

Code of Practice on  
Disinformation – January  
2023 Baseline Report of  
Maldita.es

## Table of Content

<b>VII. Empowering the fact-checking community</b> .....	<b>1</b>
Commitment 33 .....	1
<b>VIII. Transparency Centre</b> .....	<b>2</b>
Commitment 34 .....	2
Commitment 35 .....	2
Commitment 36 .....	2
<b>IX. Permanent Task-Force</b> .....	<b>3</b>
Commitment 37 .....	3
<b>X. Monitoring of Code</b> .....	<b>3</b>
Commitment 38 .....	4
Commitment 39 .....	4
Commitment 40 .....	4
Commitment 42 .....	5
Commitment 43 .....	5

## Executive summary

Executive summary (max. 2 pages)

Maldita.es is a non profit organisation dedicated to fighting disinformation. Our goal is to give people “tools not to be fooled”, so we develop innovative formats particularly suited for social media and for the creation of a community that shares our mission and is ready to help us fulfil it. Most of our editorial activities are based in fact-checking techniques, production of explainers, and data journalism. Furthermore, we do Media Literacy, Academic Research, and Public Policy in order to build a society that everyday grows more capable to identify dis and misinformation before sharing it.

Now that Maldita.es is a well-established organisation, we have put a bigger focus on **strengthening the European fact-checking community through better cooperation**. An example of this effort is that we have taken an active role in the project for the creation of the **European Fact-Checking Standards**, as Maldita.es was a member of the initial consortium and it now holds the presidency of the association's governance body. The EFCSN has made an effort to assist small fact-checking organisations by encouraging the development of technical capacity (such as the creation of enhanced databases) and skill sets (such as advocacy capabilities) to strengthen their contribution to the fight against disinformation.

Moreover, there is no doubt that cooperation is one of the best practices for fact-checking, especially in times of crisis. In order to avoid duplication of work and looking for transnational trends we inspired the creation of **UkraineFacts**, a debunk database open to fact-checkers from all around the world that resulted in sharing over 5,000 articles related to the war in Ukraine from almost 100 organisations.

Also in the context of the invasion, we have taken part in **EDMO's task-force on Disinformation and the War in Ukraine**, where we shared our daily insights, common trends and narratives, as well as guidance to continue to fight disinformation about the conflict.

At an organisational level, Maldita.es has undoubtedly **improved capacities in terms of technology and human resources** in order to confront online disinformation more efficiently.

As for the Code, Maldita.es recognized the step in the right direction taken by the Code of Practice on Disinformation 2018 as a call to action against a problem that affects every online platform. Nevertheless, it fell short: commitments were rather weak and, as guidance provided by the Commission to strengthen the Code recalled, a broader participation from other relevant actors was needed.

Maldita.es joined the negotiations when the call for participation in the strengthening of the 2018's Code was made. During the process, we made concrete suggestions from the perspective of an independent fact-checking organisation, based on years of experience fighting online disinformation. Moreover, Maldita.es became a signatory of the Code in order to contribute with our commitments.

Because of our organisation's nature and our role within the Code, we believe it is key to:

- 1) Promote meaningful **collaboration between online platforms and other relevant stakeholders, including the independent fact-checking organisations** that abide by the standards set by the European Fact-checking Standards Network or the International Fact-checking Network, facilitating that their users across Europe benefit from those organization's work.;
- 2) Obtain **greater transparency from signatories (particularly online platforms) in their approach fighting disinformation** – clear knowledge on what policies are in place, what measures are being taken, and what tools users have in place to protect themselves within the platforms' services,
- 3) Make sure the Code **adapts to new crises and challenges** on disinformation flagged by fact-checkers and researchers.

4) Correctly **monitor the compliance and effectiveness of the Code** as a tool to prevent the spread of online disinformation and its most damaging consequences, seeing that commitments actually translate into actions that obtain meaningful results, or that larger signatories face consequences if that is not the case. Our commitments within the Code follow these mentioned lines.

