

IMPROVING MEDIA LITERACY CAMPAIGNS ON DISINFORMATION (ERGA REPORT)



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PREFACE

„Media Literacy should be approached as a serious issue for ALL, not just a feel-good term for media & ISP companies. It should not be primarily about technology per se, but about developing ‘civic competence’: it should relate to broader themes like diversity, ethics, sustainability and social inclusion. So, we need to go beyond the kind of morale-boosting rhetoric that tends to dominate the field and act fast and effectively with practical steps. Having said that, we should engage evidence-based research and focus on pushing social media companies for offering more quality content, technical tools (e.g. report buttons) and align with the international regulation & mobility. We need more synergies among governmental and quasi-governmental agencies and application of a regulatory inter-sectoral developmental framework. There is an opportunity to use the challenges created by COVID-19 to good effect since it is apparent that the infodemic wave has led to an information thirst where people relied heavily on social media for stress relief looking for good news but also went back to traditional media looking for accurate information on such a crucial health issue” [Irene Andriopoulou¹].

¹ EC Media Literacy Expert, UNESCO MIL Alliance co-Secretary General

1. THE CODE OF PRACTICE SIGNATORIES' COMMITMENTS REGARDING MEDIA LITERACY CAMPAIGNS AGAINST DISINFORMATION

Media literacy (ML) skills have been widely recognised as one of the most important tools in combatting disinformation, as outlined in the Recital 59 of revised Audiovisual Media services Directive (EU) 2018/1808 (AVMSD):

“In order to enable citizens to access information and to use, critically assess and create media content responsibly and safely, citizens need to possess advanced media literacy skills, Media literacy should not be limited to learning about tools and technologies, but should aim to equip citizens with the critical thinking skills required to exercise judgment, analyse complex realities and recognise the difference between opinion and fact. It is therefore necessary that both media service providers and video-sharing platforms providers, in cooperation with all relevant stakeholders, promote the development of media literacy in all sections of society, for citizens of all ages, and for all media and that progress in that regard is followed closely.”²

According to the Code of Practice on Disinformation (the Code), Signatories commit to partner with civil society, governments, educational institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital media literacy (par. II.D.10).

It seems to be clear that the provisions of the Code have to be read jointly with those of AVMSD, which underlines the importance of media literacy promotion in all sections of society.

² Directive (EU) 2018/1808 of the European Parliament and of the Council of November 14, 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States, relating to the provision of audiovisual media services (Audiovisual Media Services Directive)

2. THE TOPIC OF MEDIA LITERACY CAMPAIGNS IN PREVIOUS ERGA REPORTS

In its final *Report on disinformation: Assessment of the implementation of the Code of Practice*, published in May 2020, the European Regulators Group for Audiovisual Media Services (ERGA) proposed a set of recommendations, aimed at improving the monitoring of the existing Code's commitments, among others, by drafting a set of guidelines for platforms concerning the media literacy campaigns in each country.

In the Report³ ERGA reminds, that *“media literacy is not a skill to be obtained and consistently maintained, but rather is an ever-changing process that requires constant reflection and adaptations. This has to be an ongoing process and [...] for this reason ERGA believes that the efforts made by the Code's signatories to foster media literacy initiatives should be part of a more systematic campaign and should address a much bigger part of the population in the whole national territory. In general, cooperation with the NRAs and with civil society and associations on the planning and conducting phases of the campaigns could be crucial.”*

As ERGA's monitoring activity had revealed, in several countries the Code's signatories have entered into various partnerships with media companies and educational organisations to plan and execute media literacy campaigns. However, these campaigns were involving only a tiny fraction of the total population (mainly journalists, politicians and school teachers), usually concentrated in the main cities. Also, as it was highlighted by some NRAs, in the absence of any data on the uptake and impact of such initiatives provided by the platforms, it was not possible for the monitors to evaluate their efficiency.

According to ERGA's final report, media literacy belongs to the concept of consumer empowerment, as the aim to reduce the spread of disinformation and the aim to help people make informed decisions when they come across online news that may be wrong, are strongly connected. In this perspective, however the focus of the first monitoring was political advertising, through the requirement of better transparency of advertisements and the clear labelling of political material the decision-making ability of the consumers were prioritised. Since the report highlighted the discrepancies in the way the platforms were fulfilling the Code's commitments, it became clear, that the need to better inform the public should become one of major issues for online platforms.

As the report states „the importance of media literacy in developing critical thinking and countering phenomena such as disinformation cannot be highlighted enough. The final report summarized the different discrepancies of media literacy campaigns, therefore ERGA made recommendations to further investigate the issues and shortcomings of such efforts. In order to make the inspection efficient, according to the recommendations of the Report, it became necessary to create a focus-group which would work on more clear statements and proposals. As the Report specifies: “a sets of guidelines should be drafted with the aim to improving the media literacy campaigns in each Country”⁴.

