Code of Practice on Disinformation – Report of FIDU – Federazione Italiana Diritti Umani for the period 1 January – 31 December 2024

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Executive summary

FIDU (Italian Federation for Human Rights) is a global organization dedicated to safeguarding human rights, upholding the rule of law, and supporting victims of human rights abuses. FIDU's work primarily focuses on advocacy, awareness campaigns, fact-finding missions, monitoring elections and trials, and reporting abuses. To achieve its mission, FIDU draws upon its vast international network, which includes civil society organizations (CSOs), universities, media professionals, lawyers, and experts. These collaborations aim to strengthen traditional mechanisms for human rights protection and introduce innovative tools to combat impunity and defend victims of abuses. Recognizing the growing threats posed by disinformation and foreign interference to human rights and the rule of law, FIDU actively engages in efforts to counter these phenomena. FIDU's work in this field is focused on raising awareness about the negative impact of disinformation and foreign interference on society, as well as monitoring and analysing the narratives, methodologies, and targets used in disinformation campaigns.

During the reporting period and in relation to the Code's commitments, FIDU successfully completed the implementation of two key projects: one, under the European Commission's CERV Programme, Media Literacy for Democracy (MLFD), which aimed at promoting an effective and inclusive European media literacy strategy among citizens to protect democracy, another one, New Media Literacy Strategies to Counter Antisemitism, within the Coalition to Counter Online Antisemitism (CCOA), focused on developing media literacy programs to counter antisemitism. Both initiatives contributed to empower experts across the EU to create and implement strategies against hate speech, misinformation, and disinformation targeting our society. In addition to these projects, FIDU organized numerous events, including conferences and workshops on media literacy, disinformation, and foreign interference. Members of the organization also participated in various national and international events to further its advocacy efforts and raise awareness on the necessity of a multidisciplinary and cross-sectoral approach to address these issues. Specifically, during the reporting period, FIDU's activities related to media literacy and the fight against disinformation have focused on four main areas: advocacy, training, participation in cross-sectoral activities, and publications. FIDU's advocacy efforts focused on organizing various national and international public events. These activities involved discussions on disinformation, media literacy, and strategies to face the current challenges. FIDU collaborated with multiple institutions, experts, and stakeholders to present findings, share policy recommendations, and explore solutions to address the challenges posed by disinformation and foreign interference. In terms of training, within the framework of the MLFD and the New Media Literacy Strategies to Counter Antisemitism projects, FIDU organized and implemented several national and international training sessions and workshops, both in person and online, primarily targeting students, young professionals, and media workers. Regarding the participation in cross-sectoral activities, FIDU participated in several events aimed at exchanging best practices and insights on media literacy and advancing recommendations. Finally, regarding publications, the main publications released during the reporting period are related to the findings and recommendations of the MLFD project MLFD Policy Recommendations and of the New Media Literacy Strategies to Counter Antisemitism project Final Report.

Furthermore, FIDU's work on disinformation extends to the ongoing Russian war of aggression against Ukraine. In collaboration with Ukrainian partners, FIDU works to raise awareness of the realities of the war while combating pro-Kremlin narratives. This includes continuous analysis of how these narratives are spread through both traditional and new media, identifying the targets of such campaigns, and examining the methods used in these operations.

FIDU's participation in the Code of Practice on Disinformation is specifically related to the subgroups Crisis Response and Outreach and Integration of New Signatories.

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, filer and download data as needed in a user-friendly way and format.

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 17.1	
QRE 17.1.1	FIDU has actively developed and maintained several resources to empower users in evaluating and engaging with online content. One such tool is the MLFD Booklet (https://fidu.it/wp-content/uploads/MLFD-Booklet.pdf), produced within the Media Literacy for Democracy project, under the CERV Programme. This booklet remains freely available online and serves as a resource for citizens, helping them recognize and counter disinformation. The MLFD Booklet is also designed to be used by trainees and educators during workshops and training sessions. It provides practical guidance on how to evaluate online content, understand the context of the information presented, and critically assess the sources of news and information. This is part of FIDU's ongoing commitment to supporting citizens, educators, and vulnerable groups in strengthening their media literacy and critical thinking abilities, thereby improving their resilience to the challenges posed by disinformation and foreign interference.

SLI 17.1.1 - actions enforcing policies above [change wording if adapted]	Engagement and interactions with the tool.			
	Total count of the tool's impressions	Interactions/ engagement with the tool	Other relevant metrics	Other relevant metrics
Data	N/A	500 among educators and participants engaged in the activities (EU)		

Measure 17.2	
QRE 17.2.1	During the reporting period, FIDU's activities related to media literacy and the fight against disinformation have focused on 4 main areas: **- Advocacy**: Among the main activities in the field:

FIDU co-hosted the **MLFD Final Conference** held online on March 19th, which gathered over 120 participants from 10 EU countries, to discuss disinformation during the war in Ukraine and the European elections and present the project's final recommendations. On July 11, FIDU organized the event **Media Literacy Strategies,** which was hosted in the Italian Parliament and brought together MPs, CSOs, journalists, and experts to present and discuss the MLFD project findings and policy recommendations. On November 28th, FIDU co-organised the international conference **Countering Disinformation as a Global Challenge,** in cooperation with the European Council of Foreign Relations (ECFR) and the Embassies in Rome of the Republic of Poland, Estonia, Latvia, Lithuania, and Ukraine, which gathered representatives of institutions and experts to discuss and coordinate strategies to counter disinformation and foreign interference. Within the **New Media Literacy Strategies to Counter Antisemitism** project, funded by the Coalition to Counter Online Antisemitism (CCOA) through the Google.org Foundation, FIDU hosted a final conference at the Italian Senate in December 2024, presenting the final report and tailored policy recommendations for combating online antisemitism through media literacy.

