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A REPORT OF ANTI-DISINFORMATION INITIATIVES

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0 EXECUTIVE SUMMARY

Fake news is a global problem that challenges how we share information and perceive the world around us. Evidence of home-grown and foreign online influence operations has caused alarm and concern among politicians and voters. There are fears that democratic institutions and national elections are under threat from mis-, dis-, and mal-information shared on a huge scale online and on social media platforms. Mob lynchings and other violence based on false rumours have turned fake news into an emergency in some parts of the world, costing lives and causing significant problems for societies. This has prompted a number of governments to adopt measures ranging from legislative and legal action to media literacy and public awareness campaigns to fight the spread of disinformation.

In addition, international pressure on tech and social media giants has been increasing to urgently address the spread of disinformation on their platforms or face the possibility of fines or regulation. However, rights groups have also argued that the fight against disinformation and fake news has been used to make unjustified arrests or pass repressive laws that primarily aim to silence political dissent and limit freedom of speech and expression.

In this report, BBC Monitoring's specialist Disinformation Team investigates fake news landscapes around the world and analyses a range of measures adopted by governments to combat disinformation. The analysis provides geopolitical context with timely, relevant examples from 19 countries in four continents (with a particular focus on European nations). The team also reports on the European Union because of its size, power, and influence.

1 EUROPE

1.1 European Union

The European Commission launched a consultation to gather a range of views on fighting the spread of fake news in November 2017 (EU Commission, 2018a). It solicited public feedback and asked a high-level expert group of journalists, tech giants, academics, and researchers to suggest policies and measures. As a result of this research, it published a report in the spring of 2018 (EU Commission, 2018b).

More than 26,000 citizens from all member states took part in a Eurobarometer survey conducted in February 2018 via telephone (EU Commission, 2018c). Eighty-five per cent of respondents described fake news as a problem in their countries and 83% said it was a problem for democracy in general. Respondents said journalists (45%), national authorities (39%), and the press and broadcasting management (36%) should be responsible for tackling the spread of fake news.

Based on these findings, the European Commission published a communication titled *Tackling Online Disinformation: A European Approach in April 2018* (EU Commission, 2018d). The communication recommended the creation of an independent network of European fact-checkers as well as an online platform that would support the Commission's work. It also committed to backing transparency in political advertising, closing fake accounts, and demonetizing purveyors of disinformation.

In May 2018, Facebook CEO Mark Zuckerberg testified before MEPs in Brussels, in part on the proliferation of fake news on his platform (BBC News, 2018a).

In September 2018, the Commission announced that representatives of online platforms, leading social networks, advertisers, and the advertising industry had agreed on a self-regulatory code of practice based on the communication published in April (EU Commission, 2018e). Google, Mozilla, Facebook, and Twitter were among the signatories (EU Commission, 2018f).

The first response of the signatories to the code of practice, which advised the adoption of measures to tackle online disinformation, was released in early 2019 (EU Commission, 2019a). While welcoming the measures taken, the European Commission urged Google, Facebook, Mozilla, and Twitter to 'develop a more systematic approach to enable a proper and regular monitoring and assessment, on the basis of appropriate performance data' (EU Commission, 2019a). It stated that a comprehensive analysis of the code's initial 12-month period would be published by the end of 2019, adding: 'Should the results prove unsatisfactory, the Commission may propose further actions, including of a regulatory nature' (EU Commission, 2019b, para. 12).

Ahead of the European parliamentary elections in May 2019, the Commission introduced its 10-point action plan to ensure the safety and transparency of the vote

and a number of national elections in member states by 2020 (EU Commission, 2018g).

1.2 Sweden

Sweden has concentrated its efforts on countering the spread and amplification of disinformation by informing and educating its citizens on the methods used, rather than by passing legislation to counter it. In the lead-up to its general election in September 2018, Prime Minister Stefan Lofven and the security service issued repeated warnings about political interference and online disinformation said to have originated from Russia (Corera, 2018).

The Civil Contingency Agency (MSB), which was tasked with spotting potential influence operations by foreign actors, devised an awareness campaign for journalists and the public about the spread of misleading information and propaganda (Brattberg & Maurer, 2018).