³ ERGA Report on disinformation: Assessment of the implementation of the Code of Practice on Disinformation <https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf>

⁴ p. 50.

3. SUMMARY OF THE ACTIVITIES TAKEN BY THE TEAM

3.1 - INTERVIEWING MEDIA LITERACY EXPERTS

In order to gather all possible ideas and suggestions that might serve for formulating the guidelines, the team has drafted a set of questions which were then shared with media literacy experts from several countries who were chosen following the suggestions of ML work-stream members. The initial idea was to organise an online meeting in the formula of round table, where the invited guests could exchange their views on the subject of media literacy campaigns organised by or with the participation of the Code signatories. Eventually, the event didn't gather many participants, but the input of those who did share their experience and expertise with the team members was very valuable. Several experts who could not participate in the event have provided their remarks in writing.

Questions for the experts:

1. *What should be the features of a good media literacy campaign organized with/by digital platforms in order to fruitfully contribute to combating disinformation?*
2. *What are the institutions / organisations advised for partnership with the platforms to support efforts aimed at improving critical thinking and digital media literacy in the context of disinformation (press bodies, media education organisations, academic organisations, fact checking organisations, consumers' associations)?*
3. *What are the new media actors advised for partnership in organizing media literacy campaigns (bloggers, influencers)?*
4. *Should the guidelines envisage also an element of supporting the educators with training and/or resources?*
5. *What ways of promotion a digital media literacy campaign could have to be visible for the largest possible part of target group (especially elderly people)?*
6. *Could you describe an example of media literacy campaign that you consider efficient and good? Would any elements of such a campaign be useful in drafting the guidelines for the digital media literacy campaigns organised by/ with the signatories of the EU Code of Practice on Disinformation?*
7. *Are there any current media literacy campaigns on disinformation in your country? Are there any campaigns regarding media literacy in public education? What are the focal points of such programmes? Are there any campaigns that connect the civil society with government?*

MEDIA LITERACY EXPERTS INVOLVED:

- **Irene Andriopoulou** - EU media literacy expert, UNESCO GAPMIL Co-Secretary General. Working for EKOME - Research, Studies & Educational Programs Department Audiovisual Archives & Education R&D Directorate. EKOME is a member of i) Media Literacy Expert Group, DG CONNECT, ii) Coalition of Information and Media Users in South East Europe - CIMU SEE and iii) SOMA - Social Observatory for Disinformation and Social Media Analysis.
- **Paulina Barczyszyn-Madziarz PhD** - Assistant Professor at the Department of Social Communication and Journalism at the Institute of Political Sciences at the University of Wrocław. She participated in few international research projects, including Media Accountability and Transparency in Europe (MediaAct) (2010-2013), Journalism in change – professional journalistic cultures in Poland, Russia and Sweden (2011-2014) and European Journalism Observatory (2014-2017). She is the author of articles and chapters of monographs in the field of journalism studies for instance in Series Studies in Communication and Politics of Peter Lang Edition.
- **Michał Kuś PhD**, Assistant Professor at the Department of Social Communication and Journalism, University of Wrocław (Poland). Research interests: media and politics, media regulation.
- **Veronika Pelle** - Assistant Lecturer at the Institute of Communication and Sociology at Corvinus University of Budapest. Expert in Digital Literacy Development at the NMHH. Member of the Educational Authority's expert group on developing a national media literacy measurement tool. She participates in national and international research groups and conferences and, besides having published a number of articles and book chapters, she is the co-author of Médiabefolyásolás – Az új kislexikon (Media Influence – The New Small Encyclopaedia, 2016) and the editor of Developing Media Literacy in Public Education: A Regional Priority in a Mediatized Age (2016), an international conference volume based on a year-long IVF research, mapping the state of media literacy in public education in the V4 region. Her research interests focus on the theory and practice of media and digital literacy as well as formal and informal media education.
- **Prof. Grzegorz Ptaszek** - Member of the Polish Society for Social Communication and the European Communication Research and Education Association (ECREA). President of the Polish Society for Media Education (www.ptem.org.pl), expert of the Ministry of National Education.
- **Prof. Walter Quattrociocchi** - Head of the Laboratory of Data and Complexity at Ca' Foscari University of Venice - Assistant Professor (Tenure Track) in Computer Science (data science, network science, cognitive science, and data-driven modelling of dynamic processes in complex networks. His research interests include data science, network science, cognitive science, and data-driven modelling of dynamic processes in complex networks. His activity focuses on the data-driven modelling of social dynamics such as (mis)information spreading and the emergence of collective phenomena. He is Scientific Advisor of the Italian Communication Authority (AGCOM).

