media literacy, poor access to credible information, poor socioeconomic conditions, and low trust in governments (Okereke et al. 2021; Ufearoh 2021). Similarly, it is believed that information disorder as it is known today is a reflection of the continent's political systems, which tend to suppress freedom of expression, and a result of divisive cultural systems and religious beliefs (Cheruiyot and Ferrer-Conill 2018).

Another widely used term in sub-Saharan Africa is "fake news." This particular term has found favor among politicians, headline writers, and the public and has been used to dismiss information as being biased or untrue without any regard to the accuracy of the information (Habgood-Coote 2018). If this term is to be taken literally, it would only apply to falsified information produced in a news format with the aim of deceiving the audience about its origins or accuracy (Habgood-Coote 2018). As such, it is also prudent to note that "fake news," while contributing to information disorder, is not at the core of the disinformation discussion. Instead, it can be thought of as a by-product of either mis- or disinformation.

In the context of Covid-19, the world has been said to be at war on two fronts. The world is battling, on the one hand, the spread of the novel coronavirus, and on the other hand, the "infodemic," which refers to the spread of misinformation related to the virus (Offer-Westort, Rosenzweig, and Athey 2021; WHO n.d.). Such misinformation spans across a number of areas of interest, including rumors about the origin of the virus, government activities, scams that ostensibly offer opportunities for aid, and hoax cures. In some instances, people remain in disbelief and deny the existence of the virus in its entirety (Offer-Westort, Rosenzweig, and Athey 2021).

> The WHO (n.d.) has warned that the infodemic has tangible implications for collective efforts to tackle the crisis. The infodemic has been attributed to an excess of information, some accurate and some not, which makes it difficult for people to find trustworthy sources and reliable guidance when they need it (WHO 2020).

Much like the actual virus, mis- and disinformation around Covid-19 are borderless and are spread following the trajectory of other types of online information. False information tends to spread faster and farther than true information, thereby putting more lives at risk (Vosoughi, Roy, and Aral 2018). Arguably, the biggest challenge that the infodemic presents is the fact that false information and fake news overshadow official public health advice regarding Covid-19, making it extremely difficult for the voices of healthcare professionals to be heard. The implications of this may turn out to be enormous as the virus spreads between and within diverse populations (Ahinkorah et al. 2020).

# 4. COUNTERING INFORMATION DISORDER

The strategies and methodologies proposed by the literature to counter information disorder are derived from the theoretical and empirical understanding of the factors which engender it. Current scholarship emphasizes the promotion of media literacy for the public and media practitioners, the development of communication strategies informed by an understanding of the production and consumption of falsified information, the promotion of access to credible information, data-powered fact-checking strategies, and multifaceted interventions which bring together diverse stakeholders (Seo et al. 2021).

> Studies conducted in Kenya, Nigeria, South Africa, and Zimbabwe have found that information disorder has penetrated various fields of economic activity, impacting on the functionality of various sectors and actors such as public health, financial services, job recruitment, elections, and so forth.

Media and information literacy programs are based on the assumption that societies will increasingly be datafied and the public inundated with information. Media and information literacy programs are therefore seen as necessary efforts that must be sustained to target the primary consumers of news media and information. Broadly, media and information literacy empowers citizens with competencies which will enable them to access, critically analyze, create, and consume information. It is, however, also seen as a means for societies to realize their right to access information and to exercise their freedom of expression—based on the idea that literacy will increase the demand for credible information and promote informed expression amongst producers of news and information. Such programs address the issue of poor and/or compromised media that leads to citizen distrust; they also aim to strengthen poor journalistic practices (Seo et al. 2021).

The lack of trust in traditional news media in sub-Saharan Africa has given rise to a series of independent fact-checking organizations and initiatives who, despite operating at the periphery of media institutions, seek to improve upon the journalistic practices that negatively impact media credibility. These organizations or initiatives investigate claims circulating on social media or traditional media with the objective of providing access to information and holding media and politicians to account by engaging the general public in news production (Cheruiyot and Ferrer-Conill 2018). According to Africa's first fact-checking organization, which hosts the largest fact-checking network on the continent, the practice of fact checking serves two functions: countering the spread of unverified and/or misleading information and raising the general public's awareness of how to identify false claims and break circulation (Africa Check 2020).

Research on fact-checking organizations and their impact in sub-Saharan Africa is limited, however. The key findings of an evaluation survey conducted by Africa Check (2020) on its Africa Fact network show that fact-checking organizations:

- value their audiences' trust
- challenge normative traditional media practices of anonymized sources by developing genuine relationships with trustworthy sources who can verify claims
- are committed and prepared to meet (through training and understanding) the demands of the ever-changing nature of information disorder
- account for the digital divide in Africa by diversifying working languages and the platforms they use
- prioritize collaboration to stay abreast of new innovations and best practice.

On the other hand, some studies reveal that media and information literacy and fact-checking practices are a limited response to an issue propelled by complex cultural and social shifts, which are further compounded by the fast-tracked development of information and communication technologies (Wasserman and Madrid-Morales 2018).

There is, however, no one approach that works best. The literature suggests a multi-levelled stakeholder approach combining various approaches and/or forming alliances, taking into consideration the disparities between communities in Africa. Combating mis- and disinformation related to Covid-19 will require a coordinated approach that brings together the relevant authorities in public and global health, government agencies, international development organizations, journalists, fact-checking organizations, civil society entities, and community leaders to develop communication strategies (Dzinamarira et al. 2021). These communication strategies should be informed by an understanding of the production and consumption of mis- and disinformation. This is crucial to improve community preparedness when high levels of messaging or critical thinking are required to absorb information, and especially when there is limited access to information.

## 5. THE POLICY ENVIRONMENT

The policy environment around information disorder can be said to have developed from the 1990s, a period which has been described as a time of media liberalization across most countries in sub-Saharan Africa. The majority of governments in the region made use of an amalgamation of colonial-era and newer laws, regulations, and policies to control the operations of broadcast, print, and online media (where applicable). The norm at the time was that restrictions on speech were viewed as protecting society against harm to the rights or reputations of individuals and organizations or information that might undermine public order. In this sense, besides legislation that penalized defamation, there was not much of an effort to legislate in the area of false information per se. This amalgamation of laws on occasion included falsehood among the grounds on which information could be prohibited, but the legislation was often framed in a very broad and vague way, not referring to any particular types of falsehood. There are conflicting views on the issue of vague language used in legislation dealing with falsehoods, as discussed earlier.

With the advent of the digital age, the ability of state authorities to police the flow of information on various digital platforms has lessened over the years (Ndlela and Mano 2020). While these developments were initially welcomed by the general public, a study carried out by Cunliffe-Jones et al. (2021) in eleven sub-Saharan African countries showed that between 2016 and 2020, ten of the eleven countries had either introduced new laws or amended existing laws and regulations that dealt with "false information" through traditional or social media. This raised from seventeen to thirty-one the number of laws authorities said were aimed at reducing the harm caused by false information in the countries studied (Cunliffe-Jones et al. 2021). Such a surge in legislation was met with concern around the intentions behind these actions. For example, in Nigeria, the Protection from Internet Falsehood and Manipulation and Other Related Matters Bill, which has since been abandoned, gave authorities the power to arbitrarily shut down the internet, limit access to social media, or sentence a person to up to three years in prison for criticizing the government. From a policy point of view, not only did this give the authorities too much power; it was also difficult to justify the legality of such legislation when weighed up against the guaranteed human rights of Nigerian citizens.

> With the advent of the digital age, the ability of state authorities to police the flow of information on various digital platforms has lessened over the years.

Besides the human rights concerns outlined above, general criticisms of the current legislative approach include the following:

- When seen against the scale of the problem, the direct effects of legal action are minimal.
- The regulations are mainly used against media and opposition politicians.
- Restrictions such as internet shutdowns have potentially harmful effects.

## 6. GAPS IN THE RESEARCH

Several gaps have been identified in the literature on mis- and disinformation in sub-Saharan Africa:

- While efforts to carry out and publish research on information disorder are commendable, limited research has been done on contexts other than the Covid-19 pandemic. This means that the majority of the literature on information disorder in sub-Saharan Africa is biased in that regard.
- Studies on information disorder in the context of Covid-19 are also lacking in that they do not address the origins or causes of these myths and misconceptions, nor the way they are conveyed and maintained. The focus is often on the media (traditional, digital, and social) as vehicles for the development of mis- and disinformation. Socio-cultural or socio-anthropological factors have rarely been explored. It would thus be important, especially in the sub-Saharan African context, to better understand the factors or cultural specificities that lead to information disorder.
- While several studies present a global perspective on information disorder, especially from a digital point of view, not enough attention is given to the efforts of grassroots actors who are actively combating information disorder offline. This is especially true in the African context,

where non-digital strategies are just as important as their digital counterparts.

- Most of the studies focus on publicly available online platforms and do not follow or examine rumors and conspiracy theories circulating through other channels and offline (Islam et al. 2020).
- There is limited literature on the impact of approaches or initiatives to counter information disorder led by non-journalistic actors (Wasserman and Madrid-Morales 2018).
- Although mentioned as an approach mostly in phenomenological studies such as those on Covid-19 and health communication, the literature reviewed for this study only included two studies whose primary research objectives were to investigate fact-checking organizations and their networks.
- The majority of studies are concentrated in the usual research hubs—South Africa and Zimbabwe in southern Africa, Kenya in East Africa, and Nigeria in West Africa.
- English is the dominant language in research on mis- and disinformation in the sub-Saharan African context. Other languages, such as French, Spanish, Portuguese, Swahili, and so forth, could be utilized more frequently. Furthermore, there is no evidence of publication in local languages, despite the fact that initiatives countering false information have adopted some local languages. This is likely also related to trends in the global publishing economy, which prioritizes research published in English.

## 7. CONCLUSION

The studies reviewed are informed by an understanding that media credibility, lack of access to information, and, in some cases, socioeconomic shortcomings contribute to information disorder in sub-Saharan Africa. Information disorder is framed as important in as far as it threatens democracy and possibly citizens' rights to access information and to expression.

Studies related to Covid-19, published between 2020 and 2021, make up the majority of studies on information disorder. This comes as no surprise given the extent to which this global health crisis has exacerbated the amount of falsehoods circulating, most of them with high virality due to the nature of social media and technology. However, some studies, especially those predating the pandemic, highlight the influence of cultural systems, socioeconomic inequalities, and religion in contributing to information disorder, particularly in relation to the uptake of myths, rumors, or conspiracies.

The approaches examined and/or proposed reflect what researchers believe to be the root cause of information disorder: low levels of trust in media, low media and information literacy, and the declining credibility of traditional media. Attempts at combating information disorder through policies and legislation have been met with suspicion given how vague the legislation tends to be and that it has often been employed selectively, especially when the information in question is anti-authoritarian. There is much that can be done to combat information disorder through policy, but this will require concerted efforts involving all the different stakeholders—civil society, academia and researchers, governments, digital platforms, policymakers, policy advocates, and the general public—that are active in the fight against information disorder.

> Knowledge gaps remain in the field of combating information disorder, especially in sub-Saharan Africa. More Afro-centric approaches to research in this area will likely yield better results. This could lead to a better understanding of the root causes of the disorder on the continent and, by extension, assist actors to devise tailored ways of combating the infodemic in sub-Saharan Africa.

# ANNEX A

| Type of actor | Initiative | Implementing organization/actor | URL |
|---|---|---|---|
| Academic/training | Check Global | Meedan, Birmingham City University | https://meedan.com/ |
| Academic/training | Umati | iHub Research | https://ihub.co.ke/ |
| Civil society | #BenbereVerif | Benbere | https://benbere.org/dossiers-benbere/benbereverif/ |
| Civil society | Afia Amani Grands-Lacs | Pole Institute, International Alert, Internews | https://afia-amanigrandslacs.info/qui-sommes-nous/ |
| Civil society | Africa Check Nigeria | Africa Check | https://africacheck.org/geofocus/nigeria |
| Civil society | Misinfo | African Network of Centers for Investigative Reporting (ANCIR) | https://misinfo.investigate.africa/index.html |
| Civil society | Asante Mariamu | Asante Mariamu | http://www.asante-mariamu.org/our-programs/albinism-awareness/ |
| Civil society | Bénin Check | Bénin Check | https://benincheck.org/about/ |
| Civil society | Burundi Fight Covid-19 | Not applicable | https://twitter.com/FightBurundi |
| Civil society | Cellule Anti Fake News | Cellule Anti Fake News | https://celluleantifake.org/ |
| Civil society | Coalition against Witchcraft Stigmatization of Children in Africa | Coalition organizations | http://stopchildwitchcraftaccusations.blogspot.com/search?updated-max=2011-11-13T08:01:00-08:00&max-results=7&start=7&by-date=false |
| Civil society | Countering Disinformation on Covid-19 in Africa | Fondation Hirondelle | https://www.hirondelle.org/de/unsere-news/1237-lutte-contre-la-desinformation-liee-a-la-pandemie-de-covid-19-en-afrique-notre-programme-avec-le-soutien-de-l-union-europeenne |
| Civil society | Data Cameroon | L'Association pour le Développement Intégré et la Solidarité Interactive (ADISI-Cameroun) | https://datacameroon.com/ |
| Civil society | Digital Africa Research Lab | Digital Africa Research Lab | https://digiafricalab.org/index.html |
| Civil society | Electoral Institute for Sustainable Democracy in Africa (EISA) | EISA | https://aceproject.org/about-en/ace-partners/EISA |
| Civil society | Fake Watch Africa | National Democratic Institute (NDI): Institute for War and Peace Reporting | https://medium.com/@FakeWatchAfrica |
| Civil society | GuineeCheck | Association Villageois 2.0. | https://www.guineecheck.org/ |
| Civil society | Namibia Fact Check | Institute for Public Policy Research | https://namibiafactcheck.org.na/tools/ |
| Civil society | ODIL (L'Observatoire des Initiatives de Lutte contre la Désinformation; Observatory of Initiatives to Combat Misinformation) | Organisation Internationale de la Francophonie; CheckFirst | https://odil.org/a-propos |
| Civil society | PesaCheck | Code for Africa | https://pesacheck.org/english/home |
| Civil society | Promise Tracker | Africa Check | https://africacheck.org/promise-tracker |

| Type of actor | Initiative | Implementing organization/actor | URL |
|---|---|---|---|
| Civil society | Sexual Minorities Uganda (SMUG) Fact Checking | SMUG | https://sexualminoritiesuganda.com/mission-and-team/ |
| Civil society | Ghana Association of Persons Living with Albinism (GAPA) | GAPA | https://www.facebook.com/Gapaghana/ |
| Civil society | What's Crap on WhatsApp? | Africa Check | https://www.whatscrap.africa/ |
| Civil society | Witch Camp Integration Project | The Southern Sector Youth and Women's Empowerment Network | https://www.ghanaweb.com/GhanaHomePage/NewsArchive/NGO-launches-witches-camp-integration-project-178855 |
| Civil society | Standing Voice | Standing Voice | https://www.standingvoice.org/albinism |
| Civil society | The Albino Foundation | The Albino Foundation | https://albinofoundation.org/who-we-are/ |
| Civil society | Bloggers of Zambia | Bloggers of Zambia | https://bloggersofzambia.org/ |
| Civil society | Choose Your Own Fake News | Pollicy | https://pollicy.org/projects/choose-your-own-fake-news/ |
| Civil society | RIPOTI | Paradigm Initiative network (supported by Netherlands Human Rights Fund and Omidyar Network) | https://www.ripoti.africa/site/index |
| Global development | #DontGoViral | UNESCO; Innovation for Policy Foundation (i4Policy) | https://en.unesco.org/news/dontgoviral-unesco-and-i4policy-launch-campaign-crowdsource-local-content-combat-infodemic |
| Global development | Africa Infodemic Response Alliance (AIRA) | Africa CDC, IFRC (International Federation of Red Cross and Red Crescent Societies), UN Verified, UNESCO, UNICEF, UN Global Pulse, US CDC and WHO | https://www.afro.who.int/aira |
| Global development | Partnership for Evidence-Based Response to Covid-19 (PERC) | Africa CDC and Novetta Mission Analytics (NMA) | https://venturebeat.com/2020/09/09/combatting-covid-19-misinformation-with-machine-learning-vb-live/ |
| Global development | Presimetre | Center for Democracy and Development (CDD) | https://www.presimetre.bf/ |
| Global development | CDD Fact Check | CDD | https://cddfactcheck.org/ |
| Global development | YALIChecks | Young African Leaders Initiative | https://yali.state.gov/checks/ |
| Health | Covid-19 Response in Africa: Together for Reliable Information | A consortium (Article 19, Deutsche Welle Akademie, Fondation Hirondelle, Free Press Unlimited, International Media Support, Reporters Without Borders, and UNESCO) led by Free Press Unlimited | https://collaboration.freepressunlimited.org/projects/covid-19-response-in-africa/ |
| Health | Viral Facts Africa | Part of AIRA | https://who-africa.africa-newsroom.com/press/viral-facts-africa-initiative-to-combat-dangerous-health-misinformation?lang=en |
| Information/library services | Misinformation on Covid-19: Call to action | African Library and Information Associations and Institutions (AfLIA) | https://web.aflia.net/misinformation-on-covid-19-call-to-action/ |
| Information/library services | Working Group on Infodemics (Designing a Policy Framework) | Forum on Information and Democracy (Forum sur l'information et la démocratie) | https://informationdemocracy.org/ |

| Type of actor | Initiative | Implementing organization/actor | URL |
|---|---|---|---|
| Legal/human rights | Campaigns against disinformation and hate on social networks | Internet Without Borders | https://internetwithoutborders.org/category/campagne/ |
| Legal/human rights | Lawyers Hub Kenya: Fact checking | Lawyers Hub Kenya | https://lawyershub.org/ |
| Legal/human rights | Freedom of Expression | Amnesty International | https://www.amnesty.org/en/what-we-do/freedom-of-expression/ |
| Legal/human rights | Section 27 | Section 27 | section27.org.za |
| Media | AFP Fact Check | AFP News Agency | https://factcheck.afp.com/ |
| Media | BBC Reality Check | BBC | https://www.bbc.com/news/reality_check |
| Media | Benin Stop Fake News | Coordinated by journalists; supported by US Embassy in Benin | https://beninstopfake.news/ |
| Media | Chasseurs de Fake News | Les bénévoles de l'EMI | https://www.facebook.com/BenevoleEmi |
| Media | CongoCheck | SBL Initiative des Factcheckers du Congo (IFC) | https://congocheck.net/a-propos/ |
| Media | Covid-19 misinformation hub | BBC News Africa | https://www.bbc.co.uk/news/resources/idt-e7e3acde-9cdf-4b53-b469-ef6e87a66411 |
| Media | CrossCheck Nigeria | Nigerian newsrooms | Website not active; social media accounts outdated |
| Media | Desinfox Africa | CFI Media Development | https://cfi.fr/en/project/desinfox-africa |
| Media | Dubawa | Premium Times Center for Investigative Journalism (PTCIJ) | https://t.co/tbAjVegL78?amp=1 |
| Media | Fact Check Ghana | Media Foundation for West Africa | https://www.fact-checkghana.com/ |
| Media | FasoCheck | FasoCheck | https://fasocheck.org/ |
| Media | IvoireCheck | Réseau des Professionnels de la Presse en Ligne de Côte d'Ivoire (REPPRELCI) | https://www.ivoirecheck.com/ |
| Media | Know News | Media Monitoring Africa | https://chrome.google.com/webstore/detail/know-news/bmlfbcipfpdohbhhlkibdiacikbpaofm?hl=en |
| Media | Les Observateurs de France 24 | France 24 | https://observers.france24.com/fr/ |
| Media | Les Verificateurs | Radiodiffusion Télévision Ivoirienne (RTI) | https://www.lesverificateurs.info/ |
| Media | MaliCheck | Le Jalon | https://lejalon.com/ |
| Media | National campaigns to tackle misinformation and fake news | Article 19 | https://www.article19.org/what-we-do/ |
| Media | NigerFocus | NigerFocus | http://www.nigerfocus.com/ |
| Media | RJDH (Réseau des Journalistes pour les Droits de l'Homme en Centrafrique) | RJDH | https://www.rjdhrca.org/category/actualites/fact-checking/ |
| Media | RoveR | Media Monitoring Africa | https://www.rover.directory/privacy |

| Type of actor | Initiative | Implementing organization/actor | URL |
|---|---|---|---|
| Media | Stop Intox | Stop Intox | https://stopintox.cm/apropos/ |
| Media | TogoCheck | Centre d'Observation et d'Analyse du Web (Co@web) | https://www.togocheck.com/ |
| Media | Véri-Facts | Ouestaf | https://www.ouestaf.com/category/veri-facts/ |
| Media | Verifox Africa | CFI Media Development in partnership with Les Observateurs de France 24 | https://cfi.fr/en/project/verifox-africa |
| Media | ZimCheck | ZimFact, under the umbrella of the Voluntary Media Council of Zimbabwe (VMCZ) | https://zimfact.org/ |
| Media | African Center for Media Excellence | African Center for Media Excellence | https://acme-ug.org/ |
| Media | 263Chat | 263Chat | https://www.263chat.com/category/news/ |
| Media | Open & Disclose | Media Monitoring Africa | https://openanddisclose.org.za/about-us |
| Military | Campaign against mis- and disinformation | Special Operations Command Africa using IST Research's platform Pulse | https://www.fedscoop.com/socafrica-disinformation-ist-research/ |
| National government | Covid-19 resource portal | South African government | https://sacoronavirus.co.za/ |
| Technology | CheckFirst | CheckFirst | https://checkfirst.network/ |
| Technology | Civic Signal | Code for Africa | https://civicsignal.africa/# |
| Technology | Smart Click Africa | Smart Click Africa | https://smartclickafrica.org/projets/# |
| Technology | eyeWitness Global | eyeWitness Global | https://www.eyewitness.global/ |

