

Code of Practice on
Disinformation – Report of
Pagella Politica and
Facta.news (TFCF srl) for the
period 16 January 2024 to 16
January 2025

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Executive summary

Executive summary (max. 2 pages)

Pagella Politica and Facta.news (PP/F) are two fact-checking and debunking projects operated by the Italian company TFCF, active in various projects in the research, monitoring and contrast of disinformation at the national and European level, as well as media and information literacy.

In light of their nature and activities, PP/F have chosen the following commitments:

33-34-35-36-37-38-39-40-42-43.

PP/F ethical, transparency and independence standards are certified annually by IFCN Code of principles external evaluators. PP/ F are also members of the EFCSN consortium and governance body, as well as official and verified signatories of its Code of Standards.

Pagella Politica and Facta participate in the crisis management sub-group actively. They share knowledge about the state of disinformation at Italian level, and also at the European level, thanks to PP/F position of coordinators of the fact-checking network within EDMO.

PP/F have internal staff dedicated to the CoP , who participate in TaskForce subgroups, and ensure internal compliance with the commitments.

Guidelines for filling out the report

Reports are detailing how signatories have implemented their Commitments under the Code and signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each signatory.

Reporting period

The reporting period to be covered in the reports is **12 months (edit reporting period)** for signatories who are not offering very large online platform services. Signatories shall submit reports outlining policy updates and actions taken to implement the Commitments and Measures they signed up to under the Code. All data and policy updates should be reported for 12 months period from the submission of last reports.

Adjusting the reporting template

Signatories who are not offering very large online platform services can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Relevant signatories will report only on commitments and measures they subscribed to and provide Member State-level data only if feasible.

Reporting per Service

When filling in a report for several services, use colour codes to clearly distinguish between services. At the beginning of the report, clarify what colour is used for which service.

Reporting in text form

Reporting in the form of written text is required for several parts of the report. Most of them are accompanied by a target character limit. Please stick to the target character limit as much as possible. We encourage you to use bullet points and short sentences. When providing information to the QRE, please make sure that your answer covers all the elements of the associated commitment and measure. Links should only be used to provide examples or to illustrate the point. They should not be used to replace explanations or to provide data in the forms. All relevant explanations and data must be included in the report directly, in written form.

Reporting SLIs and data

Reporting on SLIs requires quantitative information to be reported on in this harmonised reporting template.

- Where relevant and feasible, SLIs should be reported on per Member State.
- If no data is available on Member State level, SLIs might, instead, be exceptionally reported on per language. (NB that signatories agreed to revisit this issue after the first reporting, to ensure harmonised and meaningful reporting.)
- Please report data in the format provided by the harmonised reporting template, not through external links. Please use the Member State/language template provided in the harmonised reporting template. Where the table asks for "Other relevant metrics", please name the metric that you would like to report on in addition to the ones already provided. You may include more than the number of additional fields provided where necessary; in that case, please adjust the table as needed.
- Please contextualize all data as much as possible, i.e. include baseline quantitative information that will help contextualize the SLIs (e.g. number of pieces of content labelled out of what volume of content).
- If there are no relevant metrics to report on, please leave the respective columns blank.

Reporting on TTPs

If subscribed to Commitment 14, Integrity of Services, we ask you to report on each identified TTP individually. The number of identified TTPs may vary per service. Where more than one TTP are reported under the same action, clarify the reasoning in the methodology. Where input is not provided, keep the placeholder for the relevant TTP and explain reasons and planned remedial action. Additionally, as with all other SLIs, data can be provided per Member State for each individual TTP.

Missing Data

In case that at the time of reporting there is no data available yet, the data is insufficient, or the methodology is lacking, please outline in the dedicated field (i.e. in the field about further implementation measures planned) how this will be addressed over the upcoming six months, being as specific as possible.

Signatories are encouraged to provide insights about the data/numbers they provide by inserting possible explanations in the boxes of the template "*Methodology of data measurement & insights on data provided*". This should aim to explain the why of what is being reported, for instance – *Are there trends or curiosities that could*

require or use contextual explanation? What may be driving the change or the difference in the number? Please also indicate inconsistencies or gaps regarding methodology in the dedicated box.

Attachments

We ask you not to enclose any additional attachments to the harmonised reporting template.