3.2 - SUMMARY OF THE ML EXPERTS' INTERVENTIONS

In the attempt of specifying the subject of discussion the experts were asked to describe the possible features of a good media literacy campaign organised by / with the platforms with the aim of combating disinformation. Most of the respondents were indicating the necessity of defining target group, attracting recipients' attention and then using concrete examples of misinformation in order to show the mechanism to be recognised. So such campaigns should "show and not only tell", "have trendy form", "be based on specific cases from real life" (Veronika Pelle). But from the other side, there is also a danger connected with too big exposition of fake news topic, which may lead to general loss of trust resulting in serious problems in society (Walter Quattrociocchi), especially in the times of crisis.

As far as the suggested cooperation with institutions and organisations is concerned, there was a general agreement, that cooperation with entities involved in media literacy and / or fact-checking is undoubtedly welcome. The Code signatories might profit from the existing initiatives of fact-checking organisations which sometimes provide also offer for schools (in Poland – *Demagog* and its *Akademia Fact-Checkingu*) or train volunteers (*Wojownicy Klawiatury*). "The academia, fact-checking and media education organizations have great potential. Scientists could support efforts to discover the mechanisms of disinformation with their expert knowledge. This potential seems to be underused. Organizations dealing with fact-checking and media education often rely on experts, but also on volunteers who willingly pass on the knowledge obtained during training and organize meetings in schools, clubs, etc. I think that scientists and representatives of organizations working to raise media competences could become valuable partners for these platforms" (Paulina Barczyszyn-Madziarz).

The idea of partnership with the new media actors in organising media literacy campaigns has aroused many controversies. On one hand bloggers, influencers and other creators of online content are the new opinion leaders, especially among youth. This fact was at the source of a very interesting initiative in Hungary, where the Star Network Influencer Agency created a so called Influencer Advice Package for influencers to help reliable information spreading in the time of COVID-19. On the other hand, the videobloggers themselves often (knowingly or not) spread disinformation (Michał Kuś), which problem is also connected to the lack of transparency through the content creating and disseminating process. It would be necessary to make the new media actors "realize their huge potential and impact, so that they could act ethically and openly. For example, when they are being paid for an ad (or product placement), this should be clearly stated as such on an obvious space of their channel/account (Instagram, YouTube)" (Irene Andriopoulou). What's more, despite having the potential to reach wide audience, it is not clear if the influencers would show willingness to contribute to raising awareness of new media users about the mechanisms of disinformation and the role of critical thinking.

The Hungarian experience in this regard provides a good perspective. As the research has revealed, the media literacy educators generally have access to manuals, OERs and other

materials intended to support their work. As a good example might serve again the Hungarian initiative called Magic Valley, which on one hand educates students in order to develop their media literacy and on the other hand provides lesson plans and infographics for teachers. At the same time, some NGOs active in this area indicate scarcity of resources and need for extra support. There appeared a suggestion of establishing a fund “to finance activities, e. g. courses, trainings, information campaigns, targeted at various groups of recipients, settled in the announced competitions. At present, media platforms cooperate only with selected entities on the basis of bilateral contacts. In the case of announcing open competitions, there is a greater chance of reaching larger group of recipients with appropriate educational programmes, especially when this type of subject may be not co-financed from public funds within some EU countries” (Grzegorz Ptaszek). Another kind of support for ML educators could be observed in some countries, where during lock-down the educational institutions were cooperating with public media entities.

One of the biggest challenges, in the opinion of interviewed experts, is the question how to reach the widest possible range of target groups in society, especially the elderly people. “Research shows that this is a group where there are known gaps in media literacy, but most projects still focus on young people. To some extent, the so-called third age universities sometimes provide courses in media literacy, but this is certainly not enough. Perhaps in this case one should think about cooperation with journalists well known to this age group” (Paulina Barczyszyn-Madziarz). In order to reach this target group it would be necessary “to search, analyze and make use of the media outlets/pages/groups they mostly use on social media as well as engage local administration resources and public and private institutions” (Irene Andriopoulou). The good example of such an attitude can be the workshops organized by Microsoft for young women and senior citizens in Greece during the EU Code Week or the seminars for senior citizens organized in Czech Republic (<http://nadacnifondklausovych.cz/Seniori-komunikuji-1/>).