# ANNEX B

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
|---|---|---|
| **Angola (southern Africa)** | | |
| Against falsehoods:<br>Penal Code 2019 | Article 224 criminalizes the abuse of press freedom and the dissemination of information that encourages secession; the creation of organized groups of crime; the instigation of racial, tribal, ethnic, and religious hatred; and apologies for fascist and racist ideologies. It also criminalizes the intentional promotion of a campaign to persecute or defame any person through the systematic and continuous dissemination of false information about facts, attitudes, or the professional, administrative, or commercial performance of that person. It further criminalizes the intentional publication of false news.<br>Article 322 prohibits propaganda against the national defense force and the armed forces. It covers the divulging of false statements or the distortion of true facts that may impact on the actions of the armed forces. | Violation of Article 224 is punishable by up to six months in prison or a fine.<br>Violation of Article 322 may result in up to three years in prison or a fine, and up to five years in prison during wartime. If the offense was committed intentionally, violation of Article 322 may result in up to five years in prison, or between two and six years during wartime. |
| **Benin (central Africa)** | | |
| Against falsehoods:<br>Loi 2017-20 du 20 Avril 2018 portant code du numérique en République du Bénin | Article 550(3) broadly criminalizes the dissemination of false information about a person. | Violation may result in a fine of 500,000 to 1 million CFA francs and between one to six months' imprisonment, or both. |
| **Botswana (southern Africa)** | | |
| Misinformation:<br>Penal Code, Chapter 08:01 | Section 59(1) criminalizes the publication of "any false statement, rumor, or report which is likely to cause fear and alarm to the public or to disturb the public peace." | Section 33 of the Penal Code indicates that violation of Section 59 may result in a punishment of imprisonment for up to two years, or a fine, or both. |
| Disinformation:<br>Penal Code, Chapter 08:01 | Section 55(b) makes it illegal for an individual to send a message "which he or she knows to be false" with the purpose of causing "annoyance, inconvenience or anxiety to another person." However, this section requires the individual to know that the information is false; it thus does not punish misinformation. | Violation of this section may result in a fine of between 10,000 and 50,000 pula, or imprisonment for a term of between one and four years (or both). |
| Legislation related to Covid-19:<br>Emergency (COVID-19) Regulations, 2020 | Regulation 31(3) criminalizes the publication of any statement with the intention of deceiving another person about Covid-19, the Covid-19 infection status of a person, or any measure taken by the government to address Covid-19. Speech is restricted only where it is in pursuance of the protection of public health, which is a legitimate aim. | Violation may result in a fine not exceeding 100,000 pula or imprisonment for a term not exceeding five years, or both. |
| Cybercrime:<br>Cybercrime and Computer Related Crimes Act, 2018 | Section 18 criminalizes offensive electronic communication. While this provision does not directly address disinformation, it has been used to prosecute individuals for disinformation alongside other offenses. It provides that "a person who willfully, maliciously or repeatedly uses electronic communication of an offensive nature to disturb or attempt to disturb the peace, quiet or privacy of any person with no purpose to legitimate communication" is guilty of an offense. | Violation may result in a fine not exceeding 20,000 pula or imprisonment for a term not exceeding one year, or both. |
| **Burkina Faso (West Africa)** | | |
| Disinformation:<br>Penal Code No. 025-2018/AN | Articles 312–13 of the Penal Code criminalize the intentional dissemination of false information which is likely to make others believe that the destruction of property or an attack against persons has already occurred or is likely to take place. | Violation may result in a fine of 1 million to 10 million CFA francs and imprisonment of between one to five years. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
|---|---|---|
| **Burundi (East Africa)** | | |
| Disinformation:<br>The Penal Code, 2009<br>The Press Law, 2018 | Article 625 of the Penal Code prohibits an individual from knowingly spreading false rumors that are likely to alarm the public or incite them against the government. It also prohibits an individual from knowingly publishing or disseminating false news by any means with the intention to disturb public peace.<br>Article 21 of the Press Law requires the media to "convey information honestly and faithfully" in accordance with constitutional principles and legal and professional ethics. Article 54 further requires journalists to "demonstrate moral integrity and to be guided by facts" and "not to distort the texts and documents used to present the facts or comment on them" and "correct in a timely manner any published information which proves to be false or inaccurate." Furthermore, Article 62 obliges media houses to avoid publication of any content that is contrary to morality, or that could threaten public order. | Violation of Article 625 of the Penal Code may result in a fine of between 50,000 and 200,000 Burundian francs, and between one and three years in prison, or both.<br>Article 77 of the Press Law empowers the National Council for Communication (CNC) to "suspend or prohibit the use of a press pass (journalist pass or press card), the distribution or the sale of a printed newspapers, a periodical, or any other information medium, the broadcast of a show, the operation of a radio or television station or a news agency, when they do not comply with the law." |
| **Cameroon (central Africa)** | | |
| Misinformation:<br>Law No. 2016/007 of July 12, 2016 on the Penal Code | Section 113 of the Penal Code criminalizes the propagation of false information. It covers false information liable to injure public authorities or national unity, while Section 240 of the Penal Code criminalizes false news, covering anyone who publishes or propagates by any means whatever any news without being able to prove either its truth or that he/she had good reason to believe it to be true. | Violation of Section 113 may be punished by imprisonment for three months to three years, and a fine of between 100,000 and 2 million CFA francs. Violation of Section 240 may be punished by imprisonment for one to five years, and a fine of between 20,000 and 10 million CFA francs. The penalty for Section 240 shall be doubled for anonymous publication or propagation. |
| Cybercrime:<br>Law No. 2010/012 of December 21, 2010, on Cybersecurity and Cybercrime | Section 78(1) criminalizes the use of electronic communications to publish or propagate a piece of information without being able to attest to its veracity or prove that the said piece of information was true. | Violation may result in a fine of between 5 million and 10 million CFA francs, or imprisonment of between six months and two years, or both. These penalties are doubled under Section 78(2) where the offense is committed with the aim of disturbing the peace. |
| **Chad (central Africa)** | | |
| Against falsehoods:<br>Law No. 020/PR/2018 on Audiovisual Communication<br>Law No. 014/PR/2014 on e-Communications in Chad | Article 81 of Law No. 020/PR/2018 prohibits any false or misleading audiovisual advertising comprising false allegations, indications, or presentations that are likely to mislead. Article 34 further requires that broadcasts not contain indications or presentations that are false or likely to mislead consumers.<br>Article 115 of Law No. 014/PR/2014 prohibits any person from knowingly transmitting false or misleading distress signals or calls on the radio. | According to Article 57 of Law No. 020/PR/2018, the High Authority for Media and Audiovisual (HAMA) may request that the Minister of Communications suspend the functions of a media entity and institute disciplinary proceedings against the perpetrators.<br>Violation of Article 115 of Law No. 014/PR/2014 may result in imprisonment of between six months to one year, and a fine of between 1 million and 10 million CFA francs, or both. |
| **Comoros (southern Africa)** | | |
| Disinformation:<br>The Penal Code, 1995 | Under Article 254, the publication, distribution, disclosure, or reproduction of fake news, news which contains fabricated parts, news which is falsified, or news which contains falsehoods attributed to third parties is illegal. | If anyone is found guilty of these acts, they face up to three years in prison and a fine of 750,000 Comorian francs. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
|---|---|---|
| **Côte d'Ivoire (West Africa)** | | |
| Misinformation:<br>The Penal Code, 1981<br>Loi 2017-867 du Décembre 2017 portant régime juridique de la presse | Article 173 of the Penal Code broadly criminalizes the publication of false news. It covers the dissemination of false and fabricated information when it results (or could result) in civil disobedience, attacks the public morale, or discredits institutions or their functioning.<br>Article 97 of Law No. 2017-867 broadly prohibits the publication or dissemination of false news through the press. It is unclear how to determine whether speech is false. | Violation of Article 173 of the Penal Code is punishable by one to three years' imprisonment and a fine of 500,000 to 5 million CFA francs.<br>Violation of Article 97 of Law No. 2017-867 may result in a fine of between 1 million and 5 million CFA francs. |
| Cybercrime:<br>Loi 2013-451 relative à la lutte contre la cybercriminalité | Article 65 criminalizes the dissemination of false information which suggests that the destruction of property or an attack against persons has already occurred, or is likely to take place. Article 65 further covers false information regarding any other emergency situation. | Violation may result in a fine of between 1 million and 5 million CFA francs and imprisonment of between six months to two years. |
| **DRC (southern Africa)** | | |
| Disinformation:<br>The Penal Code, 1995 | Article 199(bis) prohibits an individual from knowingly spreading false rumors that are likely to alarm the public, worry them, or provoke them against the established powers. Article 199(ter) prohibits the same offense even when committed without the intention to alarm the public. Article 211 prohibits anyone from intentionally sharing false news with the intention of disturbing the public peace. | Violation of Article 199(bis) may result in a fine of 100 to 500 zaires, and imprisonment of between two months and three years. Violation of Article 199(ter) may result in a fine of 20 to 100 zaires, and imprisonment of between one month and one year. Violation of Article 211 may result in a fine of 1,000 to 10,000 zaires, and imprisonment of between two months and three years. |
| Against falsehoods:<br>The Press Freedom Law, 1996 | Articles 76 and 77 broadly criminalize expression through any medium that directly incites theft, murder, pillage, arson, or any offense against state security, including cases where the incitement has not been followed by action. Article 77 also covers direct incitement of discrimination, hatred, or violence against an individual or group due to their origin, ethnicity, nationality, race, ideology, or religion. Article 77 further criminalizes insults directed at the head of state or incitement of members of the armed forces with a view to diverting them from their duties. Due to their broad construction, each of these offenses could be interpreted to include disinformation. | Violation of Article 76 or 77 is punishable by fifteen days in prison or a fine of 2 million new zaires or the equivalent of 20 Congolese franc. |
| **Eswatini (southern Africa)** | | |
| Legislation related to Covid-19:<br>The Coronavirus (Covid-19) Regulations, 2020 | Regulation 29 criminalizes the spreading of any rumor or unauthenticated information regarding Covid-19, the publication of any statement about Covid-19 with the intention to deceive another person, and the spreading of any rumor or unauthentic information regarding any measure taken by the government to address Covid-19. It is not clear how to determine whether a statement is a "rumor" or "unauthenticated." It is also unclear what falls within the scope of "any measure taken by the Government to address Covid-19." | A person or organization that violates Regulation 29 will be fined up to 20,000 emalangeni or be sentenced to imprisonment for a term not exceeding five years. |
| Disinformation:<br>Suppression of Terrorism Act, 2008 | Section 5(3)(b) makes it illegal to intentionally communicate information which is "a false alarm" or "causes a false alarm or unwarranted panic" for another person or an institution. Similarly, section 5(3)(e) criminalizes the intentional publication or communication of false information about the existence of any danger, dangerous thing, explosive, or harmful or hazardous substance. | The penalty for violation of Section 5 is either a fine or imprisonment for a period not exceeding three years. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
|---|---|---|
| **Ethiopia (East Africa)** | | |
| Disinformation:<br>Hate Speech and Disinformation Prevention and Suppression Proclamation No. 1185/2020 | Article 5 broadly criminalizes the dissemination of disinformation and Article 2 provides a vague definition of disinformation. It is defined as speech that is false, is disseminated by a person who knew or should reasonably have known the falsity of the information, and is highly likely to cause a public disturbance, riot, violence or conflict. | Article 7 provides that disseminating disinformation via broadcasting, print, or social media will result in imprisonment for up to one year or a fine of up to 50,000 birr. Disinformation disseminated via social media by an individual with more than 5,000 followers or through a broadcast service or print media will result in imprisonment for up to three years or a fine of up to 100,000 birr. Disinformation leading to violence or public disturbance will result in imprisonment for up to five years. |
| **Gambia (West Africa)** | | |
| Disinformation:<br>The Criminal Code Act 25 of 1993 | Sections 59 and 181A broadly prohibit the publication of false news. Section 59 prohibits the publication of any statement, rumor, or report "which is likely to cause fear and alarm to the public or disturb the public peace, knowing or having reason to believe that such statement, rumour or report is false." Section 181A prohibits the willful, negligent, or reckless publication or broadcast of any information or news which is false. | Violation of Section 59 is a criminal offense and the individual may be liable to imprisonment for two years, or a fine, or both.<br>Violation of Section 181A will result in a fine of between 50,000 and 250,000 dalasi, or imprisonment for a term of not less than one year, or both. |
| **Ghana (West Africa)** | | |
| Disinformation:<br>The Criminal Code Act 29 of 1960<br>Electronic Communications Act 775 of 2008 | Section 208 of the Criminal Code criminalizes "the publication or reproduction of any statement, rumor, or report which is likely to cause fear and alarm to the public, or to disturb the public peace when knowing or having reason to believe that the statement is false."<br>Section 76 of the Electronic Communications Act prohibits an individual from using an electronic communications service to knowingly send false or misleading communications which are "likely to prejudice the efficiency of life-saving service or to endanger the safety of any person, ship, aircraft, vessel or vehicle." | Violation of Section 208 of the Criminal Code is a misdemeanor, but the Criminal Code does not provide for a specific penalty. Section 296 does, however, indicate that under these circumstances the penalty will be imprisonment for a term not exceeding three years.<br>Violation of Section 76 of the Electronic Communications Act may result in a fine of not more than 36,000 cedis or a term of imprisonment of not more than five years, or both. |
| **Kenya (East Africa)** | | |
| Misinformation:<br>The Penal Code (Chapter 63 of 2009) | Section 66 criminalizes the publication of false statements, rumors, or reports which are likely to cause fear and alarm amongst the public or to disturb the public peace. | The Code does not specify a punishment. Section 36, which relates to general punishment for misdemeanours, states that where no punishment is directly prescribed by the Code, anyone found guilty of a misdemeanour shall be punished by imprisonment for a term not exceeding two years or with a fine, or with both. |
| Cybercrime:<br>Computer Misuse and Cybercrimes Act 5 of 2018 | Section 22 criminalizes "false publications" and Section 23 criminalizes the "publication of false information." Section 22 prohibits individuals from intentionally publishing false, misleading, or fictitious data or misinforming with the intention that the data be considered or acted upon as authentic. Section 23 prohibits individuals from knowingly publishing false information (in print, through a broadcast, in the form of data, or using a computer system) which "is calculated or results in panic, chaos, or violence among citizens of the Republic, or which is likely to discredit the reputation of a person." | Violation of Section 22 will result in a fine not exceeding 5 million shillings or to imprisonment for a term not exceeding two years, or both. Violation of Section 23 will result in a fine not exceeding 5 million shillings or to imprisonment for a term not exceeding ten years, or both. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
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| **Lesotho (southern Africa)** | | |
| Legislation related to Covid-19:<br>Legal Notice No. 26 of 2020: Declaration of Covid-19 State of Emergency Notice<br>Public Health (Covid-19) Regulations, 2020 | Section 3(f) of Legal Notice No. 26 of 2020 states that the public should note that the publishing of fake news constitutes an offense and that broadcast licensees may not publish such news.<br>Section 10(5) of the Public Health (Covid-19) Regulations provides that "no person shall publish or spread fake or false information." | Any person who contravenes the provisions of Section 10(5) of the Public Health (Covid-19) Regulations commits an offense and is liable to a fine not exceeding 5,000 maloti or to imprisonment for a period not exceeding one month, or both. |
| Disinformation:<br>Communications Act, 2012 | Section 44(1)(e) of the Communications Act makes it an offense to intentionally modify or interfere with the contents of any message sent by means of a communications service. | If the authority determines that a licensee has contravened the provisions of the Act, the authority may issue a warning to the licensee, direct the licensee to take actions to remedy the violation, impose financial penalties on the licensee, require the licensee to make restitution to anyone affected or directly injured as a result of the contravention, or modify or revoke the licensee's license. |
| Against falsehoods:<br>Broadcasting Rules, 2004 | Rule 8(2) of the Broadcasting Rules provides that news and information should be presented in the correct context and in a balanced manner without the intentional or negligent departure from facts, whether through distortion, exaggeration or misinterpretation, material omission, or summarizing or editing. | Section 26 states that if a licensee has failed to comply with any requirement of the Act, the authority may impose a fine or direct the licensee to broadcast a correction or an apology or both. The amount of any financial penalty imposed shall be determined by the authority. |
| **Madagascar (southern Africa)** | | |
| Misinformation:<br>Law 2016-029 Establishing the Code of Media Communication<br>The Penal Code, 2001 | Article 30 of Law 2016-029 prohibits the publication, dissemination, or production of false news which has or is likely to mislead the public, disturb public peace, undermine the discipline or the morale of the armed forces, obstruct civil peace, undermine public confidence in the strength of the currency, or cause withdrawals of public funds.<br>Article 91 of the Penal Code broadly criminalizes any acts that are likely to compromise public security, cause serious political unrest, or provoke hatred of the government. | Violation of Article 30 of Law 2016-029 will result in a fine of between 3 million to 6 million ariary.<br>Violation of Article 91 of the Penal Code will result in imprisonment for a term of between one and five years. |
| **Malawi (southern Africa)** | | |
| Misinformation:<br>The Penal Code, Chapter 7(1)<br>The Electronic Transactions and Cyber Security Act, 2016<br>The Public Security Regulations | Section 60 of the Penal Code criminalizes the publication of false news in a vague manner. It provides that "any person who publishes any false statement, rumour or report which is likely to cause fear and alarm to the public or to disturb the public peace shall be guilty of a misdemeanor."<br>Section 87 of the Electronic Transactions and Cyber Security Act makes it a misdemeanor for a person to "wilfully and repeatedly use electronic communication to disturb or attempts to disturb the peace, quietness or right of privacy of any person with no purpose of legitimate communication whether or not a conversation ensues."<br>Regulation 4 of the Public Security Regulations prohibits any person from acting or publishing anything likely to prejudice public security, undermine public confidence in the government, promote a feeling of ill-will or hostility between any sections or classes or races of people in Malawi, or promote industrial unrest. | Section 34 of the Penal Code provides for the punishment of misdemeanors such as those described in Section 60. It indicates that a person may be fined or imprisoned for a term not exceeding two years, or both.<br>Section 87 of the Electronic Transactions and Cyber Security Act stipulates a fine of 1 million kwacha and imprisonment for twelve months for any violation.<br>Regulation 4 of the Public Security Regulations is silent on penalty. However, Regulation 14 provides for punishment through a fine of 1,000 kwacha and imprisonment of five years. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
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| **Mali (West Africa)** | | |
| Disinformation:<br>Loi 00-046 du 7 juillet 2000 portant régime de la presse et délit de presse | Article 37 criminalizes the dissemination of news that is false or falsely attributed to third parties when it is done in bad faith and disturbs the public peace. It also covers false information that is likely to undermine the discipline or morale of the armed forces. | Violation may result in imprisonment of between eleven days to six months, or a fine of 50,000 to 150,000 CFA francs, or both. |
| **Mauritius (southern Africa)** | | |
| Against falsehoods:<br>The Criminal Code (Supplementary Act) Cap. 196<br>The Information and Communication Technologies Act (ICT Act) 2001 | Section 299 of the Criminal Code makes it an offense to publish, diffuse, or reproduce false news or news which, though true in substance, has been altered in one or more parts or falsely attributed to some other person if it stands to disturb public order or public peace.<br>Section 46(g) of the ICT Act makes it an offense to knowingly send, transmit, or cause to be transmitted a false or fraudulent message. Section 46(ga) makes it an offense to disseminate any message which is obscene, indecent, abusive, threatening, false or misleading or which is likely to cause or cause annoyance, humiliation, inconvenience, distress or anxiety to any person. | Violation of Section 299 of the Criminal Code may be punished by imprisonment for up to one year and a fine not exceeding 10,000 Mauritian rupees when committed verbally. An individual may be punished by imprisonment for up to one year and a fine of between 20,000 and 50,000 rupees if the offense was committed by any written means.<br>Section 47(1) of the ICT Act indicates that a violation will result in a fine not exceeding 1 million rupees and imprisonment of up to ten years. Section 47(2) further provides that the court may order additional punishments such as forfeiture of property and cancellation or suspension of licenses. |
| **Mozambique (southern Africa)** | | |
| Disinformation:<br>The Penal Code (35/2014) | Articles 398(2)(a) and (b) of the Penal Code provide for an offense of disturbing public order or attempting to do so. They cover the instigation or provocation of collective disobedience against the laws of public order or essential public functions, or any attempt to disturb public order or peace by any means. This is qualified by adding that such an offense may be compounded by publishing false or biased news which may cause alarm or unrest, or distributing or attempting to distribute written material which may lead to the same result. | Violation of Article 398 will result in imprisonment for up to six months and a corresponding fine. Article 399 provides for additional punishments for accessories to the crime, which include prohibition or suspension of the exercise of certain functions, and confiscation of property or dissolution of business for legal entities. |
| **Namibia (southern Africa)** | | |
| Legislation related to Covid-19:<br>Regulations published under Proclamation No. 9 of March 28, 2020 (as amended) | Regulation 16 makes it an offense to publish any false or misleading statement about or in connection with Covid-19, or any statement that is intended to deceive any other person about the Covid-19 status of any person, or measures to combat, prevent, and suppress Covid-19. | Violation of Regulation 16 may result in a fine of 2,000 Namibian dollars and up to six months in prison. |
| **Niger (West Africa)** | | |
| Cybercrime:<br>Cybercrime Law, 2019 | Article 31 broadly criminalizes the dissemination of false news. It covers false information which is likely to disturb public order or infringe upon human dignity. | Violation may result in a fine of between 1 million and 5 million CFA francs, and imprisonment of between six months and three years. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
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| **Nigeria (West Africa)** | | |
| Disinformation:<br>Cybercrimes (Prohibition, Prevention, etc.) Act, 2015<br>Criminal Code Act, 1990<br>Protection from Internet Falsehoods and Manipulation and Other Related Matters Bill, 2019 | Section 24(b) of the Cybercrimes Act makes it a criminal offense to knowingly or intentionally publish a message online, or to cause such a message to be sent, when the individual knows the message "to be false, for the purpose of causing annoyance, inconvenience, danger, obstruction, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to another."<br>Section 59 of the Criminal Code makes it a criminal offense to publish or reproduce "any statement, rumour or report which is likely to cause fear and alarm to the public or to disturb the public peace, knowing or having reason to believe that such statement, rumour or report is false."<br>Clause 3 of the proposed bill made it a criminal offense to transmit a statement when knowing or having reason to believe that it is "a false statement of fact" and that the transmission is likely to be prejudicial to national security, public health, public safety, public tranquility, public finance, or international relations, or to influence the outcome of an election, incite hatred, or diminish public confidence in any public function, business, property, or other economic interests. It similarly prohibited other "online contents and activities and malicious falsehoods" capable of causing harm to individual users or minors, or threatening the way of life in Nigeria, either by undermining national security or by reducing trust and undermining shared rights, responsibilities, and opportunities to foster unity and integration. | Violation of Section 24(b) of the Cybercrimes Act may result in a fine of not more than 7 million naira or imprisonment for a term not exceeding three years, or both.<br>Violation of Section 59 of the Criminal Code may result in a fine of not more than 7 million naira or imprisonment for a term not exceeding three years, or both.<br>Clause 3 of the proposed bill provided that an individual convicted of transmission of a false statement of fact would be fined up to 300,000 naira and/or imprisoned for a term not exceeding three years. In any other case, the penalty was a fine of up to 10 million naira. |
| **Rwanda (East Africa)** | | |
| Disinformation:<br>Law No. 68/2018 of August 30, 2018 | Article 194 criminalizes the spreading of false information or harmful propaganda with the intent to cause public disaffection towards the government of Rwanda, or where such information or propaganda is likely or calculated to cause public disaffection towards or a hostile international environment for the government of Rwanda.<br>Article 221 criminalizes the intentional spreading of false allegations in public that directly or indirectly discredit the value of the national currency or negotiable instruments. | Violation of Article 194 may result in seven to ten years in prison during peacetime and life imprisonment during wartime.<br>Violation of Article 221 may result in imprisonment of between one and two years, and a fine of between 1 million and 3 million Rwandan francs. |
| Cybercrime:<br>Law No. 60/2018 of August 22, 2018 | Article 39 prohibits individuals from knowingly publishing, via a computer, rumors that may incite fear, insurrection, or violence amongst the population, or that may make a person lose their credibility. | Violation will result in imprisonment for three to five years and a fine of between 1 million and 3 million Rwandan francs. |
| **Senegal (West Africa)** | | |
| Misinformation:<br>The Penal Code, 1965 | Article 255 of the Penal Code criminalizes the publication, dissemination, disclosure, or reproduction of false news (*nouvelles fausses*) when it causes or is likely to cause disobedience in terms of the country's laws, damage to the morale of the population, or discrediting of public institutions. | Violation may result in a fine of 100,000 to 1.5 million CFA francs and between one and three years' imprisonment. |
| **Seychelles (southern Africa)** | | |
| Misinformation:<br>The Penal Code, Chapter 158 | Section 62 criminalizes the publication of false statements, rumors, and reports where they are likely to cause fear and alarm amongst the public or to disturb the public peace, and when the person who makes the statement knows or has reason to believe that it is false. | Violation may result in imprisonment for three years. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
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| **Sierra Leone (West Africa)** | | |
| Against falsehoods:<br>Public Order Act, 1965 | Section 32 criminalizes the publication of false statements, rumors, and reports. Section 32(1) prohibits the publication of any false statement, rumor, or report which is likely to cause fear or alarm amongst the public or disturb the public peace. Section 32(2) prohibits the publication of false information which is "calculated to bring into disrepute any person who holds an office under the Constitution, in the discharge of his duties." Section 32(3) prohibits the publication of false information which is likely to "injure the credit or reputation of Sierra Leone or the government." | Violation of Section 32 may result in a fine not exceeding 300 leones or imprisonment for up to a year, or both. This penalty applies to false statements that are likely to cause fear or alarm amongst the public, disturb public peace, or injure the credit or reputation of Sierra Leone or the government. However, false statements which are "calculated to bring into disrepute any person who holds an office under the Constitution" may result in a fine not exceeding 500 leones or imprisonment not exceeding two years, or both. |
| **South Africa (southern Africa)** | | |
| Legislation related to Covid-19:<br>Disaster Management Act 57 of 2002 | Section 11(5) criminalizes the publication of any statement made "with the intention to deceive any other person" about Covid-19, the infection status of any person, or any measure taken by the government to address Covid-19. The "intention to deceive" is understood to mean that even if the content used is not false or fabricated, the way that it is used or published is misleading or deceptive. | Violation is punishable by a fine or imprisonment for a period not exceeding six months, or both.<br>. |
| Cybercrime:<br>Cybercrimes and Cybersecurity Bill, 2017 | Clause 17(2)(d) would criminalize the distribution of any data message that is harmful, including messages that are "inherently false in nature" and "aimed at causing mental, psychological, physical or economic harm to a specific person or group of persons." A person would also have to consider the message as being harmful. | The penalty for violation of Clause 17 would be a fine or imprisonment for a period not exceeding three years, or both. Clause 19 of the bill provides that a court may order an electronic communications service provider to disable access to or remove a data message in violation of Clause 17. The electronic communications service provider would be guilty of an offense if they do not comply with a court order. |
| **Tanzania (southern Africa)** | | |
| Disinformation and Cybercrime:<br>The Cybercrimes Act, 2015<br>The Electronic and Postal Communications Act, 2010<br>Electronic and Postal Communications (Online Content) Regulations, 2018<br>The Media Services Act 12 of 2016<br>The Electronic and Postal Communications (Online Content) Regulations, 2020 | Section 16 of the Cybercrimes Act makes it a criminal offense to publish information or data in a computer system, where the person knows that it is false, deceptive, misleading, or inaccurate, and where there is an intention to defame, threaten, abuse, insult, or otherwise deceive or mislead the public, or to counsel the commission of an offense.<br>Section 118(a) of the Electronic and Postal Communications Act, 2010, makes it a criminal offense to use network or content services to knowingly create, solicit, or initiate the transmission of communication which is, among other things, false, with the intention to annoy, abuse, threaten, or harass another person.<br>Regulation 12 of the Electronic and Postal Communications (Online Content) Regulations, 2018, prohibits online service providers from publishing any "prohibited content," including content which threatens national security or public health and safety, such as false information with regards to the outbreak of racial disturbances in a specific part of the country, and false content which is likely to mislead or deceive the public, except where it is clearly pre-stated that the content is satire and parody, or fiction, and not factual.<br>...continued | Violation of Section 16 of the Cybercrimes Act will result in a minimum fine of 5 million Tanzanian shillings and a minimum prison sentence of three years, or both.<br>Violation of Section 118(a) of the Electronic and Postal Communications Act, 2010, will result in a fine of not less than 5 million Tanzanian shillings or imprisonment for a term of not less than twelve months, or both. Furthermore, individuals will continue to be liable for a fine of 750,000 Tanzanian shillings for every day during which the offense is continued after conviction.<br>Regulation 18 of the Electronic and Postal Communications (Online Content) Regulations, 2018, provides that a person who violates any regulation, including Regulation 12, will be liable for a minimum fine of 5 million Tanzanian shillings or a minimum prison sentence of one year, or both.<br>...continued |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
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| **Tanzania (southern Africa) (continued)** | | |
| | Section 50(1)(a) of the Media Services Act 12 of 2016 makes it an offense for any person to use a media service for the purposes of publishing information which is intentionally or recklessly falsified in a manner which threatens the interests of defense, public safety, public order, the economic interests of the country, public morality, or public health, or is injurious to the reputation, rights, and freedom of other persons. Section 50(1)(b) prohibits the use of a media service to publish information which is maliciously or fraudulently fabricated. Section 50(1)(d) makes it an offense to publish a statement when knowing it to be false or without reasonable grounds for believing it to be true. Section 50(2) further criminalizes, inter alia, disseminating false information without justification. Section 54 criminalizes the publication of any false statement, rumor, or report which is likely to cause fear and alarm amongst the public or to disturb the public peace.<br>Regulation 16 of the Electronic and Postal Communications (Online Content) Regulations, 2020, prohibits the publication of any "prohibited content" or the facilitation of user access to prohibited content. "Prohibited content" includes content which threatens public security and national safety, including rumors spread for the purpose of ridiculing, abusing, or harming the reputation, prestige, or status of the United Republic, the flag, or national anthem, and false content which is likely to mislead or deceive the public, except where it is clearly pre-stated that the content is satire and parody, or fiction, and not factual. | Violation of Section 50 of the Media Services Act will result in a fine of between 5 million and 20 million shillings or imprisonment for three to five years, or both. Violation of Section 54 will result in a fine of between 10 million and 20 million shillings or imprisonment for four to six years, or both.<br>Regulation 21 of the Electronic and Postal Communications (Online Content) Regulations, 2020, provides that a person who violates any regulation, including Regulation 16, will be liable for a minimum fine of 5 million Tanzanian shillings or a minimum prison sentence of one year, or both. |
| **Togo (West Africa)** | | |
| Disinformation:<br>The Penal Code, 2015 | Article 497 of the Penal Code broadly criminalizes the dissemination of news that is false or falsely attributed to third parties when done in bad faith and when it disturbs public peace or is likely to do so. It also prohibits false news that disturbs or is likely to disturb the discipline or morale of the armed forces, or to obstruct a war effort. | Violation may be punished by imprisonment for six months to two years, and a fine of 500,000 to 2 million CFA francs, or both. If the court determines that the individual is the original author of the false news, then the person could be punished by imprisonment for one to three years, or a fine of 1 million to 3 million CFA francs, or both. This same penalty applies for violations of Article 497 that are likely to disturb the discipline or morale of the armed forces, or to obstruct a war effort. |
| Cybercrime:<br>Loi 2018-026 sur la cybersecurity et la lutte contre la cybercriminalité | Article 25 criminalizes the electronic dissemination of false information which would make it appear that the destruction of property or harm to another person has been (or will be) committed, or regarding an emergency situation. | Violation may result in a fine of 1 million to 3 million CFA francs, or imprisonment of between one and three years, or both. These penalties also apply to accomplices. |
| **Uganda (East Africa)** | | |
| Misinformation:<br>The Penal Code (Cap. 120, 1950) | Section 50 of the Penal Code, which criminalized the publication of false statements, rumors, or reports which were likely to cause fear and alarm amongst the public or to disturb the public peace, was declared null and void by the Supreme Court in 2002 (Charles Onyango & Anor v Attorney General, Supreme Court Constitutional Appeal No. 2 of 2002). However, since the beginning of the Covid-19 pandemic, Section 171 of the Penal Code has been used to prosecute individuals for dissemination of false information. Section 171 prohibits an individual from unlawfully or negligently doing anything which that person knows or has reason to believe is likely to spread the infection of any life-threatening disease. | Violation of Section 171 of the Penal Code may result in a prison sentence of up to seven years. |

| Type of Legislation and Specific Law or Section | Scope of Law | Enforcement |
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| **Uganda (East Africa) (continued)** | | |
| Disinformation:<br>The Computer Misuse Act, 2011 | Section 25 criminalizes the willful and repeated use of electronic communication to disturb or attempt to disturb the peace, quiet, or right to privacy of any person. | Section 25 stipulates a fine not exceeding 24 currency points (USD 178) or imprisonment not exceeding twelve months, or both. |
| Against falsehoods:<br>Uganda Communications Act, 2013 | Section 5 sets out the functions of the Uganda Communications Commission (UCC), which includes a mandate to license, monitor, regulate, and set standards for communication services in Uganda. Section 31 prohibits a person from broadcasting any program unless it complies with Schedule 4, which sets out the "minimum broadcasting standards." One of these is that news broadcasts must be "free from distortion of facts." | Section 31 requires that all broadcasters comply with Schedule 4. Violation of Schedule 4 may result in an order to remedy the situation, which may be a proportionate response. However, Section 41 also allows for the UCC to fine an operator up to 10 percent of its gross annual revenue, and suspend or revoke a license. |
| **Zambia (southern Africa)** | | |
| Disinformation:<br>The Penal Code Act, Chapter 87 | Section 67 of the Penal Code criminalized the publication of false news with the intention to cause fear and alarm amongst the public. | This legislative instrument is no longer in force because of constitutional inconsistency. |
| **Zimbabwe (southern Africa)** | | |
| Misinformation:<br>Criminal Law (Codification and Reform) Act (Chapter 9:23) | Section 31 criminalizes the publication or communication of false statements that are prejudicial to the state. It covers false statements that are "wholly or materially false." Statements are considered prejudicial to the state when they either risk or cause public disorder, adversely affect the defense or economic interests of the country, or interfere with any essential service. | Violation may result in "a fine up to or exceeding level fourteen or imprisonment for a period not exceeding twenty years or both." |
| Legislation related to Covid-19:<br>Public Health (Covid-19 Prevention, Containment and Treatment) (Amendment) Regulations, 2020 (No. 1) | Section 14 states that publishing false news about any public official involved with enforcing or implementing the national lockdown, or about any private individual "that has the effect of prejudicing the State's enforcement of the national lockdown" should be considered as "a false statement prejudicial to the State" for the purposes of Section 31 of the Criminal Law (Codification and Reform) Act. | Violation may result in "a fine up to or exceeding level fourteen or imprisonment for a period not exceeding twenty years or both." |
| Cybercrime:<br>The Cyber Crime, Cyber Security and Data Protection Bill, 2019 | Section 164C criminalizes the transmission of a "false data message intending to cause harm." Specifically, "any person who unlawfully and intentionally by means of a computer or information system makes available, broadcasts or distributes data to any other person concerning an identified or identifiable person knowing it to be false with intent to cause psychological or economic harm shall be guilty of an offense." | Violation is punishable by "a fine not exceeding level 10 or imprisonment for a period not exceeding five years or both." |

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# LIST OF INTERVIEWS

- Afia Amani Grands-Lacs, August 24, 2021, via Zoom
- Africa Check Senegal, August 6, 2021, via Zoom
- AIRA (Africa Infodemic Response Alliance), August 20, 2021, via Zoom
- Amnesty International, August 24, 2021, via Microsoft Teams
- Bellingcat, August 26, 2021, via Microsoft Teams
- Cellule Anti Fake News, August 10, 2021, via Zoom
- Check Global (Meedan), August 18, 2021, via Zoom
- Countering Disinformation and Misinformation Project (Center for Democracy and Development), September 13, 2021, via Zoom
- Covid-19 Response in Africa: Together for Reliable Information, August 19, 2021, via Zoom
- Desinfox Africa (CFI Media Development), September 1, 2021, via Zoom
- Digital Africa Research Lab, September 8, 2021, via Zoom
- Dubawa (Premium Times Center for Investigative Journalism), August 24, 2021, via Zoom
- EISA (Electoral Institute for Sustainable Democracy in Africa), August 31, 2021, via Zoom
- eyeWitness Global, August 25, 2021, via Microsoft Teams
- GAPA (Ghana Association of Persons Living with Albinism), September 16, 2021, via WhatsApp and Zoom
- GIZ (German Society for International Cooperation), September 2, 2021, via Zoom
- Internet Without Borders, September 3, 2021, via Zoom
- IvoireCheck (Réseau des Professionnels de la Presse en Ligne de Côte d'Ivoire), August 17, 2021, via Zoom
- Namibia Fact Check (Institute for Public Policy Research), August 26, 2021, via Zoom
- ODIL (L'Observatoire des initiatives de lutte contre la désinformation), September 8, 2021, via Zoom
- Paradigm Initiative, August 23, 2021, via Microsoft Teams
- Pollicy, September 13, 2021, via Zoom
- Promise Tracker (Africa Check), August 20, 2021, via Zoom
- Section 27, August 30, 2021, via Microsoft Teams
- Viral Facts Africa (part of AIRA, managed by Fathm), September 9, 2021, via Zoom

# NOTES

1. This took the form of the production of illegal pamphlets, known as the gutter press, which criticised the Kenyan government.
2. Two satirical pieces, a deck of playing cards, and a publication titled "A Guide to Dangerous Snakes in Zimbabwe" used political cartoons as a means of resistance to President Mugabe's authoritarian rule (see Hammett 2011).
3. This graph excludes eleven initiatives, whose founding dates are unknown.
4. All quotations from interviews in French have been translated by the interviewer and subsequently edited.
5. Laws against "falsehoods" are principally meant to restrict what media houses and the press can publish. In certain instances, the media and press are specifically prohibited from publishing certain things about influential people (mostly politicians). Laws against mis- or disinformation, on the other hand, are more generally applied.
6. This post has since been removed.
7. Geoffrey York, July 20, 2020, 17:42, https://twitter.com/geoffreyyork/status/1285238583885004801.
8. Translated by the authors of this study.

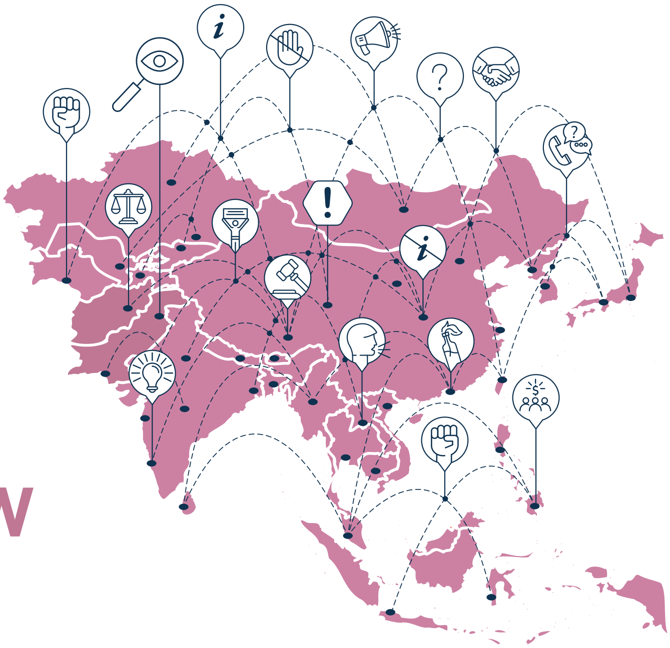
## CORRECTION:

This version of the regional report has been corrected to indicate that Digital Africa Research Lab has never received funding from the Twitter, as was incorrectly stated in a previous version of the report.

# ASIA

GAYASHI JAYASINGHE,
RAMATHI BANDARANAYAKE,
HELANI GALPAYA,
AZAMAT ABABAKIROV,
AND RUWANKA DE SILVA

LIRNEasia
Pro-poor. Pro-market.



# PART 1
# GENERAL OVERVIEW

## 1. INTRODUCTION

Like elsewhere in the world, "information disorder" (a broad term that encompasses misinformation, disinformation, malinformation, hate speech, and other concepts) is an ongoing issue in Asia. Information disorder emerges in a variety of fields, and false information is spread by various actors with different motivations, through various means. The topics on which false information is spread tend to be those that are polarizing in a given society, or where the stakes are high and the situation is dangerous or uncertain (for example an election, an epidemic, or a natural disaster).

We have found that, in Asia, the two main areas in which information disorder emerges are politics and health. Hate speech against marginalized groups is also found in these contexts, especially in terms of othering or scapegoating certain groups, such as ethnic and religious minorities, women, and LGBTQI+ individuals. We have observed that, in Asia, the actors who propagate information disorder are generally motivated by power, ideology, or money, and that they sometimes merely spread information that fits their psychological biases or political persuasions.

In some cases, disinformation campaigns are structured and intentional, often with the aim of achieving a certain outcome, such as winning an election. In other cases, misinformation or rumors happen to gain momentum.

In terms of how information disorder spreads, social media platforms, such as Facebook, WhatsApp, Instagram, Twitter, and so forth, are of course key conduits. However, word of mouth and offline gossip also play an important role. In some contexts, traditional media can also become propagators of information disorder, mainly due to poor media ethics practices, a lack of funding and resources, or censorious regulatory environments in which the media are tightly controlled by the state.

Diverse actions have been taken by organizations combating information disorder in Asia:

- Fact checking, a popular method across the region, is carried out by independent third-party organizations or individuals and by journalists as part of adhering to media ethics in the journalistic process.
- Media and digital literacy campaigns are another method. Many media and civil society organizations offer training for media and the general public and run grassroots-level interventions and campaigns. Some of the organizations that carry out these activities form part of global or regional programs, while others are only active in a specific country. Some universities also offer courses and training programs on fact checking and media and digital literacy.
- Digital platforms have taken measures against information disorder on their platforms, including in Asia. These measures include blocking and flagging content that violates community standards, monitoring for systematic information manipulation campaigns and threats, collaborating with third-party fact checkers, and supporting media literacy initiatives.

- Funders and networks offer capacity-building and financial support to civil society organizations and fact checkers working to combat information disorder.
- Governments in the region have launched a variety of initiatives as well. Some government departments have their own fact-checking units and/or are involved in media and digital literacy initiatives, sometimes in collaboration with civil society.
- Numerous laws have been passed in the countries of the region to curtail information disorder.

