Code of Practice on Disinformation – Report of European Fact–Checking Standards Network for the period [July 2023]

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Executive summary

This is the first report of the European Fact-Checking Standards Network since becoming a signatory of the Code of Practice. As the representative voice of European fact-checkers, EFCSN will not only report on the relevant activities of the association, but will also relay the experiences of the European fact-checking organisations themselves after surveying its members.

The report focuses on the commitments of the Code of Practice where EFCSN's assessment and expertise is most relevant, namely those regarding fact-checking and particularly the ones in Chapter VII: Empowering the Fact-Checking Community. Also, in order to put resources where they can have the most impact in protecting users from disinformation, the report focuses on the largest signatories.

The commitments of the Code of Practice regarding fact-checking can be grouped in four categories:

- To establish agreements with fact-checking organisations to achieve coverage of all member states and languages.
- To provide fair financial contributions to them.
- To integrate or consistently use fact-checking in the platforms.
- To provide adequate access to fact-checkers to do their work in their services.

Fact-checking coverage

The first one is key to the whole endeavour - without agreements with fact-checking organisations to use their work, signatories cannot integrate their output in their services or grant them access to the data they need to provide effective fact-checking coverage of a member state. 78% of the fact-checking organisations reported having agreements with Meta providing fact-checking coverage in most member states and 15% said the same about TikTok, the latter's agreements covering only a handful of member states.

No fact-checker reported any agreements at all with either YouTube or any of the Microsoft services. No organisation had an agreement with Google to provide fact-checking coverage of a Member State either, although 15% mentioned media literacy-oriented agreements with the company. Some report having tried to approach the company but never managed to get a response, conversations that went dead, or discussions about media literacy programs or invitations to join a voluntary trusted flaggers initiative.

In addition to them being still quite rare across platforms, there are other issues around agreements: they are not very stable even when they exist, with 83% of the reported agreements having a duration of one year or less. And while the fact-checkers consider that almost all of their current agreements with platforms (96%) contain enough safeguards to preserve their independence, they EFCSN have expressed concern for the fact that most of them (83%) are protected by non disclosure clauses that could create in the public the impression of obscurantism and lack of transparency. The NDAs need to be more limited to improve public trust, so the fact-checkers can explain better what they do, including as part of the Code of Practice reporting, and additionally the platforms that do have third-party fact-checking programs need to be transparent about their functioning and be clear to users about how outputs of fact-checking are being used by the platforms.

There is room for the fact-checking coverage to grow through agreements, as all organisations polled that do not currently have agreements with Meta and Google declare that they would consider entering into one. That is the case as well from 93% that would consider having an agreement with YouTube, 91% with TikTok, 82% with Bing, and 74% with LinkedIn. This could be partly because many of those organisations are already monitoring those services for disinformation even if they have no agreement with the platforms to do so: all of the fact-checking organisations that do not have an agreement with Meta monitor its services nevertheless, 78% do the same on Twitter, 74% on TikTok, 63% on YouTube, and 57% on Google Search.

On the commitment by signatories to offer fair financial contributions to the fact-checkers for their work to combat disinformation on their services, 100% of the organisations say that is not the case for Microsoft, 96% say the same about YouTube, 89% report the same about TikTok, 85% about Google, and 26% about META.

Taking into account Europe's diversity, EFCSN considers that the most effective fact-checking coverage of a country is the one implemented by organisations that are rooted there; that means not only working in the local language, but being aware of the culture, history, beliefs, and traditions that are key understand and communicate effectively with its different communities and subgroups. To reflect that, the EFCSN assembly approved a change in its [European Code of Standards for Independent Fact-Checking Organisations](#) stating that verified members "*must have a substantial and demonstrable focus on one (or more) of the countries of the Council of Europe, plus Kosovo, Belarus or Russia, and a meaningful connection with the country or countries where the mis- and disinformation they fact-check originates from*".

Integration of fact-checking

EFCSN committed to working with other signatories and assisting them on how to better fulfil their commitment to "integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents". During the reporting period, we had conversations with the major signatories to that effect, and provided detailed feedback about the policies and implementations they provided in their baseline reports in early 2023.