Media organizations encouraged independent fact-checking and Sweden's government stated that it wanted children as young as those attending primary school to be taught how to spot fake news (Bell, 2018). The government distributed civil defence pamphlets to its citizens which included guidelines on dealing with false information (Woody, 2018).

1.3 France

President Emmanuel Macron announced plans in early 2018 for a new law to combat fake news specifically during election campaigns (BBC News, 2018b).

The law proposed forcing social media giants to disclose the source and funding of sponsored campaign advertisements, enabling France's media regulator to block foreign-controlled broadcasters which deliberately publish false stories and allowing election candidates to ask a judge to rule on taking down information published about them which they deem to be false.

The controversial bills faced criticism from the left and the right, with some arguing that they threatened freedom of speech and expression and accusing Mr Macron of creating 'thought police' (Chrisafis, 2018). Despite being endorsed by the National Assembly, both bills were rejected by the Senate because of free speech concerns. The proposals were amended and subsequently passed into law by parliament in November 2018 (Assemblée Nationale, 2018), in time for the European elections in May 2019.

The Kremlin-backed news channel RT said that the law specifically targeted Russian outlets such as itself and Sputnik (RT, 2018). However, France's government fell foul of this law itself in April 2019 after Twitter refused to receive payment for sponsored tweets for the government's voter registration campaign #OuiJeVote (Yes, I Vote).

Twitter stated that accepting payment for this service would mean that it would fail to comply with the letter of this new law (BBC News, 2019a).

1.4 Germany

The *Netzwerkdurchsetzungsgesetz* (NetzDG), a hate speech law, was passed by German MPs in June 2017 and came into force on 1 January 2018 (BMJV, 2017). Websites were given 24 hours to remove 'obviously illegal' content or face fines of up to €50m (£45m). The law applies to social media platforms with more than two million members, like Facebook, Twitter, and YouTube.

Critics, including the Association of German Journalists, said the law could lead to inadvertent censorship or curtail free speech. Human Rights Watch described NetzDG as 'fundamentally flawed' (Human Rights Watch, 2018a). Questions were raised after *Titanic*, a satirical magazine, saw its Twitter account blocked for mocking Beatrix von Storch, a member of the right-wing Alternative for Germany (AfD) party, only a few days after the law came into force (Thomasson, 2018a).

Heiko Maas, justice minister at the time, was also found to be in violation of the law after several complaints led to one of his tweets from 2010 being removed (Local, 2018). Facebook said in July 2018 that it had removed 362 posts in the first six months of the year to comply with NetzDG (Zhou, 2018). Following criticism that too much content was being deleted, politicians said they would revise the law to help web users get online posts restored if they had been incorrectly removed (Thomasson, 2018b).

1.5 The Netherlands

A 2018 report by the Dutch Media Commission (CvdM) stated that the majority of citizens in the Netherlands trust news outlets and that only 3 out of 10 were worried about fake news (CvdM, 2018). The study, in association with Reuters, found that, of the 37 nations surveyed, the Dutch had the highest level of trust in their news media. Only 11% distrusted media entirely, down from 17% the previous year.

Notable in the CvdM/Reuters report was the lack of trust people in the 18–24 age group had in news on social media. More than half said that news sourced from social media was untrustworthy. They placed greater trust in news obtained directly from a news website or app. High levels of trust in the Netherlands' own news outlets and fact-checking initiatives mean that attention has turned to foreign actors attempting to subvert the media sphere with disinformation.

The authorities have emphasized the importance of education, with national broadcaster NOS airing a 90-minute television special in March 2018 called *News or Nonsense* (*Nieuws of Nonsens*), which gave examples of what people should look out for (NOS, 2018). Fact-checking initiatives are already well established. Facebook has been collaborating with Leiden University's *Nieuwscheckers* initiative and news portal nu.nl since 2017 (de Jong, 2019).