While much is being done, many of these initiatives face significant challenges:

- Many fact-checking and civil society organizations in the region have faced difficulties and uncertainties in securing consistent funding and resources, including human resources, for their work. Many organizations have had to look abroad for funding, which often leads to opponents of their work accusing them of being controlled by foreign interests.
- The nature of platforms can make it difficult to do fact checking. In particular, direct messaging apps such as WhatsApp and Telegram are harder to deal with, since messages are often private. Social media platforms have been accused of not doing enough in Asia, as well as of a lack of consistency and transparency in implementing methods and guidelines.
- Polarization and psychological biases (for instance along the lines of ethno-religious identities or politics) can adversely affect the efficacy of fact checking and media and digital literacy programs.
- Few organizations are able to effectively measure the impact of their work, and where methods are in place, they are often rudimentary, for example checking the number of likes or reactions on a social media post about a fact check.
- Language often poses a barrier, especially in terms of accessing content in languages not widely spoken, as well as finding tools and techniques that are compatible with local languages.
- In Asia, the lack of independent media has been a significant challenge, limiting the scope for unbiased and accurate reporting. In some instances, media outlets lack the resources to retain journalists, and in certain contexts there is a shortage of well-trained journalists. Profit motives can lead to bad incentives, where sensational stories are chased at the expense of accuracy.

Government initiatives against information disorder have been controversial, as critics contend that governments use the need to combat “fake news” and hate speech as a cover to silence dissent and legitimate criticism of the state. In particular, legislation, which is often vague and expansive, gives the state excessive power to decide what is true and false, opening the door for abuse. While some legislation explicitly targets “fake news,” other types of laws—such as those dealing with defamation, sedition, technology regulation, cybercrime, and online harassment—have been deployed against “false” information. Some of these laws have been in force for a long time, dating back to colonial eras in some cases, and have long had implications for freedom of expression more broadly.

Censorship and the ability to practice civil liberties such as freedom of expression affect the form that information disorder takes as well as the efficacy of measures deployed to control it. Where censorship and information control are low, many types of information (of varying degrees of veracity) can spread. In this type of situation the different actors described above also have multiple avenues through which to challenge false and harmful information, regardless of the source. When censorship is high, however, and the state has tighter control over information flows, narratives are dominated by the information supplied and disseminated by the state. Hence, if state organs spread false information, civil society and the media have few avenues to safely and effectively challenge it. The power of the state to influence information disorder can therefore not be ignored.

The Asian region shows evidence of varying degrees of press freedom. Table 1 (on the following page) classifies the geographical scope of this report using the color code found in the 2021 World Press Freedom Index of Reporters Without Borders (RSF 2021). For the region considered in this report, Freedom House’s Global Freedom Scores are summarized in Table 2 (on the following page).

This report sets out to map the ecosystem of information disorder in Asia, including the main topics involved, the mediums through which information disorder is propagated, the actions being taken by different types of actors to counter information disorder, and the challenges they face. In our discussion we rely on interviews with key actors and region-specific readings and secondary research.

**Table 1:** Press freedom in the Asian region (Source: RSF 2021)

| Color code | Countries and regions |
|---|---|
| Good situation [1] | None |
| Satisfactory situation | South Korea, Taiwan |
| Problematic situation | Bhutan, Japan, Hong Kong, Kyrgyzstan, Maldives, Mongolia, Nepal |
| Difficult situation | Bangladesh, Cambodia, India, Indonesia, Kazakhstan, Malaysia, Myanmar, Pakistan, Philippines, Sri Lanka, Thailand, Uzbekistan |
| Very serious situation | Laos, Singapore, Tajikistan, Turkmenistan, Vietnam |

**Table 2:** Freedom in the Asian region (Source: Freedom House 2021a)

| Status | Country/Territory |
|---|---|
| Free | Japan, Mongolia, South Korea, Taiwan |
| Partly free | Bangladesh, Bhutan, Hong Kong, India, Indonesia, Malaysia, Maldives, Nepal, Pakistan, Philippines, Singapore, Sri Lanka |
| Not free | Cambodia, Kazakhstan, Kyrgyzstan, Laos, Myanmar, Tajikistan, Thailand, Turkmenistan, Uzbekistan, Vietnam |

> The geographical scope of this study includes Bangladesh, Bhutan, Cambodia, Hong Kong, India, Indonesia, Japan, Kazakhstan, Kyrgyzstan, Laos, Malaysia, Maldives, Mongolia, Myanmar, Nepal, Pakistan, the Philippines, Singapore, South Korea, Sri Lanka, Taiwan, Tajikistan, Thailand, Turkmenistan, Uzbekistan, and Vietnam.

We end the report by offering recommendations for future interventions. In summary, our main recommendations for interventions and further study are the following:

- **Funding:** There is a need for sustainable, long-term funding for those who work in this space. Currently, funding for fact checking and media and digital literacy programs tends to be short term and project-based.
- **Certification:** The verification resource pool representing the region for International Fact-Checking Network (IFCN) certification could be expanded and made more accessible.
- **Technological tools and techniques:** Many local languages are underserved by these tools. Hence, there is a need to develop tools with local language needs in mind.
- **Evaluation of impact:** This area is understudied, and many of those working to combat information disorder do not have tools to measure the impact of their work. More research and practical applications are needed here.
- **Media and digital literacy programs:** These programs need to be worked into the education system, and tailored to target vulnerable populations.
- **Collaboration:** Different actors (fact checkers, academics, policymakers, those engaged in digital literacy training) should collaborate with each other to make interventions more holistic.
- **Awareness:** Promoting public awareness of the problem of information disorder is crucial.
- **The dangers of legal interventions:** Care must be taken to prevent legal responses from leading to censorship and the criminalization of dissent, which are themselves drivers of information disorder.

## 2. THE ECOSYSTEM OF INFORMATION DISORDER

The factors driving information disorder have always been a part of human civilization, but the speed at which information disorder spreads and the ability of disseminators to target larger audiences have increased rapidly in recent times (Carson and Fallon 2021). Consequently, information disorder has the potential to affect many areas of public life, including politics, the marketplace, health communication, journalism, education, and science, which has led to the topic receiving increased attention in recent years (Greifeneder et al. 2021).

In a report titled "Information Disorder: Toward an Interdisciplinary Framework for Research and Policy Making," Wardle and Derakhshan (2017, 20) use the dimensions of harm and falseness to distinguish between three types of information:

1. **Disinformation:** "Information that is false and deliberately created to harm a person, social group, organization or country."
2. **Misinformation:** "Information that is false, but not created with the intention of causing harm."
3. **Malinformation:** "Information that is based on reality, used to inflict harm on a person, organization or country."

Our report is based on the framework and definitions introduced by Wardle and Derakhshan (2017). Going forward, the term "information disorder" will be used to refer to mis-, dis-, and malinformation.

## 2.1 TOPICS OF MISINFORMATION

Masato Kajimoto, associate professor of practice HKU Journalism (the Journalism and Media Studies Centre, the University of Hong Kong), observed that "hot topics" for mis- and disinformation differ between countries, depending on the context:

> *In the US, gun control is a very polarizing issue. You could easily throw any misinformation about gun control and people buy it. Whereas gun control is a non-issue in most Asian countries. [...] any misinformation about gun control, nobody cares, nobody shares. So depending on the topic, people's reactions are different. [...] In the case of Japan, politics is not one of those topics, but Covid-19 vaccination is. And there are several other touchy topics in Japan, like same-sex marriage. (interview, 2021)* [2]

We observed that across Asia, politics and health were the two most prominent topics around which information disorder develops. These two topics came up repeatedly in the interviews with key informants and in the literature review. Others include natural disasters (e.g. fake images and videos, relief scams), cyberbullying, and hate speech (sometimes targeting women, ethnic minorities, and members of the LGBTQI+ community). We have also observed different elements of information disorder being combined with each other, for example hate speech campaigns that contain false information about the person or group being targeted.

### POLITICS

Politics is one of the topics most ripe for information disorder, especially where a person or group has an interest in swaying public opinion and securing a certain outcome. Elections provide an ideal breeding ground for information disorder, as does the process of drafting and passing legislation, as support needs to be drummed up. Many actors who spread disinformation are backed by the state, or at least aligned with a political party. Some prominent examples include the "IT cells" of political parties in India (for more information, see Campbell-Smith and Bradshaw 2021), "troll factories" in the Philippines (for an ethnographic study of the organization and motivations of coordinated mis- and disinformation campaigns in the Philippines, see Ong and Cabañes 2019a), "buzzers" in Indonesia (see Potkin and Costa 2019) and "cyber troops" in Malaysia (see Guest 2018).

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Such coordinated campaigns push out messages that promote or generate support for the political party the actors are aligned with, and launch attacks on critics. In some cases, automated bots are used to advance the messages, and in others an individual operates multiple accounts, creating an artificial impression of mass support (for more information on cyber troops, see Bradshaw and Howard 2017). In other cases, information restrictions and blocks may be used. For example, "on the day of Kazakhstan's snap presidential election (June 9, 2019) and for days after, users in several cities where anti-government demonstrations took place found that social media platforms and messaging apps—including Facebook, Instagram, and WhatsApp—were temporarily inaccessible" (Freedom House 2021b). Other methods include crashing websites. For example, Jo-Ann Ding of the Centre for Independent Journalism in Malaysia related how cyber troops used bots to disrupt Malaysiakini, a major online media outlet: "Previously, on election night, Malaysiakini's site was attacked and they had to set up mirror sites to deal with website crashes" (interview, 2021).

Torokul Doorov, director of Azattyq, the Kazakh-language service of Radio Free Europe/Radio Liberty (RFE/RL), observed that "troll factories" are a growing problem in Kazakhstan (interview, 2021). While Doorov and his team have not actually done any investigation into this phenomenon, they are planning to do so because they have noticed that whenever a major political event occurs, there is an intensification of fake accounts on social media. Trolls appear to be linked to government figures or certain opposition figures, but this has not yet been verified. Doorov stated that this observation is based on the similarities in the style, languages, and phrases that tend to be used in comments left by these fake accounts in response to their articles.

In some cases, political campaigns and candidates have been targeted on the basis of religion or ethnicity.

In some cases, political campaigns and candidates have been targeted on the basis of religion or ethnicity. For example, in the 2016 Jakarta gubernatorial elections, the incumbent governor, Basuki Tjahaja Purnama (a Christian with ethnic Chinese ancestry in Muslim-majority Indonesia), was accused of blasphemy on the basis of a misleadingly edited video of one of his speeches, implying that he had insulted or misinterpreted a verse in the Koran (Columbia University 2021). He was prosecuted and sentenced to two years in prison. He lost the elections.

Likewise, Nalaka Gunawardene, a science writer and media analyst in Sri Lanka, has observed the promotion of ethno-nationalist narratives in the run-up to elections:

> *Come election time [...], it used to be the "Ali Koti Giwisuma" allegation always levelled against the UNP [United National Party], for a quarter century. No evidence was ever produced, but the rival camps only had to say, "Ah, there is this secret deal with the Tigers [LTTE guerilla group]." Now what they say is, again, that the UNP has some secret deal to sell national assets to the West, and it's "un-fact-checkable." And yet it is the kind of false narrative that will immediately gain traction. In decisive times, like five days before an election and national elections, these things do matter. (interview, 2021)*

Women's rights activists have also found themselves the targets of hate speech. For example, Ramsha Jahangir, a journalist in Pakistan, observed:

> *For instance, organizers of this women's rights march have also been accused of treason. There have been cases filed against them in the court to ban them, calling for them to be hanged as well, because they were accused of blasphemy last year. It's very intense and, of course, it threatens the safety and lives of participants of the march. Their pictures have been leaked, their private information has been leaked. And it's more than a hate comment or cyberbullying. Of course, it is accompanied by that as well. There have been alternate hate campaigns, online hate campaigns at the same time, like "Ban Aurat marchers" or "Hang these blasphemers" or these hashtags have also trended. But on the ground, it is worse. It's very, very blatant. And this is why women's rights activists have been asking the state to do something about it, to provide safety, because all they're asking for is a women's rights celebration; whatever they're demanding is not something that should put their lives at risk. But the situation has definitely escalated more and more [in recent] years. Opponents also were throwing rocks and attacking the marchers in the capital in Islamabad. So it's definitely both offline and online, [and] it's very big. (interview, 2021)*

In the Philippines, Cheryll Ruth Soriano, a professor in the Department of Communication of De La Salle University, studies "historical distortion." She investigates YouTube videos which attempt to whitewash or downplay atrocities committed during the Marcos regime's era of martial law: "In another study [we were doing] that was not about politics, these narratives from these YouTubers that surfaced in our research came up several times. That's how we learned that your regular driver, your regular students are using these YouTube videos as their sources of educational information about their history" (interview, 2021). This is significant, as members of the Marcos family still have political aspirations.

Foreign disinformation campaigns have been observed, as well as geopolitical tensions contributing to information disorder. For example, in 2020 the EU Disinfo Lab released a report in which they stated that they had "uncovered a massive operation targeting international institutions and serving Indian interests: "'Indian Chronicles'—the name we gave to this operation—resurrected dead media, dead think-tanks and NGOs. It even resurrected dead people. This network is active in Brussels and Geneva in producing and amplifying content to undermine—primarily—Pakistan" (Alaphilippe, Adamczyk, and Grégoire 2020). Similarly, Doublethink Lab in Taiwan released a report in 2020 on information operations based in China targeting the 2020 general elections in Taiwan. According to the report, "During Taiwan's 2020 general election there were countless disseminators of disinformation, residing in both China and Taiwan. In addition to politically-oriented disinformation manufacturers and distributors, there were a large number of actors driven by financial interests, cooperating with others in a decentralized pattern" (Tseng et al. 2020, v). Furthermore,

> *specific narratives have dominated the 2020 Taiwan general election campaign, such as "Democracy is a failure," which supports the view that democracy in Taiwan has failed to give the people good governance, positive international relationships, and a strong economy, and that democracy leads to moral decadence. "Democracy is a failure" was a constant narrative that played out during the presidential election campaign up until the COVID-19 pandemic. (Tseng et al. 2020, vi)*

In Central Asia, the influence of content from Russia cannot be discounted. Lola Islamova, founder, director, and editor of the news agency Anhor.uz, noted that state propaganda is a big part of the problem of misinformation in Uzbekistan. The role of Russian media is especially significant. She explains that certain demographic groups, like elderly viewers, prefer to watch Russian TV channels for information and entertainment, and these channels often contain disinformation. Based on Islamova and her team's monitoring of online content, they concluded that Uzbek-language content and Russian-language content have different audiences, and as a result there are differences in how misinformation manifests. Misinformation in Uzbek is often linked to religion, whereas consumers of content in Russian in Uzbekistan tend to be more educated, and simple misinformation related to religious differences may not have great traction among them (interview, 2021).

Similarly, Duman Smaqov, head and editor of the website Factcheck.kz, noted that some of the trolls and bots active in Kazakhstan seem to be originating from Russia, judging by the language, style, and examples used. He explained that many of these bots are very developed and seem to be actively posting information and following each other; to a layperson they may appear to be authentic accounts. Compared to bots and fake accounts in Kazakhstan, those in Kyrgyzstan seem to be a bit less advanced. Partners of Smaqov and his team from the website Factcheck.kg noticed an increase in such accounts during the elections (interview, 2021).

It has also been noted that border disputes (such as the one between Tajikistan and Kyrgyzstan) can give rise to information disorder. Torokul Doorov observed that during the recent Tajik–Kyrgyz border conflict, there were videos of army vehicles at the border and descriptions implying the mobilization of the army at the border. However, it turned out that the videos were old or actually from another country (interview, 2021).

Injina Panthi, a fact checker from South Asia Check, has also observed anti-Indian sentiments contributing to information disorder in Nepal: "For example, there is one politician, she spoke Hindi in our Parliament. So people [created] a perception about her—that she is pro-Indian and can't be loyal towards Nepal—and disseminated information accordingly on social media" (interview, 2021).

> Injina Panthi, a fact checker from South Asia Check, has also observed anti-Indian sentiments contributing to information disorder in Nepal.

Similarly, Jason Cabañes, professor of communication and research fellow in the Department of Communication, De La Salle University, observed that tensions between the Philippines and China over the South China Sea and, more recently, the Covid-19 pandemic have led to discriminatory attitudes towards Chinese migrant workers in the Philippines, and even towards Filipinos of Chinese descent:

> *And from both camps, those supporting and those who are against the administration, they're putting out misinformation, or disinformation, that's amplifying negative sentiments against the [Chinese] migrants who are here. And then, even more importantly, it becomes extended. This is even more scary for Filipinos of Chinese descent or with Chinese heritage. They are very well integrated into the Philippine population—they've been here since the Spanish colonial period, [but now] they are becoming part of this discourse. So it's becoming very xenophobic and nativist. (interview, 2021)*

## HEALTH

While health-related mis- and disinformation has often existed (for example the promotion of fake medicines and cures, organ donation scams, etc.), the Covid-19 pandemic has led to the dissemination of a large volume of mis- and disinformation specifically related to the novel coronavirus. Topics include fake cures (for example in India, where this issue is linked to ethnonationalist sentiments), mis- and disinformation about Covid-19 vaccines, and claims accusing certain ethnic, national, and religious groups of being "spreaders" of the virus. In addition, state-backed campaigns have been used to distort information about Covid-19, including the number of cases and deaths.

Fake cures have featured prominently as topics during the pandemic, in many different Asian countries. "I noticed that there were, in quite a lot of places, including in India, and in Sri Lanka, and even in Pakistan, there were these posts that were talking about miracle cures. [...] Different countries were touting these herbal remedies, which, in reality, often just boosted immunity, but were being sold as cures for Covid," observed Raisa Wickrematunge of Himal Southasian in Sri Lanka (interview, 2021). Likewise, Injina Panthi noted, "We are doing lots of fact checking on Ayurvedic medicine [during the Covid-19 pandemic], but people keep posting and sharing the same thing, same material" (interview, 2021). Duman Smaqov noted that in Kazakhstan there was a lot of information about folk and herbal remedies, most of which were ineffective and were doing more harm than good (interview, 2021).

In some cases, health mis- or disinformation is based on ethnonationalist ideology. For example, Vigneswara Ilavarasan, a professor in the Department of Management Studies of the Indian Institute of Technology Delhi, noted, "There is a lot of health-related information, misinformation being spread that is glorifying Hindutva-based medicine structures" (interview, 2021). In other instances, such mis- or disinformation is state-backed. In Kyrgyzstan, dangerous false information was publicly endorsed by President Sadyr Japarov and his health minister, who vouched for the effectiveness of a toxic root against Covid-19 despite the World Health Organization (WHO) issuing warnings against its use (Radio Azattyk 2021) and local reports of poisoning attributed to the root (RFE/RL Kyrgyz Service 2021b). Civil society and medical professionals mobilized against this treatment and worked with Facebook, which eventually removed all mentions of the treatment from the president's and health minister's Facebook pages and Instagram posts (RFE/RL Kyrgyz Service 2021a).

Mis- and disinformation about Covid-19 vaccines have also been a widespread issue, with the potential to drive vaccine hesitancy. Reasons for vaccine hesitancy include false information about the vaccines and lack of trust in authorities (see, for instance, Lee 2021; Nachemson 2021; Zainul and Chua 2021). In some cases, religious perceptions have helped fuel vaccine hesitancy.

For example, Ramsha Jahangir observed that the belief that there are *haram* products in the vaccines can drive the perception that the vaccine is "un-Islamic" (interview, 2021). In Malaysia, the belief that vaccines are *haram* has also contributed to hesitancy, and some mosques have used sermons to encourage people to get vaccinated (Rodzi 2021).

In other instances, delays in vaccine rollouts have provided room for rumors to flourish. For instance, Taeksoo Cho, a news reporter at the Joongang Tongyang Broadcasting Company (JTBC) in South Korea, observed: "The biggest problem is that we need to speed up vaccinations for the people, but we don't have enough vaccines right now. So that's why a lot of misinformation is circulating on social media, and [by word of] mouth" (interview, 2021).

Pre-existing cultural beliefs about medicines, as well as cross-cultural influences, can play a role in vaccine hesitancy. Kayo Mimizuka, freelance journalist and member of the Japan Center of Education for Journalists (JCEJ), observed:

> *It's just my impression that is not based on any research, because I'm not an expert on [vaccine hesitancy]. But because I've spent the last two years in the US, here, I have this impression that people are okay to take really strong medicines or get vaccines for flu and stuff. But I would say in Japan, that hesitancy is more a part of the culture. I guess it really depends on the generations. But I think there's that foundation in the culture—that people don't really want to rely on vaccines or medication. I don't know if it's because of Eastern medicine culture or something else. But when it comes to Covid, we see a lot of misinformation being imported from abroad. And that's getting translated by certain people in Japan, and that circulates a little later, after [it has circulated] in the USA, especially. So I'm sure that misinformation also increases vaccine skepticism. (interview, 2021)*

The pandemic has also led to the scapegoating of certain communities as "spreaders" of the disease, as observed by Nalaka Gunawardene:

> *A large number of Sinhalese will uncritically believe a tall tale about a Muslim or a Tamil. They will not demand evidence. And I say this with some shame, as a Sinhalese, that many among us Sinhalese have that prejudice. So last year [2020], during the early days of Covid, Muslims were accused of being super-spreaders: [it was said] that this is a Muslim-spread disease and*

> *mosques are in fact teaching [people] how to go and spread this among non-Muslims. This is very deadly stuff, all of which was uncritically believed and amplified by some broadcast media, who ought to be much more responsible than that. (interview, 2021)*

The Muslim community was similarly scapegoated in India during the pandemic (Murthy 2020).

Fear and uncertainty around the pandemic also led to rumors regarding availability of care. Dr. N. Tamilselvi, an independent fact checker from India, recalled this phenomenon as follows:

> *As soon as this new government took over, [it was] said that they had created 800 beds with oxygen facilities for people in Chennai [at the Chennai Nandambakkam Trade Center]. But, unfortunately, an innocent mother's number was given and her son's name was mentioned. And when we tried to call this person [to ask] whether he is responsible for getting admitted here in the hospital, they literally cried. They said, "Ma'am, I've been receiving at least 800 calls, I'm tired of explaining this. I don't even know how my number got into this. We have no connection to this trade center or oxygen facility or beds, please remove our number." (interview, 2021)*

Furthermore, certain governments have tried to conceal the extent and spread of the pandemic, which included coercing those who contradicted the official state narrative. Ruslan Myatiev, editor of Turkmen.news, noted that the government of Turkmenistan denies the existence of Covid-19 to this day. He added that Turkmenistan has many economic and social problems, which the government refuses to acknowledge, so denying the reality of the Covid-19 pandemic is typical (interview, 2021). Other examples abound. In the early stages of the pandemic, the government of Kazakhstan refused to admit that there were cases of Covid-19 in the country and suppressed the true extent of the infections. There are numerous cases involving arrests of teachers, activists, doctors, and ambulance drivers during this period (Toiken 2020; Utenova 2020). In Tajikistan, doctors and public health officials are afraid to comment on the magnitude of the infections in the country (Yusufzoda 2021). This issue is certainly not limited to Central Asia. For instance, the government of India has ordered platforms to remove posts critical of the government's handling of the pandemic, using mis- and disinformation as a rationale for this (Krishnan 2021). Hence, it is clear that the Covid-19 pandemic has provided new opportunities for the ecosystem of information disorder to thrive.

## NATURAL DISASTERS

Instances of mis- and disinformation were observed during the 2015 earthquake in Nepal (Nettikkara 2015). Injina Panthi noticed a similar phenomenon during flooding and wildfires:

> *After the flood—the photo happened in Sindhupalchok district of Nepal—and on social media, they [were] posting old photos and writing captions like, "Things are happening, please wake up and help." And so a photo that is not from that place and that event is circulated. We had a wildfire—two, three months before—and then also, a photo from a foreign country was circulated on social media, [with claims that it was] from Nepal, and that due to the wildfires, this much disaster and much loss is happening. This kind of photo is mainly [asking people to pray for victims]." (interview, 2021)*

Relief scams circulating online have also been observed (interview, Panthi, 2021).

## HATE SPEECH

In many countries across Asia, members of ethnic minorities, women, and members of the LGBTQI+ community have faced hate speech (see, for example, Thaniago 2020). As noted in previous sections, hate speech often coincides with other forms of information disorder. During election campaigns, candidates can be targeted on the basis of their religion or ethnicity. Pre-existing ethnic tensions are also harnessed by candidates to drum up support and attract voters. Sometimes this is connected to geopolitical tensions, and those perceived to be "foreign" are othered. Women and those belonging to minority religions have also become targets. Likewise, during the Covid-19 pandemic, certain communities, often already marginalized ones, have been scapegoated and labelled "spreaders" of the disease.

> During election campaigns, candidates can be targeted on the basis of their religion or ethnicity. Pre-existing ethnic tensions are also harnessed by candidates to drum up support and attract voters.

For example, hate speech online and through traditional media has been an ongoing problem in Myanmar:

> *In Myanmar, communities have been disrupted, traumatized and displaced due to the armed conflicts between ethnic minorities armed groups and the military governments as well as*

> *the political tensions between pro-democratic groups and the oppressed military society leading to the incitement of violence for several decades. In 2012, intra-communal violence occurred due to the deeply-seated [sic] mistrust, the rooted authoritarian culture of administrative structures and unclear policies of immigration, and [the violence] escalated until 2014. Since then, the dissemination of hate speech through various forms of media coverage [has] emerged. (PEN Myanmar 2015, 3–4)*

A qualitative study on Myanmar, carried out by LIRNEasia and MIDO, with Kantar TNS Myanmar, found intense anti-Muslim sentiment online in 2017, as the conflict in Rakhine intensified. Other research subjects reported that they refrained from using their real names on Facebook to avoid becoming the targets of hate based on their ethnicity (LIRNEasia 2018). Furthermore, those—including journalists—who have attempted to highlight abuses in Myanmar, for example discrimination against Rohingya people, have faced harassment and suppression at the hands of the state (Crispin 2019; Warren 2017).

### CELEBRITY GOSSIP

Rumors and false information about prominent public figures, such as celebrities and political figures, are also common topics of mis- or disinformation. This has been observed on several occasions, including in India and South Korea. JeongHyun Lee, ICTD fellow at the United Nations University Institute in Macau, noted the following of South Korea:

> *For some famous people, specifically celebrities and politicians, there are a lot of [rumors] that are not necessarily credible facts. Some information is not very important, but it attracts many people's attention. These [pieces of information], such as their clothing brands, [where they] live, [their] dating partners, [the] schools they graduated [from], and even the their family members' lives, often get more attention. Moreover, in most cases, that personal information comes from an individual social media post, without any verification. (interview, 2021)*

## 2.2 MODES OF DIFFUSION OF INFORMATION DISORDER

Mis- and disinformation can spread through both online and offline modes, such as through digital platforms, through traditional media, and by word of mouth.

### DIGITAL PLATFORMS

Facebook, WhatsApp, and YouTube are very popular social media platforms in Asia. Twitter, Instagram, LINE, and Telegram are also used, as well as country-specific applications like Kakao Talk in South Korea and Zalo in Vietnam. Different platforms pose different challenges in terms of tackling information disorder (e.g. direct messaging applications vs. more public types of platforms), which will be discussed later on.

> Sometimes, cross-platform activity takes place as well. For instance, in Pakistan online disagreements between politicians and civil society take place on Twitter, but they are passed on to the general public via Facebook and WhatsApp (interview, Jahangir, 2021).

The rate of spread and the impact of mis- and disinformation spread via social media platforms will depend on how many people use social media and whether they use it as a source of information and news. (For more on information sharing behavior in Asia, see Zainudeen and Amarasinghe 2019). For example, in Japan, which has an aging population, fewer people use digital media to access news; instead, they rely more on traditional media. Most people who turn out to vote at elections are also older. So while online smear campaigns have taken place during election times, they do not appear to have influenced election outcomes in a meaningful sense (interview, Kajimoto, 2021). The opposite effect is possible in countries where more people use digital media to access information.

### TRADITIONAL MEDIA

Information disorder can also be enhanced through mainstream media. This can be due to a lack of resources and funding for independent media organizations, as well as poor media ethics practices. For instance, Laxman Datt Pant of Media Action Nepal, who conducts training for journalists, reported finding serious problems with misleading information reported in the Nepali media (Pant 2021). He further observed:

> *Body shaming was there, character assassination was there, questioning the role of a particular gender, including that of LGBTQI [people] and women. And there are different social stigmas—human rights, human rights violation cases—*

> *in some parts of Nepal. Women are discriminated against and beaten, widespread violence continues, [they are charged with] witchcraft. [...] These stories are even highlighted by the news media and newspapers, mainstream newspapers, with photographs [taken] without their permission, stating that, yes, witchcraft exists. (interview, 2021)*

Other problems include censorship of the media through suppressive political and legislative environments. These issues will be discussed further later on in the report.

## WORD OF MOUTH

Another important medium for the spread of mis- and disinformation is word of mouth. For example, Vigneswara Ilavarasan described the phenomenon in India as follows:

> *Say my father receives a message, but he cannot interpret it. So his friends, who are supposedly slightly educated, they are the gatekeepers, and they share this information with their group of friends. Political parties, especially in this country, are able to exploit this very nicely. So at the central city level there is an IT cell of each of the political parties, and they create content and pass it down to the last level. The last person spreads it to the rest of the people offline, physically. So if you ask me what is the exact device they're looking at to receive this information, I can say that a lot of people are looking at Twitter and Facebook; they're receiving all this information. The next level of information is coming on WhatsApp and YouTube. We have an interesting segment of people who look at content only on YouTube. The first set of people access all kinds of platforms. The second set of people are looking at WhatsApp and YouTube, and the third set—other people—are basically dependent on people who access WhatsApp and YouTube. They are offline! But they are the ones who believe this, who follow this. For example, for [Covid-19] it was said that you are supposed to take a lot of turmeric water. So if you look at which people are using a lot of turmeric water, they are either those with a little bit of access to WhatsApp or those who are dependent on people who have access to WhatsApp. [...] At the top [are people with] all ICT devices, and at the bottom those who do not have access to ICT devices, but they're dependent on the gatekeepers that are coming from the top. The gatekeepers can be anyone. (interview, 2021)*

A common theme across many of our key informant interviews was that information disorder arises due to polarization and bias; people are more likely to believe information that already fits their pre-existing beliefs.

## MOTIVATIONS FOR SPREADING FALSE INFORMATION

People's motivations for spreading mis- or disinformation are varied. Some are motivated by ideology, while others are looking to monetize clicks and will therefore promote even false content to maximize clicks. Others spread misinformation inadvertently, through ignorance, or even with good intentions. For instance, Dr. N. Tamilselvi noted that some people forward false appeals for medical donations, genuinely believing them to be real (interview, 2021). Qadaruddin Shishir from AFP Fact Check describes motives for spreading as follows:

> *State-sponsored actors spread this kind of misinformation, opposition-sponsored actors spread this kind of misinformation, and there are some religious right-wing people who have pages or groups on Facebook or YouTube and they spread this disinformation. They know that the [information is] false but they propagate it on a regular basis. Then there are some other actors, like financially motivated actors. They have websites, Facebook pages, and YouTube channels. They get ad revenue from clicks or views. Some of them are journalists—[they do not openly identify themselves as such, but the nature of the] content [implies] that journalists [could] be behind the production of this content. They know that this is misinformation or misleading information or outright false information, but still they frequently spread it just to attract readers to their websites and channels to earn ad money. (interview, 2021)*

> People's motivations for spreading mis- or disinformation are varied. Some are motivated by ideology, while others are looking to monetize clicks and will therefore promote even false content to maximize clicks. Others spread misinformation inadvertently, through ignorance, or even with good intentions.

# 3. ACTIONS TAKEN TO COUNTER INFORMATION DISORDER

## 3.1 FACT CHECKING

A range of organizations are working on different strategies and action plans to counter information disorder, as it is perceived to soil the marketplace of ideas (Young, Jamieson, et al. 2018). Fact checking is considered to be one of the most popular strategies in countering mis-, dis-, and malinformation (Walter et al. 2019). Fact checking can be defined as the "the practice of systematically publishing assessments of the validity of claims made by public officials and institutions with an explicit attempt to identify whether a claim is factual" (Walter et al. 2019, 351). According to H. R. Venkatesh from BOOM India, "fact checking is about two things. One is to tell people who are swallowing lies that are not true, and the second is about correcting the record" (interview, 2021).

Fact checking has become an accepted practice in mainstream journalism, often leading to higher-quality media coverage (Schumacher-Matos 2012). However, even with the growing popularity of fact checking, its effectiveness in countering information disorder is doubtful, as empirical evidence on the matter is highly divided (Graves et al. 2021). Fact checking often starts with small-scale projects focused on a specific event, such as key elections, which then develop into established organizations (Bell 2019).