While those conversations remain ongoing, inside and outside the Permanent Task Force of the Code, it is still to be seen if that feedback ultimately results in changes to the policies or their implementation. Many of the member organisations of EFCSN also reported contact with some of the major platforms and were polled on their general judgement of the effectiveness of the major signatories' measures against disinformation.

To the statement *My organisation considers that this platform's policies, community guidelines and moderation policies to tackle disinformation are insufficient* and rating their level of agreement from 1 (disagree) to 4 (agree), the ones seen as most insufficient were those from TikTok (3,4) and Google (3,3), followed by YouTube (3,1). Those from META (2,5), Bing (2,33), and LinkedIn (2,14) gathered more neutral views, but many declared they were not very knowledgeable about the policies of the last two.

The concrete criticism by the fact-checking organisations generally aligns with what the EFCSN has been arguing in its review of the baseline reports. Some of the key issues mentioned are the lack of consistent third-party fact-checking in some platforms and the reluctance of some platforms to work with fact-checkers with local knowledge. Others criticised the focus on removals and the lack of adequate monitoring tools to detect disinformation on some platforms. The need to use video-format in video-centred platforms was mentioned, as well as stronger policies against disinformation by political figures.

EFCSN and the Code of Practice

The European fact-checking community remains committed to the Code of Practice and eager to see more effective policies implemented by its signatories, particularly now that the Digital Services Act is in effect for the services designated as very large online platforms and search engines. We will continue to represent our members in the Code of Practice Permanent Task Force, and in the Subgroup on 'Empowering fact-checking' that we currently co-chair.

We are happy to assist other signatories and interested parties in any way to help advance the fact-checking commitments of the Code of Practice, while continuing to represent and provide opportunities for our verified members. As our community grows and strengthens in Europe, we hope to be ever more helpful to the wider anti-disinformation ecosystem as the challenges are more serious than ever.

The EFCSN was created by almost 50 fact-checking organisations in Europe that wanted to raise the bar and have the highest standards in ethics, transparency, methodology, and independence. Our members agree to be evaluated by two different independent academic experts every two years on their compliance of the [Code of European Standards for Independent Fact-Checking Organisations (2022)](#) and subject themselves to the EFCSN complaint procedure. The Code of Practice recognizes it as an instrument of compliance in Measure 33.1. Since its launch in January 2023, 39 European fact-checking organisations have applied to become part of EFCSN, 16 have been approved, and 23 more are going through the process. For the purposes of the survey that is mentioned in this report, all European fact-checking organisations in the EFCSN, IFCN and the EDMO network were invited to participate.

Guidelines for filling out the report

Baseline reports are detailing how Signatories have implemented their Commitments under the Code and provide the Qualitative Reporting Elements (QREs) and Service Level Indicators (SLIs), as they stand one month after the implementation. The baseline report should also include a comparison between the measures in place under the previous Code to the measures taken to implement the new Code. The measures taken to implement the new Code should be outlined per commitment in the dedicated field of the reporting template.

Reporting period

The reporting period to be covered in the baseline reports is from 16 December 2022 to 16 January 2023 for all Signatories. (The implementation period of the Code from 16 June 2022 to 16 December 2022 is followed by a one-month reporting period from 16 December 2022 to 16 January 2023.) Signatories shall submit baseline reports outlining policy updates and actions taken to implement the Code during the implementation period. Data, e.g. on the number of actions taken under a specific policy, should be reported on from the end of the implementation period (16 December 2022) until the cut-off date of 16 January 2023. In case specific data is not available for the first reporting period (from 16 December 2022 to 16 January 2023), please provide the monthly average based on the previous quarter, clearly outlining the methodology used in the relevant field. The submission date for baseline reports is January 31, 2023.

Adjusting the reporting template

Non-VLOPs can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Non-VLOPs 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. 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 table directly, in written form.

Reporting SLIs and data

Reporting on Service Level Indicators requires quantitative information to be reported in the reporting template. We ask you to report data in the format provided by the reporting template, not on external links.

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. Please also indicate inconsistencies or gaps regarding methodology in the field dedicated to methodology.