According to Leiden University, despite fears of foreign meddling, most disinformation found in Dutch social media is domestic and appears to consist of images and videos deliberately mislabelled to provoke a reaction. The majority of these are posted by right-wing groups and individuals, Dr Peter Burger, a lecturer at the university, notes (Burger in Vollebregt, 2019).

The Dutch government launched an online awareness campaign and implemented stricter standards for political advertising on platforms such as Facebook and Twitter ahead of the local and European elections in May 2019.

However, a feature in *De Groene Amsterdammer* news magazine noted that there was – and still is – an eager audience among Dutch conspiracy theorists for disinformation spread by Russia following the shooting down of the Malaysia Airlines MH17 flight in 2014 (van der Noordaa & van de Ven, 2019).

1.6 Bulgaria

In 2018, Bulgaria's parliament passed a law compelling media outlets to declare sources of funding other than revenues generated by commercial activities, such as grants and donations from overseas (Website of the Bulgarian Parliament, 2018).

Critics argued that the Law for the Compulsory Depositing of Print Media had particularly restrictive repercussions for independent media, and pointed to how it had been pushed through thanks to lobbying by the MP Delyan Peevski, the country's most powerful media mogul (Dimitrov, 2018).

The government announced in 2019 that it would also draft a new law to replace the 'morally outdated' Radio and Television Act, with a view to addressing the significance of online news sources. Arguing that harmonization with European requirements was needed, the government said websites, like broadcast media, would also need to be controlled and regulated by the state (BBC Monitoring, 2019a).

More than 1.8 million Bulgarians told a Gallup International poll in 2018 that they had come across a news story that they considered fake a week before the poll (Novinite, 2018). The 2019 World Press Freedom Index of countries compiled by Reporters Without Borders puts Bulgaria at 111 out of 180, behind all other EU member states (Reporters Without Borders, 2019).

1.7 Hungary

Hungarian news media under the populist government of Viktor Orbán are rife with fake news and disinformation, despite state assurances that the situation is being monitored (BBC News, 2019b).

Pro-government media often portray both foreign and domestic criticism of them as fake news, particularly criticism of Hungary's restrictive immigration policy, which criminalizes providing aid to undocumented immigrants and asylum-seekers, and of its relationship with the European Union (BBC News, 2019b).

The narrative often refers to 'villains and traitors', and routinely accuses critics of being paid members of the 'Soros network', a reference to Hungarian financier George Soros. The government also claims that disinformation is being planted in opposition media by US and European outside interests, as well as by Soros himself.

A government video campaign, aired on public TV channels in September 2018, portrayed Guy Verhofstadt, George Soros, and Dutch MEP Judith Sargentini as enemies of Hungary who are part of a scheme to bring Hungarian immigration policy under EU control. These claims were rebuffed by a European Commission communique (Mulligan, 2018).

European Commission President Jean-Claude Juncker has accused Hungary of peddling fake news. "If governments make claims about the EU or the Commission that are not true, then we respond immediately," he told the *Berliner Morgenpost* (Berliner Morgenpost, 2019). In response, Hungarian Foreign Minister Peter Szijjarto said the government "would continue to fight against pro-immigration politicians" (BBC Monitoring, 2019b).

Another claim based on incomplete evidence is that the EU is going to reduce aid to Hungarian farmers to fund immigrants (BBC Monitoring, 2019c). In November 2018, the prime minister's office said it had hired a private company to monitor Facebook, YouTube, and other social media for fake news paid for by US financiers.

However, this is regarded as simply paying lip service to a problem which is receiving very little attention in the country. According to liberal Hungarian magazine *HVG*, hundreds of pro-government videos have been posted on Facebook by Hungarian media outlets, including fake news (Márton, 2019). *HVG* stated that with no official partner in Hungary checking content, Facebook has been slow, almost to the point of inaction, to identify disinformation.

1.8 Italy

Proliferation of fake news online has been a major cause for concern in Italy in the past few years, with debates on ways to tackle it regularly heating up ahead of major votes. In the run-up to the 2018 general election, the Italian government created an online service allowing users to report what they thought might be fake news to the

Italian Postal Police, a police division that tackles online crime (Polizia di Stato, 2018). The move, described by then Interior Minister Marco Minniti as a ‘transparent and legitimate public service’, prompted concerns about censorship (la Repubblica, 2018).