> The fact-checking landscape differs across countries in the Asian region. In some countries, fact checking is well funded and media organizations, independent fact checkers, and civil society all actively participate. But in other countries, the industry is still in the development stages (Meel and Vishwakarma 2020).

In Singapore, for example, "there's a lot of intention and desire to do fact checking, but it's not actually happening, because there's just no manpower. I think, occasionally, you'll find some ad hoc thing. But there's no sustained civil society effort to do it, because there's just not enough resources to do it in a systematic, sustained manner," according to Kirsten Han, a freelance journalist (interview, 2021).

According to Professor Jun Sakamoto of Hosei University, Japan, the lack of a developed fact-checking industry in Japan is a result of information disorder not being given importance: "The only fact-checking organization in Japan is the FIJ [Fact Check Initiative Japan]. One reason is that there is not much interest in the problem of disinformation in Japan" (interview, 2021).

On the other hand, as Rema Rajeshwari, an officer in the Indian police service, explained, India has a thriving fact-checking industry: "There are a lot of independent agencies which work as fact checkers, and some of the mainstream media also came up with their own fact-checking wings. And a lot of government agencies and institutions don't call themselves fact-checking teams, but at least they have the system of sharing credible information on a real-time basis" (interview, 2021).

### TYPES OF FACT-CHECKING ORGANIZATIONS

The fact-checking landscape is diverse across countries in Asia. Two common forms of organizations engaged in fact checking are independent third-party fact checkers and the fact-checking arms of media organizations (Amazeen 2017).

#### INDEPENDENT THIRD-PARTY FACT CHECKERS

Independent third-party fact checkers are the core group within the fact-checking community. Some of these organizations are formally structured, whereas others simply consist of a group of journalists, academics, and civil society activists working together.

Civil society organizations that consider fact checking to be part of their activities, especially during events that tend to trigger larger amounts of mis- and disinformation, also belong to this category. As noted by Mong Palatino, regional editor for South East Asia, Global Voices, and former member of the Philippines House of Representatives, in the Philippines "there are many civil society groups which are providing fact checking, especially relating to elections and then the public health crisis [Covid-19]" (interview, 2021).

#### FACT-CHECKING ARMS OF MEDIA ORGANIZATIONS

In countries with an evolved fact-checking landscape, most of the reputed mainstream media organizations have their own fact-checking arms

(Berkeley Library 2021). This could range from having a dedicated tab for fact checking in the online versions of newspapers and television channels, to dedicating a separate space in the program line-up to fact checking.

According to Taeksoo Cho, JTBC started a fact-checking program around 2016–2017 to tackle information disorder related to the impeachment of the then president of South Korea. As one of the largest media organizations in South Korea, JTBC allocates five minutes of their prime-time news bulletin to fact checks of popular news items (interview, 2021).

Even in countries with relatively prosperous socio-economic conditions, such as Japan and South Korea, fact checking is still a new phenomenon. As Jun Sakamoto noted, traditional media in Japan, such as newspapers, are beginning to engage in fact checking (interview, 2021). According to Gi Woong Yun, Vail M. Pittman associate dean and professor at the Reynolds School of Journalism of the University of Nevada, Reno, a similar pattern can be observed in South Korea, as "many traditional media organizations [in South Korea] are doing their own fact checking" and "even the public media broadcast[ers] have fact-checking sections" (interview, 2021).

## SELECTING INFORMATION FOR FACT CHECKING

The general selection criteria for fact checking include the virality of the story, the risk that it would lead to violence, and general public interest. As Yvonne Chua, associate professor of journalism at the University of the Philippines, Diliman, explained, "the focus is really on claims that are factual and have gained traction or have the potential to gain traction." She added: "It should be of a high public importance, the ones that are going viral or have the potential to go viral, and the ones that are extremely harmful" (interview, 2021). Asel Sooronbaeva, a fact checker and journalist from Factcheck.kg/Media Development Center of Kyrgyzstan, explained that they determine the need to fact check a certain news item based on sensitivities around it and also the impact it would have on peace and harmony in the country and the region.

Prominent organizations in the industry have developed guidelines and criteria to follow during the process of selecting what to check (Borel 2020; Buttry 2020). Fact-checking organizations that are members of the IFCN follow the internationally recognized process of fact checking (see IFCN 2016). This process is recognized by legitimate fact checkers, as it allows them to maintain strong standards in their process and avoid bias.

Fact checkers also rely on their intuition in selecting stories. Many fact checkers do not limit themselves to specific themes or topics of interest, while others focus on specific themes such as health, politics, and entertainment. We also found some fact-checking organizations that focus only on speeches or statements made by public figures in their country.

Fact checkers sometimes receive suggestions from readers and viewers regarding news items that need to be checked. This happens mostly as a result of fact checkers maintaining an active social media presence. According to Duman Smaqov, regular readers reach out to request specific fact checks, and also tag the Factcheck.kz team in social media posts that they want fact checked (interview, 2021). Dr. N. Tamilselvi explained that during their selection process, she and her collaborators "select information that sometimes people forward—I mean, they send it to us asking us to debunk it, asking us whether it is true" (interview, 2021).

> We found some fact-checking organizations that focus only on speeches or statements made by public figures in their country.

Fact checkers also have to consider the amount of time and effort needed to check a story. They might have to decline simply because the required time and resources cannot be justified in the context of limited funds and other resources that most fact-checking organizations operate in. Another consideration is that the more time is spent on a fact check, the more public interest in the story wanes; this also impacts on the decision-making process.

## OUTPUT FORMATS

The outputs produced by fact checking can take various forms. The channel of dissemination can have an impact on this, but, more than that, the types of stories that fact checkers are targeting affect the form their output takes (Walter et al. 2019). For example, a quick turnaround is required for some news items due to the nature of the news article; fact checks on news stories that have the potential to lead to violence are an example. On the other hand, some stories require more time and energy and are less urgent. Such fact checks would resemble longer investigative journalistic pieces of writing. Duman Smaqov spoke about the different types of fact checks produced by Factcheck.kz, which included standard fact checks and investigative pieces. Factcheck.kz uses collaboration and partnerships in working on some stories (interview, 2021).

The categorization of the news item that has gone through a fact check also plays a role in the output format. Each fact-checking organization has its own way of categorizing content (Graves and Cherubini 2016). For example, Nepal Fact Check uses a four-color system, with green indicating true or correct information; red indicating fake information; yellow indicating misleading information, partly incorrect information, or information where there is no logical connection; and black indicating information that cannot be verified as true or false.[3]

## SOURCES

Traditional media such as newspapers, television, and radio, along with online media—including digital media platforms such as Facebook, Twitter, Instagram, and YouTube, and direct messaging platforms such as WhatsApp—can all be sources of stories to be fact checked (Silverman 2015). Fact checkers in Asia are faced with the challenge of accessing reliable sources in the context of government-imposed limitations and language barriers.

According to Abohon Sultonnazarov, regional director of the Institute of War and Peace Reporting, fact checkers and journalists in Central Asia often have to rely on government sources, as these might be the only sources of information available. But they have to be vigilant in checking the authenticity of the information they receive from the government (interview, 2021).

> Asel Sooronbaeva noted that she and her team rely only on available sources for fact checks and use a multitude of tools to comb through English- and Russian-language databases. They also use government sources of information (interview, 2021).

According to Oiwan Lam of the Factcheck Lab in Hong Kong, their fact checkers "take references from other fact-checking organizations. If they have conducted related fact checking, we will check their source and see if we can also cite it as a reference. And we also take references from media outlets which have a proven professional editorial process" (interview, 2021).

## TOOLS

Fact checkers have a wide range of tools and techniques in their arsenal. Fact checkers with affiliations to international organizations such as Facebook can benefit from more advanced tools and databases. Fact checkers also rely on more conventional journalistic tools as well.

A fact checker from a fact-check agency in Sri Lanka, who preferred to remain anonymous, stated, "We use methods like conventional journalistic approaches, like interviews, and also digital methods" (interview, 2021). Other tools that were commonly mentioned during the interviews include Data Viewer, Google Street View, Google Maps, Google Earth, Google Reverse Image Search, CrowdTangle, SentiOne, and Claim Buster. Some of the interviewees also use tools powered by artificial intelligence (AI), even though these tools have many limitations.

Vidushi Marda, a lawyer and senior program officer at Article 19, pointed out: "AI systems don't understand nuance at all, don't understand context. The systems don't understand cultural nuances that differ from place to place" (interview, 2021). On the other hand, Sumon Rahman, professor of media studies and journalism at the University of Liberal Arts Bangladesh, acknowledges the positive impact AI-powered tools can have on tackling information disorder if supported by strong databases: "I think we can solve the problem 80 percent or 70 percent [through] AI, and the rest of it can be done manually. So I don't think AI can solve the whole problem. But AI can solve it to a greater extent if we have a proper database to support it" (interview, 2021).

## DISSEMINATION OF FACT CHECKS

Once a story has been checked, the corrected information—with justifications, details of sources, and explanations—needs to be communicated to the public. Fact checkers use a variety of methods to achieve this. Firstly, if they are attached to a media organization, fact checkers will receive space to publish their stories and the social media pages of the media organization will also publish the fact checks. Some independent fact-checking organizations have created formal or informal partnerships with traditional media, social media, and direct messaging platforms so that they can publish their fact checks on a regular basis. Other fact-checking organizations have their own websites, social media platforms, and direct messaging accounts that they use to disseminate corrected information. The aim of many organizations is to attract their primary audience to their main platforms of dissemination and then create a conversation around the fact check or topic, which will in turn engage a secondary audience (Pavleska et al. 2018).

Fact checkers and journalists are aware that different platforms or channels are more effective in reaching specific audiences. Many interviewees mentioned that, in general, Facebook has the widest reach, whereas Twitter tends to have an audience with higher levels of engagement and English-language skills. Yudhanjaya Wijerathne described how Watchdog uses different channels to achieve different goals and to reach specific audiences. He pointed out that even though their Facebook page has the highest reach, it is seen as comparatively less professional and credible than their website by some sections of their audience, due to general perceptions of the platform (interview, 2021). Mahoshadi Peiris made similar comments on the differences between the audiences that connect to Factcheck.lk via Facebook vs Twitter: "Facebook and Twitter are like two different things. The community on Twitter is very tight-knit: everyone knows everyone, and it's a very small circle. We see a lot more fruitful engagement from English-media-consuming audiences on Twitter, because they're concerned about the same kind of [socio-political] issues" (interview, 2021). Similarly, Sandun Arosha, from Sri Lanka, explained that Citizen Fact Check's Twitter audience tends to be English speaking, whereas Facebook has a better reach among the Sinhala-speaking audience (interview, 2021). Harshana Silva, a fact checker from Hashtag Generation in Sri Lanka, mentioned that they use Instagram posts and stories to reach a different audience (interview, 2021).

## REACHING TARGET GROUPS

Dr. N. Tamilselvi narrated that in India she and her collaborators specifically target the middle-class urban population. They have made a deliberate decision to not focus on other social classes. According to her, reaching the lower social classes is tougher, as their interests are focused on primary needs, whereas members of the upper class benefit from their access to English media channels, which tend to counter mis- and disinformation to a greater degree than their local-language counterparts (interview, 2021).

Asel Sooronbaeva noted that Factcheck.kg's highest levels of engagement on social media are from urban, educated men in the 25–45 years age bracket. They have started creating content in the local language (Kyrgyz) to connect with local rural audiences, and they create content on TikTok to reach younger audiences (interview, 2021).

## INNOVATIVE METHODS

Yudhanjaya Wijerathne in Sri Lanka stressed the importance of secondary channels in the dissemination of fact checks. Watchdog not only publishes fact checks on the usual channels; it also ensures that the fact checks can be easily shared on direct messaging platforms like WhatsApp. This results in increased visibility and reach, as people who see the original posts on Watchdog's website or its Facebook or Twitter pages can then support the dissemination of the fact check by sharing it on direct messaging groups. This also helps to create a culture of fact checking and debunking of false information beyond the primary target audience (interview, 2021).

Fact checkers and journalists rely on different formats and strategies to get the attention of the public. They use images, catchy headlines, short videos, and infographics to achieve this goal. Additionally, some fact checkers emphasize the use of local languages to reach a wider audience and also ensure that the tone and flow of the language used suit the key demographics (Agarwal and Alsaeedi 2021; Lazer et al. 2018). Asel Sooronbaeva mentioned that her and her team's practice has evolved from the publication of simple fact-checked articles to the use of infographics and videos to reach a wider audience (interview, 2021). Mahoshadi Peiris talked about how Factcheck.lk are using innovative communication tools such as video clips and infographics to reach audiences:

> "We made a more active effort to change these captions to be more than just a translation, to speak to that audience. And even in terms of repackaging, we're trying out new videos that we want to put out. Fact checks in video format are easier for people to digest, and maybe different infographics as well" (interview, Peiris, 2021).

## FUNDING

Independent fact-checking organizations rely heavily on international donor organizations to obtain funding for their operations. The National Endowment for Democracy (NED), the Open Society Foundation (OSF), the IFCN, Facebook, and Google are some of the most prominent international organizations that provide funding for fact checking. Additionally, as mentioned above, some fact-checking organizations receive funds from their parent companies. We also found that some fact checkers have reached out to local business communities to obtain funding.

There is a small group of fact-checking organizations that are operated by or affiliated with universities. For example, Masato Kajimoto spoke about Annie Lab, a fact-checking program that operates at the Journalism and Media Studies Centre at HKU in collaboration with the Asian Network of News and Information Educators (ANNIE). Annie Lab was established in 2019, and operates with the support of students, faculty, and former journalists (interview, 2021). On a similar note, in South Korea, the Seoul National University (SNU) runs SNU Fact Check as a joint fact-checking project with twenty-seven major media outlets in the country.

There is a small group of fact-checking organizations that are operated by or affiliated with universities.

According to Yvonne Chua, a fact-checking initiative focusing on presidential, vice-presidential, and senatorial candidates beyond the official debates in the 2016 elections was carried out by journalism students of the University of the Philippines for the non-profit media organization VERA Files, which Yvonne Chua cofounded. In 2019, the university started the country's first collaborative fact-checking initiative, which brought together three universities and eleven newsrooms nationwide to monitor the mid-term elections (interview, 2021).

## THE IMPORTANCE OF COLLABORATION AND PARTNERSHIPS

Fact checkers, journalists, and even civil society organizations rely on collaboration and partnerships with governments and with other organizations working on information disorder in their own countries and around the world (Graves and Cherubini 2016). Such partnerships assist them in setting up operations, gaining the skills and expertise needed to do fact checking, learning about tools and techniques available for fact checking, and understanding the funding landscape that they have to navigate in order to sustain their operations. Collaboration also helps fact checkers to improve their work through learning from others and through obtaining support when a language barrier or lack of access to sophisticated tools hinders them from doing their work. For example, Duman Smaqov and his organization were able to help initiatives in other countries in Central Asia, including in Kyrgyzstan and Tajikistan, by virtue of the skills and knowledge they have gathered through the process of setting up a fact-checking organization in Kazakhstan (interview, 2021).

Asel Sooronbaeva spoke of the importance of regional cooperation and support for her team's work. They have worked with partners from Ukraine, Moldova, and the UK, who have helped them with training of journalists. Currently their network includes organizations in Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan. She also referred to their partnership with Bellingcat (a Netherlands-based investigative journalism website that specializes in fact checking and open-source intelligence), which assisted them in terms of the tools and techniques they use in the fact-checking process (interview, 2021).

Jean-Jacques Sahel, Asia-Pacific information policy lead at Google, provided an example of the benefits received through organic collaboration and partnerships when fact checking was starting out in Taiwan:

> *I think it's just lots of different willing people that came together. But one of the things that happened is that they [a group of collaborators that Google worked with in Taiwan] created the fact-check center. They were lucky that there was, at the University of Taipei, an association for quality journalism that [had] brought together already academics and journalists, before they started worrying about misinformation. So that provided already a nexus, a place for them to come together, and effectively that provided a backbone for the Taiwan fact-check center to be born. (interview, 2021)*

Abohon Sultonnazarov stressed the importance of the skills possessed by journalists and fact checkers, and spoke of how partnerships have helped the Institute of War and Peace Reporting with skills development. The institute had to rely on journalists from other countries (Ukraine, Georgia, Russia, and the USA) to bring in practical and theoretical knowledge on the topic (interview, 2021).

Ujjwal Acharya and Umesh Shrestha noted that Nepal Fact Check benefits from its collaboration with the Center for Media Research, as these two organizations co-publish one of the most popular blogs in Nepal.[4] Fact checks are published on the blog, creating more visibility and leading to more visits to the website (interview, Umesh Shrestha, 2021).

Nepal Fact Check has also observed that mainstream media use their fact checks to correct false information previously broadcast through mainstream channels, a process that happens without any formal agreement between the parties involved: "The media correct disinformation and sometimes they give credit to us directly. We see that on a lot of media. Possibly every fact check we have done on the media, they have corrected themselves" (interview, Umesh Shrestha, 2021). This is an interesting situation because it shows the value of fact checking and can serve as inspiration for similar relationships to be formed in other countries of the region in order to improve journalistic standards.

Injina Panthi shared similar thoughts on the topic. South Asia Check in Nepal have accounts on Twitter and Facebook as well as their own website, but they also work with other media organizations to increase their reach. As the fact-checking and journalistic community in Nepal is small, they tend to rely on personal connections and networking rather than formal agreements to link with traditional media and disseminate fact checks (interview, 2021). Ellen Tordesillas discussed VERA Files' collaboration with traditional media in the Philippines, in particular with a tabloid, in an attempt to engage with otherwise hard-to-reach audiences (interview, 2021).

## 3.2 MEDIA AND DIGITAL LITERACY TRAINING AND AWARENESS

Fact checking is only one of the tools used in tackling information disorder. Other essential methods to challenge the problems caused by information disorder include initiatives involving media and digital literacy training, and awareness campaigns targeting different groups of society, including school children, journalists, public officials, and the general public (Wardle and Derakhshan 2017).

Media literacy programs also facilitate fact checking, as media-savvy individuals are more likely to notice the signs of information disorder and report this to authorities or notify fact checkers. Additionally, media literacy campaigns create awareness about the existence and scale of information disorder. This also motivates the general public to refer to fact checkers when they are doubtful about information they have received, and encourages people to do fact checking themselves (Brown-Hulme 2018; McDougall 2019). Masato Kajimoto noted that "the audience learning the skills and tools and techniques to identify quality information and detect potentially bogus claims" is the primary aim of media literacy programs (interview, 2021).

### TYPES OF PROGRAMS AND TARGET GROUPS

It is important that any type of training program be customized for the audience (Buckingham 2019). For example, in India, a training program targeting journalists would need to be customized to match the context and specific needs of a particular state.

Journalists, academics, fact checkers, government institutions, media organizations, and civil society organizations carry out a wide variety of activities to promote awareness and media literacy (Livingstone and Wang 2013). For example, in Indonesia, as a way of tackling hoaxes and misinformation in rural areas with no internet access, Liputan6, a fact-checking organization, conducts road shows at Islamic schools, universities, and other community centers. They work with local community radio stations to improve media literacy among indigenous groups in the country (Mubtadi 2021).

Rema Rajeshwari explained to us how she and her team conducted a three-day training program on social media literacy in India, targeting village heads. They taught them how to identify malicious content and how to reach out to the relevant officials regarding content verification. The main aim of this training was to prevent the spread of harmful content on community social media groups and WhatsApp groups. Songs and stories with cultural elements were used instead of speeches to communicate the message. In order to enable villagers to attend such programs, they also focused on not disrupting the villagers' agricultural practices, by holding the events in the evenings (interview, 2021).

> In Pakistan, the Digital Rights Foundation educates journalists, human rights activists, and civil society organizations on topics such as digital security and safety, laws that can impact on journalism work, and how to advocate a stronger legal framework that protects the rights of journalists and human rights activists (Digital Rights Foundation 2021).

In many cases, university academics have included media literacy classes in their curricula. Masato Kajimoto has trained not only university students but also journalists and school pupils in Hong

Kong. He uses edutainment videos to teach high school students about media literacy, as part of the Google News Initiative project. Kajimoto's initiatives have also been active in the Philippines, Indonesia, and Thailand, where partnerships with local NGOs are used. In the Philippines, media literacy has been made mandatory for high school students, but teachers have not received the proper training. Kajimoto was involved in a program where teachers in the Philippines were trained by a local NGO based on video-centered teaching of media literacy. In Thailand, six videos were created (on YouTube) to teach primary school students about digital literacy and the role of journalists. In Indonesia, the target group was housewives. A video series involving a family drama was used to create awareness about which sources to trust and what to consider before forwarding information. Additionally, Kajimoto has a training program on Coursera titled Making Sense of the News (interview, 2021).

> In the Philippines, media literacy has been made mandatory for high school students, but teachers have not received the proper training.

### FACT-CHECKING TRAINING

Training programs conducted by fact checkers naturally tend to focus on the practical aspects of fact checking. Fact-checking organizations use such training programs to educate the public and also to create a pool of potential candidates with the skills and knowledge required to become professional fact checkers. For example, Dr. N. Tamilselvi is an academic who ventured into fact checking because of the training she received. This training allowed her to understand the impact of personal biases and the legitimacy of sources (interview, 2021).

Umesh Shrestha, who works with Nepal Fact Check via the Center for Media Research, trains selected groups on the ethics of fact checking and on the tools and techniques to use. Most of these training programs make use of practical fact-checking exercises (Center for Media Research 2021). Similarly, Media Action Nepal conducts training programs targeted at journalists in South Asia. The three-day virtual training program includes the principles of journalism, codes of ethics, gender disinformation, the process of fact checking, and tools and techniques used in fact checking (Media Action Nepal 2021).

## 3.3 ACTIONS TAKEN BY PLATFORMS

Online platforms play a major role in information disorder. This includes social media platforms such as Facebook, Twitter, Instagram, and YouTube, as well as direct messaging platforms like WhatsApp, LINE, and Telegram. Critics have accused these platforms of facilitating the spread of mis- and disinformation, either deliberately or through their lack of response in situations where such mis- or disinformation is brought to their attention. While it may be unfair to assign responsibility solely to platforms in these situations, their role in information disorder cannot be ignored. This holds true especially when mis- or disinformation spread online has an impact offline in the form of violence and/or unrest.

One fairly recent example from Asia would be Facebook's role in allowing the spread of hate speech that fueled violence against thousands of Rohingya Muslims in Myanmar (Kamdar 2020). Later, Facebook admitted that the platform had been used to "foment division and incite offline violence" in Myanmar and that it had not done enough to prevent said violence (Warofka 2018). A similar case of negligence on the part of Facebook occurred in Sri Lanka in 2018. A report by Article One found that the "proliferation of hate speech (e.g., '*Kill all Muslims, don't even save an infant; they are dogs*') and misinformation (e.g., that a Muslim restaurateur was adding sterilization pills to his customers' food)" on Facebook may have contributed to the 2018 unrest and subsequent anti-Muslim violence in the city of Kandy (Article One 2018, 7). Since 2013, government officials, researchers, and NGOs had repeatedly asked Facebook to take action against the use of the platform to call for violence or to target people for their ethnicity or religion, but to no avail (Rajagopalan and Nazim 2018).

Instances where platforms have been used to spread mis- or disinformation and hate speech have only increased in recent years. However, platforms have stepped up and started taking action in various ways as well. These actions include, but are not limited to:

- the introduction of various policies and guidelines
- the removal or suspension of manipulated content, accounts, pages, and groups spreading misinformation
- collaboration with fact checkers, local-language content moderators, and other third parties
- the introduction of a forwarding limit and the labelling of repeatedly forwarded messages on direct messaging platforms
- funding journalism research and digital literacy
- monitoring suspicious activity online.

Platforms have also instituted measures to deal with particular situations that tend to lead to an increase in information disorder, such as the Covid-19 pandemic and elections. A concerning development is the hiring of freelancers to help disseminate disinformation on platforms. We also discuss the criticism that has been levelled at platforms for the way that they have responded to the problem of information disorder.

## POLICIES AND GOVERNANCE

Companies have introduced certain policies to regulate the type of content that can be shared on their platforms. In the case of Facebook, these policies are explained under its community standards. On TikTok, it takes the form of community guidelines. These guidelines and standards outline the types of content that are not allowed on the relevant platform as well as the actions that will be taken in the event of content policy violations.

Most companies have introduced policies that directly target information disorder. Examples would be Facebook's policies against "inauthentic behaviour" and "false news" (Facebook 2021a; Facebook 2021b), Twitter's "synthetic and manipulated media" policy (Twitter Help Center 2021), and TikTok's and YouTube's "misinformation" policies (YouTube Help 2021; TikTok 2020). However, we will not be describing these policies in detail, as it is outside the scope of this report. As an additional measure, TikTok has localized content moderation guidelines for individual South-East Asian countries by appointing local content moderators. The platform has also appointed a Safety Advisory Council for the Asia-Pacific region (Bettadapur 2020a; see also Oliver 2021).

South Korean messaging app KakaoTalk has stated that it will impose temporary or permanent restrictions on users whose activities fall under the "prohibited activities" described in the Kakao Operation Policy. These include restrictions on messaging, posting, and chatroom use, or restrictions from using the platform at all (KakaoTalk 2021b). Some examples of "prohibited activities" include posting any content that "violates human dignity, incites violence, and instigates discrimination or prejudice due to reasons that include an individual's place of origin (including country and region), race, appearance, disability or illness, gender, gender identity, sexual orientation, and other factors associated with an individual's identity", uploading a posting "that is deemed false among [*sic*] any postings that have form of articles with name or title of press company," and attempting to "steal and disseminate personal information" (KakaoTalk 2021a).

## REMOVING OR SUSPENDING CONTENT, ACCOUNTS, PAGES, OR GROUPS

This is one of the most common actions taken by platforms to combat information disorder. Removals and suspensions sometimes occur as a result of requests made by government agencies, fact checkers, and other third-party organizations such as news agencies. One such example is when Facebook removed several pages and posts targeting Rohingya Muslim refugees in Malaysia after they were flagged by Reuters in 2020 (Latiff and Ananthalakshmi 2020). Similarly, Twitter removed 795 fake accounts targeting the West Papuan independence movement in Indonesia following an investigation by Bellingcat.[5] Platforms have also made a concentrated effort to remove content that violates their own community guidelines and policies.

> Facebook removed several pages and posts targeting Rohingya Muslim refugees in Malaysia after they were flagged by Reuters in 2020 (Latiff and Ananthalakshmi 2020).

Google and YouTube have taken down content following government requests in, for example, Singapore and Thailand. In 2017 the Info-Communications Media Development Authority of Singapore requested the removal of a video entitled "Inside the Khilafah" from Google+. The authority claimed the video was produced by ISIS and advocated terrorism. The video was removed for violating Google+ content policy (Google Transparency Report 2021a). In 2020 the Thai government sent three requests regarding the removal of six technically manipulated (deepfake) YouTube videos of King Rama X, during which the content of the king's public announcement was altered. These videos were taken down, as they violated YouTube's community guidelines (Google Transparency Report 2021b).

There have been other cases where platforms took down content backed by government figures and government entities. The banning of the Myanmar military (Tatmadaw) and all military-controlled state and media entities from Facebook and Instagram in late February 2021 was as a result of events stemming from the military coup which occurred on February 1, 2021 in Myanmar (Frankel 2021). Previously, Facebook had taken down a fake account network managed by President Rodrigo Duterte's social media manager during his 2016 campaign in the Philippines. The accounts, on both Facebook and Instagram, elevated the candidate and attacked opponents (Gonzales 2019).

Furthermore, accounts connected to the Royal Thai Army (RTA) were suspended by Twitter in 2020. The accounts promoted content in favor of the government and the RTA while targeting high-profile people in the political opposition (Twitter Safety 2020).

> It is harder for direct messaging platforms to employ the same measures to track and identify mis- or disinformation, due to the private nature of direct messages. However, there have been a few situations where action was taken against controversial content.

South Korea's KakaoTalk has been known to take action when users report criminal activities (Jun-suk 2019). Telegram has also made some attempts to regulate questionable content by disabling certain groups when detecting, for example, pornography or religious extremism. It will typically give the group administrators time to rectify the situation, after which the group will be reinstated (Guest, Firdaus, and Danan 2021). In 2017 the government of Indonesia partially blocked Telegram due to content linked to terrorism and radicalism. The founder of Telegram, Pavel Durov, met officials from the Ministry of Communication and Information Technology in Jakarta and pledged that Telegram would have a direct line with the government of Indonesia to address their requests, thereby speeding up the process. After this, the Indonesian government assented to lifting the ban (Reuters 2017). Furthermore, WhatsApp has stated that they regularly delete fake accounts in Indonesia (Potkin and Costa 2019).

### WORKING WITH FACT CHECKERS, CONTENT MODERATORS, AND OTHER THIRD PARTIES

Asia is home to a vast variety of different cultures and languages. Dealing with information disorder is a difficult task, and when combined with the added challenge of understanding the local context of each country that platforms operate in, it becomes even more daunting. Consequently, platforms have taken measures to collaborate with certain third parties and, in particular, with fact checkers.

In April 2018, Facebook announced a partnership with Rappler and VERA Files for a third-party fact-checking program in the Philippines, which aimed to prevent false news from spreading on the social media platform. Rappler and VERA Files, which have been certified by the Poynter Institute's non-partisan IFCN, work as third-party fact checkers to review news stories on Facebook, check the facts involved, and rate the accuracy of the stories (Magsambol 2018). Similarly, in Malaysia, Facebook launched a third-party fact-checking program in partnership with Agence France-Presse (AFP) in June 2019 (*Malay Mail* 2019).

These partnerships are part of Facebook's global third-party fact-checking program, where the social media giant partners with independent third-party fact checkers who are certified through the IFCN in order to fight the spread of mis- and disinformation and provide people with more reliable information. The program has since expanded to encompass more than sixty languages around the world, including several locations in Asia (Meta Journalism Project 2021). Sumon Rahman spoke about Facebook's third-party fact-checking program with us. He noted that Facebook had provided Fact Watch with training and with access to CrowdTangle, a tool which can be used to analyze content on the platform. CrowdTangle makes it easier for fact checkers to access and generate content (interview, 2021).

In Taiwan, the direct messaging application LINE has taken measures to counteract mis- and disinformation by partnering with local fact-checking organizations. LINE has formed partnerships with the Taiwan Fact Check Center and Cofacts, which enabled it to create the program LINE Fact Checker. This allows users to report messages and inquire whether they are true or false (Deck and Elliott 2021). LINE Fact Checker is a part of LINE's digital accountability project, which involves collaboration with both the government and third-party fact checkers (Lange and Lee 2020).

One of the main challenges that other messaging platforms such as WhatsApp and Signal face when attempting to remove harmful content lies in the fact that these platforms are encrypted to protect the privacy of users. If implemented by other direct messaging platforms, a program like LINE Fact Checker would go a long way in circumventing the barrier raised by end-to-end encryption.

WhatsApp has taken measures to check the flow of mis- and disinformation by providing contact numbers for the IFCN chatbot and local IFCN fact checkers who are collaborating with WhatsApp. This enables users to check information if they believe it to be inaccurate or suspicious. The numbers includes contact numbers for the Anti-Slander Society (Mafindo) in Indonesia;

BOOM, AFP, Digit Eye, and others in India; and Fact Crescendo in Myanmar and Sri Lanka (WhatsApp Help Center 2021).

TikTok has launched an Asia-Pacific fact-checking program, partnering with fact checkers AFP and Lead Stories (Bettadapur 2020b).

Both Google and Facebook have been known to work with threat intelligence company Graphika to identify potentially harmful content. Google has terminated thirty-six YouTube channels, one ad account, and one blog as part of its investigation into coordinated influence operations linked to Pakistan in June 2021. Google had received leads from Graphika for this investigation (Google 2021). In 2018, Facebook removed nine pages and six accounts for engaging in coordinated inauthentic behavior (CIB) on the platform in Bangladesh. The investigation began partly based on a tip from Graphika (Facebook 2018).

### FUNDING JOURNALISM, RESEARCH, AND DIGITAL LITERACY

In addition to managing information disorder on their platforms, companies such as Facebook and Google have also taken the initiative to combat it on a wider scale by raising digital awareness through various initiatives and providing journalists and fact checkers with the funding and tools to fight mis- and disinformation.