Attachments

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

Uploading data to the Transparency Centre

After the submission of the baseline reports and the launch of the Transparency Centre website, all data from the reporting template must be uploaded to the Transparency Centre within maximum 7 days, allowing easy data access and filtering. 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, filer and download data as needed in a user-friendly way and format.

II. Scrutiny of Ad Placements	
Commitment 2	
Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising messages. [change wording if adapted]	
Measure 2.2	**We will be open to assist in the development of tools and methodologies by Relevant Signatories to identify content and sources as distributing harmful Disinformation, to identify and take action on ads and promoted content that violate advertising policies regarding Disinformation mentioned in Measure 2.1.**
QRE 2.2.1 [We will report on the conversations we engage in and partnerships we convene to identify content and sources that contravene policies mentioned in Measures 2.1 including information obtained by polling our members.]	. The EFCSN board has had conversations with several signatories that touched on the specific issue of disinformation in ads, particularly with Meta and Microsoft.

II. Scrutiny of Ad Placements	
Commitment 3	
Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services. [change wording if adapted]	
Measure 3.1	[insert wording if adapted]
QRE 3.1.1 [insert wording if adapted]	The EFCSN remains accessible and open for conversations with relevant actors in order to provide information regarding possible misuse of advertisement systems and tackling purveyors of harmful disinformation.

IV. Integrity of Services
Commitment 16

Relevant Signatories commit to operate channels of exchange between their relevant teams in order to proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation and with due consideration for security and human rights risks. [change wording if adapted]	
Measure 16.1	[insert wording if adapted]
QRE 16.1.1 [insert wording if adapted]	We actively participate in the sub-groups established within the Code, for instance the Crisis SG, to share relevant information provided by our verified members. Moreover, we regularly conduct 1-on-1 meetings with Relevant Signatories in order to flag specific concerns we've detected with respect to their services and exchange any relevant information. Our members also participate in events and open discussion where topics such as information manipulation, foreign interference in information space and incidents regarding disinformation campaigns are addressed and discussed.

V. Empowering Users
Commitment 17
In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups. [change wording if adapted]

Measure 17.2	[insert wording if adapted]
QRE 17.2.1 [insert wording if adapted]	Promoting media literacy for the public benefit is part of the purpose of the Association. The EFCSN continuously enhances and promotes efforts and initiatives conducted by its verified members and, given the short existence of the organisation, by fact-checkers which contributed to the formation of the association. For instance, the EFCSN collected some of these initiatives in its social media accounts during the European Media Literacy Week in order to give more visibility to fact-checking organisations all around Europe promoting critical thinking. On the occasion of the International Fact-checking Day, more projects were compiled and shared. Aside from the support and visibility to initiatives promoting media literacy conducted by verified members, the EFCSN also aims to increase capacities of fact-checking organisations and offers internal training on several fields of action including sustainability, regulation, audience growing, or employee wellbeing,
Measure 17.3	[insert wording if adapted]
QRE 17.3.1 [insert wording if adapted]	

	EFCSN's verified members and other fact-checking organisations that collaborate with the Association work closely with several universities and academics on media literacy. Moreover, we exchange insights with other relevant stakeholders such as the EDMO and its national hubs, or ERGA in order to build more complete and updated knowledge.

V. Empowering Users
Commitment 21
Relevant Signatories commit to strengthen their efforts to better equip users to identify Disinformation. In particular, in order to enable users to navigate services in an informed way, Relevant Signatories commit to facilitate, across all Member States languages in which their services are provided, user access to tools for assessing the factual accuracy of sources through fact-checks from fact-checking organisations that have flagged potential Disinformation, as well as warning labels from other authoritative sources. [change wording if adapted]

