

National Counter Disinformation Strategy Working Group - Public Consultation

Fields marked with * are mandatory.

National Counter Disinformation Strategy Questionnaire

Counter Disinformation and protect freedom of speech using a rights based approach

This is a rights-based strategy. Measures to counter disinformation must uphold human rights, including the freedom of expression. In addition, all members of society should be empowered to seek, receive and impart information and ideas, while acknowledging that the right to freedom of expression must respect the rights of others to privacy, protection from discrimination and to data protection under the General Data Protection Regulation (GDPR).

What are your general views in relation to this principle?

1250 character(s) maximum

The principle aims to balance freedom of expression with other human rights, like privacy and protection from discrimination. It adopts a 'rights-based strategy' to counter disinformation, showing commitment to safeguarding free speech, particularly significant in our digital age. However, this principle also highlights the complexities involved in implementing such a strategy. Balancing human rights while combating disinformation requires finesse in understanding technology, human behaviour, and socio-political contexts. There should be a particular onus on Government bodies and agencies to publish accurate and factual information and this is an element that can dovetail with this principle. It suggests that governments not only act as significant publishers but also as regulatory standard-setters. The challenge will be in practical implementation, ensuring that freedom of speech is not unintentionally suppressed or that agencies are not burdened with cumbersome validation protocols.

What recommendations do you think could be considered in the strategy in relation to this principle?

1250 character(s) maximum

Promote Media Literacy: Launch nationwide public awareness campaigns and integrate media literacy into educational curricula to help citizens distinguish between credible and non-credible information.

Set Standards for Government Information: Mandate transparency protocols for government agencies & employ third-party audits to ensure the accuracy and reliability of public information.

Enable Individual Data Control: Offer citizens options to control how their data is used, especially in news algorithms. Encourage opt-out features for personalised recommendation algorithms, aligning with the EU Digital Services Act.

Facilitate Public-Private Partnerships: Facilitate Public-Private Partnerships: Promote collaborations for real-time fact-checking services and tech solutions to counter to disinformation.

Research and Development: Invest in academic research to study the effectiveness of countermeasures against disinformation.

Legal Safeguards: If legislation is necessary, it should be limited and clearly defined, with regular review clauses to assess its impact on freedom of expression.

Tech-Based Solutions: Use technologies for origin stamping and verification, providing transparent tracking of news stories and their sources.

Counter Disinformation by building resilience and trust – at individual and societal levels

It is important to raise awareness and encourage use of supports that enable a trustworthy information environment including:

- Ensuring public access to trustworthy and reliable public interest information.
- Empowering people with the media and data literacy skills and knowledge to be able to make informed choices about the media that they consume, create and disseminate in a critical, creative and responsible manner, including highlighting how digital platforms' algorithms can amplify particular narratives which may promote hate and hysteria.
- Promoting diversity and plurality of information and access to high quality ethical journalism by regulating and supporting the media sector.

What are your general views in relation to this principle?

1250 character(s) maximum

Public access to trustworthy information is an indispensable cornerstone of any democratic society. Here, governments and public institutions can play a pivotal role in disseminating credible, evidence-based information.

Empowering individuals with media and data literacy is also commendable. In an era where the line between facts and falsehoods can be blurred by sophisticated disinformation campaigns, equipping citizens with the skills to critically evaluate information is invaluable especially adoption a "Zero Trust" information model.

The call to promote diversity and ethical journalism by regulating the media sector is in line with the global trend towards increased accountability. Regulation should, however, be handled carefully to avoid the curtailment of press freedom. Supportive measures can include financial incentives for high-quality journalism and stricter regulations against hate speech and false information.

It's essential that such regulation be carefully designed to enhance media quality without imposing undue restrictions. Thus, while the principle is robust and comprehensive, its successful implementation will require a careful balancing act.

What recommendations do you think could be considered in the strategy in relation to this principle?

1250 character(s) maximum

Independent Auditing: Develop a system where an independent body audits news organisations and platforms for compliance with ethical standards. This could serve as a quality assurance mechanism.

Public Interest Journalism Fund: Create a fund to support high-quality journalism that serves the public interest. This would incentivise investigative reporting and fact-based journalism.

Multi-Stakeholder Collaboration: Develop partnerships among government, tech companies, and civil society to collaboratively tackle disinformation. Pooling resources and expertise can lead to more effective countermeasures.

Fact-Checking Services: Support the development and dissemination of fact-checking tools that can be easily accessed and used by the general public.

Promote Pluralism: Offer tax incentives or grants to media outlets that adhere to ethical standards and demonstrate a commitment to unbiased, pluralistic reporting.