One such initiative is Facebook's We Think Digital, which is a multi-phase awareness campaign to promote digital literacy in the Asia-Pacific region. Launched in 2019, the campaign involves Facebook working with experts, academics, NGOs, civil society organizations, and governments in various countries (Facebook 2021d). The modules and resources designed for the programs in each country can be downloaded or viewed for free by educators and the general public from the We Think Digital website.[6] In some countries, the program is targeted at specific groups of people. For example, Facebook partnered with the National Commission for Women (NCW) and the Cyber Peace Foundation in India to provide digital literacy training to women. The aim was to train 100,000 women across seven Indian states, namely Uttar Pradesh, Assam, West Bengal, Madhya Pradesh, Gujarat, Jharkhand, and Bihar (Majumdar 2020).

In 2018, Google launched Google News Initiative, a journalism-focused program that aims to help publishers earn revenue and combat fake news globally.[7] In 2019, Google News Initiative worked together with the Communications and Information Ministry of Indonesia and Mafindo to run a training program for the public on identifying disinformation online (*The Jakarta Post* 2019).

Also in 2019, Google took action to expand digital literacy in South Korea as well. The company announced that it would help expand the digital and media literacy education program nationwide to educate the public on making sound judgements on digital media platforms and how to use a variety of digital media tools.

> The South Korean education program, which has been hosted by the Center for Digital Literacy since 2016, received 500 million won from Google.org (the charitable arm of Google) in 2017, allowing it to become one of the official programs at middle schools in Seoul and Gyeonggi province.

In September 2019, LINE Thailand held its first workshop (in Bangkok), as part of its Stop Fake News campaign, in collaboration with its parent company LINE Plus Corporation and the Associated Press (AP). The campaign is aimed at young people and college students, especially those studying mass communication and journalism, and is also supported by the Thai Media Fund and LINE TODAY. In 2019 the campaign released an animated video to educate viewers on how to ascertain the reliability of information before sharing it (The Nation 2019).

### FORWARDING LIMITS

In 2018, WhatsApp began to limit the number of times a message could be forwarded. While its global limit was twenty times, WhatsApp imposed a limit of five times on its biggest market, India, before bringing the global limit to five in 2019 (Liao 2018; Reuters 2019). In 2020 it narrowed down the limit of frequently forwarded messages to one chat at a time (Singh 2020). In May and June of 2021 WhatsApp blocked over 2 million accounts in India on the grounds of rule violations. WhatsApp stated that 95 percent of those users were blocked for exceeding the forwarding limit (BBC News 2021a). California-based Signal too has imposed a forwarding limit of five times on its platform, while Facebook Messenger has taken measures to do the same (Signal Support 2021; Singh 2020).

### MONITORING AND AWARENESS

Social media companies generally make a point of monitoring their platforms for questionable content, with the help of dedicated teams and various tools. They regularly release reports detailing their actions against questionable content in order to spread awareness about their activities and the kind of content users should be aware of. Sometimes, companies communicate with each other and follow up on content which gets flagged on other platforms.

The Twitter Transparency Center contains various reports on subjects such as government information requests, actions taken to enforce Twitter rules, legal demands for content removal, takedown notices, and more. Each report contains details of the particular subject, inclusive of data covering a particular time period.

Facebook also shares information about CIB that the platform has acted against, for example with regard to Myanmar:

> *We removed 79 Facebook accounts, 13 Pages, 8 Groups, and 19 Instagram accounts in Myanmar that targeted domestic audiences and were linked to individuals associated with the Myanmar military. We found this activity after reviewing information about a portion of it shared by a member of civil society in Myanmar. Our investigation revealed some links between this operation and the activity we removed in 2018. (Facebook 2021c)*

Google's Threat Analysis Group (TAG) is a specialized team of security experts that works to identify, report, and stop government-backed phishing and hacking activity targeted at Google and the people who use their products. They work across Google products to identify new vulnerabilities and threats (Gidwani 2020). TAG uploads a quarterly bulletin on coordinated influence operation campaigns terminated on Google platforms worldwide.[8] TAG also states whether their findings match those of other platforms such as Facebook or Twitter, which implies that these platforms share data and leads on suspicious activities. For example, among the various entries related to Asian countries, one from January 2021 refers to Kyrgyzstan:

> *We terminated 6 YouTube channels as part of our investigation into coordinated influence operations linked to Kyrgyzstan. The campaign uploaded content in Kyrgyz critical of the former President Almazbek Atambayev and the opposition leader Adakhan Madumarov. This campaign was consistent with similar findings reported by Facebook. (Huntley 2021)*

## COVID-19

With the advent and spread of the Covid-19 pandemic came a corresponding surge in mis- and disinformation related to it. Globally, platforms have taken action against the spread of this "infodemic" by employing most of the measures explained above.

In Malaysia, the Covid-19 Immunisation Task Force (CITF) and Facebook Malaysia launched a series of new initiatives to combat mis- and disinformation related to Covid-19. This included a digital campaign, launched in collaboration with the Malaysian Communications and Multimedia Commission (MCMC), which focused on encouraging safe behavior (e.g. wearing masks and social distancing) and correcting mis- and disinformation around Covid-19 vaccines (Dzafri 2021). Facebook has also supported the Ministry of Health in Mongolia. For instance, the Ministry of Health and the Communications and Information Technology Authority (CITA) collaborated with experts on Facebook's public policy and advertising teams on a Covid-19 public education campaign (Anudari 2020).

TikTok announced in July 2021 that it was working with the Ministry of Communications and Information in Singapore to encourage vaccination against Covid-19. The campaign intended to release livestreams with experts and public health organizations (TikTok 2021).

## ELECTIONS

Elections offer prime conditions for information disorder. In a situation where people's opinions are already divided, the potential for mis- and disinformation to cause harm increases to a point where it may even affect the entire country. Online platforms have taken special measures to limit the spread of mis- and disinformation during elections.

Facebook has also set up "war rooms" in some countries, with the aim of fighting election-related mis- and disinformation. The company established a war room in Taipei ahead of the presidential and legislative elections in January 2020. The task force, assisted by Facebook's regional election center in Singapore, aimed to work with the Central Election Commission (CEC) as well as political parties, law enforcement, and the camps of the three presidential candidates (Tzu-ti 2019). A similar war room was set up in Mongolia to counter mis- and disinformation and interference in the Mongolian parliamentary elections, scheduled for June 2020. With support from its US and Irish offices, Facebook was to provide 24-hour monitoring of content, including posts and advertising, using AI to identify and delete fake accounts (Ankhtuya 2020a).

However, not all countries have received the same level of support from Facebook when it comes to election-related mis- and disinformation. In November 2019, it was observed that not all of the transparency tools that had been built by Facebook for other countries to monitor election ads had been launched in Sri Lanka (Wong 2019). This implies that the policy is not consistently applied.

In the run-up to the 2020 elections in Singapore, Google said it would no longer accept political ads as of December 2, 2019, as they were now regulated under a new "fake news" law in the country. The law in question, also known as the Protection from Online Falsehoods and Manipulation Act (POFMA), had been introduced in October 2019. Google stated that it would prohibit ads that "influence or seek to influence the outcome of a general election" and "ads that promote the interests of a political party or other group of persons organised in Singapore for political objects" (BBC News 2019b). The move was contested by an opposition party, who said the move would deprive Singaporean voters of information (BBC News 2019b). Google announced on November 13, 2019 that from November 15, 2019 to January 17, 2020 all ads by political candidates in Taiwan would be suspended (Everington 2019).

## THE HIRING OF FREELANCERS FOR MIS- AND DISINFORMATION CAMPAIGNS

A 2021 article by journalist Ramsha Jahangir highlighted how online job boards were being used to hire workers for mis- and disinformation campaigns. In June 2021 Facebook removed a network of pages, groups, profiles, and Instagram accounts for engaging in CIB. Several of these pages had represented themselves as international media organizations. Graphika stated that numerous stories shared by these fake "media" accounts were uploaded by employees of a marketing firm based in Islamabad. Actors and voice-over artists were hired to promote criticism of India and praise of Pakistan, and to advocate the China–Pakistan Economic Corridor (CPEC). One freelancer who had been hired for this work via the online freelancing platform Fiverr claimed that she did not know that her face had been used for propaganda purposes (Jahangir 2021a). The fact that freelancers can be hired to facilitate the spread of disinformation through these online platforms is a concerning development.

The role of freelancers in facilitating political disinformation is significant in the Philippines, according to Jason Cabañes, who notes that these freelancers will be hired by people who run political campaigns to create content and then introduce it onto platforms like Twitter and Facebook (interview, 2021). This phenomenon could be a factor for platforms to take into account when they consider taking measures against information disorder.

## CRITICISMS AND CHALLENGES

Despite the many actions taken by digital platforms, it seems they can still do more. One allegation that has been leveled at social media companies is that they have been slow and inconsistent in identifying and reacting to mis- and disinformation on their platforms. For example, these accusations have been levelled at Facebook, as mis- and disinformation spread on the platform has been linked to offline violence in both Sri Lanka and Myanmar.

At the time of writing, in 2021, it seemed that TikTok was repeating Facebook's mistakes in Myanmar. After the military coup in Myanmar on February 1, 2021, government soldiers used TikTok to spread propaganda and threaten demonstrators against the coup with violence. Digital rights advocates in Myanmar stated that TikTok had failed to make connections with civil society or to hire experts who speak Burmese in order to enforce community standards. New moderators fluent in Burmese were only recruited in December 2020, and by this time propaganda linked to the military had already spread on the platform (Guest, Fishbein, and Lusan 2021).

> Ayesha Binte Towhid, a researcher at the Bangladesh Institute of International and Strategic Studies (BIISS), argued that these companies build their content policies based on the environment of their origin countries, with the result that these policies are not necessarily relevant in the context of the Global South (interview, 2021).

For example, Facebook's policies may define hate speech in a way to which people in the Global South may not relate, because hate speech as defined by Facebook may not occur in that particular environment. There is a lack of consideration for other ethnic and religious contexts in these policies (Guest, Fishbein, and Lusan 2021).

When Facebook made the decision in 2019 to not fact check statements made by politicians, it appears to have failed to adequately consider how this decision would impact countries with different social and political environments. Sanjana Hattotuwa, PhD candidate at the University of Otago, New Zealand, spoke about the fact that Facebook did not have enough contextual information about content in Sinhala and Tamil or the political environment of Sri Lanka: “The sophisticated instrumentalization of Facebook by politicians and powerful proxies, just around electoral moments in 2019 and 2020, outstrips in scale and complexity what [the platform] has responded to even in the United States” (interview, 2021). In an email to the IFCN, Masato Kajimoto stated: “In many Asian countries, politicians are one of the major sources and disseminators of misinformation and disinformation who have a wide reach and influence. They should be held more accountable for what they say, in my view” (Mantas 2021).

> “The sophisticated instrumentalization of Facebook by politicians and powerful proxies, just around electoral moments in 2019 and 2020, outstrips in scale and complexity what [the platform] has responded to even in the United States” (interview, Hattotuwa, 2021).

Platforms have likewise been criticized for their lack of transparency, especially with regards to situations where content is taken down or user access is blocked by a platform. In May 2021, in India, Instagram stories pertaining to relief efforts for Covid-19, volunteer activities, and political criticism were removed, as well as private chats on these topics. Instagram stated that it was due to a technical issue and later claimed that they had fixed it. They later claimed the problem was related to an update (Access Now 2021a). However, organizations such as Access Now, the Association for Progressive Communications (APC), and Human Rights Watch were concerned about the explanation provided by the platform, as it was unclear what exactly led to these takedowns and whether there was any government pressure at play. In addition, even though the platform stated that the takedowns were not related to the content itself, the content taken down in India was disproportionately pertaining to posts about Covid-19 relief, politics, and activism (Access Now 2021a). Mong Palatino also expressed concern about the lack of transparency on the part of platforms: “I think they should be more transparent. If they take down posts and accounts based on the request of governments, they should be more transparent about the criteria they use in complying with requests by the governments” (interview, 2021).

While it is easy to blame social media companies for their inefficiencies in dealing with information disorder, it is important to keep in mind the complexities of the issue at hand. The sheer amount of mis- and disinformation online presents challenges in terms of human resources and time. One issue is the encryption of direct messaging platforms, which presents a major barrier to fact checking and identifying the flow of mis- or disinformation. To improve traceability, these platforms would have to change their technological structure. The feasibility of this is questionable and would also compromise the privacy of users.

Another point to consider is how the algorithms used by social media platforms recommend content. “Clearly, their algorithms function in order to increase engagement. And engagement for the worst kinds of things is often highest, because of how we react to them emotionally,” said Nikhil Pahwa, journalist and founder of MediaNama, who believes that platforms should be held accountable for how their algorithms function (interview, 2021). It is definitely a point to consider; however, there does not seem to be a simple solution to this particular issue.

Social media companies also have to deal with challenges concerning the religious and political environments of the countries they operate in. TikTok was banned in Pakistan in March 2021 after reviewing a complaint that said the popular video app hosted immoral and objectionable content. The Peshawar High Court Chief Justice, Qaiser Rashid Khan, described some videos on TikTok as “unacceptable for Pakistani society,” and said that these videos were “peddling vulgarity,” according to local media reports. The country had previously banned the app in October 2020 (Singh 2021). Ramsha Jahangir notes that the banning of TikTok is evidence of the influence of religion on politics in the country (interview, 2021).

Various platforms encountered problems in India in 2021. At the time of writing, WhatsApp was suing the Indian government over new digital rules that will force the messaging service to violate privacy protections. In a statement, a WhatsApp spokesperson said that the rules “would break end-to-end encryption and fundamentally undermine people’s right to privacy” (BBC News 2021b). Twitter has also run afoul of the government of India. In May 2021 several tweets posted by members of the ruling party of India were labelled “manipulated media” by the platform. Police officers visited Twitter’s office in New Delhi, and in June an investigation was launched into Twitter due to a viral video of a Muslim man being assaulted (Perrigo 2021). India has also permanently banned TikTok, stating that the app was “prejudicial to sovereignty and integrity of India, defence of India, security of state and public order” (Reuters 2021).

Singapore’s POFMA has sparked some controversy since it took effect in October 2019, as it gives the government the power to instruct platforms to remove or correct untrue statements “against the public interest” (BBC News 2019a).

Various parties have raised concerns about the Act. Facebook has said that it is concerned that the government rather than fact checkers will determine accuracy (Mandhana and Dvorak 2019). In December 2019 Lim Tean, an opposition politician, was asked to rectify a Facebook post on the topic of foreign students receiving more funding than home students. In his defense, he stated: “It is clear to me that POFMA is being used by this government ahead of the upcoming GE (general election) to silence its opponents and chill public discussion of unpopular government policies” (Aravindan 2019).

Furthermore, Ruslan Myatiev observed that credible journalists and media organizations have been the targets of seemingly organized attempts to shut down their Facebook and Google accounts through complaint channels (interview, 2021). One of the authors of this report, Azamat Ababakirov, who is from Kyrgyzstan, has observed that some Kyrgyz journalists complain on social media about their inability to receive verification on Facebook (indicated by a blue verification badge next to the page or profile). The restoration of a blocked account can take weeks, often during critical political events. Most recently, Kloop’s YouTube channel was cancelled by Google on the eve of the parliamentary elections in Kyrgyzstan, only to be restored after the elections (Roziev 2021). If platforms worked with local networks of journalists and media organizations to ensure their ability to function uninterrupted, this could play a critical role in countering harmful content.

It is difficult to say with certainty whether social media companies will be able to find concrete solutions to the issue of information disorder on their platforms. On the one hand, it is clear that they are taking action. On the other hand, it is hard to measure the extent to which they have succeeded. What they can do is to continue to improve their systems and invest in both technology and human resources in the fight against information disorder.

## 3.4 ACTIONS TAKEN BY FUNDERS AND NETWORKS

Countering information disorder requires the support of regional and global networks, donors, and funders. These are mostly tech companies, international funding agencies, or government-affiliated organizations (Amazeen 2017; Graves 2016). Based on the information obtained during the interviews held for this study, this support can be in the form of:

- providing funding to sustain fact checking, media literacy programs, and training of journalists and fact checkers
- providing access to fact-checking tools and methodologies
- providing access to training and capacity-building programs on information disorder and fact checking
- developing and maintaining industry standards and guidelines
- contributing to research and policy development on information disorder.

The key funders mentioned during our interviews are the IFCN, Google, Facebook, YouTube, Yahoo News, the NED, the OSF, the APC, the UNDP, UNICEF, USAID, the US State Department, the EU, the Soros Foundation Kazakhstan, and local NGOs (in Bangladesh).

Jean-Jacques Sahel referred to types of activities that Google has focused on: “We are particularly keen to do literacy work and training. So we do a lot of fact-checking training and digital literacy training for people like journalists, academics, and researchers, including government researchers” (interview, 2021). Google works in collaboration with governments, civil society groups, and academia to offer training, facilitate research, and influence policy creation. Sahel further stated:

> *In Southeast Asia, Google has partnered with local NGOs and schools. It’s not just about misinformation; often the problem [is linked to] other issues like intolerance and hate speech. So, in Indonesia, we are trying to teach students how they can use online tools, both to do fact checking and express themselves and express tolerant views. (interview, 2021)*

Dulamkhorloo Baatar of the Mongolian Fact Checking Center expressed enthusiasm about joining Facebook’s third-party fact checkers, and also expressed gratitude for being approached by Facebook to do so (interview, 2021). According to Nikita Vashisth, former editor and fact checker for Newschecker.in, the initiative has received funding from Share Chat for fact-checking services, from the IFCN through a grant in 2020, and from Facebook through becoming a third-party fact checker (interview, 2021).

Fact-checking organizations and civil society organizations that work in this space are sometimes affected by changes in international funding trends. Raisa Wickrematunge noted that potential structural changes in donor organizations and the shifting environment have made them consider diversifying their funders (interview, 2021). Amar Gunatilleke from the Marga Institute, a civil society organization in Sri Lanka working on hate speech and media literacy, spoke of the importance of looking for funding partners from Sri Lanka to sustain their operations. He added that the local business community has to be involved in such activities (interview, 2021).

## 3.5 IFCN CERTIFICATION

IFCN certification is a key aspect for most of the fact checkers we interviewed. This certification not only assists them to maintain high standards in their processes and methodology; it also increases their credibility, leading to greater trust among the public and more funding opportunities. IFCN certification also gives fact checkers the opportunity to become third-party fact checkers for Facebook, an added revenue opportunity. As Yvonne Chua noted, “A number of Facebook partners have acknowledged that the partnership has helped sustain a portion of their fact-checking operations” (interview, 2021).

Even though most fact checkers we interviewed are either currently IFCN verified or are interested in obtaining the verification, there are certain obstacles that make the process more difficult for fact-checking organizations. Firstly, although many acknowledge that the lengthy and strict process is essential to ensure the high standards expected by the IFCN, some have struggled with the process. These difficulties include not having the time and capacity needed for the process due to a lack of resources, difficulty in collecting all the information and documents required in English (this applies to fact checkers who focus on local languages), and the unaffordability of the processing fees charged by the IFCN for the assessment.

Ujjwal Acharya from Nepal Fact Check and Umesh Shrestha from the Center for Media Research mentioned the delay experienced by Nepal Fact Check when applying for IFCN certification: “We don’t have the human resources [to collect the documents needed]; we don’t make money. So we haven’t been able to apply for [the certification]” (interview, Acharya, 2021).

## 3.6 ACTIONS TAKEN BY GOVERNMENTS

Many governments across Asia have taken measures to deal with information disorder. There have been internet shutdowns during certain events, and certain websites have been blocked. Furthermore, specific actions have been taken to tackle mis- and disinformation related to Covid-19. While governments tend to argue that these measures are necessary to combat “fake news,” critics contend that this is often used as a means to silence criticism of the government. Laws to deal with information disorder have also been passed, which will be dealt with in the next section. In some cases media literacy campaigns have been carried out by governments—these have been dealt with in the section on media literacy.

> Many governments across Asia have taken measures to deal with information disorder.

### “FAKE NEWS” TASK FORCES

Several governmental organizations and ministries have set up fact-checking task forces and operations (see also Schuldt 2021). For instance, the Ministry of the Digital Economy and Society in Thailand launched its Anti-Fake News Center in 2019. *The Bangkok Post* reported on it as follows:

> *People are also allowed to send information they find suspicious to the centre so it can be checked and verified with relevant organisations. The verified information will be shared through online channels.*
>
> *The public can send information via the centre’s channels on Facebook, Line and Twitter, or use the website www.antifakenewscenter.com.*
>
> *Any information deemed as infringement will be forwarded to the Royal Thai Police for investigation.*
>
> *The four main content areas subject to stringent checks are those considered to affect people’s life and property, cause social divide, spur mass misinformation or ruin the country’s reputation. (Leesa-Nguansuk 2019)*

In 2018, the Pakistani Ministry of Information and Broadcasting launched a Twitter page titled “Fake News Buster.”[9] The website Factually,[10] which is run by the government of Singapore, is meant to clarify false information on matters of public interest (Lee 2017). In 2018, the Myanmar Ministry of Communication and Transportation created a social media monitoring team (Situ 2018). In 2017, the MCMC in Malaysia launched an online portal called Sebenarnya.[11] The website contains fact checks and enables the public to verify news (Hassan 2017). The government of Vietnam launched its Anti-Fake News Center in January 2021 (Diep 2021). The army of Vietnam also has an online information warfare unit called Force 47, which

> *consists of thousands of soldiers who, in addition to their normal duties, are tasked with setting up, moderating and posting on pro-state Facebook groups, to correct "wrong views" online. According to a Reuters review of provincial-level state media reports and broadcasts by the army's official television station, Force 47 has since its inception in 2016 set up hundreds of Facebook groups and pages, and published thousands of pro-government articles and posts. (Pearson 2021)*

The Indonesian Ministry of Information and Communication Technologies (Kominfo) has undertaken a variety of initiatives on mis- and disinformation. This includes a war room which uses both humans and AI tools to detect content (Basu and Tay 2020). A task force to deal with "fake news" was also created in Laos in 2021 (Thanabouasy 2021). Sri Lanka's Media Center for National Development also contains a fact-checking unit. This department falls under the Ministry of Mass Media.

There has been some criticism of state-backed task forces. For example, Facebook took the following actions against Force 47 in Vietnam:

> *After being approached by Reuters this week, a Facebook source said the company had removed a group called "E47", which had mobilised both military and non-military members to report posts they did not like to Facebook in an effort to have them taken down. The source said the group was connected to a list of Force 47 groups identified by Reuters.*
>
> *A Facebook spokesperson confirmed that some groups and accounts were taken down on Thursday for "coordinating attempts to mass report content." A company source said the action was one of Facebook's largest takedowns initiated under its mass reporting policy. (Pearson 2021)*

Concerns about the Thai government's approach (and the approach of other Asian governments) have been raised by the Office of the United Nations High Commissioner for Human Rights (OHCHR):

> *In Thailand, the Anti-Fake News Center of the Ministry of Digital Economy and Society and the Technology Crime Suppression Division of Royal Thai Police are conducting joint operations to address social media content deemed to be "disinformation" in the COVID-19 context. There are concerns that people raising legitimate issues of public interest related to COVID-19 are also being targeted, and such action may create an atmosphere of self-censorship. One example is a Thai artist arrested on 23 April for posting concern about the apparent lack of screening measures in Suvarnabhumi airport upon his arrival from abroad on 16 April. He was released on bail and has since been indicted. (OHCHR 2020)*

In Pakistan, pro-government "fact checkers" have engaged in online harassment of journalists who have criticized the government, and these journalists' reporting has been labelled "fake news" (Jahangir 2021b).

## INTERNET SHUTDOWNS AND WEBSITE BLOCKS

Tackling fake news and hate speech has become a common reason that governments advance for shutting down the internet and blocking certain websites. A report by Access Now records that 196 internet shutdowns took place worldwide in 2018, with Asia and Africa being the most affected regions. "Fake news" or "hate speech" was the third most common justification provided by governments (Taye and Access Now 2018).

For example, in 2018, the Sri Lankan government blocked access to Facebook, WhatsApp, Instagram, and Viber in the aftermath of anti-Muslim mob violence (Goel, Kumar, and Frenkel 2018). In December 2018, mobile operators were instructed by the telecoms regulator of Bangladesh to shut down high-speed mobile internet services until midnight on election day. The reason given was "to prevent rumors and propaganda surrounding the vote" (Reuters 2018). In 2018, in Tripura, India, the government blocked SMS, mobile internet, and data services for twenty-eight hours. A news article from *The Economic Times* reported that the director general of police sought the blocking of these media following an incident where a person was lynched by a mob who suspected him of being a child kidnapper (Singh 2018). A 2020 article by Human Rights Watch observed the following in relation to Myanmar:

> *In addition to the mobile internet, the Myanmar authorities have ordered the blocking of websites of independent and ethnic news media, among many other sites. Between March 19 and May 11, telecommunications operators and internet service providers received five directives from the Transport and Communications Ministry under article 77 of the Telecommunications Law to block 2,172 specific websites, of which 92 were alleged to provide "fake news." Independent and ethnic media sites such as Development Media Group, Narinjara News, Karen News, and Voice of Myanmar were among those ordered blocked. (HRW 2020)*

## CASE STUDY: HOW INDONESIA'S KOMINFO IS DEALING WITH INFORMATION DISORDER

In a written reply, Semuel Pangerapan, Director-General of Applications and Informatics in Kominfo, explained some of the initiatives that have been taken against mis- and disinformation:

> *[In] countering information disorder, we aim at three levels, namely the upstream, middle-stream, and downstream levels:*
>
> *1. At the upstream level, we focus on digital literacy, where we collaborate with more than 110 organizations, such as communities, academics, and government institutions, to carry out information and digital literacy education, coordinated by our national digital literacy movement, called Siberkreasi.*
>
> *2. At the middle-stream level, we take a series of serious and swift actions to remove access and content from websites, digital platforms, or social media accounts that circulate false information. We do not randomly take blocking actions; we take these actions in accordance with applicable laws.*
>
> *3. At the downstream level, the ministry supports the law enforcement action to prevent the spread of false information that may cause further chaotic action [in] society, in coordination with the law enforcement bodies. (interview, 2021)*

Regarding Kominfo's partnerships, Pangerapan noted the importance of collaboration between multiple stakeholders when dealing with information disorder in a country as diverse and massive as Indonesia. Kominfo engages with several stakeholders to enhance several aspects of its digital literacy program:

> *1. Local government partners will spearhead the implementation of digital literacy programs across regions in Indonesia.*
>
> *2. Central government and law enforcement partners will play a role in supporting policies for implementing relevant national digital literacy programs, and at the same time, [they will be] strategic partners for keeping the online community safe from any risks in the digital space.*
>
> *3. Community partners that are included in the Siberkreasi national digital literacy movement will be partners [in] implementing digital literacy activities, providing expert speakers, and developing joint content/materials [for the] digital literacy national curriculum.*
>
> *4. Academic institutions will become partners in the preparation of [the] digital literacy curriculum, as well as [in] designing and assisting [with] survey/evaluation/research activities to measure the effectiveness of our national digital literacy program to enhance the nation's digital literacy index.*
>
> *5. Media partners and digital platforms will become the platforms for media showers and [the] online broadcasting of digital literacy activities, as well as [co-creating] digital literacy content. For [social media] platforms, we've [also been] collaborating to minimize the spread of negative content and misinformation by [taking] swift action on content take-down and blocking.*
>
> *6. International institutional partners will provide experts for knowledge sharing and technical advice [in order to create] synergy between [the] national and international digital literacy curriculum. (interview, 2021)*

Pangerapan also explained Kominfo's use of technology :

> *At the Directorate General of Informatics Applications, we use an AI system for analyzing content and reporting it to people. The use of AI technology [involves] crawling or searching for harmful content, like pornography content. By using AI, we can easily validate the content. Some challenges are that the system must continuously develop according to the needs and developments of digital technology. (interview, 2021)*

In terms of impact assessment, Pangerapan explained:

> *Each month, we measure the number of hoaxes we're dealing with. Follow-ups on the spread of hoaxes are carried out in three ways:*
>
> *1. First, fact-checking collaboration with social media platforms and several national media that have fact-check[ing] programs.*
>
> *2. Second, block[ing] or tak[ing] down hoax content [on] social media platforms.*
>
> *3. Third, law enforcement cooperation with the Directorate of Cyber Crime and Criminal Investigation at the National Police Headquarters to legally process creators and spreaders of hoax content. (interview, 2021)*

While governments have contended that shutdowns and the blocking of websites are necessary to counter mis- and disinformation and the spread of hate speech, critics argue that

> *internet shutdowns curtail freedom of expression, cut access to information, and can inhibit people from assembling and associating peacefully, online and off. In addition, during shutdowns, many victims are unable to reach their families, get accurate information to stay safe, or reach emergency services. Shutdowns disrupt businesses, schools, and ordinary lives, often exacting a significant financial cost. (Taye and Access Now 2018)*

Critics have also questioned whether social media bans are in fact effective in curtailing the spread of mis- and disinformation. For instance, it has been noted in Sri Lanka that social media bans have been overcome by using virtual private networks (VPNs) (Funke and Benkelman 2019).

### GOVERNMENT ACTIONS TO MANAGE THE COVID-19 INFODEMIC

Governments have also taken many actions to deal with mis- and disinformation related to Covid-19. Many have passed laws, which will be discussed in the following section. One example of another type of initiative is found in Taiwan, where the digital minister adopted a "humor over rumor" risk communication strategy, which included comic messages to discourage the hoarding of toilet paper in response to a rumor about toilet paper shortages, and also to encourage safety measures (Bendix 2020). The Singaporean government has used traditional media, social media, government websites, and the Gov.sg Telegram and WhatsApp channels to debunk mis- and disinformation (Mahmud 2020). In the Philippines, the Department of Health launched a campaign called #ChecktheFAQs to combat mis- and disinformation related to Covid-19 and to highlight the importance of fact checking information. Tech companies such as Google, Facebook, Twitter, and TikTok have stated that they would support the effort (DoH 2021). The Department of Information and Communications Technology in the Philippines reported on its website that it "has combined efforts with the Philippine National Police (PNP) to create 'Task Force COVID Kontra Peke', a group tasked with preventing and reporting fake news" (DICT 2021). The government of Bhutan has created a Covid-19 page with a section called "Myth Busters;" the page also displays a warning against spreading fake news.[12]

In the Philippines, the Department of Health launched a campaign called #ChecktheFAQs to combat mis- and disinformation related to Covid-19 and to highlight the importance of fact checking information.

Once again, however, critics have expressed fears that government responses to mis- and disinformation related to Covid-19 were stifling free expression and criticism of government responses to the pandemic in Asia. A release by the OHCHR noted:

> *[Michelle] Bachelet [the UN High Commissioner for Human Rights] said the COVID-19 pandemic had seen a further tightening of censorship in several countries, along with the arbitrary arrest and detention of people critical of their Government's response or for simply sharing information or views about the pandemic.*
>
> *Arrests for expressing discontent or allegedly spreading false information through the press and social media, have been reported in Bangladesh, Cambodia, China, India, Indonesia, Malaysia, Myanmar, Nepal, the Philippines, Sri Lanka, Thailand and Viet Nam.*
>
> *The High Commissioner recognised the need to restrict harmful misinformation or disinformation to protect public health, or any incitement of hatred towards minority groups, but said this should not result in purposeful or unintentional censorship, which undermines trust. "While Governments may have a legitimate interest in controlling the spread of misinformation in a volatile and sensitive context, this must be proportionate and protect freedom of expression," Bachelet said. (OHCHR 2020)*

## 3.7 LEGAL RESPONSES TO INFORMATION DISORDER

Various legal tools have been deployed in Asian countries to regulate information disorder. While some laws explicitly address false information or hate speech, other types of legislation contain certain provisions that are applicable to information disorder, such as legislation related to defamation, cyber/digital security, sedition, electronic transactions, and media regulation, as well as legislation drafted to address specific situations, such the Covid-19 pandemic.

The use of legal tools to address information disorder is the subject of great controversy. While proponents argue that the problem of information disorder needs to be dealt with through binding regulations, critics contend that such legislation is often applied selectively and in a politically motivated manner, and used to stifle freedom of expression and criticism of the government. The punishments prescribed by this legislation often include fines and prison sentences.

## OVERVIEW OF THE LEGISLATION

The laws used to combat information disorder in the Asian region are quite varied. Some are relatively recent, in part due to the ongoing Covid-19 crisis and regulatory responses against the "infodemic." However, an increased enthusiasm among Asian governments to fight "fake news," including through regulatory means, has been observed in recent years (Tani 2018). As can be seen in Table 3, however, other laws date back many decades. Some of these, in countries that have experienced colonization, were first enacted during colonial times. It has been observed that British colonial-era laws are still being used in parts of Asia to suppress dissent (McLaughlin 2021).