Measure 21.1	**We are open to collaborate with Relevant Signatories by partnering with them to provide context and insights to develop and apply policies, features, or programs across Member States and EU languages to help users benefit.**
QRE 21.1.1 [We will report on our engagement with Relevant Signatories on the policies, features, or programs they deploy to meet this Measure and on their availability across Member States, including information obtained by polling our members]	The EFCSN gave detailed feedback to relevant signatories as a reaction to their submitted baseline reports. Here, we collected impressions on the adequacy of different policies, features, or programs employed and reported under commitment 21. For instance, YouTube, TikTok and LinkedIn seem to have limited actions and focused on removals of content, an approach inconsistent with the goal to empower users. Same case with LinkedIn's use of browser extension, rather disconnected from the current experience of most users. Those concerns have been also raised in conversation with all the different VLOP signatories. of the Code of Practice. Furthermore, verified members of the EFCSN have reported the following regarding their impressions on current policies, features, or programs: • **About Google Search**'s policies, the European fact-checkers find them rather insufficient (**3,26** out of 4 points, being 4 the higher level of agreement with the statement: *My organisation considers Google's policies, community guidelines and moderation policies to tackle disinformation are insufficient*). Prioritisation of fact-checks is suggested, and some organisations point to shortcomings in the limited pre-bunking experiments from the platform. • **YouTube**'s policies are also found insufficient (3,11 out of 4 points in agreement with the above-mentioned statement). Doubts arise regarding what the service identifies as disinformation, the lack of a consistent fact-checking program, the failure of Claim Review integration, or the preference for taking videos down. Transcription solutions are suggested.

	- Overall, impressions on the sufficiency of **Facebook and Instagram** policies are neutral (2,55 out of 4). Fact-checking organisations referred to recommendations to improve Meta's services including removing the exemption on politicians from being labelled, refinement of monitoring tools for fact-checkers, or allowing video-checks. - **TikTok** scores a 3,44 out of 4 on the insufficiency of their policies. Removal without indication of motive, lack of algorithmic transparency, insufficient information on criteria for new partnerships, and in some cases lack of partners with local focus are some of the concerns. Tools for better monitoring of the platform are suggested. - Impressions on policies implemented by **Bing** (2,33) and **LinkedIn** (2,14) are rather neutral but many express a lack of knowledge on their specific policies, while alerting of the absence of local partnerships or disclaimers on the use of AI technology. - Impressions on **X-Twitter policies (3,44) are the most negative**, while Community Notes being mentioned as having some problematic aspects.
Measure 21.2	**We will, in light of scientific evidence, undertake and/or support research and testing conducted by Relevant Signatories on warnings or updates targeted to users that have interacted with content that was later actioned upon for violation of policies mentioned in this section. We will disclose and discuss findings within the Permanent Task-force in view of identifying relevant follow up actions.**
QRE 21.2.1 [insert wording if adapted]	The EFCSN remains accessible to support research and testing efforts.
Measure 21.3	**Where Relevant Signatories employ labelling and warning systems, we will be open to provide input in order for the design to be in accordance with up-to-date scientific evidence and help analyse the users' needs on how to maximise impact and usefulness of such interventions, for instance such that they are likely to be viewed and positively received.**
QRE 21.3.1 [We will report on our engagement with Relevant Signatories where we provide input on their procedures for developing and deploying labelling or warning systems, as well as maximising its usefulness for the user, including information obtained by polling our members]	The EFCSN gave detailed feedback to relevant signatories as a reaction to their submitted baseline reports, also regarding the use of labels and warning systems. For instance, the EFCSN highlighted how, in TikTok, users can sometimes see "unverified" labels on videos, but cannot access the rationale and sources justifying such labels, so they are hardly empowered to make their own decisions. The small number of videos labelled "unverified" calls into question the impact of the measure. Investing in fact-checking labels is the major recommendation for Google Search and YouTube services, as it is believed that Claim-review does not provide consistency and sustainability in the long term. From the EFCSN polling of its members on their individual engagement with VLOP signatories, the following insights were obtained: - Only 22,2% of the organisations do not currently have an agreement with Meta. Nevertheless , half of those that have no agreement have engaged with the company anyway regarding the improvement of the intervention or possible partnerships. Organisations polled recommend permitting labelling on political figures and allowing for contextual or additional information labels on any publication. - No conversations were reported to have taken place with X-Twitter or Microsoft, but EFCSN has engaged with the latter about these issues on a number of occasions during the reporting period..

	• 17,4% of the organisations reported having engaged with TikTok about labelling. Conversations mentioned prospective partnerships. Among the recommendations for improvement from organisations with agreements, upgrading editorial control on the selection of videos and placement of labels as well as allowing for 'false information' labels were considered.