The project was apparently abandoned after the election. At the time of writing, its web page was no longer accessible. In the past three years, Italy has also seen several attempts to introduce legislation to tackle the spread of disinformation, none of which have yet been adopted.

The first bill, tabled in February 2017 and heavily criticized by experts, proposed introducing fines and prison sentences for those spreading ‘false, exaggerated or biased news on data or facts that are manifestly false or unproven’ (Senato della Repubblica Italiana, 2017, Art. 1).

Under another draft law, put forward by the centre-right Forza Italia (Go Italy) party in May 2019, users would only be allowed to create new social media accounts if they provided their social security number (la Stampa, 2019).

There have also been attempts to tackle disinformation by promoting media literacy. In October 2017, the Italian government worked with Facebook and Google on an experimental programme to teach students in 8,000 high schools how to recognize fake news (Troop, 2017). However, the general levels of media literacy in the country appear to remain low. A 2018 study by the Suor Orsola Benincasa University of Naples suggested that the majority of Italians – 65% – are unable to distinguish between fake and real news (Suor Orsola Benincasa University of Naples, 2018).

1.9 Turkey

Turkey ranks first in a list of countries where people complain about completely made-up stories, according to the ‘2019 Reuters Digital News Report’ (Fletcher, 2018). While Turkey has not passed any specific laws to tackle fake news, and instances of people being arrested or detained for spreading fake news are not widespread, the authorities have occasionally investigated suspects accused of such activities.

Turkish Fox TV’s news anchor Fatih Portakal was investigated for ‘insulting government institutions’, ‘defamation’, and ‘slander’ regarding a critical news report about a hospital in the eastern province of Mersin (Şafak, 2018, para. 2).

Following a sharp fall in the value of the Turkish lira against the US dollar in 2018, some measures targeting ‘fake news’ and disinformation have focused on the economy and finance (Hürriyet Daily News, 2018). The financial watchdog of the Capital Markets Board of Turkey said in August that it would take legal action against those suspected of spreading ‘fake news or announcements’ about banks and companies (Hürriyet Daily News, 2018).

According to media reports, Turkey’s Financial Crimes Investigation Board ‘inspected’ people suspected of spreading ‘fake news’ or ‘false information’ about foreign

currencies in bank accounts being converted to the lira, while the Interior Ministry investigated 346 social media accounts that it said had posted about the fall in the value of the lira ‘in a provocative way’ (Turkish Minute, 2018, para. 2).

Two well-known ‘fact-checking’ initiatives have been launched by the Bosphorus Global think tank, which is said to be run by the pro-government columnist Hilal Kaplan and her husband. According to the Poynter Institute for Media Studies, Bosphorus Global’s projects are ‘dedicated to refuting criticism against the Turkish government’ (Sözeri, 2017, para. 34).

The first, called *Gunun Yalanlari* (Lies of the Day), claims that it verifies news, photos, and textual content shared on social media, and comments by politicians, among other things. The second, called Fact-Checking Turkey, has content in English and other languages. It claims that it monitors the ‘factual accuracy’ of news related to Turkey. In practice, both websites appear to serve the government’s agenda. Fact-Checking Turkey often picks foreign press reports critical of Turkey and ‘debunks’ them without supplying substantial evidence (Fact-Checking Turkey, 2018; Fact-Checking Turkey, 2019a; Fact-Checking Turkey, 2019b).

2 FORMER SOVIET UNION

2.1 Russia

Despite widespread accusations that the Russian authorities spread state-sponsored disinformation, several initiatives tackling the spread of fake news have been put forward. In April 2018, a group of deputies from the Russian State Duma, the lower house of the Russian Federal Assembly, tabled a bill that would require owners of social media networks to delete false information at the request of the authorities (State Duma Online Database, 2018). The bill was approved at the first reading by the State Duma but was later dismissed by the presidential administration as unnecessary (Samokhina, 2018).