Table 3 contains an overview of legislation in Asia related to information disorder, indicating the sections of each law that are relevant in terms of definitions, offences, and punishments. We searched for official English versions of the legislation. In some cases, such as in countries where English is not an official language, unofficial English translations have been used. (Consult the list of references at the end of this report for the sources of legislation.) Where the text of directives and legislation could not be found in English, we relied on analyses, media reports, or scholarly works. Where we do not specify the relevant section, article, or chapter, it is because we were not able to identify these in English versions of the legislation. Sometimes the categories overlap: for example, a law on electronic transactions could also have provisions relating to defamation. In Table 3 we have tried to categorize the legislation according to the most appropriate category.

**Table 3:**
Overview of the relevant legislation in Asia

| Details of legislation | Country | Relevant sections/articles |
|---|---|---|
| **Legislation related to "fake news" or falsehoods** | | |
| Protection from Online Falsehoods and Manipulation Act (POFMA), 2019 | Singapore | Sections 7, 20, 24 |
| Anti-Fake News Act, No. 803 of 2018 (Repealed) | Malaysia | Section 4(1) |
| Bill on the Manipulation of Information (see Arapova 2020) | Kyrgyzstan | |
| Amendments to Criminal and Administrative Codes (see CPJ 2020b; CPJ 2021) | Uzbekistan | |
| **Defamation, libel, or insult legislation** | | |
| Penal Code, Act XLV of 1860 | Bangladesh | Section 499 |
| Penal Code of Malaysia, Act 574, February 1, 2018 | Malaysia | Sections 499, 500, 501, 502, 503 |
| Criminal Code of the Republic of Korea | South Korea | Articles 307(1), 307(2), 308, 309(1), 309(2), 311 |
| Criminal Code of the Republic of China | Taiwan | Articles 309, 310, 312, 313 |
| Revised Penal Code of the Philippines, 1930, Act No. 3815 | Philippines | Chapter 1, Articles 355, 356, 357, 358, 359. Section 2, Article 360 |
| Penal Code of Bhutan, 2004 | Bhutan | Chapter 22: 317, 320, 319(a), 319(b) |
| Penal Code of India | India | 499, 500, 501, 502 |
| Penal Code of Japan, Act 45 of 1907 | Japan | Articles 230(1), 230(2), 233 |
| Criminal Code of Cambodia | Cambodia | Articles 305, 306, 307, 308 |
| Criminal Code of Mongolia | Mongolia | Articles 111(1), 111(2), 111(3) |

| Details of legislation | Country | Relevant sections/articles |
|---|---|---|
| Anti-Defamation Law (repealed) (see Gossman 2021) | Maldives | |
| Criminal Code of Kazakhstan (see CPJ 2020a) | Kazakhstan | Articles 373, 375 |
| Criminal Code of Thailand | Thailand | Sections 326, 327, 328 |
| **Legislation related to hate speech, harassment, religion, and obscenity** | | |
| International Covenant on Civil and Political Rights (ICCPR) Act, No. 56 of 2007 | Sri Lanka | 3(1), 3(2), 3(3), 3(4) |
| Protection from Harassment Act, 2014 | Singapore | Sections 3(1), 3(2), 4(1), 4(2), 5(1), 5(2), 5(1A) |
| Penal Code of Malaysia, Act 574, February 1, 2018 | Malaysia | Section 298A |
| Penal Code of India | India | Section 153A |
| Hate Speech Elimination Law, 2016 | Japan | Article 2 |
| Penal Code of Pakistan, 1860 | Pakistan | 295C |
| Penal Code of Nepal, Act 36 of 2017 | Nepal | Section 121 |
| **Legislation related to electronic transactions and regulation of technology** | | |
| Act on Promotion of Information and Communications Network Utilization and Information Protection, 2016 | South Korea | Articles 44–47 |
| Electronic Transactions Act, No. 11 of 2008 | Indonesia | Articles 28(1), 28(2), 45(2) |
| Ministerial Regulation 5 (see HRW 2021c) | Indonesia | |
| Information, Communications, and Media Act of Bhutan, 2018 | Bhutan | Chapter 4, Section (71) |
| Computer Crime Act, No. 24 of 2007 | Sri Lanka | Sections 6(1), 6(2) |
| Telecommunications Law, No. 31 of 2013 | Myanmar | Section 66 |
| Information Technology Act, 2000 | India | Section 66A |
| Sub-decree on the Establishment of the National Internet Gateway (see HRW 2021a) | Cambodia | |
| Electronic Transactions Act, 2008 | Nepal | Sections 47(1), 47(2) |
| Registration of social media outlets (see *The Star* 2020) | Laos | |
| Law on Informatization (see CPJ 2021) | Uzbekistan | |
| Computer Crime Law, 2007 | Thailand | Sections 14, 15, 16 |
| **Legislation relating to security, sedition, disturbing the peace** | | |
| Digital Security Act, No. XLVI of 2018 | Bangladesh | Sections 21(1), 21(2), 21(3), 25(1), 25(2), 25(3), 28(1), 28(2), 31(1), 31(2), 31(3) |
| Sedition Act, No. 15 of 1948 | Malaysia | Sections 3(1), 4(1) |
| Penal Code of Malaysia, Act 574, February 1, 2018 | Malaysia | Sections 504, 505 |
| Anti-Infiltration Act (see Aspinwall 2021) | Taiwan | |
| Cybercrime Prevention Act, No. 10175 of 2012 | Philippines | Section 4(c)4 |
| Anti-Terrorism Act, 2020 | Philippines | Section 9 |

| Details of legislation | Country | Relevant sections/articles |
|---|---|---|
| Revised Penal Code of the Philippines, 1930, Act No. 3815 | Philippines | Article 142 |
| Prevention of Terrorism Act, 1979 | Sri Lanka | Sections 2(1), 2(2) |
| Penal Code of Sri Lanka | Sri Lanka | Section 120 |
| Police Ordinance, Sri Lanka | Sri Lanka | Section 98 |
| Sedition Act (1948, revised 2013) | Singapore | Sections 3, 4 |
| Penal Code 1871 | Singapore | Section 499 |
| Hong Kong Basic Law | Hong Kong SAR | Article 23 |
| Law 24 on Cybersecurity, June 12, 2018 | Vietnam | Article 16 |
| National Security Act, 1992 | Bhutan | Articles 7, 8 |
| Penal Code of India | India | Sections 124A, 505, 295, 503 |
| Penal Code of Myanmar | Myanmar | Section 124A |
| Prevention of Electronic Crimes Act, 2016 | Pakistan | Chapter II: 9, 10, 11, 12, 20 |
| Law on Prevention and Combating Cyber Crime (see *The Star* 2020) | Laos | |
| **Media and publishing regulations** | | |
| Communications and Multimedia Act, No. 588 of 1998 | Malaysia | Sections 211(1), 211(2), 233(1), 233(2), 233(3) |
| Media Law, 2014 | Myanmar | Chapter 4(9) |
| Penal Code of India | India | Section 292(20) |
| Broadcasting Act, No. 132 of 1950 | Japan | Articles 9(1)–9(3) |
| Law on Mass Media, 1999 | Kazakhstan | |
| Law on Mass Media (see Itkulov 2021; Kaliakparov 2021; Soz 2021) | Kyrgyzstan | |
| Law on Mass Media (see Article 19 2014) | Tajikistan | |
| Law on Mass Media (see Article 19 2019) | Uzbekistan | |
| **Legislation related to Covid-19** | | |
| Emergency (Essential Powers) (No. 2) Ordinance 2021 | Malaysia | Part I Section 2, Part II Section 4(10) |
| Bayanihan to Heal as One Act, No. 11469 of 2020 | Philippines | Section 6(f) and Penalties |
| “Fake News” Covid Decree (see Nguyen and Pearson 2020) | Vietnam | |
| Law on Offenses, Criminal Law (see Ankhtuya 2020b) | Mongolia | |
| Amendments to the Administrative Offences Code (see Asia Plus 2020) | Tajikistan | |
| Emergency Decree (see HRW 2021d) | Thailand | |
| State of Emergency (see Ratcliffe 2020a) | Cambodia | |

## THE IMPLICATIONS OF LEGISLATION FOR CENSORSHIP AND FREEDOM OF EXPRESSION

The major debate surrounding legislation that addresses information disorder has been on its relationship to freedom of expression, and the possibility of governments using this legislation to suppress criticism of the state and exercise censorship. A 2017 Global Information Society Watch (GISWatch) report entitled "Unshackling Expression: A Study on Laws Criminalising Expression Online in Asia" observed:

> *With the rise of social media applications and the growing popularity of instant messaging applications on a global level, with almost nationwide adoption, state authorities would naturally feel more inclined to extend their existing powers to cover these platforms. On the one hand, the government would reiterate the need for "holistic" solutions and prevention with regard to issues of security, online fraud and "fake news", and would utilise this as leverage for further control and punitive measures; on the other hand, the imposition of additional regulations with expanded regulatory powers afforded to a politically aligned entity would mean that legitimate interest in freedom of expression would likely be compromised to achieve the former. (APC 2017, 94)*

Vidushi Marda contends that "a new body of law" against "fake news" is unnecessary:

> *I think a lot of people forget that protected speech includes lies. Lies, I think, are still legitimate speech. And I think this entire idea of fake news was constructed almost in a hurry . Of course, it not only started then, but [this idea] was constructed in a hurry [in order] to prosecute and things like that. And this treats it like a new problem, but it really isn't a new problem. The idea of speech in legitimate speech, hate speech, these things have existed for sixty or seventy years. And the minute there is a requirement under the law to say this is what is fake news and this is what is legitimate news, you have to ask yourself: Who gets to decide that? Because if it's the courts, we know that the judiciary isn't a perfect system—not everyone can access it equally—and, of course, states have greater kinds of sway when it comes to the courts. So, for me, the basics of what we need are there in traditional law, we don't have to reimagine and say: "This is so special that we need a new body of law." We actually just need to go back to the fundamentals of freedom of expression, opinion, information, etc. (interview, 2021)*

It has also been observed that the Covid-19 pandemic has driven up censorship and endangered freedom of expression, often under the guise of combating "fake news" and mis- or disinformation.

> Human Rights Watch has documented numerous instances of the Covid-19 pandemic being used as a justification to restrict freedom of expression, including actions such as the arbitrary arrest, detention, and imprisonment of critics of the government, among other abuses.

Other measures include legislation against certain kinds of media coverage, and criminalizing the spread of misinformation. More information can be found on the Human Rights Watch website,[13] including maps showing the geographical areas where different types of abuses have been reported. Many countries in Asia are identified on the maps produced by Human Rights Watch, especially with regard to "Arbitrary Arrest, Detention, Prosecution" and "Censorship Through Laws, Threats, and Blocking Reporting" (HRW 2021b; HRW n.d.).

Even outside the context of the pandemic, such legislation has been problematic. In Pakistan and Indonesia, blasphemy legislation, which prohibits criticism of religion, has been wielded against religious minorities (BBC News 2019c; Harsono 2018). Vague definitions often mean that terms such as "libel" and "false information" can be overstretched. Mong Palatino was a member of the Philippines House of Representatives when the 2012 Cybercrime Law was passed. He recalled opposing the law, and notes the dangers it poses to freedom of expression:

> *I voted no, against this anti-cybercrime law. The intention during that time, from the point of view of the government, was to make the internet a safer place. And they believed that we are doing a public service by passing this law, which intends to criminalize cybercrimes. So, we have legislators who have little knowledge about internet legislation and who think that the only way to protect the people is to police the internet. The cyber-libel [provision of the law] is really controversial. Because if there is a crime, and if you used a gadget, or a cell phone or computer, they immediately add another penalty for that.*

> *So if it's libel and you used a cell phone, it's called cyber-libel. So [it's not just] the cyber-libel [provision that] is problematic, the libel law itself is. For many years, journalists have been calling for the decriminalization of libel. [And now] you add another dimension to that by criminalizing cyber-libel. Authorities can now use the law to persecute and prosecute, not just journalists, but ordinary citizens. (interview, 2021)*

A prominent case concerning cyber-libel took place in 2020, when the well-known Filipino journalist and executive editor of the online news website Rappler, Maria Ressa, was found guilty of cyber-libel. A former writer and researcher, Reynaldo Santos Jr., was also found guilty. This prominent case made headlines internationally, and raised fears about the consequences of the verdict for freedom of expression and press freedom in the Philippines (Ratcliffe 2020b).

Furthermore, empowering the state with the ability to legislate truth and falsehood increases the power imbalance between the government and those who may try to push back against state narratives. Kirsten Han observed some of the challenges that journalists face due to Singapore's POFMA:

> *I think you become quite aware that you're quite vulnerable. Because [the government] gets to say what is fake news. Particularly when I work on issues that might be sensitive, like prisoners' rights, like police conduct—when people make comments about the police, policing powers, and they make allegations about prison officers or police officers misbehaving, then it's very difficult to tell those sorts of stories. Because it's so hard to prove. For example, I did a story about a prisoner who said that he was being bullied in prison. But as a journalist, I don't have access to prison, because the government controls that as well. I can't interview him directly. I interviewed his mother. And all the prisoners, the former prisoners whom I interviewed, who backed him up, don't have documentation on this. They say things like, "Oh, I wrote it down. But when I was released from prison, they took the notebook." So as a journalist, that makes me quite nervous. Because it's important enough to tell the story, but how can you tell it without being POFMA'd? Because if they just say, "Well, that's not true," it's very hard to respond to that. Because they have all the access to information and data as well. There's no independent oversight into things like prison or police. So if they say it's not true, then there's not a lot that we can do. So that's a big problem. I think POFMA just adds to that. And I think NGOs that deal with sensitive topics like sex workers, or LGBT people have to grapple with that as well. (interview, 2021)*

Arbitrary and politically motivated enforcement of laws and prosecution is another concern. For example, it has been argued that Sri Lanka's ICCPR Act has been used to target religious minorities, while members of the Buddhist clergy who have made incendiary statements have not been prosecuted (Mahamoor 2019). Qadaruddin Shishir from Bangladesh observed: "If I am a normal citizen or a journalist, if some website writes some random fake news about me, [I can] go to the police and report my case, but there will be no action against those perpetrators, criminals or those information spreaders. But if I am [highly] connected, to a political party or government people, then I can have a remedy" (interview, 2021).

Lack of genuine public consultation about such laws is another issue. Shmyla Khan of the Digital Rights Foundation recalled the public consultations around the cybercrime law in Pakistan:

> *We had written input, but there were also in-person consultations. Meetings were called in Islamabad, [and] civil society had access to some of them. For example, the Minister of IT was present at some of the meetings. We did have access to high-level [officials] at the government's meetings, and some consultations we did on our own. For example, we had certain senators or members of the national assembly attending who were sympathetic to a civil-society-led consultation. They could come in and see what the trends were and a lot of them did raise objections, [which] we talked about later on. But that was a small minority of lawmakers. I think a big issue is [that] the government will invite you for consultations after you make some noise. But eventually, the draft that comes out discards most of what you said. So, there's this question of how do we ensure that those consultations are meaningful, rather than just being an eyewash. (interview, 2021)*

In addition, media regulation legislation can drive up censorship. For example, in the Central Asian region, such regulations have been used to stifle criticism of the government. Censorship contributes to information disorder by limiting people's ability to challenge potentially incorrect information that comes from the state, and to cover up abuses. Serious limitations on the space for civil society have been observed in Cambodia as well, and tight state control on information is exercised in Vietnam and Laos. As illustrated by Table 1 and Table 2 earlier in this report, most of Asia is grappling with limitations on press freedom and freedom of expression and information to varying degrees.

Overall, legal responses to information disorder in Asia have proved highly controversial, as critics have pointed to numerous instances in which such legislation has enabled state overreach and suppression of dissent, while providing cover for state-backed narratives. In addition, it is less clear to what extent this type of legislation in fact assists in combating information disorder. More research to evaluate the effectiveness of these laws would be welcome.[14]

# 4. CHALLENGES IN COUNTERING INFORMATION DISORDER

Actors working to counter information disorder face many challenges. Firstly, they are restricted by the availability of financial resources. Many fact checkers we interviewed talked about how their plans to expand have been curtailed by a lack of funding. Secondly, many fact-checking and journalistic initiatives to counter information disorder are impacted by human resources constraints. This may take the form of not being able to hire skilled and qualified staff due to a lack of funding, the unavailability of trained journalists and fact checkers, or difficulties in finding people with the intrinsic motivation to engage in fact checking.

Fact checkers, journalists, and civil society also face credibility issues. This can be due to perception bias associated with the media and/or negative perceptions of civil society and foreign-funded projects in general. Furthermore, the process of fact checking has its own set of challenges that create problems for fact checkers. There are also platform-specific challenges, such as the nature of direct messaging apps. Expanding the reach and impact of fact checks is a complex challenge, as is dealing with bias and polarization among the public. Finally, we discuss the challenges posed by the role of journalists and the mainstream media.

## 4.1 FUNDING

Fact checkers, journalists, and civil society activists working on information disorder in the region face continuous challenges in securing sustainable funding that not merely supports sections or projects, but that provides overall support covering operational expenses. At the same time, in certain countries in the region, state restrictions on obtaining funding from international organizations and foreign governments limit fact-checking initiatives' opportunities to apply for funding.

### SHORT-TERM AND FOCUSED FUNDING

Funding opportunities tend to be short term and focused on highly specific activities. This makes it difficult for organizations to plan long term and have strategies in place for advocacy. Injina Panthi is involved in South Asia Check, operating from Nepal, which currently receives funding from the OSF. Panthi highlighted the difficulties in dealing with short-term funding and in convincing international donors of the need for fact checking: "Our funding is for this year only, till November. So we are also searching for donors. [Donors] think that [fact checking] is not very important. It's very hard to convince them" (interview, 2021). South Asia Check has also been forced, due to resource restrictions, to limit the types of media channels they target for fact checking. They currently focus on television and newspapers, but not on social media, as their team of four does not have the capacity to comb through social media.

"Donors think that [fact checking] is not very important. It's very hard to convince them" (interview, Panthi, 2021).

In Sri Lanka, Mahoshadi Peiris of Verité Research's Factcheck.lk noted that they need to constantly search for funding opportunities, and that most funding is only for a narrow range of topics:

> *Funding is very difficult to come by. We [are] constantly search[ing] for grants. We've also noticed that sometimes funding [is] for a specific topic, like for fact checking, where all initiatives are focused on debunking things on Covid-19 vaccines. You can secure funding for things like that. We also see that there is funding for specific topics, and not necessarily to sustain a platform even sometimes. (interview, 2021)*

### LIMITATIONS IMPOSED BY LEGISLATION AND REGULATIONS

Shmyla Khan noted that in Pakistan, government regulations are making it harder to access funding for NGOs and civil society organizations and that the government is using indirect threats, surveillance, and monitoring to create an atmosphere of self-censorship: "Often you have to submit yourself to a lot of surveillance, which really is detrimental to your work—especially if it's critical of the state and the government—in order to just receive funding, and it leads to a lot of self-censoring. And there's always a sword hanging over us—that funding can be stopped at any moment" (interview, 2021).

"Often you have to submit yourself to a lot of surveillance, which really is detrimental to your work—especially if it's critical of the state and the government—in order to just receive funding, and it leads to a lot of self-censoring" (interview, Khan, 2021).

Kirsten Han shared similar thoughts on the link between funding and self-censorship. In Singapore, civil society organizations face many obstacles in accessing funding, and there is a lack of understanding about the importance of fact checking and the expenses associated with it. Additionally, certain registration procedures that must be completed in order to operate as an independent media outlet in Singapore may prevent fact checkers from accessing foreign funding. This has led to a situation where most fact-checking initiatives are run by volunteers:

> *It's very difficult for civil society groups that might be seen to be critical of the government to get funding. Some [funders] don't fund you because they're scared; some don't fund you because they don't understand the cost and the value. And if you are an independent media outlet, you probably might already be registered to say that you can't take foreign funding, including grants. Or if you do take foreign funding, that will be used to attack you. (interview, 2021)*

Similarly, according to Duman Smaqov, in Uzbekistan fact-checking operations are restricted by government limitations on transferring foreign funds into the country (interview, 2021).

### SOLUTIONS

Organizations with links to larger media companies or associations fare better, because they have better access to funding opportunities. In Nepal, the Center for Media Research has been forced to take creative measures to solve funding problems. They noticed that fact checking is not an area that attracts the attention of funders; in response, they changed their large-scale funding proposals to include only minor elements of fact checking: "And that [funding] comes not directly for [fact checking], but as a small part of other projects. So what we try to do is to include fact checking as a small component in every project. But it's not direct funding to do fact checking" (interview, Umesh Shrestha, 2021).

Needrup Zangpo of the Bhutan Media Foundation noted that seed money linked to their foundation helps them to maintain operations when funding dries up (interview, 2021). Unfortunately this is not a situation in which many other organizations dealing with information disorder find themselves in.

Sandun Arosha, co-founder and editor-in-chief of Citizen Fact Check in Sri Lanka, spoke about the importance of obtaining IFCN certification as a solution to the limitations in the organization's current operations. They plan to work on obtaining IFCN certification, as it will lead to more funding opportunities which, in turn, will allow them to expand their fact checking from English to also include Sinhala and Tamil (interview, 2021).

## 4.2 HUMAN RESOURCES AND TRAINING

Raisa Wickrematunge emphasized the difficulties faced by Himal Southasian in verifying information in certain languages. This makes it difficult to obtain multiple sources to back up the articles they publish, as sometimes the only reliable source of information on a topic in a certain language is the author or authors of the specific article: "Even though we do have some language capabilities in Sinhala and Tamil, since we are a small team, we don't have capabilities in languages like Dhivehi or Pashto languages" (interview, 2021).

According to Dulamkhorloo Baatar, finding the right kind of human resources goes beyond financial and skills limitations. The Mongolian Fact Checking Center struggles to find the "right people" with the "right mindset" to recruit as fact checkers: "It's difficult to build a team, even when you have the resources or the money to [pay people a] salary. It's very difficult to find the right people with the right heart and right expertise to be part of a fact-checking team" (interview, 2021).

According to Yudhanjaya Wijerathne, Watchdog in Sri Lanka uses volunteers for periods during which a higher amount of fact checking is required. This allows the organization to increase its capacity and work on more fact checks as the situation demands. However, even so, Watchdog faces issues related to human resources. Wijerathne stated that the volunteer model is not sustainable, as people with good skills in fact checking are most often not in a position to provide their services on a volunteer basis (interview, 2021).

Dulamkhorloo Baatar shared a similar sentiment. She acknowledged that fact checkers should come with the "right mindset" and have a sense of social responsibility as part of their work ethic, and she also emphasized that compensation is required if fact checking activities are to be sustainable (interview, 2021).

Bangladesh faces a severe lack of human resources to support fact checking. Fact checkers are a small community in the country and have been trained by two key organizations working on information disorder. One of these is the University of Liberal Arts Bangladesh. Sumon Rahman made the following comments on the issue: "There are no fact checkers in the market. The handful of fact checkers that we have [were] trained by us and another organization. So two or three people are behind all these initiatives. We need to train more people" (interview, 2021).

In addition, Duman Smaqov recalled having to rely on a Ukrainian colleague to learn about fact checking, as it was such a new activity in Kazakhstan (interview, 2021).

## 4.3 CREDIBILITY ISSUES

Fact checkers, journalists, and civil society organizations across the region often encounter attacks on their credibility. Most of these organizations depend on funding from international donors, which affects how the organizations and their actions are perceived by the public and even by governments. There are negative perceptions surrounding international funding and NGOs in many Asian countries (De Coninck et al. 2021). Thus, such organizations are sometimes seen as having vested interests that are opposed to the interests of the countries that they operate in, and of having biases against national governments.

Injina Panthi mentioned that some groups on social media tend to discredit South Asia Check by associating them with a "conspiracy" or an "agenda," because they receive international donor money. She added: "Also, government agencies and politicians are ignorant about fact checking. So it is difficult to explain to them who we are and what we do. Often we have to explain [it to] them" (interview, 2021).

Nalaka Gunawardene mentioned an incident of a prominent government minister in Sri Lanka accusing Factcheck.lk, one of the key fact-checking organizations in Sri Lanka, of being biased towards certain political parties (also see Factcheck.lk 2021): "Udaya Gammanpilla[15] once held an entire press conference to vilify and discredit Factcheck.lk. The thing is, perceptions matter. Even if you are completely careful and ethical, fingers [can still be] pointed at fact-checking individuals or fact-checking entities to undermine their credibility. This is an occupational hazard for fact checkers" (interview, 2021).

> Fact checkers tend to rely on certification from organizations like the IFCN to obtain funding from international sources, as certification gives them more credibility. But a lack of local contextual knowledge and fluency in specific languages among IFCN assessors creates delays in the certification process.

This creates another barrier to obtaining funding. According to Dulamkhorloo Baatar, the Mongolian Fact Checking Center encountered delays in obtaining IFCN certification due to a lack of IFCN accessors who possess both knowledge and expertise on Mongolia and sufficient English-language skills: "They couldn't find a suitable assessor who understood the Mongolian media environment and who spoke good enough English. That's the main reason; it took them four or five months to find that person" (interview, 2021). Oiwan Lam had the following thoughts on the situation: "It was a very slow process. But finally, we got an assessor. We submit[ted] the applications early, maybe end of December 2019. It takes a long time to assess, because I know that in the IFCN there is only one reviewer who is capable of reading Chinese" (interview, 2021).

Qadaruddin Shishir mentioned the impact of negative perceptions of Western countries on their work and how their fact checks are perceived by the public: " I think if people want to accuse us, they can accuse us because the UNDP is a foreign entity. In a country like Bangladesh, 80 to 90 percent of Muslims [are prejudiced] against Western things. They can [claim] that these organizations are serving the causes of Western countries or Western ideologies" (interview, 2021). Ellen Tordesillas, president of VERA Files in the Philippines, noted that the issue of foreign funding has been used to undermine the credibility of fact checkers. The organization has been accused of having ties to the Central Intelligence Agency (CIA) of the USA, as they receive funds from the NED:

> *One of the accusations is that we are foreign funded. When I was being interviewed on radio, the question was, "Are you funded by the NED?" It's a yes or no question. If I said yes, they would say: "See, Ellen Tordesillas admits they are foreign funded." So we had to come out with a statement and information on foreign funding. We said that our funders do not dictate to us what to fact check. And I said we were the ones who applied for the NED grant; the NED did not come and get us. A columnist once asked me: "Do you know that the NED is CIA?" I said, "No, I haven't met [anyone from the] CIA in all these years we've been dealing with the NED." (interview, 2021)*

Funders themselves are aware of the problems associated with maintaining credibility. Jean-Jacques Sahel recommended that fact-checking initiatives try to source multiple donors rather than relying on one or two donors: "I think it could be helpful if you have a collective, [so that there are] several donors. For example, you might have a collaboration between a reputable local organization, like a UN or an ADB or something like that, and the internet companies. So we avoid [a situation where] the scheme [is seen as being] overly influenced by one specific donor." He also added that Google funds projects rather than organizations, to reduce the credibility risks and the perception of dependency (interview, 2021).

Credibility issues are one of the reasons behind the difficulties faced by fact-checking and civil society organizations in obtaining long-term funding to cover their operations. Raisa Wickrematunge pointed out the ramifications of this situation: "It's hard to plan ahead and to [say that] we're going to try to expand by bringing on board more fact checkers, so that we can do this in a more sustained way" (interview, 2021).

## 4.4 CHALLENGES RELATED TO THE FACT-CHECKING PROCESS

There are many challenges inherent in the process of fact checking (Dias and Sippitt 2020). Fact-checking organizations face obstacles in obtaining sources and information due to a lack of sources and fact-checking tools in local languages. They are also constrained by restrictions on access to information imposed by governments. In addition, there are certain types of information that are more difficult to verify. And it must be acknowledged that fact checkers face significant stress and pressure in the course of their work.

### ACCESS TO SOURCES AND INFORMATION

In the context of Asia, access to information and sources is one of the biggest challenges. This problem has multiple facets (Haque et al. 2018). Firstly, certain tools and techniques, such as searching for images on Google and using internet databases, might not be available or useful due to language barriers. Injina Panthi spoke of difficulties in obtaining information when the query is in Nepalese: "Even technology cannot help us to fact check. Most of the time, if we have to search for something that is [related to] Nepal and in the Nepali language, we cannot find [it through] Google. So those kinds of tools and techniques are not useful for us. That is the biggest limitation that we are facing right now" (interview, 2021).

Fact checkers and journalists in many countries of the region face issues in accessing reliable information in some local languages. They also do not have the human resources to fact check in many different languages and dialects. This is a challenge, as mis- or disinformation tends to move not only from one platform to another but also across different geographical regions and languages (Haque et al. 2018; Vashisth 2020).

Panthi noted that South Asia Check has had to give up on fact checking certain articles on social media that were written in Arabic and propagating hate speech, as they lacked the language capabilities and faced problems in verifying and authenticating the information and the photos (interview, 2021). A similar sentiment was shared by Gehan Gunatilleke, a lawyer in Sri Lanka:

> *I do think that some of the more problematic Islamist content that you might get on social media, originating both from outside Sri Lanka*

> *and from within Sri Lanka, might be in Arabic. And I don't know whether that's always picked up that well by fact checkers working in these organizations, because I don't think we have the language capacity. (interview, 2021)*

In Bangladesh, dialects of Bengali pose problems for fact checking on social media, according to Sumon Rahman: "In most cases, misinformation is found in local dialects. And even we don't understand some of them" (interview, 2021).

Secondly, fact checkers sometimes struggle to access the latest data and statistics that are needed to debunk mis- or disinformation. Often this is because government sources or websites do not publish the latest reports and statistics. According to Panthi, South Asia Check in Nepal has faced issues due to organized government data and government websites not containing the latest statistics. This means that fact checkers have to write to or call government officials to verify data, which can lead to delays in publishing fact checks (interview, 2021). Ellen Tordesillas, from the Philippines, shared similar concerns. The speed of publishing a fact-checked article is also affected by the problems in accessing sources: "Access to information is a huge problem, because we have to write/call people and get official statements/official documents. This is not easy" (interview, 2021).

Asel Sooronbaeva spoke of deliberate attempts by the government of Kyrgyzstan to stop journalists from accessing information by making the process unnecessarily difficult (interview, 2021). According to Mahoshadi Peiris from Factcheck.lk, "contradictory government messaging" is an obstacle: "We have multiple state ministries and ministers under the health ministry, and they all say different things [related to Covid-19]" (interview, 2021).

Information from international organizations, on the other hand, is mostly available in English only, which can pose a problem due to language barriers. For example, Dulamkhorloo Baatar discussed the challenges faced in using information about Covid-19 obtained from legitimate sources such as the WHO. Not only fact checkers and journalists but even the Mongolian government have encountered difficulties in translating such information and disseminating it among the public. This has led to an increase in information disorder in relation to Covid-19: "There were occasions when the Ministry of Health misinterpreted some WHO guidelines and a research article published on Lancet and announced [this information] during their official press conference. The main most trustworthy sources for certain topics are in English" (interview, 2021).

## INFORMATION DISORDER ACROSS DIFFERENT PLATFORMS AND LANGUAGES

Mis- or disinformation does not stay on one platform, in one language, or in one geographical region. It tends to mutate, either organically or due to deliberate attempts by agents, and move across platforms, languages, and even countries (Christopoulou 2019; Waghre and Seth 2020). This is a major problem in India due to the inherent complexities of the country. According to H. R. Venkatesh, BOOM India has to fact check the same mis- or disinformation at different times in different local languages: "The same piece of misinformation will prop up in multiple languages, so the moment you've dealt with it in Hindi, it will probably pop up in Bengali; the moment you've dealt with it in Bengali, it will pop up in Punjabi; the moment you've dealt with it in Punjabi, it will pop up in Malayalam" (interview, 2021). Sandun Arosha explained how in Sri Lanka the same message can appear in various forms, creating challenges for fact checkers: "So that [message] came [in the form of] a WhatsApp message. And then it came as a police media release, then an audio message, [but] it's the same thing" (interview, 2021).

> According to Yvonne Chua, fact checking in local dialects is a major problem in the Philippines, as there are so many dialects. Certain politicians, including the president, tend to take advantage of this situation by switching to a dialect in the middle of a speech being delivered in English or Filipino.

This means that journalists and fact checkers are at a disadvantage in fact checking certain parts of the speech—sections which are generally more sensitive/controversial in nature: "We have quite a number of dialects. [This] is really a challenge for fact checkers, I think we're missing out. It would be great to have a fact-checking team with people who know different dialects" (interview, 2021).