Crisis and elections reporting template

Relevant signatories are asked to provide proportionate and appropriate information and data during a period of crisis and during an election. Reporting is a part of a special chapter at the end of the harmonised reporting template and should follow the guidelines:

- The reporting of signatories' actions should be as specific to the particular crisis or election reported on as possible. To this extent, the rows on "Specific Action[s]" should be filled in with actions that are either put in place specifically for a particular event (for example a media literacy campaign on disinformation related to the Ukraine war, an information panel for the elections), or to explain in more detail how an action that forms part of the service's general approach to implementing the Code is implemented in the specific context of the crisis or election reported on (for example, what types of narratives in a particular election/crisis would fall into scope of a particular policy of the service, what forms of advertising are ineligible).
- Regarding elections, signatories are expected to provide specific information on their **experience with the RRS for FR and RO elections**. This can be included in the first two rows ("Threats observed..." / "Mitigations in place ..."). In addition, **regardless of the RRS activation, signatories should report on relevant actions in place for elections at national level** (parliamentary/presidential) in EU Member States during the reporting period – specifying the country(ies) and election(s).
- Signatories who are not offering very large online platform services and who follow the invitation to report on their specific actions for a particular election or crisis may adapt the reporting template as follows:
 - They may remove the "Policies and Terms and Conditions" section of the template, or use it to report on any important changes in their internal rules applicable to a particular election or crisis (for example, a change in editorial guidelines for fact-checkers specific to the particular election or crisis)
 - They may remove any Chapter Section of the Reporting Template (Scrutiny of Ads Placement, Political Advertising, Integrity of Services etc.) that is not relevant to their activities
- The harmonised reporting template should be filled in by adding additional rows for each item reported on. This means that rather than combined/bulk reporting such as "Depending on severity of violation, we demote or remove content based on policies X, Y, Z", there should be individual rows stating for example "Under Policy X, content is demoted or removed based on severity", "Under Policy Y, content [...]" etc.
- The rows should be colour-coded to indicate which service is being reported on, using the same colour code as for the overall harmonised reporting template.

Reporting should be brief and to the point, with a suggested character limit entry of 2000 characters.

Uploading data to the Transparency Centre

The reports should be submitted to the Commission in the form of the pdf via e-mail to the address CNECT COP TASK FORCE CNECT-COP-TASK-FORCE@ec.europa.eu within the agreed deadline. Signatories will upload all data from the harmonised reporting template to the Transparency Centre, allowing easy data access and filtering within the agreed deadline. It is the responsibility of the signatories to ensure that the uploading takes place and is executed on time. Signatories are also responsible to ensure that the Transparency Centre is operational and functional by the time of the reports' submission that the data from the reports are uploaded and made accessible in the Transparency Centre within the above deadline, and that users are able to read, search, filter and download data as needed in a user-friendly way and format.

VII. Empowering the fact-checking community

Commitment 33

Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.
[change wording if adapted]

Measure 33.1	[insert wording if adapted]
QRE 33.1.1 [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]</p> <p>Both Pagella Politica and Facta (PP/Facta) are active members of the IFCN network and verified signatories of its Code of Principles:</p> <ul style="list-style-type: none"> • PP has been a verified member since 2017 and its compliance with the IFCN principles is reviewed and assessed periodically. The last assessment was issued in September 2023, the next one is scheduled in September 2025. • Facta was born in 2020 and has been a verified member since 2021, the last assessment was in November 2023 and next one was scheduled for November 2024, but the assessment is delayed for now, due to IFCN’s staff overload, thus the status of our organization is “under renewal”. <p>PP/Facta are also among the founding members of the European Fact-Checking Standards Network (EFCSN). Both are verified signatories of its Code of Standards and their Deputy Director is a member of its Governance Body. After having updated their internal methodologies, norms and procedures:</p> <ul style="list-style-type: none"> • PP has been verified as compliant with the Code in April 2023, and the assessment is valid until May 4, 2025 • Facta has been verified as compliant with the Code in September 2023, and the assessment is valid until September 21, 2025 <p>Pagella Politica and Facta already abide by ethical, transparency and independence rules as certified periodically by IFCN Code of principles external evaluators and lastly by EFCSN Code of Standard assessors.</p>
SLI 33.1.1 - number of European fact-checkers that are IFCN-certified [change wording if adapted]	<p>Methodology of data measurement [suggested character limit: 500 characters]</p> <p>The complete list of verified signatories of the IFCN Code of Principles is publicly available here:</p>

	https://ifcncodeofprinciples.poynter.org/signatories . As of February 25th, 2025, signatories from EU member States + Council of Europe + Kosovo are as follows: <ul style="list-style-type: none"> • Verified active signatories: 63 • Under renewal: 17 • Expired: 9 	
	For EFCSN, the list of verified members is publicly available here: https://efcsn.com/list-of-verified-members/ . <ul style="list-style-type: none"> • As of February 25th, 2025, the number of verified members is 59 	
	Nr of fact-checkers IFCN-certified	Nr of members of CPI
Data	63	59