- Training: Within the framework of the MLFD and the New Media Literacy Strategies to Counter Antisemitism projects, FIDU organised and implemented several national and international trainings and workshops, both in person and online, mostly targeted to students, young professionals, and media workers.

- Participation in cross-sectoral activities: FIDU participated in several events aimed to exchange best practices and insights on media literacy and the current challenges. In particular, on June 3rd FIDU participated in the closed-door workshop **Disinformation Storm – Managing the Unmanageable** organised by ECFR. On November 7th, FIDU participated in the **Media Literacy Cluster Meeting**, specifically in the panel session "Mis-/disinformation, democracy, and values, at the European Commission headquarters in Brussels, which was organised by the European Education and Culture Executive Agency (EACEA) and brought together experts from diverse sectors across Europe. On November 25th-27th FIDU participated in Warsaw in the international conference **Mainstreaming Digital Human Rights: a Unified Approach to Counter Online Antisemitism Beyond 2024,** organised by ISD and where FIDU presented the final results of the New Media Literacy Strategies to Counter Antisemitism project.

- Publications: The main publications in the field published by FIDU in the reporting period are related to the findings and recommendations of the MLFD project https://fidu.it/language/en/mlfd-policy-recommendations/ and the New Media Literacy Strategies to Counter Antisemitism project https://fidu.it/language/en/report-new-media-literacy-strategies-to-counter-antisemitism/ .

SLI 17.2.1 - actions enforcing policies above	- Number of participants and number of countries involved in the advocacy activities. - Number of awareness raising activities (conferences and trainings).

	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of participants	Nr of interactions with online assets	Nr of countries
Data	8 + 2 trainings	N/A	370	N/A	+ 15
Measure 17.3					
QRE 17.3.1 [insert wording if adapted]	For the above-reported activities FIDU partnered with media literacy experts, especially from European universities, EDMO Ireland, the Italian Digital Media Observatory (IDMO), the Italian Communications Authority (Agcom), as well as several CSOs with relevant expertise in media literacy and disinformation. Additionally, FIDU participated in meetings and events with EU institutions, notably the EEAS – East StratCom Task Force, as well as Europe Direct, EACEA, and DGs representatives.				

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	
QRE 36.1.1 (**for the Commitments 34-36)** [insert wording if adapted]	As qualitative reporting elements and service level indicators are essential for full compliance with the code, FIDU remains committed to meeting them accordingly.

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]	N/A
Data	N/A

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	
Measure 37.2	
QRE 37.6.1 [insert wording if adapted]	FIDU is active in 2 subgroups. Namely Crisis Response and Outreach and Integration of New Signatories. FIDU members participated in all the CoP plenary sessions.

Reporting on the service's response during a period of crisis

Reporting on the service's response during a crisis
War of aggression by Russia on Ukraine and Israel – Hamas Conflict

At the time of reporting, significant threats related to mis- and disinformation continue to be observed, particularly concerning the Russian war of aggression against Ukraine and the Israel-Hamas conflict. These threats contribute to widespread information disorder, affecting both online and traditional media. The dissemination of false or misleading information through various channels, including news outlets, social media platforms, as well the use of diverse tactics, create confusion and distorts public debates. In some cases, the disinformation and harmful narratives related to the Russian war in Ukraine and the Israel-Hamas conflict have been interconnected, with the narratives being manipulated across multiple conflicts. This results in a lack of timely, accurate, and comprehensive information for the general public, which often leads to reactive rather than proactive responses. Additionally, vulnerable groups, such as marginalized communities, are disproportionately impacted by disinformation and require tailored approaches to address their specific challenges.

Mitigation: FIDU's work in the media literacy field and disinformation counteraction aims to mitigate these threats by empowering individuals across different sectors to critically assess both online and traditional media sources, ensuring that more informed, proactive responses are fostered in the face of evolving global challenges. Specifically, FIDU's action, based on a multidisciplinary and cross-sectoral approach, includes:

- Analysis of the modus operandi used by foreign actors: tactics (social media, fake accounts and state-run outlets disseminated fake news), targets, and goals.
- Raising awareness on disinformation, foreign interference and information manipulation at a multi-sector level.
- Promote activities based on cross-sector cooperation.

All the activities are addressed by always keeping in mind the need to balance the right to freedom of expression, the right to be informed, and the protection of democracy and the rule of law from disruptions to the public debate.

During the reporting period, FIDU conducted various activities, including hosting conferences in collaboration with Institutions, publishing reports and policy papers, and participating in expert roundtables. These activities aimed to disseminate knowledge, facilitate discussion, and foster collaboration among stakeholders in order to improve the Member States' response to crisis.

Empowering Users

Specific Action applied (with reference to the Code's relevant Commitment and	- Publication of findings, analysis, and recommendations related to the spread of antisemitism during Israel-Hamas conflict: https://fidu.it/wp-content/uploads/Report_New-Media-Literacy-Strategies-to-Counter-Antisemitism.pdf - Publication of an analysis of vulnerability to disinformation and policy recommendations for media literacy:

Measure)	https://fidu.it/wp-content/uploads/FINAL_MLFD-Recommendations.pdf - Organisation of trainings and expert workshops on the spread of disinformation during the Russian war of aggression against Ukraine and the Israel-Hamas conflict. - Organisation of the conference Countering Disinformation as a Global Challenge in collaboration with ECFR and the Embassies in Rome of the Republic of Poland, Estonia, Latvia, Lithuania, and Ukraine to exchange insights and coordinate strategies to counter disinformation and foreign interference in the context of the Russian war of aggression against Ukraine.