3.3 - EXAMPLES OF EFFICIENT AND GOOD MEDIA LITERACY CAMPAIGNS:

- [Amazing mind reader](#) of saferinternetbanking.be on privacy and data consciousness;
- [Love story](#) of Movistar on grooming and fake profiles;
- [Wo Ist Klaus?](#) of klicksafe.de, a joint project of the Central Authority for Media and Communication Rhineland-Palatinate (LMK) and the Media Authority of NRW;
- [Keep It Real Online](#) of the New Zealand government on online bullying, grooming, pornography, media aggression and video gaming;
- [Say No! – A campaign against online sexual coercion and extortion of children](#) of EUROPOL on sextortion;
- [#nemvagyegyedül](#) – cyberbullying campaign of UNICEF;
- [Hozzájárulás nélkül \(Without consent\)](#) – a screencast campaign film of students of Corvinus University of Budapest and NMHH on sharing content without permission;
- [PARA campaign](#) of NMHH's Internet Hotline on various forms of online infringement;
- [Be Media Smart](#), an initiative of Media Literacy Ireland, supported by the BAI has been developed to help people tell the difference between reliable and accurate information and deliberately false or misleading information, calling people to STOP, THINK, CHECK before sharing or posting information online. The campaign initially ran in 2019 and was specifically repeated in 2020 to counter dis- and mis-information relating to Covid-19. The campaign ran across a range of platforms including social media platforms, television, radio and print. The campaign has been shared with NRAs across Europe, some of whom have adapted the campaign for their own needs.
- The transmedia media literacy campaign by CAC- Catalan Authority on Audiovisual during the lock-down and the pandemic. The campaign had a mass reach for all audiences for responsible screen use during the lock-down through 4 videos and 4 radio announcements that were broadcast on TV3, Catalunya Ràdio and social networks. The campaign motto said: STOP, THINK, CHECK and called for responsible digital device and internet use. It also offered recommendation to rely only on official information, to use various media sources to double check information, and not to share information without checking if it's true first.
- <https://akademia.demagog.org.pl/> - educational project addressed to different target groups in an attractive way (lessons, games).
- In Italy regional elections and a national referendum took place on the 20 and 21 of September 2020. As part of the commitments signed by digital platforms with AGCOM to ensure equal access to political subjects during the campaign for the regional elections and the referendum (commitments were in line with Code's rules), Facebook had organized, with the support of

AGCOM, three training meetings, “Training for parties politicians / candidates / referendum committees” which had been broadcast live online. The Italian example also shows the attempt to involve the greatest possible number of recipients of the training course. The trainings for the regional elections had the same content but took place on two different dates to ensure maximum participation of political representatives. The initiative was promoted by AGCOM on its social channels (Telegram, Facebook, Instagram, YouTube etc.) and also on local level by Corecom (Regional committees for communications) that are local organisations for AGCOM. As the law provides, in case of referendum, the political representatives of the two positions (YES OR NOT) had to notify AGCOM their intention to participate in TV and radio political communication programmes and to transmit political messages programmes, indicating their position in favor or against the referendum question. AGCOM publishes the list of representatives on its institutional website with contacts, that can be used by media. In this case AGCOM gave the contact to Facebook that sent the invitation for the trainings directly to all political representatives.

The meetings were finalised to understand how to best use the Facebook and Instagram platforms for political communication; Facebook’s electoral integrity initiatives have been presented, with particular attention to the procedures to ensure the transparency of political and electoral advertising and to good practices in terms of account and pages security. During the trainings, that have been carried out on the BlueJeans platform, the participants had the possibility to interact directly with Facebook experts.

- Another example comes from Iceland and we find it important as it represents the way of evaluating the impact of an initiative made with Facebook. The Icelandic Media Commission was in close contact with Facebook due to the Icelandic awareness campaign on media literacy and COVID-19 disinformation spread on Facebook and Instagram called “Stop – Think – Check”. Facebook supported this Icelandic initiative, which was launched in cooperation with the Directorate of Health and the Icelandic Web of Science, by providing free ad credits for a 4-week-campaign reaching the whole nation. The campaign reached more than 2/3 of the country; in particular it had the best reach among seniors, even though it was directed to all age groups. The Iceland Media Commission engaged an ad agency conducting the campaign for them on Facebook and Instagram. The campaign consisted also of a quiz with five questions on COVID-19 disinformation and a short video as well, which was very important to the young audiences on Instagram.

The estimated reach was 230.000 people (out of 350.000 Icelanders) with more than 2 million views. Through cookies on its website the Media Commission could see how many people had come from the campaign to read more about disinformation on the Media Commission’s website (15.425 page viewers) and how many had tried the online quiz on Covid-19 disinformation (21.898 started the quiz).