V. Empowering Users	
Commitment 25 In order to help users of private messaging services to identify possible disinformation disseminated through such services, Relevant Signatories that provide messaging applications commit to continue to build and implement features or initiatives that empower users to think critically about information they receive and help them to determine whether it is accurate, without any weakening of encryption and with due regard to the protection of privacy. [change wording if adapted]	
Measure 25.1	**We will be open to act as a third-party partner and work with relevant signatories to design and implement features to facilitate users' access to authoritative information without any weakening of encryption and with due regard for the protection of privacy.**
QRE 25.1.1 [We will report on the tools, policies, partnerships, programs, and campaigns that involved our input, if any, including information obtained by polling our members.]	33,4% of the organisations have engaged in conversations regarding WhatsApp's service. Moreover, 5 organisations have entered the WhatsApp fact-checking program with access to the WhatsApp API. This represents only a few countries out of the 27 that the Code of Practice applies to.

VII. Empowering the fact-checking community
Commitment 30

Relevant Signatories commit to establish a framework for transparent, structured, open, financially sustainable, and non-discriminatory cooperation between them and the EU fact-checking community regarding resources and support made available to fact-checkers. [change wording if adapted]	
Measure 30.1	**We will assist Relevant Signatories in setting up agreements between them and independent fact-checking organisations (as defined in whereas (e)) to achieve fact-checking coverage in all Member States. These agreements should meet high ethical and professional standards and be based on transparent, open, consistent and non-discriminatory conditions, and will ensure the independence of fact checkers**
QRE 30.1.1 [We will poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE]	- No organisation that participated in the survey reported having current agreements with YouTube, Microsoft, or X-Twitter. 82,7% of the agreements signed by the organisations in the survey are NDA-protected, meaning some of the terms of the contract cannot be disclosed publicly. - Every organisation with an agreement with an online platform except for one believes that the agreements they signed with online platforms assured their independence as fact-checkers. 72,4% of the agreements under the survey have a duration of one year while 10,3% of them are signed for less than 6 months. - Google Search: no organisation reported an agreement with Google to provide fact-checking coverage of a Member State, as specified by the Code. One of the reported agreements with Google focused on supporting regional fact-checking cooperation, while the rest were media literacy-oriented. 77,8% of the organisations have an agreement with Meta and its services. This represents coverage of 76,1% of the countries covered by the survey. 95,2% of the agreements are focused on providing fact-checking coverage of a member state. Most organisations (71,4%) reported having regular meetings with Meta to improve workflow and gain efficiency. Nevertheless, 57,1% are not certain on how their insights are used by the platform while 14,2% do partially. 42,9% consider they count on efficient tools to do their job while 28,6% report these tools are not sufficient or they fail. 14,8% of the organisations have an agreement with TikTok. Out of this group, 75% of the contracts are directed to providing fact-checking coverage, which represents coverage for only a limited number of countries out of the 27 that must be covered. These organisations do not have clear knowledge on how the insights they provide are used. All of these fact-checkers with agreement with TikTok have an income higher than 1.500.000 and over 15 employees working on fact-checking tasks. - The EFCSN has conveyed to the VLOP signatories that, in appreciation of Europe's diversity, fact-checking coverage of a given country will be more effective when implemented by organizations that are rooted there and have experience not only in the local language, but are also aware of the culture, history, beliefs, and local traditions that are key understand and communicate effectively with the different communities and population groups in the country. To reflect that, the EFCSN assembly approved a change in its European Code of Standards for Independent Fact-Checking Organisations stating that verified members "*must have a substantial and demonstrable focus on one (or more) of the countries of the Council of Europe, plus Kosovo, Belarus or Russia, and a meaningful connection with the country or countries where the mis- and disinformation they fact-check originates from*".
Measure 30.2	**We will intercede for the community of independent European fact-checking organisations in order to assure Relevant Signatories provide fair financial contributions for their work to combat Disinformation on their services.**