## 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.

### 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, thus please adjust and fill in the provided template as needed. Additionally, as with all other SLIs, data should 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, except those that form part of the harmonised reporting template itself (TBD).

## 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.

## 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 Center 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]	
<b>QRE 33.1.1</b> [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]</p> <p>We have been a verified signatory of the International Fact-Checking Network (IFCN) Code of Principles since 2018 and have undergone the assessment procedure each year since then. The assessment is accessible <a href="#">here</a> and our declarations on <a href="#">methodology</a>, <a href="#">organisational transparency</a>, and <a href="#">neutrality</a> are also public on our website.</p> <p>Meanwhile, Maldita.es has led the consortium for the development of the European Fact-Checking Network, that we now chair. We have now updated our methodologies, policies and procedures to make them even more transparent and accessible, in order to be compliant with the <a href="#">EFCSN Code of Standards</a>. EFCSN is accepting applications as of January 2023 and forwarding them to external assessors to be evaluated.</p>	
<b>SLI 33.1.1 - number of European fact-checkers that are IFCN-certified</b> [change wording if adapted]	<p>Methodology of data measurement [suggested character limit: 500 characters]</p> <p>We have taken into account fact-checking organisations based in EU Member or Council of Europe states, plus Belarus and Kosovo.</p> <p>For the IFCN, we have included the status of the organisations.</p> <p>For the EFCSN (<i>Code of Professional Integrity</i> in the text of the Code), the organisation is accepting and evaluating applications starting on January 2023</p>	
	Nr of fact-checkers IFCN-certified	Nr of members of CPI
<b>Data</b>	<p>Verified: 44</p> <p>Under renewal: 12</p> <p>Expired: 18</p>	<i>As of January 2023, the EFCSN is accepting applications for later evaluation</i>

<b>VIII. Transparency Centre</b>	
<b>Commitment 34</b>	
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]

<b>VIII. Transparency Centre</b>	
<b>Commitment 35</b>	
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]

<b>VIII. Transparency Centre</b>	
<b>Commitment 36</b>	
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]	
<b>QRE 36.1.1 (for the Commitments 34-36)</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]



	Even though Maldita.es has not taken part of the task-force subgroup in charge of the Transparency Centre, we have been in contact with other signatories to follow the development of the tool and have attended the final meeting on the design of the site. Furthermore, we are available to signatories or other relevant actors that want to receive input from our organisation.
--	--

<b>IX. Permanent Task-Force</b>	
<b>Commitment 37</b>	
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]
<b>QRE 37.6.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters] Maldita.es has taken part in two different sub-groups within the Task-force: Crisis Response and Monitoring & Reporting. Furthermore, we have been present in the meetings dedicated to develop a set of structural indicators for the Code, a working group created within the Monitoring & Reporting Subgroup. By attending every meeting of these subgroups, we have shared insights from our daily fight against disinformation and different narratives we encounter as well as what we perceive as shortcomings of other signatories when it comes to fighting and measuring disinformation. Furthermore, we have raised concerns from the fact-checking community and given constant feedback on the decisions that were being taken.

<b>X. Monitoring of Code</b>
------------------------------

### 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]

**QRE 38.1.1** [insert wording if adapted]

Outline relevant actions [suggested character limit: 2000 characters]

In order to comply with our commitments under the Code, the entire Public Policy and Institutional Development team is in charge of duties related to both reporting information and engaging with the Task-Force, other signatories and different relevant actors that could contribute to the implementation of the Code. These include contacts with civil society organisations, researchers, public authorities, and online platforms within the Code and also with potential partners that are not yet signatories.

Meanwhile, Maldita's debunking team closely searches for and monitors different narratives and networks that promote disinformation, providing valuable evidence to alert relevant Signatories of potential policy breaches or act as an early-warning system. With the aim of identifying larger trends in misinformation, these observations are also being shared with other independent fact-checking organisations within the IFCN and EFCSN.

## 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.