3.4 - RESEARCH - SUMMARY OF ACTIVITIES UNDERTAKEN BY THE CODE SIGNATORIES

As it was mentioned before, ERGA's report, published on the 29th of April 2020, summarised the monitoring of the compliance to the provisions of the pillar D of the Code (empowering consumers) conducted by 13 NRAs, which gathered information from the Self-Assessment Reports (SARs) , from third party reports and from their meetings with civil society organisations, associations of consumers and journalists, universities, researchers and fact-checkers (or from their websites).

As a follow-up of this task, ERGA has analysed the media literacy projects carried out during the year 2020, taking information from the platforms' reports provided to the Commission, directly from platforms and received from NRAs. Examination of the reports⁵ provided by the online platform signatories of the Code as part of the COVID-19 monitoring and reporting programme set out in the Communication "Tackling Covid-19 disinformation - Getting the facts right" also brings many interesting elements to the picture of European countries' efforts to counter disinformation.

From the last reports provided by the platforms (August and September 2020) it emerged that Google, Facebook and Twitter mainly promoted media literacy campaigns or activities devoted to empower or defend consumers in the emergency of Covid-19. In particular the campaign launched by Google in Germany deserves attention because of the involvement of the institution (Ministries of Education) to ensure a nationwide diffusion of the campaign. Even though the topic of Covid-19 disinformation is of utmost importance, this report does not take it into account as this topic is covered by another workstream⁶.

The Facebook campaign www.stampoutfalsenews.com is important for the number of the countries involved. In most of the cases the amount of information provided is not sufficient to verify the impact and the spread of the campaigns.

Google reported that it continued to organise News Lab training for journalists, with free workshops live in Dutch, English, French, German, Italian, Polish, Portuguese and Spanish and nearly 10k Europeans taking part in live sessions covering digital verification and data journalism skills since the start of the pandemic. Google also launched a global Journalism Emergency Relief Fund through the Google News Initiative to support small and medium-sized news organisations producing original news for local communities. They have partnered with or supported (via grants from the foundation Google.org) the work of third party organisations that promote media literacy and improve user awareness in the EU countries where they operate: in the **Czech Republic**, Google launched a localised version of Interland, a free online game that helps educate children on online safety; in **France**, two Google.org grantees - Generation Numerique and Observatoire pour la Parentalité et l'Éducation au Numérique - have provided their trainings to debunk fake news and conspiracy theories, through online programme Google Ateliers Numériques - in **Spain** Google and the Prime Minister launched

⁵ <https://ec.europa.eu/digital-single-market/en/news/first-baseline-reports-fighting-covid-19-disinformation-monitoring-programme>

⁶ https://erga-online.eu/?page_id=686.

the media literacy programme for teens ‘Infórmate’ focused on critical thinking as a vaccine against fake news; in **Germany** Google.org funded “Weitklick⁷”, a media literacy project of the Voluntary Self-control for Multimedia Providers (Freiwillige Selbstkontrolle Multimedia-Diensteanbieter, FSM⁸) which focuses on information literacy and misinformation. The project aims to engage with secondary and vocational teachers to help them address misinformation online and its impact on democratic societies in the classroom with a blended learning concept that includes an online platform and digital tools in self-learning courses and modules, online webinar sessions, and offline trainings. To achieve a nationwide implementation the project will work with Ministries of Education to certify the project’s resources along states’ curricula.

Twitter ran a media literacy campaign focused on COVID-19 in partnership with UNESCO and the European Commission and the World Jewish Congress to help people build resilience and assess the information they saw online. Twitter supported the campaign with a \$20,000 Ads for Good grant, a message from EMEA Vice-President Sinead McSweeney, and through their own accounts @TwitterGov and @NonProfits.

Following the rise in COVID-19-related stress and anxiety and the increase in mental health topics being discussed on Twitter, a training was organised for organisations within the German umbrella organisation for mental health “Aktionsbündnis Seelische Gesundheit” on May 20th 2020. More than 40 representatives from 26 different organisations across Germany participated in this training which provided them with insights into using Twitter effectively for their communications and campaigns.

On 8th May 2020, Twitter held a workshop on crisis response on Twitter for the European Emergency Number Association (EENA) and their members (around 40 participants from all over Europe). EENA and their network play a crucial role in disseminating key advice, good practices and emergency resources related to COVID-19 for emergency services.

In August a joint Twitter training session was organised with the Digital Culture Network (DCN works across the UK arts & culture sector), attended by over 100 participants, which was focused on what organisations could be doing on Twitter to help build a more engaged audience, particularly during this challenging period.