QRE 30.2.3 [We will poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE]	Out of the fact-checking organisations that participated in the survey, none had agreement with Microsoft, YouTube, nor X-Twitter. Concrete data on the adequacy of their financial contributions to fact-checkers cannot be provided. Nevertheless, fact-checkers shared impressions on the signatories fair financial contributions to fact-checkers: ● 85,1% do not believe Google Search provides fair financial contributions. Organisations state that a grant-approach by the company is not sustainable and does not allow for in depth action nor improve the core work of fact-checkers, but more importantly the funding is not focused on fact-checking activities. ● 96,3% do not believe YouTube provides fair financial contributions. Fact-checkers highlight that funds are not sufficient given the magnitude of the problem and focus on grants for developing capacities rather than fact-checking. Others criticise YouTube for using intermediaries instead of dealing directly with fact-checkers or their representatives. ● 88,89% do not believe TikTok provides fair financial contributions. ● 100% believe Microsoft and X-Twitter do not provide fair financial contributions ● 25,9% do not believe Meta provides fair financial contributions. Meta stipulates some requirements for fact-checkers in their program as a limit of verifications per month but most claim full editorial control. On TikTok, there are some requirements on working days or some quotas to follow, as TikTok decides videos queued for verification. Google offers some fixed financial contributions (because of their grant nature) for specific project activities that are not necessarily fact-checking, but adjacent to it. Most of the agreements signed by Meta (81%), on the other hand, depend on publications rated and articles published, and 3 out of 4 agreements by TikTok use the number of fact-checks to determine the financial contribution.
Measure 30.3	[insert wording if adapted]
QRE 30.3.1 [We will report on actions taken to facilitate the cross-border collaboration between fact-checkers. We will also poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE]	The EFCSN, aside from ensuring high-standards for fact-checking organisations, offers access to a close-knit community where members can exchange knowledge, research, trends and other insights, as well as find opportunities to collaborate. The EFCSN also organises regular training and mentorship opportunities for its members, an annual conference and various forms of support for those facing harassment and other threats. Regarding the impressions of fact-checking organisations on online platforms' actions, polled organisations rated the statement "My organisation believes (signatory) contributes through its actions to fostering cross-border collaboration between fact-checking organisations" as follows: 1. Meta (2,67 points out of 4 on agreement with the statement) 2. Google (2.23 points) 3. LinkedIn (1.77) 4. YouTube (1.67 5. TikTok (1.55) 6. Bing (1.52) 7. X-Twitter (1.37)

	Fact-checking organisations believe that providing cross-border data on disinformation and actors from different countries would give relevant insights useful for their job and provide a wider picture of disinformation at an EU-level. Improved technological tools that allow this collaboration are also much needed.
Measure 30.4	**To develop the Measures above, we will be open to engage in consultations.**
QRE 30.4.1 [We will report on the conversations with Relevant Signatories we engage in, including the development of the framework of cooperation described in Measures 30.3 and 30.4. Furthermore, we will poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE]	The EFCSN has engaged in conversation with Relevant Signatories both privately and within the Task-force of the Code. Within the sub-group on fact-checking which the EFCSN chairs, we have brought to the table the conversation on recommendations for cooperation between verifiers and other signatories as well as other topics that aim to improve this collaboration for the benefit of users. The fact-checking community is willing to enter agreements with relevant signatories. Out of organisations that currently do not have a contract with them, all of them would consider an agreement with Google and Meta provided that fair remuneration is contemplated, 92,6% would consider the same with YouTube, 91,3% with TikTok, 88,9%; with X-Twitter, 81,5% with Bing, and 74,1% with LinkedIn. Organisations justify their interest in convening agreements with these online platforms because of the lack of enough reaction to tackle disinformation, their role in hosting and amplifying disinformation in their countries, and the need for more quality information in different languages in their services. Moreover, these organisations without an agreement are already investing time and work in monitoring disinformation in these platforms without any financial contribution given the need. Specifically, all organisations without agreement with Meta do, 73,9% do the same for TikTok, 77,8% for X-Twitter, 63% for YouTube, and 56,5% for Google Search.