## TOOLS AND TECHNIQUES

Challenges in the fact-checking process related to tools and techniques include a lack of access to new tools and techniques and difficulties in debunking certain types of mis- and disinformation (such as images and videos), among others.

If more tools and techniques were accessible to fact checkers in the region they would be able to manage their scarce human resources more efficiently. Qadaruddin Shishir, discussing Bangladesh, had the following comments on the issue: “Any kind of tool that helps to verify any claim or at least [make] manual work [easier would be] appreciated, as fact checking is a very time-consuming process” (interview, 2021). Yudhanjaya Wijerathne pointed out the technical limitations of the tools currently available. The lack of user-friendliness of common tools used in fact checking can limit how much they are being utilized, as most fact checkers come from a journalistic background and only have limited technical knowledge: “A lot of the software that we use in day-to-day life [is] not necessarily cutting-edge. The cutting edge exists, but it takes years and years for people to slap nice interfaces on them, to make them user-friendly” (interview, 2021).

> Fact checkers and journalists face a conundrum when it comes to certain types of information, which are almost impossible to verify (Yatid 2019). These mostly come in the form of long and complex narratives that use multiple techniques to spread false information (Al-Zaman 2021c).

According to Cheryll Ruth Soriano, “there are narratives or stories of falsehoods that are long-winded. Sometimes they flow from one video to another. If you see them as a whole, you [understand] what they’re trying to do to create the particular falsehood. But it’s very hard to flag it as false” (interview, 2021). In such situations, where a straightforward fact check is not feasible, fact checkers give “explainers.” According to a fact checker from an agency in Sri Lanka, who requested to remain anonymous, “explainers are when you can’t directly debunk a story, when you can’t take a straightforward approach. Most of the time, these are misleading narratives. You try to explain what has actually happened, or the true picture of the stories, and how the narrative has been slightly twisted” (interview, 2021). Ayesha Binte Towhid added the following regarding the situation in Bangladesh: “A lot [of what] we see in Bangladesh is image-based misinformation, so it becomes really difficult to debunk. At times, the images are so carefully manipulated that at first glance you wouldn’t be able to debunk it” (interview, 2021).

### EMOTIONAL AND PSYCHOLOGICAL STRESS FACED BY FACT CHECKERS

Dilrukshi Handunnetti, from the Center for Investigative Reporting in Sri Lanka, spoke about the additional pressures created by the Covid-19 pandemic. She noted that journalists and fact checkers are under severe pressure and stress due to constantly having to deal with negative information associated with Covid-19. The stress of maintaining their own health and safety while performing their work is a new type of stress that journalists and fact checkers are facing due to the pandemic:

> *A lot of journalists do reach out and say I just can’t take it anymore. I’ve never seen this kind of emotional impact, not even during the years of war. We are always worried about a colleague testing positive and the entire newsroom [being] disrupted or being exposed to the virus, or indirectly exposing your family to the virus because you went on assignment. (interview, 2021)*

## 4.5 PLATFORM-SPECIFIC CHALLENGES IN FACT CHECKING

In some cases, the structure of a platform itself is not conducive to fact checking. For example, direct messaging platforms such as WhatsApp use end-to-end encryption, and therefore cannot be searched the way more public platforms can be. During the interviews we conducted, many fact checkers noted that checking mis- or disinformation that spreads via direct messaging apps is difficult. Elin Yunita Kristanti described the method used by Liputan6 to fact check on WhatsApp:

> *Our strategy is to create WhatsApp groups. We have fifteen WhatsApp group in ten regions in Indonesia, with 2,000-plus members. On a daily basis [they] inform us of suspicious information that [is] circulated in their private WhatsApp groups. After the verification has been done, we publish the article on our portal. We also distribute the article to our members and the members will spread the [corrected] articles on the WhatsApp groups. And we also have the WhatsApp chat bot. (interview, 2021)*

Kristanti observed that sometimes spreaders of false information jump to direct messaging apps to evade fact checkers:

> *They have so many accounts, Facebook groups, and [they] even use several websites to spread*

> *fake news. They produce it, they spread it, and they have so many accounts, so we cannot identify a particular website or a Facebook group to monitor them. And when the fact checker debunks information on Facebook, or in a WhatsApp group, they move to Telegram. (interview, 2021)*

It was also observed that YouTube videos are difficult to fact check because of length and because of the way they present narratives: "The length of the videos, the language [are challenges], but also linguistic creativity, the cultural complexity of understanding the content," observes Cheryll Ruth Soriano from the Philippines (interview, 2021). Hence, it is much harder to fact check a narrative than discrete statements.

## 4.6 REACH AND IMPACT MEASUREMENT: FACT CHECKING, MEDIA LITERACY PROGRAMS

### EXPANDING REACH

All types of stakeholders working to counter information disorder acknowledge that creating a level of engagement with the fact check that is equal to that of the original piece of information is very difficult. Raisa Wickrematunge, for example, noted that creating the same level of impact and dissemination as the original news item containing elements of information disorder is rarely possible (interview, 2021).

Fact checkers and journalists also face difficulties in reaching groups who have limited access to different sources of information (including online sources) and lack the skills required to navigate the complex world of news and information (Carnahan and Bergan 2021).

Amar Gunatilleke from the Marga Institute mentioned how difficult it is to create a conversation on social media around a post. They sometimes have to resort to creating an artificial debate in the comments section to get the attention of the audience: "Comments are very low on social media unless we curate the conversation, where we have two people and we have a debate about something. [We] have [something resembling] a dog fight and that [will] make people come in and comment" (interview, 2021).

Another problem is creating fact checks fast enough so that the public is still interested in the topic or news by the time the correction is published, while maintaining high standards of reporting (Pomares and Guzmán 2021). Ujjwal Acharya and Umesh Shrestha acknowledged this: "One thing that we have to be very honest [about] is that fact checks do not have the impact that we want [them] to have. Because most of the time, by the time we publish the fact checks, the heated discussion phase has passed on that issue" (interview, Umesh Shrestha, 2021). Many fact checkers constantly walk a thin line between publishing fact checks fast so that they are relevant to the news cycle and still providing strong analysis with credible sources.

> Most of the time, by the time we publish the fact checks, the heated discussion phase has passed on that issue (interview, Umesh Shrestha, 2021).

Another challenge in terms of the reach of fact checks is reaching people who are not active online, as internet and social media use in the region is relatively low compared to developed countries (Zainudeen and Amarasinghe 2019). Harshana Silva stressed the importance of connecting with such people, especially the older generation, who generally access news on traditional media channels (interview, 2021). Mahoshadi Peiris pointed out the strategy that Factcheck.lk uses: "In terms of overcoming the barrier of access to the internet, our solution is to partner with media that can publish our fact check, which is what we have done with *Daily Mirror* and the *'Ada' Sinhala* newspaper publication" (interview, 2021).

### DEALING WITH AUDIENCE BIASES AND PERCEPTIONS

Fact checkers have to deal with how the allegiances and belief systems of the audience affect the way in which they interpret a fact check. Jason Cabañes pointed out that in the Philippines, fact checking has become a political activity, and people's willingness to accept a correction often depends on their political affiliations. For example, a supporter of the current administration of the country would rather consider a fact-checked news item to be a conspiracy against the government than acknowledge the facts presented. It is therefore very important to understand the audience and to adapt the communication methods used accordingly (interview, 2021).

Harshana Silva mentioned that countering information disorder requires that fact checks be attention grabbing. Even though a fact check of an image might require a lengthy explanation, it is important to structure it in such a way that the target audience will pay attention to it (interview, 2021). Md. Mahbubur Rahman (Mahbub Roni), a fact checker from Bangladesh, shared a similar view, namely that fact checks should not look like technical reports but be written in simple language so that the public can easily understand the content: "Fact-checking reports are sometimes very complex, and many people don't understand it easily. I think fact-checking reports should also be reader-friendly and easy [to read]" (interview, 2021).

Amar Gunatilleke highlighted an issue unique to social media platforms that can narrow the reach of fact checks. As the algorithms that are used by these platforms to disseminate information tend to target profiles that share similarities, there is a possibility that only a specific group of social media users will be exposed to fact checks (interview, 2021).

### MEASURING IMPACT

A common theme across the region is the lack of a systematic approach to analyze the reach and impact of fact checks. Jean-Jacques Sahel noted the unavailability of comprehensive but simple metrics that could be used for impact measurement, and stressed the importance of developing such mechanisms: "I think it would be very difficult to find a metric that is generic enough to give us a sense of how much progress we are making" (interview, 2021).

Jhalak M. Kakkar, executive director of the Center for Communication Governance at the National Law University, Delhi, commented: "What we struggle to understand as researchers analyzing these issues is how effective these strategies are at combating the problem. And I think more access to information on how these measures are being implemented on platforms and insights on what the impact is on information flows on platforms would be useful" (interview, 2021).

A common theme across the region is the lack of a systematic approach to analyze the reach and impact of fact checks.

## 4.7 CONFIRMATION BIAS AND POLARIZATION

Many different types of stakeholders are taking measures to counter information disorder. However, in order to mitigate the issues that arise from information disorder, it is essential that the end user and the general public understand the concepts and ever-changing landscape of news and media (Cheng et al. 2020). Carol Soon, senior research fellow at the Institute of Policy Studies, National University of Singapore, pointed out that the effectiveness of all such measures depends on the level of awareness and agency expressed by the general public: "At the end of the day, there's only [so much that] governments, tech companies, and educators can do. Ultimately I think the responsibility does lie with end users" (interview, 2021).

On the other hand, even individuals who are knowledgeable regarding information disorder and understand the importance of verification and fact checking still have certain blind spots when it comes to topics that are sensitive in nature and/or that have an emotional connotation for them (Tsfati et al. 2020). H. R. Venkatesh pointed out that topics that relate to an individual's identity can "short circuit" the way information is processed (interview, 2021). Religion, race, culture, and nationalist pride are a few of the common "blind spots" observed throughout the region. Gayatri Khandhadai of the APC provided an example of how this can manifest:

> *In an extremely polarized Sri Lankan context or an extremely polarized Indian context, if I heard something like "Muslims are going around spitting on purpose to spread coronavirus," my logical mind may know already that this is untrue or that it is an overdramatization, in the worst-case scenario. But, I want this to be true. There is an emotional component and there is a historical and contextual component to it, which fact checking cannot address. (interview, 2021)*

Similarly, Dr. N. Tamilselvi explained the challenges she faced in debunking a particular article on the use of traditional medicines as a cure for Covid-19:

> *They also take it very personally when it comes to anything [related to] their beliefs, like anything that is cultural, anything that is religious, or anything that is traditional. For example, [that] turmeric can cure Covid-19 was a false claim made. So, when we discussed that topic, many people argued that we [were] against tradition and that we [were] trying to promote some English [Western] medicines. (interview, 2021)*

In order to successfully tackle the challenges of information disorder, all stakeholders must understand that human reactions to news stories are not governed by facts and figures only, but also by the emotions associated with the news (Tsfati et al. 2020). Therefore, countering information disorder cannot consist of merely countering false information with facts and figures; conversations that address emotions also need to occur.

Jason Cabañes noted: "You really need to listen to these people and see what their stories are, and you need to connect your message to them" (interview, 2021). Gayatri Khandhadai also stressed the value of tone when communicating: "When you put forward fact checking with a tone of 'Here, you idiots,' it's of no use. There is an emotional conversation that is happening around it. And there is no point in addressing fact checking without addressing that emotion" (interview, 2021).

## ECHO CHAMBERS, CONFIRMATION BIAS, FILTER BUBBLES, AND POLARIZATION

The concept of "echo chambers" refers to an environment where an individual only encounters news, opinions, and information that support their own narratives and belief systems (Villa, Pasi, and Viviani 2021). Echo chambers lead to confirmation bias, where the individual only believes in narratives that support their beliefs and opinions (Wardle and Derakhshan 2017).

Vigneswara Ilavarasan spoke about an example of confirmation bias that perpetuates information disorder along religious and racial divides in India. He explained the bias evident in the way that different TV channels report on religious gatherings of Hindus and Muslims: Depending on the bias, the narrative presented would either praise the religious gathering or accuse the event of spreading Covid-19 (interview, 2021).

Echo chambers can exist in both offline and online environments. But digital or online echo chambers have a higher tendency to support confirmation bias, with people being unprepared to or unwilling to discuss complex topics that go against their narratives. Digital echo chambers that revolve around social media are far more efficient that offline echo chambers in creating closed-off environments that promote information disorder (Bârgăoanu et al. 2019; Meel and Vishwakarma 2020).

Further, social media and the online world in general easily create filter bubbles, a type of echo chamber created by algorithms that track a person's online behavior and customize what that person encounters based on previous online behavioral patterns (Christopoulou 2019). This can increase the chances of an individual falling into the trap of confirmation bias and remaining unaware of content and ideas that oppose their point of view on a topic.

Gehan Gunatilleke explained how this can manifest by using Covid-19 vaccine hesitancy as an example:

> *A lot of average people are quick to forward something that reaffirms their biases. So, if someone's having doubts about the effectiveness of vaccines, or whether vaccines can be dangerous, and they get some crazy forward from their uncle [which] resonates with what they're already suspecting, they're [going to] say, "Yeah, I knew this," and then forward [it] to another hundred people. So I think this awareness doesn't necessarily stop people from spreading false content. (interview, 2021)*

Echo chambers fuel polarization in societies, as due to a lack of exposure to multiple points of view people are not made aware of different perspectives on a particular topic. Rema Rajeshwari noted that this fuels racial, religious, and caste-based discrimination in India, as it promotes negative stereotypes (interview, 2021). Polarization can also limit constructive public discourse, which is essential for healthy democracies (Damasceno 2021).

## LACK OF TRUST IN JOURNALISTS AND FACT CHECKERS

In many countries in the region, there is a general distrust of traditional means of obtaining news and information, such as through TV or newspapers. This leads to lack of trust in journalists and fact checkers, and has an impact on how fact checks and the credibility of journalists and fact checkers are perceived by society (Balod and Hameleers 2019).

> In many countries in the region, there is a general distrust of traditional means of obtaining news and information, such as through TV or newspapers.

Sometimes, there are legitimate reasons for this tendency, as mistakes made by mainstream media have been brought to the public's attention more than ever before because of the internet and social media. However, social media have also contributed to the issue, as explained by Ayesha Binte Towhid:

> *For many people, there is a kind of discomfort with the mainstream media. However, [on] alternative media platforms there are plenty of fascinating conspiracy theories [to] which they feel emotionally attached. This often leads people to doubt if the mainstream media [are] hiding information and question why [they are] not covering all the news trending on social media. This makes them fall for the misinformation and disinformation they see on Facebook or receive via WhatsApp. (interview, 2021)*

According to Yvonne Chua, in the Philippines,

> *Some in the general public tend to brand traditional media as disinformation or fake news. Even if it's an honest mistake, you will see some people or [especially] some netizens automatically branding traditional media as fake news. And that has partly to do with the playbook*

> *that is pretty much like the US playbook that Trump pushed. (interview, 2021)*

### LACK OF UNDERSTANDING OF THE MEDIA, INFORMATION MANIPULATION, AND THE INTERNET

Many people are not able to distinguish between trusted news sources and official or unofficial campaigns that promote information disorder (Bradshaw and Howard 2017). Therefore, many unknowingly support the spread of mis- or disinformation backed by echo chambers and filter bubbles. This behavior is common across different strata of society.

As both Needrup Zangpo, from the Bhutan Media Foundation, and Ankuran Dutta, associate professor and head of the Department of Communication and Journalism of Gauhati University, India, pointed out during their respective interviews, one cannot say that a higher level of education or socio-economic status acts as a deterrent of information disorder (interview, 2021). Jo-Ann Ding mentioned that in Malaysia older generations are influenced by their trust in print media: “Because the older generation are so used to reading the news in print, when it is in written form, somehow it carries weight: ‘Oh, someone took the time to write this down. So it must be true.’” (interview, 2021).

Jun Sakamoto posited that there are generational differences in online behavior and in how information disorder is perceived. Younger generations tend to have a better grasp of the differences between various kinds of news creators or sources on social media, whereas older people tend to trust all different types of content creators equally (interview, 2021).

In contrast, Yudhanjaya Wijerathne argued that older people tend to have the maturity to understand the possibility of manipulation in a news item they receive, while the younger generations “will instantly respond to something with rage and anger and frustration, and spam that into multiple groups to disseminate that anger and frustration” (interview, 2021).

Further, many people from the older generations exhibit the tendency to trust any information they receive from “trusted sources.” This category can include traditional media, social media platforms, or influencers on social media and, more importantly, specific individuals in a person’s social circle (such as relatives, colleagues, and friends) who are considered to be respected individuals in society. There is also a lack of understanding about the gravity of information disorder and that sharing information without verifying it can lead to negative consequences (Cheng et al. 2020). Pirongrong Ramasoota, professor of communication in the Faculty of Communication Arts at Chulalongkorn University, explained:

> *People are less cautious about sharing disinformation or misinformation in closed circles. Firstly, because they feel that it is a more reliable network of friends or acquaintances. Secondly, because this kind of grouping will tend towards an echo chamber of like-minded individuals, so members tend to be ideologically shaped and biased. (interview, 2021)*

The Covid-19 pandemic has also brought information disorder to the fore in many public discussions, and the importance of trusted information sources is recognized by many people. The pandemic has stimulated conversations around the process of information evaluation among the public. Prior to the pandemic, the general public had less interest in the topic, as it had less direct impact on their day-to-day lives (Haroon et al. 2021; Nasir, Baequni, and Nurmansyah 2020). But now, as Dilrukshi Handunnetti from Sri Lanka stated, a larger portion of the population is beginning to pay attention to the topic, as information disorder related to Covid-19 can lead to life-or-death situations (interview, 2021).

## 4.8 THE ROLE OF JOURNALISTS AND MAINSTREAM MEDIA

Mainstream media play both an active and a passive role in the dissemination and amplification of information disorder (Schuldt 2021). (Their role as sources of information disorder has been discussed earlier in this report.) As Gehan Gunatilleke from Sri Lanka stressed:

> *We do have genuinely bad behavior that can be attributed to mainstream media channels. They have been disseminators of fake news and dis-information on numerous occasions. And I think that could disrupt our trust in the media over the long term. The citizen needs to be able to trust*

> *the media, because the media is ultimately the fourth estate of our democracy. So we really need the media to do its job. (interview, 2021)*

## THE IMPACT OF CHANGES IN THE MEDIA LANDSCAPE

Constant changes in the information and media ecosystem creates uncertainty and challenges for journalists and mainstream media, including newspapers, TV, and radio. They are faced with a changing landscape that requires them to evolve their processes and techniques in order to stay ahead of the curve (Posetti and Matthews 2018).

The structure of the media industry is changing, with the demarcation between mainstream media and digital media becoming less clear, to the point where the two fields sometimes even converge. This has brought more competition to the industry, pushing some journalists and media organizations to prioritize fast outputs over quality journalism (Lăzăroiu 2009). Dulamkhorloo Baatar noted that "even professional journalists are increasingly not provided with enough time to cross check" (interview, 2021).

Traditional media can be far too slow in understanding the changes that need to be made for journalists to do their work. As H. R. Venkatesh explained,

> *the media do not realize that the information landscape has shifted and there is a very real need for fact checks that are geared specifically to disinformation or misinformation. That's why we have these fact-checking organizations come up; there was a real opportunity for them to come up because they were essentially servicing a need that was not being fulfilled by traditional media organizations. (interview, 2021)*

The need to maintain a readership or viewership by grabbing the attention of the public through sensational news items, which is generally linked to the erosion of media ethics, also has a role to play. This has demotivated journalists and encouraged them to look for more financially lucrative and exciting work opportunities outside of mainstream media organizations. As media organizations struggle to survive, they also face problems with talent retention. Prabesh Subedi of the Digital Media Foundation in Nepal explained:

> *Now, journalists do not enjoy the walk-in media houses, because pay is low and job security is not that sustainable. So they [want] to start their own projects (with two or three journalists). They start their own YouTube channel, they [launch] their own newspaper portal. That's why the big media institutions [are lacking] in quality manpower, and that is also contributing to [traditional media] producing low-quality content. (interview, 2021)*

Similarly, Needrup Zangpo spoke about how the Bhutan Media Foundation is "finding it very difficult to pay the staff. Talented people come in, they test the waters for some time, and [then] they feel quite insecure and they leave" (interview, 2021).

## THREATS BY GOVERNMENTS, REGULATORY PRESSURES, AND RESTRICTIONS

Governments in Asian countries tend to use both direct and indirect ways to restrict access to information and limit the ability of journalists and media to bring correct information to the public. This can take the form of laws and regulations, bullying and intimidation, or restrictions on access to information (Haciyakupoglu et al. 2021). The overall impact of legislation, regulations, and the political environment on information disorder has been analyzed in various sections of this report. Here the focus will be on the impact of those elements on journalists.

> Journalists have faced bullying, smear campaigns, and death threats. Media organizations and journalists also tend to get portrayed as "anti-government" and "anti-nationalistic" when they report news stories that are critical of the government or that tarnish the reputation of rulers of a country (Colomina, Margalef, and Youngs 2021; Vitug 2021).

Vadim Sadonshoev, country project director of Internews, mentioned that slander and defamation laws are used in Tajikistan to shut down media, while security services or unknown individuals have threatened and attacked journalists (interview, 2021). Raisa Wickrematunge explained that Himal Southasian had to switch their operational base from Nepal to Sri Lanka due to legal and regulatory pressure in Nepal (interview, 2021) (also see *The Hindu* 2016; Srinivasan 2016). Yvonne Chua noted that in the Philippines, "attacks on your person or your institution, threats, physical threats or physical harm, and bullying" of journalists are common (interview, 2021). Cheryll Ruth Soriano added that "some [journalists] are really intimidated, because when you speak openly or try to correct a narrative, you can be branded as a communist" (interview, 2021). Mong Palatino explained that "any independent information can be instantly equated with anti-state propaganda. If you are deviating from the official narrative, you can be accused of promoting anti-state propaganda, especially in the case of Vietnam" (interview, 2021).

Governments can also hinder independent journalism through limitations and restrictions on access to information and legitimate sources (Access Now 2021b). This can be done through bureaucracy and "red tape," which demotivates journalists and prevents them from accessing reliable sources (Dwyer 2019). As a result, journalists tend to shy away from certain topics or publish information that is not credible. As Jo-Ann Ding from Malaysia explained, "[Journalists] have to beg and borrow. You have to go from department to department, from person to person, within the government setup to get data" (interview, 2021).

## SELF-CENSORSHIP

Another major challenge faced by media and journalists is self-censorship (Wardle and Derakhshan 2017). This behavior can manifest in many ways and is generally linked to pressure from the government and/or political parties.

Cultures of self-censorship trickle down from senior editors to the rest of the journalists in media organizations, creating pressure regarding which narratives and stories to follow. Consequently, laws and regulations that restrict media freedom become less needed, as the industry has a mechanism of self-censorship in place (Oh, Ryu, and Park 2020).

> In Singapore, traditional media organizations have adopted a culture of self-censorship that is essential for their survival within the media landscape of the country.

As Kirsten Han mentioned, "I think POFMA just adds to that. What happens if you're saying something, and the state just says: 'That's not true.' And then you get POFMA'd? What can you do?" (interview, 2021). Similarly, in Indonesia, journalists and even the public tend to self-censor due to fears of imprisonment. Roy Thaniago of Remotivi noted: "I think [people] now tend to be more self-censoring on what they write" (interview, 2021). Vadim Sadonshoev added that self-censorship is highly prevalent among journalists and media organizations in Tajikistan. This prevents them from covering sensitive topics (interview, 2021). Needrup Zangpo noted that, in Bhutan, "self-censorship is mostly exercised in areas like religion, ethnicity, regionalism" (interview, 2021).

## POLITICAL AFFILIATIONS OF MEDIA COMPANIES

The media industries in many countries of the region are characterized by political affiliations, ranging from direct ownership of media organizations to indirect relationships between politicians and the owners or top executives of media companies. Such environments lead to a lack of impartiality and transparency in reporting practices, while creating a sense of distrust towards mainstream media among the general public (Yee 2017). According to Roy Thaniago, in Indonesia, "some editors and journalists keep their editorial positions while at the same time running political campaigns. They then leave the editorial position once they are elected or given a governmental position by the winning party. I don't know how they separate their job in the media and their job in politics" (interview, 2021).

In some countries the problems are linked to the core structure and profit-making mechanisms of the industry. When governments play a significant role in funding and advertising on mainstream media, media companies depend on the actions of the government for their survival. This makes them more biased in their reporting, thus affecting their credibility. It even sometimes leads to situations where their political connections cause them to actively spread mis- or disinformation.

As Gi Woong Yun explained, the media industry in South Korea is highly dependent on government advertising: "The Korean government has been subsidizing media corporations, for instance by buying media time for government campaigns" (interview, 2021). Needrup Zangpo explained that the newspaper industry of Bhutan, which relies on government advertising, has grown smaller and weaker as the government has cut down on spending. This has led to trust and credibility issues, as the public no longer believe in mainstream media's role as a watchdog (interview, 2021). Finally, Lola Islamova reported that state media in Uzbekistan do not have editorial independence, as they fully depend on government funding. They therefore cannot criticize the government or question their policies (interview, 2021).

### CHALLENGES: GENDER, RELIGION

Journalists and media organizations that focus on issues of marginalized communities—and the journalists themselves that belong to such groups—face additional challenges. Female journalists tend to face gender-based discrimination and violence, sometimes even amounting to death threats (Judson 2021).

As Shahindha Ismail from the Maldivian Democracy Network (MDN) explained, she and a colleague became the victims of harassment campaigns on both mainstream and social media due to their work on human rights and women's and girls' rights in the context of religious radicalism, including gender equality, child marriage, and female genital mutilation (FGM). The most recent and most vicious attacks were around a research report: "Although the report was co-authored by two women and two men, the two women were often singled out ([and this] continues today) both on mainstream media and social media. Distorted pictures of the two women [were plastered] on all platforms repeatedly" (interview, 2021).

## 5. RECOMMENDATIONS

The following issues need to receive attention in order to tackle information disorder and help respondents expand their work:

- **Funding:** Organizations in the region working on countering information disorder are significantly hamstrung by a lack of funds. As most of the organizations are dependent on international donors, the funding landscape determines what types of projects and activities are given priority. This does not always match the reality on the ground in a given country. Therefore, funders need to focus on understanding the nuances in the region and the differences between countries. Funding tends to be short term and project driven, making it difficult for these organizations to make long-term plans of action. Core funding grants should be considered more frequently.
- **Certification:** Some fact-checking organizations in the region have faced substantial barriers in obtaining IFCN certification, which would provide them with many benefits while giving them credibility. These challenges can be addressed by expanding the verification resource pool representing the region for IFCN certification and providing a more affordable fee structure.
- **Technological tools and techniques:** Fact checkers and journalists dealing with local languages struggle with a lack of tools that can be used to work with these languages. They are thus unable to benefit from technology that could make their processes more efficient. Consideration must be given to improving the local-language capabilities of tools and techniques that have been created to counter information disorder.
- **Measuring impact:** A common challenge experienced by countries in the region working against information disorder is the measurement of reach and impact. Fact checkers do not have a strong mechanism to analyze how their corrections impact the way that the public analyzes information. Similarly, the long-term impact of media literacy programs in changing behavior has been underexplored. Long-term collaboration between academia and practitioners in the field must be encouraged to facilitate the development of practical criteria for the measurement of reach and impact.
- **Media/digital literacy:** In the Asian region, countries need to implement nationwide, systemic approaches to enhancing the media and digital literacy of the general public in order to strengthen the fight against information disorder. These programs should target groups such as journalists, school children, and vulnerable communities.
- **Collaboration between actors:** To successfully combat information disorder, collaborative action is required from all types of actors involved. Fact checkers need the mass media to take their message to a wider audience. The government should involve civil society, legal experts, and journalists when drafting laws and regulations governing information disorder. Platforms and governments must work together to stop information disorder from tainting elections or inducing violence. Platforms and traditional media must work together to ensure that the cross-platform spread of mis- or disinformation is limited or prevented.
- **Legal responses:** Legislators need to tread carefully when drafting legislation that seeks to address information disorder, especially through regulating content, to ensure that freedom of expression is protected. Overly invasive and poorly defined laws which go too far in criminalizing speech lead to censorship, which in itself is a driver of information disorder. Further, a question to consider is whether legislation even has a place in regulating content to address information disorder in the first place.

# PART 2
# ACADEMIC OVERVIEW

## 1. INTRODUCTION

This part of the report reviews the literature on different aspects of the phenomenon of information disorder, with a focus on Asia. Academic literature and publications from globally recognized institutes and organizations have been taken into consideration. One hundred and fifty-six studies, covering twenty-five countries, have been considered in this review.

The studies that have been reviewed use either quantitative or qualitative methods, depending on the theme of the study. Many case studies explaining the developments in the region have also been considered. Mixed methods and content analysis are commonly used as research approaches. The topic of information disorder has been approached from various perspectives, including media studies, political science, cognitive science, and computer science. India, the Philippines, Indonesia, Myanmar, and Japan are among the countries that have received a lot of attention from scholars, while countries such as Laos, Brunei, Timor-Leste, and Mongolia have received less.

The remainder of this review is divided into three sections. The first discusses literature on the ecosystem of information disorder in the region, the second explores the literature on actions taken to counter the problem, and the third section summarizes the current research gaps in the field.

## 2. THE ECOSYSTEM OF INFORMATION DISORDER

### 2.1 FRAMEWORKS

Scholars in the Asian region mainly rely on frameworks developed in other parts of the world to study the phenomenon, as there are no broad conceptual frameworks on the topic that have emerged from the region. “Fake news,” “misinformation,” “false information,” “hoaxes,” and “rumors” are terms used often in research in the region (Banerjee and Haque 2018; Kamplean 2020). The Council of Europe’s report on information disorder (Wardle and Derakhshan 2017) is used in a considerable amount of research (Banadaraike et al. 2021; Kamei 2021; Krishna 2021; Waghre and Seth 2020). This framework uses the dimensions of harm and falseness to distinguish between three types of information disorder: disinformation, misinformation, and malinformation.

### 2.2 TYPOLOGIES AND THEMES

While some unique themes related to information disorder are found in specific Asian countries, there are also many common themes. The main themes related to information disorder prevalent in the region are politics, health, and entertainment

(Al-Zaman 2021c; Vashisth 2020). Al-Zaman and Akbar (2020) investigated social media rumors in Bangladesh and identified the main themes as being politics, health, education, crime, human rights, religious, religio-political issues, and entertainment. In Japan, stories dealing with natural disasters, such as tsunamis and earthquakes, tend to stimulate the creation of highly publicized mis- and disinformation (Owen, Ogasahara, and Kiyohara 2020).

> In a qualitative study of information disorder on WhatsApp in India, Banaji and Bhat (2020) propose the following typology of dis- and/or misinformation: overwhelming content, nationalism/ethno-religious bigotry, religious themes or ethno-religious bigotry, gender, and miscellaneous.

In a multi-country study by Kaur et al. (2018), different manifestations of information disorder are highlighted. This study provides case studies on India, Indonesia, Japan, the Philippines, Singapore, South Korea, and Taiwan, illustrating how some of the complexities within Asia leads to different "fake news problems."

Many attempts have been made to research contextual factors that influence information disorder ecosystems in the region. Kaur et al. (2018) argue that it is important to consider the impact of the culture, history, politics, economy, education, levels of digital adoption, technology trends, media law, and press systems of countries in the Asia-Pacific when analyzing information disorder in the region. In a qualitative study based on key informant interviews, Carson and Fallon (2021) highlight similar trends in Singapore and Indonesia.

Some studies have dealt with the impact of a country's political landscape on mis- and disinformation. Corcoran, Crowley, and Davis (2019) identified a typology of political disinformation based on case studies focusing on Taiwan and South Korea. The three classes are foreign influence operations, domestic partisan conflict, and suppression of political opposition. In Malaysia, Myanmar, and Thailand, "racist propaganda," "information operations," and "negative campaigning" have been identified as forms of disinformation and hate speech used in systematic manipulative political communication. Cultural elements and the volatile contexts found in these countries also influence these phenomena (Neo 2021; Radue 2019).