A separate bill signed into law in March 2019 outlaws the spread online of ‘questionable information’ that threatens people’s lives, health, and property or public order or threatens to ‘interfere or disrupt vital infrastructure, transport or social services, credit organizations, or energy, industrial, or communications facilities’ (TASS news agency, 2019, para. 2). The document also introduces hefty fines by Russian standards – up to 300,000 roubles (US\$4,600) for individuals and up to 1m roubles (US\$15,000) for legal entities found to have repeatedly broken the law.

In addition, this law allows the authorities to instantly block online websites violating the new rules. Although the authors of the law say that the aim is to protect Russians from false information that may put them in danger or prompt public disorder, critics warn that it is a further attempt to censor online content.

However, this legislation has not been widely used so far. In what has been described as the first known case of its kind, police in the northern city of Arkhangelsk charged a local activist in April with disseminating fake news because he shared information about an unauthorized rally online (Mediazona, 2019). But a local court refused to consider it, saying it was unclear from the police report what information in the activist's post they considered to be in violation of the law (Arkhangelsk Online, 2019).

2.2 Ukraine

Ukraine's efforts to combat disinformation have been primarily focused on countering the spread of pro-Kremlin influence in the country following the 2014 Russian annexation of Crimea.

To curb 'media aggression against Ukraine', the government has introduced a series of bans on Russian social media networks and online services, including the search engine Yandex, the Russian Internet giant Mail.ru, and VKontakte (VK), Russia's equivalent of Facebook (BBC Monitoring, 2017; 'National Security and Defense Council of Ukraine', n.d.). They have also introduced – and recently extended – sanctions against Russian state-funded media and their journalists (Committee to Protect Journalists, 2018a). In addition, over the past few years, numerous Russian journalists have been expelled from the country (RIA Novosti news agency, 2018a).

In 2018, Ukraine included Russian state news agency RIA Novosti in its sanctions list and arrested the director of its Kiev office, Kyrylo Vyshynskyy, on suspicion of high treason and waging an 'information war' (RIA Novosti news agency, 2018b).

Although the number of Ukrainians watching Russian TV or using Russian social networks has dropped significantly, the effectiveness of the policy of blocking Russian media has been questioned by some experts, who argue that bans can easily be bypassed (RBC Ukraine, 2019).

As part of its efforts to curb Russian influence, Ukraine also set up a new Ministry of Information Policy in late 2014. Critics quickly dubbed the agency a 'ministry of truth' – borrowing a term from George Orwell's *1984* – and feared that it would be used for censorship. But supporters insisted that Ukraine needed a body to help it fight Moscow in the 'information war' that has accompanied hostilities on the ground.

The ministry's initiatives have included the creation of 'information troops' – a group of volunteers tasked with debunking disinformation in the Russian media and promoting pro-Ukrainian views on the Internet in 2015 – and, three years later, broadcasting pro-Ukrainian radio and TV stations to some regions in Crimea and rebel-controlled areas in the country's east.

In 2018, the Ministry of Education and Science partnered with global education organization IREX to test Learn to Discern in Schools, a pilot media literacy

programme, in 50 secondary schools in four Ukrainian cities (International Research and Exchanges Board, 2019). During the programme, students in Chernyhiv, Ternopil, Mariupol, and Dnipro were taught practical media literacy skills, including image verification.

According to IREX's post-evaluation, participants were 18% better at identifying fake news stories than a control group (International Research and Exchanges Board, 2018).

2.3 Latvia

As one of three Baltic states with a Russian-speaking minority, Latvia has often been a target of pro-Kremlin disinformation in recent years. To curb the influence of Russian state media, which have a powerful presence in the country, the Latvian authorities have relied on a policy of fines and broadcast suspensions targeting biased reporting.

In 2015, the Latvian authorities refused to register a local branch of the Russian state news agency Rossiya Segodnya, citing its 'tendentious' coverage of the Ukraine conflict (Delfi news website, 2015). For the same reasons, in late March 2016, the government blocked access to the Latvian-language version of Rossiya Segodnya's Sputnik website (sputniknews.lv), prompting it to move to sputniknews.lv.com. Moscow condemned the decision as 'barefaced censorship' (Russian Foreign Ministry Website, 2016).