VIII. Transparency Centre	
Commitment 34	
To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website. [change wording if adapted]	
Measure 34.1	[insert wording if adapted]
Measure 34.2	[insert wording if adapted]
Measure 34.3	[insert wording if adapted]
Measure 34.4	[insert wording if adapted]
Measure 34.5	[insert wording if adapted]

VIII. Transparency Centre	
Commitment 35	
Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable. [change wording if adapted]	
Measure 35.1	[insert wording if adapted]
Measure 35.2	[insert wording if adapted]
Measure 35.3	[insert wording if adapted]
Measure 35.4	[insert wording if adapted]
Measure 35.5	[insert wording if adapted]

Measure 35.6	[insert wording if adapted]
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VIII. Transparency Centre	
Commitment 36	
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]	
Measure 36.1	[insert wording if adapted]
Measure 36.2	[insert wording if adapted]
Measure 36.3	[insert wording if adapted]
QRE 36.1.1 (for the Commitments 34-36) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters] Pagella Politica and Facta are not members of the subgroup in charge of the development of the Transparency Centre but we think that this is an initiative of paramount importance also for our work and will keep an eye on its development. Pagella Politica and Facta will upload the information in their reports on the Transparency Centre, as they did for the baseline report and the following ones.
QRE 36.1.2 (for the Commitments 34-36) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters] Our company would like to provide following data:
Data	

IX. Permanent Task-Force	
Commitment 37	
Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus. [change wording if adapted]	
Measure 37.1	[insert wording if adapted]
Measure 37.2	[insert wording if adapted]
Measure 37.3	[insert wording if adapted]

Measure 37.4	[insert wording if adapted]
Measure 37.5	[insert wording if adapted]
Measure 37.6	[insert wording if adapted]
QRE 37.6.1 [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]</p> <p>The Deputy Director of Pagella Politica and Facta co-chairs the working group on elections, assuring the coordination with EDMO efforts. In the past 12 months the EU elections and other national elections in Member States have been one of the main topics of discussion and action.</p> <p>The WG discussed and operated a Rapid Response System (RRS) in the context of elections, those for the European parliament, but also others at national level. DSA-related discussions have also obvious repercussions on the internal discussions of the WE. Pagella Politica and Facta played a decisive role in negotiating the final text of the EU elections-related RRS, coordinate its use by the EDMO Taskforce on EU elections and its monitoring. Later, Pagella Politica and Facta provided assistance to other organizations and EDMO HUBs using the RRS when activated for specific national elections (eg. France, Romania, Germany). Finally, Pagella Politica and Facta are contributing to define the permanent RRS negotiating with the other signatories of the Code.</p> <p>Pagella Politica and Facta participated also in the crisis management sub-group by sharing knowledge about the state of disinformation with the other participants, in particular on the main current crises (pandemic, war in Ukraine, Israel/Hamas conflict, elections). We have shared the information in our possession on the situation at Italian level, and also at the European level, thanks to PP/F position of coordinators of the fact-checking network within EDMO. That role allows us to access information from all over Europe, which we then materially aggregate, analyse and translate in the monthly EDMO briefs. PP/F also provided insights – potentially useful for platforms – on the single most worrying cases of disinformation detected in the context of daily monitoring we enacted during the months before the European vote (which also resulted in a daily newsletter covering the most relevant disinformation events occurred in that sensitive period) and on some recurring phenomena (e.g. the frequent use, by disinformation, of videos and images old and taken up in another context to spread false news about current events; IA-generated content etc.).</p> <p>PP/F have also made suggestions of how platforms can better collaborate with f-cs on crisis management.</p>

X. Monitoring of Code	
Commitment 38	
The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code. [change wording if adapted]	
Measure 38.1	[insert wording if adapted]
QRE 38.1.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

	Pagella Politica and Facta have a number of internal staff dedicated to following the CoP and related developments, participating in TaskForce subgroups and working groups, and ensuring internal compliance with the commitments.
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X. Monitoring of Code
Commitment 39
Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble. [change wording if adapted]

X. Monitoring of Code	
Commitment 40	
Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each Signatory, service and at Member State level. [change wording if adapted]	
Measure 40.1	[insert wording if adapted]
Measure 40.2	[insert wording if adapted]
Measure 40.3	[insert wording if adapted]
Measure 40.4	[insert wording if adapted]
Measure 40.5	[insert wording if adapted]
Measure 40.6	[insert wording if adapted]

X. Monitoring of Code
Commitment 42
Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]



X. Monitoring of Code

Commitment 43

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]

X. Monitoring of Code

Commitment 44

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]