VII. Empowering the fact-checking community
Commitment 31
Relevant Signatories commit to integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents; with full coverage of all Member States and languages. [change wording if adapted]

SLI 31.1.3 – Quantitative information used for contextualisation for the SLIs 31.1.1 / 31.1.2 [change wording if adapted]	The EFCSN has led the discussion regarding this SLI since we joined the Code. Before this, representatives of fact-checking organisations proposed within the Monitoring and Reporting Sub-Group those metrics and types of quantitative information that would empower our organisations in the fight against disinformation. The blueprint document included ideal metrics regarding the use of fact-checking for showcasing, moderating, or machine-learning purposes as well as regarding the impact of the fact-checking content used. The conversation has currently been moved to the sub-group chaired by the EFCSN.

Measure 31.3	[insert wording if adapted]
QRE 31.3.1 [insert wording if adapted]	Within the newly established sub group on empowerment of fact-checkers co-chaired by the EFCSN, we have established a tentative timeline to follow for the establishment of the fact-checking repository envisioned in the Code. This includes approaching experts and those potentially interested in the usage of the tool in order to build a repository that is useful and accessible. Once the repository is established, our verified members will actively contribute with disinformation content detected.
Measure 31.4	[insert wording if adapted]
QRE 31.4.1 [insert wording if adapted]	Within the steps proposed by the EFCSN for the establishment of the repository, we contemplate reaching out to experts on technical aspects in order to get insights that make the tool useful for a wide set of users.

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]	The EFCSN was born as a result of the resolve of almost 50 fact-checking organisations that wanted to raise the bar and work according to the highest standards in ethics, transparency, methodology, and independence as outlined in the Code of European Standards for Independent Fact-Checking Organisations (2022). Our members agree for their actual adherence to those standards to be evaluated by two different independent academic experts every two years, and EFCSN has a complaint procedure to deal with alleged non compliance by its members. The Code of the EFCSN is contemplated under Measure 33.1 as an instrument to comply with it.
SLI 33.1.1 – number of European fact-checkers that are IFCN-certified [change wording if adapted]	Methodology of data measurement: we have taken into account fact-checking organisations based in EU Member or Council of Europe states, plus Belarus and Kosovo. For both networks, we have included the status of the organisations as for the end of August 2023.

Nr of fact-checkers IFCN-certified	Nr of members of EFCSN

Data	Data from IFCN 46 verified 11 under renewal 22 expired	39 applied in two rounds: Jan. 2023 and May 2023 16 have been approved 23 are under review

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 34.3	[insert wording if adapted]
Measure 34.4	[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 35.2	[insert wording if adapted]
Measure 35.3	[insert wording if adapted]
Measure 35.4	[insert wording if adapted]

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]
QRE 36.1.1 (for the Commitments 34-36) [insert wording if adapted]	EFCSN has not taken part in the task-force subgroup in charge of the Transparency Center but we have been in contact with other signatories in order to follow the development of the tool. Furthermore, we are available to signatories or other relevant actors that want to receive input from our organisation. This is the first report of EFCSN, so it is also the first time we upload our information into the Transparency Center timely and completely.

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]	A number of verified members of the EFCSN were already signatories of the Code and thus part of the Task-force in representation of the interest of fact-checkers. As a signatory of the Code, the EFCSN is currently part of the Task-force, specifically of the following sub-groups: - Empowerment of fact-checkers SG, which the EFCSN chairs, and that is now working on its Terms of Reference that will guide the work of the Subgroup. - Monitoring & Reporting SG, - Crisis Response SG, - Ad Scrutiny SG, - Outreach and Integration of New Signatories SG and - the newly convened Generative AI SG.

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]	In order to work and report on our commitments under the Code of Practice, the EFCSN counts on a Policy Task-force formed by representatives of some verified members of the association, in charge of duties related to both reporting information and engaging with relevant actors, including the Task-Force and other signatories. The elected Governance Body is ultimately responsible for following the development of the Code of the Code and ensuring EFCSN's compliance. Meanwhile, verified members of the association and organisations that contributed to the foundation of the EFCSN continuously contribute by giving insights based on their experience that the EFCSN can report on to contextualise information provided by other signatories or flag possible breaches in commitments. Some individual members of the EFCSN are also signatories of the Code of Practice in their own right.

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 40.2	[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]

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
Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure, as agreed in the Task-force. [change wording if adapted]