But so far Latvia has failed to offer the Russian speakers a serious alternative to the pro-Kremlin media available in the country. For example, after the Latvian authorities temporarily banned the rebroadcasting of the Russian state Rossiya RTR TV channel earlier this year, the popularity of another pro-Kremlin channel, NTV Mir, went up. (Delfi news website, 2019). Plans to launch a dedicated Russian-language TV channel have faltered for financial reasons and because of opposition from some politicians (Khudenko, 2015).

Apart from targeting biased foreign media reporting, the Latvian authorities have been taking action to prevent the spread of non-political fake news. In August 2018, police arrested a man on suspicion of disseminating fake reports on natural disasters, plane crashes, and traffic accidents via at least seven websites (Baltic Course, 2018). Niks Endzins was released in late November after his custody term expired. He was subsequently placed under police supervision and banned from leaving the country.

Media literacy has been another focus for the Latvian authorities. In 2017, the country's Ministry of Culture launched a funding programme to support investigative journalism, debunking, and media literacy. A year later, 20 such projects received financial support (Media and Learning News, 2019).

Other measures include surveys and research into media literacy, support for media literacy activities for schoolchildren, and communication campaigns targeting

disinformation. In addition, the Education and Foreign Affairs Ministries host media literacy workshops and support organizations that offer such training, for example the Baltic Centre for Media Excellence (Baltic Centre for Media Excellence, 2019).

3 ASIA

3.1 India

In 2018, the Indian government announced controversial plans to suspend the accreditation of journalists found to have 'created and /or propagated' fake news (The Indian Express, 2018, para. 1). According to the guidelines, any complaint concerning fake news made against a journalist would be reviewed by the country's press and broadcast media regulators, and if found to be true, the journalist would permanently lose their accreditation (Indian Express, 2018). However, the plans were shelved less than 24 hours after being announced following an outcry from journalists and press freedom organizations (Kumar, 2018).

The spread of false rumours on WhatsApp and social media has become a major issue in the world's largest democracy and led to the killing of at least 31 people between February 2014 and July 2018, according to a BBC study (Nazmi, Nenwani, & Narhe, 2018).

Following an appeal by the authorities, WhatsApp – which boasts more than 200m users in India – reduced to five the number of chats to which a user can forward a message at the same time in India (Thaker, 2018). WhatsApp announced in January that it would extend this limit to all its users around the world (BBC News, 2019c).

At the end of 2018, the Indian press reported that the government was considering a change to the law that would force Facebook to police WhatsApp for 'unlawful' content (Chishti, 2018). This would challenge its use of end-to-end encryption technology, which is used so that a message can only be read by its sender and recipient.

The world's largest messaging app also ran a campaign of online, print, radio, and TV ads to increase awareness about the dangers of sharing false rumours ahead of the general election in March and April 2019 (WhatsApp, 2018). A number of fact-checking outlets have been founded in recent years to verify controversial stories that go viral on social media and messaging apps (Perera, 2017).

In March 2019, the defence ministry gave the go-ahead for the creation of an information warfare branch to 'combat misinformation and false propaganda ... on military matters' (Karanbir Gurung, 2019, para. 1). The move came after clashes with Pakistani forces in which deliberate misinformation supplied by both sides made it difficult to assess what actually took place.

3.2 Pakistan

The government launched a Twitter account in October 2018 to ‘discourage and reject the spread of fake news’ (FakeNewsBusterMoIB, 2018). Its first intervention was to reject rumours that a National Assembly member had been appointed to head an influential poverty reduction programme (FakeNewsBusterMoIB, 2018).

Although there is no direct reference to fake news, disinformation, or misinformation in its text, the government says that spreading fake news is a punishable crime under the Prevention of Electronic Crimes Act 2016 (FakeNewsBusterMoIB, 2019).