Regular Impact Assessments: Conduct regular assessments of the effectiveness of implemented measures, making data publicly available for scrutiny and academic research.

Counter Disinformation through increased cooperation, collaboration and coordination

An effective, long-term, sustainable strategy for countering disinformation will require broad stakeholder engagement, shared values, cooperation and alignment of existing countermeasures. This should be happening at national and international levels. Stakeholders include public authorities, researchers, educators, online platforms, advertisers, journalists, media groups, community and voluntary groups and trusted third party intermediaries. Doing these things will help:

- Sharing of best practice
- Horizon scanning
- Facilitating new collaborations and projects
- Identifying overlap or gaps in provision at national and international levels
- Aligning policy and regulatory approaches
- Effective prevention and deterrence through strategic communication
- Effectively preventing, deterring and responding to Foreign Information Manipulation and Interference (FIMI) utilising the EU's FIMI and Hybrid Toolboxes
- Participation in the EU's counter disinformation network, the European Digital Media Observatory (EDMO)

What are your general views in relation to this principle?

1250 character(s) maximum

The principle's call for "horizon scanning" and "sharing of best practice" is particularly noteworthy. In a rapidly evolving information landscape, staying ahead of trends and technologies is essential. Including a diverse range of stakeholders—educators, researchers, media groups, and even advertisers—acknowledges that countering disinformation isn't solely the remit of governments or tech platforms. The focus on "Effective prevention and deterrence through strategic communication" and participation in EU's counter-disinformation frameworks like EDMO shows an understanding that this issue requires multifaceted strategies that are agile and adaptable. It highlights the need for protocols against not just domestic but also foreign information manipulation, a crucial aspect in today's geopolitically charged information ecosystem.

What recommendations do you think could be considered in the strategy in relation to this principle?

1250 character(s) maximum

Research Consortia: Form national and international consortia to conduct research into the most effective countermeasures.

Policy Harmonisation: Work closely with EU bodies like the European Digital Media Observatory to align national policies with broader EU directives and regulations. This ensures that measures are not just effective but also legally robust.

Public-Private Funding Models: Develop funding models that encourage private sector investment in counter-disinformation technologies and methodologies.

Best Practice Repository and KPIs: Create an online repository that stakeholders can contribute to and benefit from, consisting of guidelines, research papers, and case studies on effective countermeasures along with aggregating data on disinformation trends, countermeasures, and their efficacy.

Strategic Communication Framework: Develop a framework for how official communications from public bodies should be crafted to maximise transparency and trust, aligning with your belief that the onus for accurate information lies with government agencies.

Crisis Response Teams: Form rapid response teams comprising experts from multiple sectors, trained to tackle disinformation spikes, particularly from foreign actors.

Counter Disinformation through corporate accountability and regulatory enforcement

New digital media and platforms can help to spread disinformation more quickly than ever before.

Measures to counter this should incentivise the ethical use of data, ethical business models, and consider digital platforms' recommender algorithms which can deliberately amplify hate and hysteria in people's video and social feeds for commercial gain. Measures should also consider addressing data leakage that exposes everybody to profiling, and the role this plays in creating a business model for disinformation media, undermining journalism, and exposing citizens to intrusive and intimate profiling. Legal obligations, including those in the GDPR, Digital Services Act, and Digital Markets Act must be respected and enforced. Companies should respect the law, and independent regulatory authorities should be adequately resourced to enforce it.

What are your general views in relation to this principle?

1250 character(s) maximum

The inclusion of existing legal frameworks like GDPR, Digital Services Act, and Digital Markets Act lends robustness to the approach. It serves as a reminder that laws are already in place; what is often lacking is effective enforcement and easy access to guidance. However, regulatory enforcement should not just be a punitive measure but should aim to guide companies towards ethical practices. This involves creating environments where businesses can thrive without exploiting data or disinformation. Lastly, the point about "ethical business models" stands out. This suggests a need to revisit how digital platforms make money which could be detrimental to innovation and progress, especially given the pace and scale of technology advancement and entrepreneurship in other economies and regions outside of Ireland and the EU.

What recommendations do you think could be considered in the strategy in relation to this principle?

1250 character(s) maximum

To foster innovation while addressing disinformation, a balanced approach should be adopted:

Self-Regulatory Frameworks: Advocate for industry-led ethical standards, avoiding excessive regulation while promoting accountability.

Public-Private Partnerships: Prioritise collaboration over regulation. Leverage shared research and insights for more effective countermeasures against disinformation.

Incentivise Transparency: Offer fiscal incentives like tax breaks to companies that voluntarily disclose algorithmic operations or adhere to best data privacy practices.

Sandbox Environments: Establish testing grounds for new technologies, allowing for real-world experimentation without immediate regulatory repercussions.