Facebook launched the Media Literacy Campaign to Help Spot False News a media literacy campaign in June and August in 56 countries (including all 27 EU member states) and 27 languages to raise awareness and educate people about how to spot potential false news. It had shown up on Facebook through a series of creative adverts, and link to a dedicated website, www.stampoutfalsenews.com. In consultation with some of fact-checking partners, Facebook developed ‘Three questions to help stamp out false news’. More than 1.3 million people in the EU clicked on the campaign and visited the website to learn more about how to identify false news in different countries across the EU.

⁷ <https://www.weitklick.de/ueber-uns>.

⁸ <https://www.fsm.de/en>.

Facebook reported that it also launched a digital literacy programme, Get Digital, to provide lessons and resources to help young people develop the competencies and skills they need to more safely navigate the internet. These resources are designed to be used by educators and families both in the classroom and at home, but they have become even more important as young people spend more time on their devices while at home during the COVID-19 outbreak. The Get Digital website is currently available in English, but will be expanding into other languages, including French, German, Portuguese, Italian, and Spanish, in the coming months.

3.5 - DISINFORMATION CAMPAIGNS IN NUMBERS

The research conducted on the basis of self-assessment reports of the Code's signatories as well as on the basis of input received from several (15)⁹ NRAs is proving that in the 2019 and 2020 some media literacy campaigns and other initiatives took place.

1. Country

ERGA received information about media literacy activities organised by/ with the Code's signatories in 16 EU countries plus Iceland and UK, namely:

- 1) Belgium,
- 2) Czech Republic,
- 3) Croatia,
- 4) Cyprus,
- 5) Denmark,
- 6) France,
- 7) Germany,
- 8) Hungary,
- 9) Iceland¹⁰
- 10) Ireland,
- 11) Italy,
- 12) The Netherlands,
- 13) Poland,
- 14) Portugal,
- 15) Slovakia
- 16) Spain,
- 17) Sweden,
- 18) UK

⁹ Belgium, Croatia, Cyprus, France, Germany, Hungary, Iceland, Ireland, Italy, The Netherlands, Latvia, Portugal, Sweden

¹⁰ In Iceland Facebook ran an awareness campaign about COVID-19 disinformation during the summer of 2020, as mentioned at pag 9. However, despite the frequent attempts made by the Icelandic Media Commission to contact them, Facebook and the other Code's signatories apparently don't consider the Code to be applicable in Iceland. It is worthwhile mentioning that the Code is very clear about its geographic scope: "The application of this Code is limited for each Signatory to services provided in the States that are Contracting Parties to the European Economic Area", that is, the Code applies not only to the EU Member states, but also to the other Countries of the EEA. This issue will be further investigated by ERGA.

Other countries were not mentioned in SARs, didn't respond to ERGA questionnaire of October 2020 or informed on the absence of such initiatives (Latvia).

At the same time some campaigns have been spread in many, not only European countries¹¹:

- three (3) campaigns addressed to users in all EU countries (Google NewsLab, FactCheckEU, GetDigital),
- one (1) initiative addressed to journalists in 32 countries globally (Global Media Literacy Summit),
- one (1) initiative addressed to young people speaking 45 languages around the world (Digital Literacy Library) and
- one (1) initiative devoted to spotting fake news (<https://stampoutfalsenews/>) available in 26 languages globally (Europe, Africa and the Middle East)

2. Target group

- Most of the campaigns and initiatives were addressed to children, young people and/or teachers,
- three initiatives (3) were addressed to journalists (Google News Lab, Global Media Literacy Summit and First Draft News),
- six initiatives were addressed to general public (all the users) – stampOutFalseNews, #CheckFirstThenShare, <https://kallkritikbyran.se>, Climate Science Information Center, #GlobalMILWeek, <https://newsroom.tiktok.com/de-de/sicherheitsvideos>,
- two initiatives were addressed to media literacy practitioners,
- one initiative was addressed to the Danish first-time voters,
- one initiative was addressed to Swedish teachers, MPs and scientists – study visit in California Facebook headquarters,
- one initiative was addressed to vulnerable groups of population (Portugal).

3. Topic

It is not easy to determine the exact number of media literacy initiatives devoted strictly to counter disinformation, as most of them are dealing with broadly understood digital literacy.

¹¹ It should be noted that the global campaigns are not available in all European languages

4. SUMMARY OF THE SHORTCOMINGS IN THE BEHAVIOURS AND IN THE MEASURES ADOPTED BY THE PLATFORMS

We notice with satisfaction several initiatives which fulfil the features of effective activity undertaken in order to combat disinformation like the Trusted News Initiative. However even these unfortunately do not reach audience wide enough.