The only paragraph in the law that could be linked to spreading disinformation says that any individual sharing information that he/she ‘knows to be false, and intimidates or harms the reputation or privacy of a natural person, shall be punished with imprisonment for a term which may extend to three years or with fine which may extend to one million rupees [£5,300, US\$6,700] or with both’ (Website of the National Assembly of Pakistan, 2016).

The Act also bans creating unauthorized profiles of people using their ‘identity, name and picture’ (The Cyber Forum, 2018). A fake account claiming to be the official @FakeNews_Buster with a similar handle was created only a day later, prompting the original account to issue a clarification (BBC Monitoring, 2018).

Twitter said in its most recent biannual transparency report that between July and December 2018, the Pakistani government had requested the removal of 193 accounts and reported 2,349 profiles to the platform (Jahangir, 2019). In 2016, a fake news website published an article quoting a former Israeli defence minister threatening to destroy Pakistan with a nuclear attack if it sent troops to Syria (Westcott, 2016). Pakistan’s then Defence Minister Khawaja Asif responded to the article in a tweet, which he later deleted, by stating that Pakistan could also launch a nuclear attack.

3.3 Indonesia

Indonesia’s government uses a variety of means to tackle fake news and hoaxes, which have blighted online and real-world discourse in the country. President Joko Widodo set up a National Cyber and Encryption Agency in 2018 to keep track of online disinformation and coordinate law enforcement agencies in an effort to halt their spread (Jakarta Post, 2018a). Jakarta is also cooperating with social media companies to block hoax content and has created a website (<https://stophoax.id>) where concerned citizens can report fake news.

This proactive attitude has also come with a big stick. Social media use was restricted to prevent provocative posts and disinformation following deadly riots in 2019 (Singh & Russell, 2019).

Meanwhile, local agencies are using existing laws to fight online hoaxes, including the country’s 1946 Criminal Code, which was used to detain eight people for spreading

misinformation following the September earthquake and tsunami (BBC News, 2018c). The National Police say they are willing to prosecute not only the originators of fake news but also ‘those who have shared it with no malicious intent’ (Jakarta Post, 2018b, para. 1)

However, there are concerns that using the 1946 code, which envisages a maximum of three years in prison, may be too heavy-handed if applied in all cases (Jakarta Post, 2018b). The Institute for Criminal Justice Reform (ICJR) says there is a need to prove that those spreading fake news ‘intend to provoke or cause a disturbance when they spread misinformation (Jakarta Post, 2018b, para. 12).

“The 1946 Criminal Code Law also stipulates a high measure of chaos. Commotion among netizens is not enough to trigger the ‘chaos’ article of the law”, the ICJR told the Jakarta Post in November.

The April 2019 election saw a spike in fake news stories. Many of them undermined not just the candidates and political parties but also the election results and trust in the electoral commission.

3.4 China

China, despite its strong, authoritarian control of both analogue and online media, has not been immune to the fake news phenomenon and has armed state organizations with the means to fight it (Repnikova, 2018). With online users numbering hundreds of millions, the government has tightened its control over news outlets, video-sharing services, social media, and chat apps, fighting what Beijing prefers to term ‘rumours’ (BBC News, 2017a).

Laws refer to the need to maintain national stability and order, and legislation passed in 2016 makes it illegal to spread rumours that fall under the broad definition of damaging the state (Xinhua, 2016). These laws were tightened further in subsequent years by new rules which compel online platforms to publish news only from officially recognised news outlets and require social media platforms to refute fake news and hoaxes on their services.

State control and censorship runs deep, with an ever-changing sea of words and terms that are banned from being used on search websites and social media platforms to prevent users both from discussing contentious issues and from attempting to dodge these blocks by using inventive keywords (McDonnell, 2017).

Not only does China’s fight against ‘fake news’ tackle criticism of the state, it also includes examining business news with the aim of fighting corruption and market manipulation, as well as entertainment news, which is as predictably rife with rumours as it is anywhere else in the world (BBC News, 2017b; BBC Monitoring, 2019d; Yu, 2019).

While fighting fake news, China has been accused of flooding neighbouring Taiwan – which it regards as its own territory – with disinformation with the aim of destabilising the government in Taipei (StopFake.org, 2018).