Foster R&D: Channel resources into research collaborations instead of strict compliance, encouraging the development of novel solutions.

Consumer Education: Partner with tech companies to create educational content for media literacy and data privacy, empowering informed consumer choices.

Data Portability: Encourage voluntary data transfer between platforms to stimulate competition and innovation.

Adaptive Regulations: Ensure any unavoidable regulation is flexible and can adapt to technological changes.

Counter Disinformation through evidence based counter measures and interventions

The disinformation environment is constantly evolving, and countermeasures should be based on robust research evidence. Key stakeholders need access to a well-maintained evidence base to provide in-depth awareness of disinformation trends (i.e. bad actors, narratives and tactics across different platforms as well as international developments).

Evidence could take the form of:

- Research insights (e.g. research on susceptibility, current and developing disinformation narratives, changing tactics)
- Multi-disciplinary academic research, including quantitative and qualitative research, from a number of disciplines relevant to the area
- Evaluation, risk and impact assessments
- Sector expertise (fact-checkers, disinformation experts, communications experts, regulators) that would enable effective information sharing between experts and platforms
- Publications and notifications by international partners and bodies, such as the European External Action Service (EEAS), the EU Rapid Alert System and European Center of Excellence for Countering Hybrid Threats

What are your general views in relation to this principle?

1250 character(s) maximum

The principle rightly acknowledges the dynamism of the disinformation landscape and advocates for evidence-based countermeasures. This approach is positive as it fosters a constant cycle of learning, adapting, and evolving. Research insights and multi-disciplinary academic contributions can provide the granular detail required for nuanced solutions. These insights can aid not just regulators but also tech companies in fine-tuning their algorithms and systems, thereby improving their products and services.

The principle also paves the way for enhanced sector expertise, bringing together a coalition of fact-checkers, communication experts, and regulators. This is an opportunity for tech platforms to collaborate with regulators and experts in a manner that benefits society at large, while also gaining from the collective expertise.

Further, international cooperation can ensure that countermeasures are globally effective and culturally nuanced. Tech companies, given their global footprint, can play a vital role in this. They can not only adapt to different disinformation landscapes but also become trendsetters in counter-disinformation technologies.

What recommendations do you think could be considered in the strategy in relation to this principle?

1250 character(s) maximum

Encourage data-sharing between tech platforms and researchers while respecting GDPR to better study disinformation. Use government incentives to stimulate collaborative research on disinformation. Introduce a dynamic regulatory 'sandbox' where companies can test counter-disinformation technologies in real-world conditions without immediate regulatory consequences. Jointly fund R&D projects between the public and private sectors, focusing on algorithmic fairness, disinformation detection techniques, and new media formats. Back the development of AI tools capable of rapidly identifying disinformation, leveraging the tech sector's expertise. Develop universally-accepted performance metrics to evaluate the effectiveness of counter-disinformation strategies, helping companies focus on successful measures. Create adaptive best practice guidelines that can be quickly updated based on emerging research, thus allowing tech companies to stay ahead in countering disinformation. Finally, engage tech companies in global partnerships to tackle disinformation, benefiting from their international reach while considering local nuances.

What activities or interventions are you involved in, or know of, that could help to counter disinformation?
Please give details.

1500 character(s) maximum

Digital Literacy Campaigns:
Working with national and EU agencies and representative groups to develop a model of digital skills development for farmers in the the current era of rapid digital transformation. This includes working with the Copa Cogeca Agricultural Technology Workforce and European CAP Network on develop digital skills experiential curve models that caters for all farmers regardless of digital skills or experience. This includes a Zero Trust Model of Information with promotes a reserved approach to consuming, processing, and sharing information. This Zero Trust approach positions information, regardless of its source, as potentially unreliable until proven otherwise.

* What sort of organisation do you represent?

- Government Department / Agency
- Civil Society Organisation

- Online Media Service Provider / Online Platform
- Print Journalist / Newspaper
- Academia / Research / Think tank
- General Public
- Other

If you are happy to be contacted in relation to your submission, please provide your email address below:

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All responses to this consultation are subject to release in line with the Freedom of Information (FOI) Act 2014.

Responses received are subject to the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018. For the purposes of the legislation, this Department is the Data Controller. Any personal information submitted will be treated strictly in accordance with this legislation. In order to exercise your rights under the GDPR for the purpose of any personal data submitted, you may contact the Department. Access the Department's Privacy Policy [here](#)

All submissions will be retained until such time as they are appraised by the National Archives to determine whether they warrant permanent retention as archives in accordance with the Department's obligations under the terms of the National Archives Act, 1986 (as amended).

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