- The media literacy campaigns or different initiatives designed to counter disinformation have limited reach and do not cover all EU Member States and in many cases the more detailed programmes are not translated in several languages.
- Some valuable ML initiatives developing digital competences among children do not cover lessons dedicated to disinformation recognition.
- In Europe there was no media literacy campaign addressed to elderly people (however one can find information on such a campaign addressed to this target group in US).
- Only in few cases the platforms organised face-to-face training for students, publicists, teachers, etc.; these practices were marginal and did not reach the wider population (especially youngsters).
- The platforms' media literacy activity is centred around the widening of user-friendly options and information pages; however, such functions and sites are hard to spot and do not reach users actively (e. g. context button on Facebook, Digital Literacy Library).
- No interactive or audio-visual web-based campaigns were conducted by the platforms; their own informational pages, tips and guidelines are rarely propagated on the platforms.

5. RECOMMENDATIONS FOR THE IMPROVEMENT OF THE CAMPAIGNS ON DISINFORMATION CARRIED OUT IN COMPLIANCE WITH THE PROVISIONS OF THE CODE OF PRACTICE

The recommendations enlisted below have been formulated on the basis of interviews with media literacy experts as well as on the basis of feedback received from several NRAs. They are of different character. One group enlists the suggested actions and attitude from the side of the Code's signatories. The other one has more general character and is describing the necessary attributes of a media literacy campaign. There are also good advises to platforms (see bullet L), rather practical, which were found important by the interviewees.

In order to achieve satisfying results in combatting disinformation the Code's signatories should:

A. organize or support campaigns to inform and raise awareness among consumers in all the countries where they are providing their services and not in just few of them;

Also whereas there is a welcome engagement from the main three platforms, concerns remain, however, on the depth of that engagement. There is little if any evidence of strategic engagement from platforms in media literacy across Europe. In some countries significant investment from platforms in media literacy initiatives through large-scale programmes can be observed (primarily targeted at young people) which cannot be witnessed in other countries. The campaigns should also be available in the local languages.

B. improve their cooperation/partnership with organisations like press bodies, education organizations, academies, consumers' associations, drawing upon their experience and expertise in order to reach the greatest possible part of the population;

As an example for this kind of initiative might serve the launch of a new Media Education Chair at the Lille Graduate School of Journalism in cooperation with Facebook France. As Facebook explains, this new initiative is a continuation of its commitment to media education, the promotion of critical thinking and the fight against false information, in particular via the Fund for online citizenship.

C. take steps to cooperate with governments, regulatory authorities and relevant state institutions who deal with media literacy in attempt of creating systemic approach to disinformation;

Media literacy initiatives of the Code's signatories should be a part of a more systematic planning that should be prepared in cooperation with governments and relevant state institutions in attempt of creating a systemic approach to disinformation in all EU countries. Such a cooperation would also have the important advantage of creating a common strategy and would bring more uniformity in the campaigns at national level.

As a good example of such a cooperation might serve the courses for elections organised by Facebook in cooperation with the Italian regulator – AGCOM¹² or the Google project which took place in Germany, organised with the Ministries of Education or the Icelandic example.

As set out above, Media Literacy Ireland (MLI) relaunched its Be Media Smart campaign 2020 in the context of Covid-19. Facebook and Twitter, as members of MLI, offered free Ad-credit to non-profit members of MLI to help share the BeMediaSmart message, and also page verification. The campaign has been shared with NRAs and organisations across Europe, offering the potential for effective collaboration on a European Scale.

D. cooperate also with each other with the aim of harmonising their activities and joining and directing efforts aimed at improving consumers' awareness and combating disinformation;

To increase the impact of their campaigns the Code's signatories could use their own infrastructure and tools to display the relevant information to the users of their websites in the audio-visual or visual form with subtitles relating for example to users' news feeds, reminding them that, despite the best efforts of the platform, some content may be false and informing them in a clear and simple way how it is possible to verify the reliability and authenticity of a content, how to distinguish a false content from a real one, and how to react when a user notices a suspicious content or account. To this aim platforms could create and share a list of rules to recognise fake news¹³.

E. Choose carefully the "ambassadors" of the ML campaigns, selecting them on transparent conditions among well-known new media actors (bloggers, influencers), from different age or target groups¹⁴ and from different parts of the Country;

In order to ensure the best possible coverage of ML campaigns and other initiatives undertaken with the goal of combatting disinformation, the Code's signatories should choose their "ambassadors" so that they would be recognised by the relevant age or target group such as:

- elderly people (see bullet F);
- teenagers;
- politicians;
- journalists;
- teachers;
- parents;
- gamers;
- immigrants;

¹² It should be noted that the global campaigns are not available in all European languages

¹³ see for example the Fb project www.stampoutfalsenews.com

¹⁴ <https://www.unicef.org/end-violence/how-to-stop-cyberbullying>

Ideally, these “ambassadors” might belong to different regions of a given Country. In cooperation with the famous new media actors and using the examples provided by them (including their unconscious dissemination of disinformation - but also elements of disinformation affecting them), educational materials with high potential can be prepared, - because they also have knowledge about the best techniques to reach, mainly younger people. An interesting example comes from the platform TikTok in Germany¹⁵ ; TikTok published a series of videos in cooperation with famous TikTok users (like the artist and influencer Chany Dakota with 1,3 million followers) about the safety in using the social media.