4 MIDDLE EAST

4.1 Egypt

Ahead of the presidential election in March 2018, in which Abdul Fattah al-Sisi was elected for a second term, Egypt's public prosecutor urged legal action against media outlets if they published 'false news, statements and rumours' (Reuters, 2018a, para. 1).

According to a new law passed by parliament in July, any social media account with more than 5,000 followers should be treated as a media outlet and be subject to legal action for 'spreading false news' (Reuters, 2018b). A law against 'cybercrime' was passed a month later, allowing websites to be blocked if deemed a threat to national security (BBC News, 2018d).

The government argues that such laws are necessary to fight rumours that destabilize the country (BBC News, 2018e). The Committee for the Protection of Journalists stated in its annual report in December 2018 that 19 journalists had been given prison sentences following fake news charges in Egypt, which is more than in any other country in the world (Committee to Protect Journalists, 2018b).

According to Human Rights Watch, the Egyptian authorities are increasingly using counterterrorism and state-of-emergency laws and courts to unjustly prosecute journalists, activists, and critics (Human Rights Watch, 2018b).

5 AFRICA

5.1 Kenya

Kenya passed a new law in 2018 to punish the spreading of false information and to impose a lengthy prison term on offenders (Reuters, 2018c). President Uhuru Kenyatta said in a statement that the new law would provide a legal basis on which to prosecute cybercrimes, including child pornography, computer fraud, and identity theft (Olewe, 2018). It imposes a fine of US\$50,000 (£39,000) and/or up to two years in prison for publishing false information intentionally.

The Computer Misuse and Cybercrimes Act also criminalizes abuse on social media and cyberbullying (Kenyan National Council for Law Reporting, 2017). Prior to its adoption, the Committee to Protect Journalists called on Mr Kenyatta not to sign the bill into law on the grounds that it would 'criminalize free speech, with journalists and bloggers likely to be among the first victims' (Committee to Protect Journalists, 2018c, para. 3).

6 AMERICAS

6.1 United States

The First Amendment of the United States Constitution states: ‘Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances’ (Constitution, U.S., Amendment 1.).

It is a right jealously guarded in the US and means that citizens are entitled to express their views publicly, however unpalatable they may be. It also means that any attempt to tackle fake news through legislation would most likely be doomed before it even reached Congress.

The First Amendment also means that President Donald Trump’s occasional online musings that critical broadcasters should be stripped of their licences because of what he terms ‘fake news’ – often without evidence – are also covered by the constitutional right to freedom of speech (Trump, n.d.; Koebler & Gustin, 2017).

However, this has not stopped an attempted push-back against the power of social media; the bipartisan Honest Ads Act is before Congress, and it aims to regulate political advertisements on social media (S.1989, 2018).

While such advertisements in other media are required to disclose their sources of funding, this is not the case online. With Facebook now voluntarily declaring the sources of political advertising, it is not yet clear how this bill will fare.

7 CONCLUSION

Our analysis shows that many countries across the globe are increasingly aware of the threats posed by disinformation but are struggling to find effective ways to curb its spread.

Broadcast bans, the introduction of government-run fact-checking initiatives, and the use of existing laws or new legislation to regulate social media are often met with criticism and accusations of censorship.

As a result, draft legislation is often slow to come to fruition because it requires revisions or gets stuck in the processes of bodies of legislative power.

Concerns about making just, effective laws to counter fake news are amplified by some countries' creation of legislation which purports to fight disinformation but appears instead to be used to attempt to gain greater control over their media environment and to suppress debate on social media.

Support for independent fact-checkers and the promotion of media literacy have proven to be less controversial. They seem, though, to be less popular and not as widespread. In particular, media literacy programmes tend to focus primarily on schoolchildren and have limited reach.

Our report indicates that there does not currently seem to be any quick fix that would allow governments to curb effectively the spread of disinformation through legislation without prompting criticism.

Alternative solutions ('information troops', media literacy, etc.,) have had – thus far – mixed results or have been trialled on too limited a scale to assess accurately their success in the fight against disinformation.

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