## 2.3 FORMS AND TYPES OF INFORMATION DISORDER

Mis- and disinformation can exist in many different forms. Al-Zaman (2021c) identified eight types of "fake news" content on social media in India: text; photos; audio and video; text and photos; text and video; photos and video; and text, photos, and video. In a study of misinformation on WhatsApp and misinformation in the form of images, Garimella and Eckles (2020) found that misinformation in the form of images is highly prevalent on WhatsApp public groups, while tactics such as taking images out of context or photoshopping images and memes are commonly used to spread misinformation in India.

Hate speech is another form of information disorder that is highly prevalent and studied in the region. Meedan has highlighted that mis- and disinformation filled with hatred towards minorities, anti-Asian sentiments (for example by linking the novel coronavirus to China), and political agendas are common topics in the region (Alexander 2020). By means of an anthropological approach, Ivarsson (2019) discusses the important role played by social media in advancing ethno-nationalistic agendas and spreading hate speech in Sri Lanka.

Online disinformation and hate speech can lead to violence and disastrous events. Al-Zaman (2019) uses Bangladesh as a case study to show how digital disinformation can contribute to communalism. Based on a case study analysis including India and Myanmar, Young, Swamy, and Danks (2018) suggest common factors in instances where hate speech and disinformation could result in physical harm. They list the following as active factors that spread disinformation: the normalization of violence through abusive online content, the leveraging of existing fears and societal divisions via manipulative content, and complicity or ineffectiveness of powerful groups (for example, technology companies that were slow and unenthusiastic to remove or moderate hate speech and disinformation on social media platforms). They also introduce the virality of social media posts and a lack of source transparency as "background factors."

## 2.4 CONTRIBUTORS TO INFORMATION DISORDER

A wide variety of factors have been identified as contributors to information disorder in Asia, especially in the realms of social and other digital media. The influence of users and their behavior patterns in accelerating information disorder has been studied using different methodologies, including content analysis, quantitative methods, and qualitative methods with different focus points. Gill and Rojas (2020) argue that the culture and media landscape of Asia can create the optimal conditions for fake news.

Soon and Goh (2021) describe four types of information users in Singapore based on their susceptibility to false information: "informationally disengaged," "informationally overconfident," "informationally diffident," and "informationally savvy." These scholars identify traits such as high self-efficacy, high digital literacy, low confirmation bias, and high knowledge as reducing susceptibility to false information.

A survey of nine provinces in Indonesia found that people with higher levels of education and better access to information are not necessarily more able to identify hoaxes and misinformation (Nadzir, Seftiani, and Permana 2019). According to Al-Zaman (2019), the factors involved in the successful identification of digital mis- or disinformation are demographic factors (education, socialization, social orientation, and income), culture and beliefs (nature of beliefs, religious motivation, and practices), political atmosphere and politicians (the role or significance of religion in politics, and morality among politicians), and digital knowhow (reach of digital culture, nature and number of digital dwellers, and sources of information). Digital divides, income inequalities, the thriving disinformation industry, and deep-seated public narratives that originate offline have been identified as common challenges in Southeast Asia (Gianan 2020).

## 2.5 PUBLIC PERCEPTIONS OF AND BEHAVIOR RELATED TO INFORMATION DISORDER

Public perceptions of "fake news," mis- and disinformation, and the various techniques of countering information disorder have been studied by various scholars. Based on a quantitative study of English-language internet users in India, Neyazi, Kalogeropoulos, and Nielsen (2021) found that concern with misinformation is positively associated with WhatsApp use, political party identification, and trust in news. Al-Zaman (2021a) conducted a quantitative content analysis of social media users' reactions to religious disinformation in Bangladesh and found that most users react emotionally rather than reasonably. In the same study, Al-Zaman also identified the existence of "hate spin," a systematic process of cornering minorities in online and offline environments. Through using an experimental research design in Indonesia, Rustan (2020) explored the consequences of online conformity in terms of how people respond to fake news. Cheng et al. (2020) conducted an empirical study of public opinion regarding the regulation of fake news in Japan, South Korea, and Thailand. They found that in Japan and South Korea, the perceived harm of fake news increases support for regulating it, while people in these countries who use fact-checking websites tend to be less supportive of fake news regulation. However, these findings do not hold true in Thailand. The authors imply that this phenomenon is only applicable to countries with high levels of democracy and freedom of expression. A survey in India also found that the general public support the introduction of policies and regulations to control fake news on social media (Raj and Goswami 2020).

> A survey in India also found that the general public support the introduction of policies and regulations to control fake news on social media (Raj and Goswami 2020).

Tandoc et al. (2018), based on an analysis of relevant literature and open-ended survey responses from 2,501 Singaporeans, developed a conceptual framework to understand how individuals authenticate the information they encounter on social media. This framework is based on a two-step authentication process. The first step constitutes internal acts of authentication, which refers to an individual's initial encounter with news on social media. Individuals rely on three main authentication framings: the self, the source, and the message. If the individual is satisfied with the authenticity of the information, the process stops; if not, it proceeds to the second step, which is external acts of authentication. These external validation strategies can be either interpersonal or institutional. Interpersonal strategies refer to consulting one's own network of social media friends, and institutional strategies to consulting sources characterized by formal hierarchies and organization, such as news outlets.

Sultana and Fussell (2021) note the differences in how people in the Global South interpret events compared to people in the Global North. These scholars found that people in the Global South tend to interpret events subjectively and contextually. This tendency, along with a lack of access to fact-checking resources, creates conditions (such as communal practices of deciphering the truth, and the impact of local myths) that are understudied in the region.

## 2.6 THE ROLE OF MEDIA AND JOURNALISTS

Multiple facets of the role of media and journalists in the region have been studied. It is evident that media (online as well as mainstream) and journalists play a dual role in the spread of information disorder.

On the one hand, mainstream media play a vital role in all three phases of information disorder: creation, production, and distribution (Banadaraike et al. 2021). Krishna (2021) identified four sources of false information: peer-to-peer messaging; social media; websites, blogs, or independent online publishing; and traditional news media. Al-Zaman and Akbar (2020) state that online media and mainstream media are the main sources of social media rumors in Bangladesh. Mainstream media have been seen to make use of social media not only to spread fake news but also to promote hyper-nationalism and divisive politics (Alkawaz and Khan 2020).

Mainstream media play a vital role in all three phases of information disorder: creation, production, and distribution (Banadaraike et al. 2021).

On the other hand, media and journalists have been seen to play a role in countering mis- and disinformation. For example, in a qualitative study of the different roles played by journalists in the Philippines in countering mis- and disinformation, the role of disseminator of corrected information is found to be the most important. While journalists face many challenges in enacting this role, they also see the rise in mis- and disinformation both as an opportunity and as a challenge for the journalism sector to overcome (Balod and Hameleers 2019).

## 2.7 THE ROLE OF SOCIAL MEDIA

Similarly, social media play a dual role in the realm of information disorder, in that these media both promote and counter its spread. Many studies on social media and information disorder have focused on Facebook, WhatsApp, and Twitter. A study published by the ISEAS-Yusof Ishak Institute identified the role played by social media in spreading disinformation and "fake news" through case studies from Southeast Asia. The case studies discuss the role of turbulent domestic politics coupled with negative campaigning in the spread of online disinformation in the region, contributing to the growth of the "disinformation industry" (Sinpeng and Tapsell 2020).

Gianan (2020) reports on case studies from Myanmar, the Philippines, and Indonesia and discusses the role played by social media companies as public spheres in which sociopolitical discourses take place. The study also discusses actions taken by different stakeholders and provides recommendations. Kyaw (2019) has studied the role played by Facebook as the key source of news and information and a platform of hate speech and fake news, and its efforts to counter disinformation through content moderation and deletion. On a similar note, Schulman (2019) discusses the spread of disinformation in relation to the decline of internet freedom and the monopolization of the internet by Facebook in Myanmar.

Banerjee and Haque (2018) discuss the use of Facebook messenger, WhatsApp, and Twitter to spread fake news that led to violence in India, and reveal that few actions have been taken by social media companies to curtail fake news. Khurana and Kumar (2018) used an analytical modeling approach to describe the dynamics of the spreading of fake news on WhatsApp in India, and propose a model to compare mis- and disinformation dynamics on this platform. Banaji and Bhat (2020, 24) discuss information disorder in India in terms of transmediality, which refers to phenomena "that unfold across multiple media platforms, with each text making a distinctive and valuable contribution to the whole" (Jenkins 2008, 95–96), and intertextuality, which refers to the ways in which "each text is an intersection with other texts where at least one other text can be read" (Kristeva 1980, 66).

The role of social media in countering information disorder has intensified in light of the Covid-19 pandemic. Nguyen and Nguyen (2020) illustrate the amplification of information about the risks of Covid-19 on social media in Vietnam through the spread of mis- and disinformation. A study based on WhatsApp in Pakistan found that mis- and disinformation on Covid-19 had a longer lifespan compared to other types of messages on the same topic (Javed et al. 2020). In India, social media platforms have altered information flows, funded fact checkers and journalists, made changes in their user interfaces (UI), and modified or developed policies to counter information disorder related to the Covid-19 pandemic (Waghre and Seth 2020). Krishna (2021) also found that corporations have taken to moderating content more actively due to the pandemic.

## 2.8 THE ROLE OF POLITICS AND ELECTIONS

As mentioned above, in Asia, information disorder is strongly linked to politics. Politicians have been found to be involved in organized disinformation campaigns in various forms throughout the region. Organized disinformation campaigns associated with politicians or with political motives can be based on general principles of advertising and public relations and tend to be a hyperextension of corporate marketing practices (Ong and Cabañes 2019b). Das and Schroeder (2020), in a study of key informant interviews, found that ordinary citizens in India are highly aware of disinformation campaigns connected to politicians and elections.

The Philippines has been a popular country for case studies among researchers studying this element of information disorder. Ong and Cabañes (2019b) analyzed disinformation producers employed in digital black ops campaigns in the Philippines. These scholars approach disinformation as a culture of production and discuss the social conditions (including identity, motivation, labor, and morality) that entice people to become disinformation producers. Similarly, Ong, Tapsell, and Curato (2019) explain that digital disinformation campaigns around elections in the Philippines are becoming more organized and strategic. These campaigns operate underground but exercise significant power in shaping political conversations in the country. According to Ong and Cabañes (2019a), organizations dealing with political trolling in the Philippines employ four models: the state-sponsored model, the in-house staff model, the advertising and public relations model, and the clickbait model. The roles played by different actors, and by digital disinformation producers, are also discussed by Ong and Cabañes (2019a).

Seon-gyu and Mi-ran (2020) discuss the various producers and distributors of fake news in the 2017 South Korean elections and their impact on voting behavior. Using social network analysis and in-depth interviews as research methods, Jalli and Idris (2019, 138) discuss the use of fake news for “strategic communication by cyber armies employed by political parties” in elections in Malaysia and Indonesia. Haciyakupoglu (2018) points out the need for reforming the conduct of politicians and promoting non-partisan journalistic practices to curb the politicization of “fake news” in Malaysia.

## 2.9 COVID-19 AND INFORMATION DISORDER

Since the start of the Covid-19 pandemic, it has been one of the main topics about which mis- and disinformation have been spread (Ali, Khalid, and Zahid 2021; Al-Zaman 2021b; Atmakuri and Attanayake 2020). This has also led to a great deal of research on the ecosystems of mis- and disinformation related to Covid-19 (Nasir, Baequni, and Nurmansyah 2020; Rafi 2020; Rodrigues and Xu 2020; Yusof et al. 2020; Zainul and Said 2020). Common themes in online mis- and disinformation related to Covid-19 in Bangladesh have been identified by Al-Zaman (2021b).

One research sector in this regard is the study of interventions that can be used to counter mis- and disinformation related to Covid-19. The Institute of Strategic and International Studies (ISIS) in Malaysia identified four interventions as key policy options to address vaccine-related false information: promoting good information on vaccines and the vaccination process, pre-bunking[16] and debunking vaccine-related false information, removing content, and instituting punitive measures to deter vaccine-related disinformation (Zainul and Chua 2021).

> Using content analysis, Song, Ko, and Jang (2021) studied the South Korean government’s responses to the Covid-19 pandemic and the related infodemic. They found that the government had to contend with mis- and disinformation related to both medical issues and policies.

Ahmad et al. (2021) used quantitative methods to study the spread of fake news on WhatsApp during the Covid-19 pandemic. They found that most respondents check the authenticity of news, and that they mostly share news related to Covid-19 on WhatsApp groups and through status updates.

The pandemic has also sparked the use of computer science perspectives to study information disorder, even though such studies are still limited in the Global South compared to the Global North. For example, based on transfer learning and using natural language processing techniques in Thai, Mookdarsanit and Mookdarsanit (2021) analyzed fake news detection in Thai text. They propose a Thai Covid-19 fake news detection mechanism based on word relations using transfer learning models.

# 3. ACTIONS TO COUNTER INFORMATION DISORDER

Actions to counter information disorder should be customized based on age, social class, race, religion, education level, and English literacy (Soon and Goh 2021). Commonly studied actions to counter information disorder include media/digital literacy, fact checking, policies implemented by social media platforms, and state policies and regulations.

## 3.1 MEDIA AND DIGITAL LITERACY

Media and digital literacy is one of the key tools in combating information disorder and deserves more attention in the region, as victims of information disorder tend to have low media literacy (Bali and Desai 2019; Jalli and Idris 2019; Yatid 2019). Digital literacy programs in the region need to focus on developing people's "soft skills" and ensuring that countering information disorder happens at an individual level. This especially applies to closed communication channels, such as instant messaging platforms (Soon and Goh 2021). Chatterjee and Pal (2019) address the need for and complexities of developing digital literacy programs to cater to both the news producers or publishers and the news consumers of India. These authors stress the need to create awareness of the dynamics of digital media operations and the roles played by various interest groups. Bhaskaran, Mishra, and Nair (2017) discuss the unique challenges faced in India in promoting media literacy, including inactive regulators and outdated journalism curricula. They also highlight that even though the majority of social media users in India are urban and have a certain level of media literacy, the lack of understanding of the differences in content creation between traditional and social media is a challenge. Mis- and disinformation related to Covid-19 have magnified the need for social media education to ensure the public is prepared to face a crisis while abiding by the international legal regulations on internet governance (Rafi 2020).

Bhaskaran, Mishra, and Nair (2017) highlight that even though the majority of social media users in India are urban and have a certain level of media literacy, the lack of understanding of the differences in content creation between traditional and social media is a challenge.

## 3.2 FACT CHECKING

Fact checking is one of the most popular actions to counter information disorder. Yet, even in comparatively developed countries in Asia, such as Japan, Singapore, and South Korea, the media structure and culture do not stress the need for information verification (Kaur et al. 2018).

In designing fact-checking mechanisms, the social, economic, and political dimensions that influence information disorder have to be considered. In terms of the effectiveness of fact checking, Cabañes (2020) discusses the role of the imaginative dimension in countering disinformation without overemphasizing the importance of the information dimension. He states that "this means being able to identify not only the broader social narratives with which fake news and political trolling online resonate, but also to understand the forces that are shaping them" (2020, 13). The use of "deep stories" to counter disinformation and connect with people through the same social narratives used to spread disinformation is also noted by Cabañes (2020). Hochschild (2016, 3) defines deep stories as "stories that people tell themselves about who they are, what values they hold, and, ultimately, what their place in society is."

Impartiality and the effectiveness of fact-checking operations have received considerable attention from academics in the region. Fujishiro, Mimizuka, and Saito (2020), based on a qualitative study of a 2018 local gubernatorial election in Japan's Okinawa Prefecture, identified two problems related to fact checking done by media organizations in Japan. Firstly, not enough attention is paid to the "hidden" agendas promoted by the disseminators of fake news. Secondly, there is a bias towards a left-leaning ideology. The study characterizes the disseminators of false content during this election as groups with xenophobic attitudes, especially towards China and South Korea. The need for political impartiality in fact checking, and the importance of understanding the "real issues" behind the false content, is highlighted in the paper.

Yatid (2019) recommends improving two-way communication between the public and fact checkers, using multiple languages for communication, involving different stakeholders to debunk false information, and using AI to flag "fake news" as strategies to counter mis- and disinformation in Malaysia. According to a mixed-methods study on fake news practices around disasters in Indonesia by Kwanda and Lin (2020), news organizations tend to use government statements to debunk fake news related to factual, scientific topics, whereas fake news on political or religious matters tends to create debates among different groups. The study also found that independent media have more balanced and diverse views, while the culture within Indonesian newsrooms, including levels of journalistic professionalism and organizational policies, affects how fake news is handled. Vashisth (2020) studied fact checks published by Newschecker in India and describes the role of authoritative sources, including the Indian government, experts, and media houses, in spreading mis- and disinformation.

Case studies have also focused on the processes and methods used by fact-checking operations, and the use of technology to improve fact checking. Haque et al. (2020) followed a multi-stakeholder approach using both qualitative and quantitative research methods and identified the need for improved communication between journalists and fact checkers in Bangladesh to better tackle online mis- and disinformation. They also recommend the development of infrastructure and computational tools to facilitate such collaboration and communication. Based on in-depth interviews in Bangladesh, India, and Nepal, Haque et al. (2018) identified a lack of machine-learning and AI tools built for local languages, a lack of searchable digital archives, and political pressure as challenges faced by fact-checking initiatives in the South Asian region.

Mohammad (2019) discusses the use of the co-curricular apprenticeship model as an operational model for fact-checking initiatives to achieve economic sustainability without focusing only on donor funding or crowd funding. FactWatch,[17] a university-based fact-checking initiative in Bangladesh, run by the Media Studies and Journalism Department of the University of Liberal Arts Bangladesh, is used as a case study.

Fact checkers in the Global South lack the support provided in the Global North by tools and technologies developed for a Northern context, as such tools and technologies are not fully compatible with the assumptions and values of other regions. It is therefore important to consider the ways that local communities interact with mis- and disinformation when designing tools (Sultana and Fussell 2021).

## 3.3 POLICY AND REGULATORY TOOLS AND APPROACHES

Governments across the region have made efforts to use regulations on data protection, internet content, and digital security to counter information disorder (Park and Youm 2019; Soon 2015). Such laws and regulations tend to increase threats to freedom of expression and encourage the harassment of journalists and the targeting of political opponents and marginalized communities (Alexander 2020; Daud and Zulhuda 2020; Sinpeng et al. 2021). The rise of government-backed disinformation can have policy impacts on a global scale (Boté-Vericad 2020; Corcoran, Crowley, and Davis 2019). Government actions have the potential to restrict free expression and may target journalists, advocates, writers, activists, and media entities (Dwyer 2019; FMA, Cyrilla, and APC 2020). On the other hand, the rise of the internet and social media has drastically altered the control governments have in shaping public discussion (Goh and Soon 2019).

Guest, Firdaus, and Danan (2021) discuss cases studies from India, Indonesia, Malaysia, and Singapore and conclude that “fake news” policies—those introduced by governments and those of social media and messaging platforms—are failing to stop mis- and disinformation related to Covid-19 in the region. On the other hand, in some countries in Asia there is “public appetite” for government interventions to stop fake news (Horowitz 2019).

It has been argued that governments should use a combination of penal and non-penal deterrents to curtail hate speech online (Lewerissa 2018). Cooray (2020) discusses the need to have regulations covering “fake news” that would not harm freedom of expression in Sri Lanka. Singapore’s POFMA is cited as an example, and legislation connecting relevant agencies is recommended. Ahn (2020), through a case study on South Korea, found that governmental monitoring, regulation of platforms, and criminalization of offenders are used to regulate disinformation. The impact of these measures on freedom of expression is also highlighted. Smith and Perry (2020) studied the use of cybercrime legislation in Thailand to prosecute the spreading of “fake news.” They found that lese-majeste legislation and anti-defamation laws are used to unfairly prosecute critics of the government or of private enterprises and they recommend legislative and administrative actions to solve the problem.

A study covering Cambodia, India, Myanmar, Pakistan, and Thailand found that all these countries use multiple legal provisions to target a single offense, and that online "offenses" are given harsher punishments than offline ones (APC 2017). Neo (2019) used the case of the Singaporean government to show how the securitization of fake news has been used to consolidate political power, control social media, and censor criticism of the government. In Vietnam, authorities have abused the legal system to violate the rights to free expression, opinion, and information online while applying pressure on technology companies to comply with their demands for online censorship through the imposition of onerous rules and penalties. The Covid-19 pandemic has created conditions that support such behavior (Dang 2021). In a study by Schuldt (2021), it is observed that state-operated fact-checking websites in Malaysia, Singapore, and Thailand are used by the state to control discourses around fake news that prepare the ground for restrictive legislation. Based on a qualitative analysis of twenty-four countries in the Asia-Pacific, Neo (2021) explains pathways taken by governments to crack down on "fake news" and indicates that legislation is not the optimal solution in cases where the government is motivated by political considerations.

Asia Centre (2020) identified the need to improve hate speech regulation in Southeast Asia to include hate speech against migrants, refugees, and sexual minorities, while adding that social media companies need to be given clear guidelines by governments on what qualifies as hate speech. Lohani (2021) recommends that India's regulatory framework be changed through implementing an all-stakeholder mode of regulation in order to counter hate speech and fake news online. The creation of a movement to counter anxiety and fear among the public and the power of this civil movement in creating public pressure on government has also been discussed (Nguyen and Nguyen 2020).

Internet shutdowns are noted as another tool used by governments with the pretext of stopping the spread of mis- and disinformation and hate speech. According to the #KeepItOn report on internet shutdowns in 2019, India, Pakistan, Myanmar, Indonesia, and Tajikistan are some of the countries in the region where internet shutdowns are common (Taye and Access Now 2019).

Ong and Cabañes (2018) highlight the need for self-regulation in journalism; inclusive oversight committees that include media, journalists, academics, and social platforms; and openness and transparency on the part of social media platforms in order to address digital disinformation.

# 4. GAPS IN THE RESEARCH

This review has provided a synthesis of the literature on the topic of information disorder in Asia. It is important to note that the Asia-Pacific region has unique features and patterns related to information disorder. The differences between countries in the region in terms of cultural context, mobile internet usage, reliance on direct messaging applications, and volatile political and media landscapes can be cited as examples. Therefore, research on definitions, frameworks, actors, and strategies in countering information disorder should be analyzed from an Asian perspective.

Country- or region-specific factors that contribute to unique research perspectives include people's perceptions of events, their attitudes towards regulations governing freedom of expression, the regulation of media and social media platforms, and people's attitudes towards foreign platforms and actors working in the sector (Carson and Fallon 2021). Such studies can contribute to the expansion of current conceptual frameworks and/or the development of new frameworks that consider regional factors.

> The emergence of digital media platforms and social media platforms, sometimes even overshadowing traditional media, is currently in progress in many countries of the region. This phenomenon, combined with the behavior of the producers, distributors, and consumers of information on direct messaging platforms, calls for further research.

There is also a lack of academic analysis of the actions that have been taken by social media platforms to counter information disorder. The methods commonly used by social media companies, such as content moderation, content removal, and updates to algorithms, have been identified. However, there is a lack of academic studies focusing on the actions of social media platforms in Asia to counter specific challenges.

Changes in perception and/or behavior among the general population due to fact checking and media literacy programs is another area that calls for further research, as is the effectiveness of civil society participation in countering information disorder in Asia.

Some of our interviewees posited that there may be generational differences, educational divides, and rural/urban divides when it comes to the propensity to believe and share mis- and disinformation. However, it has been difficult to find definitive research on the subject, and this would be an important area for future study.

The complex information scenarios found in the world today are replete with mis- and disinformation, and this affects advertising and marketing communications in multiple ways (Chaturvedi Thota, Song, and Biswas 2012; Visentin, Pizzi, and Pichierri 2019). Many studies in the field of information disorder have neglected to focus on the Global South.

Future research in the field of information disorder should cover avenues such as history, media communication, education, psychology, philosophy, health, economics, and the environment (Bran et al. 2021). Concepts such as the distortion and manipulation of narratives, the impact of social media manipulation on newer platforms such as TikTok, and the influence of exposure to mis- and disinformation on the development and behavior of children and young adults, are areas that are ripe for further research in the region.

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# LIST OF INTERVIEWS

All interviews were conducted during June to August 2021, via Zoom or Google Meet, unless otherwise specified.

- Acharya, Ujjwal. Nepal Fact Check
- Arosha, Sandun. Citizen Fact Check, Sri Lanka
- Aryal, Babu Ram. Forum for Digital Equality, Nepal
- Aung, Htaike Htaike. Myanmar ICT for Development Organization, Myanmar
- Baatar, Dulamkhorloo. Mongolian Fact Checking Center
- Cabañes, Jason. Professor of communication and research fellow, Department of Communication, De La Salle University, Philippines
- Chak, Sopheap. Executive director, Cambodian Center for Human Rights
- Chima, Raman Jit Singh. Asia-Pacific director and senior international counsel, Access Now
- Cho, Taeksoo. News reporter, Joongang Tongyang Broadcasting Company (JTBC), South Korea
- Chou, Yuntsai (Jessica). Professor, Yuan Ze University, Taiwan

- Chua, Yvonne. Associate professor of journalism, University of the Philippines, Diliman
- Ding, Jo-Ann. Centre for Independent Journalism, Malaysia
- Doorov, Torokul. Director of Azattyq, the Kazakh-language service of Radio Free Europe/Radio Liberty (RFE/RL), Kazakhstan
- Drahn, Peter. The Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH, Germany
- Dutta, Ankuran. Gauhati University, India
- Gul, Imtiaz. Center for Research and Security Studies (CRSS), Pakistan
- Gunatilleke, Amar. Marga Institute, Sri Lanka
- Gunatilleke, Gehan. Lawyer, Sri Lanka
- Gunawardene, Nalaka. Science writer and media analyst, Sri Lanka
- Gurumurthy, Anita. Founding member and executive director of IT for Change, India
- Haciyakupoglu, Gulizar. S. Rajaratnam School of International Studies, Nanyang Technological University, Singapore
- Han, Kirsten. Freelance journalist, Singapore
- Handunnetti, Dilrukshi. Center for Investigative Reporting, Sri Lanka
- Hattotuwa, Sanjana. PhD candidate at the University of Otago, New Zealand (interviewed with a focus on Sri Lanka)
- Ilavarasan, Vigneswara. Professor, Department of Management Studies, Indian Institute of Technology Delhi
- Islamova, Lola. Founder, director, and editor of Anhor.uz, Uzbekistan
- Ismail, Shahindha. Maldivian Democracy Network
- Jahangir, Ramsha. Journalist, Pakistan
- Jha, Anoushka. Digital Empowerment Foundation, India
- Kajimoto, Masato. Associate professor of practice, HKU Journalism (the Journalism and Media Studies Centre, the University of Hong Kong)
- Kakkar, Jhalak M. Center for Communication Governance, National Law University, Delhi, India
- Keo, Kounila. Mekhala Radiant Communication, Cambodia
- Khan, Shmyla. Digital Rights Foundation, Pakistan
- Khandhadai, Gayatri. Association for Progressive Communications (APC)
- Kristanti, Elin Yunita. Deputy chief editor and program manager for fact checking, Liputan6, Indonesia
- Lam, Oiwan. Factcheck Lab, and regional editor for Northeast Asia, Global Voices (interviewed with a focus on Hong Kong)
- Lee, JeongHyun. ICTD fellow, United Nations University Institute in Macau (interviewed with a focus on South Korea)
- Maheshwari, Namrata. Asia-Pacific policy counsel, Access Now
- Marda, Vidushi. Lawyer, and senior program officer at Article 19 (interviewed with a focus on India)
- Mimizuka, Kayo. Freelance journalist and member of the Japan Center of Education for Journalists (JCEJ)
- Mirandilla-Santos, Grace. Independent researcher, Philippines
- Myatiev, Ruslan. Editor, Turkmen.news (interviewed with a focus on Turkmenistan)
- Natarajan, Aishwarya. Program manager, TechLaw Policy, Konrad Adenauer Foundation
- Nguyen, Tien Duc. Vietnam Academy of Social Sciences
- Pahwa, Nikhil. Journalist and founder of MediaNama, India
- Palatino, Mong. Regional editor for South East Asia, Global Voices. Former member of the Philippines House of Representatives
- Pangerapan, Semuel. Director-General of Application and Informatics, Indonesian Ministry of Communication and Informatics (Kominfo) (via email)
- Pant, Laxman Datt. Media Action Nepal
- Panthi, Injina. South Asia Check, Nepal
- Paranamanna, Lakna. AFP Fact Check, Sri Lanka
- Peiris, Mahoshadi. Factcheck.lk by Verité Research, Sri Lanka
- Rahman, Md. Mahbubur. (Mahbub Roni) *The Daily Campus* and *The Daily Ittefaq*, Bangladesh
- Rahman, Sumon. University of Liberal Arts Bangladesh (ULAB)
- Rajeshwari, Rema. Officer, Indian Police Service
- Ramanujam, Pavitra. APC
- Ramasoota, Pirongrong. Professor of communication, Faculty of Communication Arts, Chulalongkorn University, Thailand
- Representatives from Media Center for National Development/Fact Research, Sri Lanka
- Rohman, Ibrahim Kholilul. Lecturer on digital economics, Faculty of Economics and Business, University of Indonesia
- Sadonshoev, Vadim. Country project director, Internews, Tajikistan
- Sahel, Jean-Jacques. Asia-Pacific Information policy lead at Google
- Sakamoto, Jun. Hosei University, Japan (via email)
- Sarnogoeva, Salkyn. Head of the Department of Information Policy, Ministry of Information, Sports, and Youth Policy, Kyrgyzstan
- Sawhney, Ria Singh. Asia-Pacific policy fellow, Access Now
- Shishir, Qadaruddin. AFP Fact Check, Bangladesh
- Shrestha, Bikram. Nepal Internet Foundation
- Shrestha, Umesh. Center for Media Research, Nepal
- Silva, Harshana. Hashtag Generation, Sri Lanka
- Sivaprakasam, Dhevy. Asia-Pacific policy counsel, Access Now
- Smaqov, Duman. Head and editor, Factcheck.kz, Kazakhstan
- Soehardjo, Juni. Legal and regulatory expert with the Law and Legislation Commission, Dewan Pers (Press Council), Indonesia
- Soon, Carol. Senior research fellow, Institute of Policy Studies, National University of Singapore
- Sooronbaeva, Asel. Journalist, Factcheck.kg/Media Development Center, Kyrgyzstan
- Soriano, Cheryll Ruth. Professor, Department of Communication, De La Salle University, Philippines
- Subedi, Prabesh. Digital Media Foundation, Nepal
- Sultonnazarov, Abohon. Regional director, Institute of War and Peace Reporting (interviewed with a focus on Central Asia)
- Tamilselvi, N. Independent fact checker, India
- Thaniago, Roy. Remotivi, Indonesia
- Tordesillas, Ellen. President, VERA Files, Philippines
- Towhid, Ayesha Binte. Bangladesh Institute of International and Strategic Studies (BIISS)
- Usenova, Begaim. Director, Media Policy Institute, Kyrgyzstan
- Vashisth, Nikita. Former editor and fact checker, Newschecker.in, India
- Venkatesh, H. R. BOOM India
- Vidi, Adyaksa. Fact checker, Liputan6, Indonesia
- Wickrematunge, Raisa. Himal Southasian
- Wijerathne, Yudhanjaya. Watchdog, Sri Lanka
- Yeh, Alvin. Twenty First Century Foundation, Taiwan
- Yun, Gi Woong. University of Nevada, Reno (interviewed with a focus on South Korea)
- Zangpo, Needrup. Bhutan Media Foundation

## NOTES

1. An explanation of the color coding methodology can be found at: https://rsf.org/en/detailed-methodology.
2. All interviews were conducted in English, with the exception of interviews with respondents from Central Asia. These interviews were conducted in Russian and the meeting notes were translated into English by the research team.
3. See https://nepalfactcheck.org/faqs/.
4. https://www.mysansar.com/
5. Twitter Safety, April 2, 2020, 14:00. https://twitter.com/TwitterSafety/status/1245682438174638083.
6. https://wethinkdigital.fb.com/resources/
7. https://newsinitiative.withgoogle.com/intl/en_gb/
8. https://blog.google/threat-analysis-group/
9. https://twitter.com/FakeNews_Buster
10. https://www.gov.sg/factually
11. https://sebenarnya.my/
12. See https://www.gov.bt/covid19/.
13. https://www.hrw.org/
14. See Helm and Nasu (2021) for an example of an article addressing the effectiveness of legislation.
15. A prominent political figure
16. A pre-emptive strategy in which a “watered-down” version of false information is made public, along with an explanation of why the information is inaccurate, in order to prepare viewers or readers for encountering the false information in the media at another point in time.
17. https://www.fact-watch.org/

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