F. extend the penetration of the campaign so that a bigger part of the population is reached by it.

In order to achieve satisfying results in combatting disinformation MIL campaigns must be planned by the Code’s signatories in a way which would guarantee their maximum circulation. In particular, ML campaigns should address a much bigger part of the population in the whole national territory, also through activities addressed to different target groups (age/social). This can be done in several ways, for example:

- by combining the off-line campaign with online tools such as workshops and / or easy-to-reach tutorials online¹⁶;
- planning also the rollout of the campaign on linear media, use public and private channels, especially PSB¹⁷.

This concerns above all, reaching the elderly people, who are relatively vulnerable to manipulation and who participate to large extent in spreading disinformation. Good example here might be the Spanish campaign broadcasting videos with actors or other famous people easily recognised by elderly people for the combination of different media - the CAC campaign during the lock-down STOP, THINK, CHECK.

G. plan Media Literacy campaigns on disinformation in a way that might serve as an information gateway to open educational resources - where the users are free to use the modules, class exercises or case studies. A good example here might be the German project “Weitklick” (<https://www.weitklick.de/ueber-uns>) funded by Google or the French campaign of the Génération numérique «Les complots rigolos»¹⁸ as well as the project of Facebook “Get digital”.

H. put more stress on correct information – educate how to use trustful sources¹⁹

¹⁵ <https://newsroom.tiktok.com/de-de/sicherheitsvideos>

¹⁶ an example comes from Netherlands. De InternetHelden” is a teaching package about online safety and digital citizenship, intended for teenagers (secondary secondary education). The teaching package has been compiled by Bureau Jeugd & Media, Safer Internet Center Nederland and Google, and is endorsed by EOKM, Helpwanted.nl, Mediaopvoeding.nl, Ouders & Onderwijs and Veiliginternetten.nl. https://beinternetawesome.withgoogle.com/nl_nl/, <https://www.lessonup.com/app/channel/deinternethelden/>; Here we can refer also to MediaLiteracyLibrary

¹⁷ As an example may serve the Greek public broadcaster ERT SA, which dedicates special TV Talk shows on fake news & disinformation for public at large.

¹⁸ <https://asso-generationnumerique.fr/actions/les-complots-rigolos/>

¹⁹ For example initiatives like GoogleNewsLab and BeMediaSmart

- I. follow direct and well-proven ideas such as addressing directly the preceptors; use “live material” - present examples; teach to distinguish truth from lie; use surprise effect; “show, not tell”, as audio-visual is more effective than a written message²⁰; be based on specific cases, examples and testimonies from real life; use audio-visual content as an integral part of the campaign; hold the attention of consumers and have a memorising value²¹;
- J. **inform periodically (every six months) the European Commission and the NRAs and their users about ML campaigns planned or executed**, so that they may be able to find them more easily;
- K. **provide disaggregated data for each country**, thus allowing the NRAs to evaluate the impact of the campaigns; possibly involve use third parties in the assessment of the impact of the campaigns (see example from Iceland).

The newly established European Digital Media Observatory (EDMO) might play an important role for the roll-out of the recommendations presented at points J and K: EDMO intends to deploy a platform to support the work of a multidisciplinary community with expertise in the field of online disinformation and create, within this platform, a repository of all the media literacy campaigns concerning disinformation planned and executed by the Code’s signatories in the EU Member States. This repository, therefore, could be the perfect tool to gather information and data about the media literacy campaigns organized by the Code’s signatories and, at the same time, offer ERGA and the NRAs a valuable basis for their monitoring activities.

ERGA would be available to work together with EDMO in the planning of this repository and would propose a minimum set of information that each record of such data base should provide.

The platforms’ media literacy activity is centred around the widening of user-friendly options and information pages; however, such functions and sites are hard to spot and do not reach users actively (e. g. context button on Facebook, Digital Literacy Library).

No interactive or audio-visual web-based campaigns were conducted by the platforms; their own informational pages, tips and guidelines are rarely propagated on the platforms.

²⁰ See the video Love story of Movistar on grooming and fake profiles.

²¹ See for example experiences in Belgium of vlogging contests for young people on hate speech (<https://www.youtube.com/weetewa>) and more recently on gaming.