# Code of Practice on Disinformation – Report of Fundación Maldita.es for the period January 2024 to December 2024

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# Executive summary

Fundación Maldita.es is a non-profit foundation based in Spain that <u>builds public trust and fosters a healthy information ecosystem for all</u> by fighting disinformation and promoting transparency through journalism, education, technology, research and policy action. Our multidisciplinary approach is rooted in evidence-based journalistic and investigative techniques supported by cutting edge and award-winning technological development that drives our educational, research and policy action in collaboration with a unique, extensive and international community of citizens, partners, and stakeholders. This pioneering and holistic response to disinformation is founded on an innovative, wide-ranging, and globally-recognised set of expertise that establishes us as a leading international reference in the fight against disinformation.

**Our mission** is to provide all actors affected—from legislators and digital platforms to journalists, citizens & educators— with tools, capacities, and evidence-based information so that they can make informed decisions, and together we can foster a more resilient, accessible, and trustworthy media & information ecosystem.

As part of Fundación Maldita.es' goal of **strengthening the European fact-checking community through better cooperation,** the CEO of Maldita.es currently holds the presidency of European Fact-Checking Network'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, cooperation is one of the best practices for fact-checking, especially in times the context procokes disinformation to thrive. In the context of the 2024 European Parliamentary elections, Maldita.es participated in the **EFCSN's Elections24Check project**, the first of its kind database that gathered and categorised fact-checked information for European countries and citizens ahead of the 2024 European elections. Maldita.es played a pivotal role in conceptualising and developing this project for the EFCSN. It led the effort to harmonise data across the community, engaging with partners to establish a common language and creating user-friendly tools for fact-checkers to efficiently collect and input data. Maldita.es was one of the main contributors to the database among over 40 European fact-checking organisations participating, providing 1 out of 10 pieces of content (debunks, prebunks, fact-checks, etc.) registered in the database as of the last day of the elections. With Maldita.es playing a key coordinating role, this project was successfully negotiated and implemented, alongside other EFCSN election-related initiatives such as the Meta AI project and the Climate initiative from the ECF.

Following its participation in the EFCSN's Elections24Check project, Fundación Maldita.es elaborated an ex-post investigation to analyse the **[response of five very large online platforms to debunked disinformation registered in the Elections24Check database](#)** during the EU Election 2024, whose results were shared with Maldita.es' stakeholders and in the press. Fundación Maldita.es also participated in a number of forums sharing their insights on fighting disinformation during the EU Elections such as the conference on "**[Disinformation, Media and the Future of the EU](#)**" with leading communication professionals, researchers and other experts on 27 May 2024, and the webinar "**[Separating voice from noise: Insights from the 2024 EP Elections](#)**" organised by Access Democracy and Democracy Reporting International on 27 June 2024. Using the data from the Elections24Check database, Maldita.es published a couple of articles on [disinformation against institutions](#) and on [disinformation on migrants during the European elections](#).

At national level, Maldita.es provided fact-checking coverage for three regional electoral dates in Spain during 2024: Galicia, País Vasco and Cataluña.

Aside from efforts related to disinformation on elections, Fundación Maldita.es quickly reacted to the information crisis that followed the floods in Valencia and other eastern regions of Spain in November 2024. Over 110 articles were published debunking hoaxes and disinformation narratives around the natural disaster which did not only circulate in Spain but across many Member States. In addition, a reflection on the role of online platforms during this specific crisis was published and shared within the Task-Force.

On a different note, Fundación Maldita.es has also aimed to foster the cooperation and dialogue among the Code's Signatories through the organization of the event "Disinformation in the EU 2024-2029: Challenges for a New Term" in which topics such as the conversion of the Code were discussed among representatives of the Task-Force.

Apart from all this, Maldita.es continued its collaboration with the **Information Sharing and Analysis Center on Foreign Information Manipulation and Interference (FIMI-ISAC)**, a group of like-minded organisations that engage in protecting democratic societies, institutions, and the critical information infrastructures of democracy from external manipulation and harm.

| VII. Empowering the fact-checking community | |
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| **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] | Outline relevant actions [suggested character limit: 2000 characters]<br><br>*Maldita.es is an active part of the European Fact-Checking Network (EFCSN). Currently holds the chairmanship of the association's governance body. We have updated our methodologies, policies and procedures to make them even more transparent and accessible, in order to be compliant with the* [EFCSN Code of Standards](#).<br><br>*Maldita.es has also been a verified signatory of the International Fact-Checking Network (IFCN) Code of Principles since 2018 and has undergone the assessment procedure each year since then. The assessment is accessible* [here](#) *and our declarations on* [methodology](#), [organisational transparency](#), *and* [neutrality](#) *are also public on our website.* |

| **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 March 2025. | |
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| | Nr of fact-checkers [IFCN-certified](#) | Nr of [members of EFCSN](#) |
| **Data** | 68 signatories<br>10 organisations under renewal<br>9 organisations with certification expired | 60 verified members<br>4 under review |

| VIII. Transparency Centre |
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| **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] |

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| Measure 34.3 | [insert wording if adapted] |
| Measure 34.4 | [insert wording if adapted] |

| VIII. Transparency Centre |
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| **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] |

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| Measure 35.2 | [insert wording if adapted] |
| Measure 35.3 | [insert wording if adapted] |
| Measure 35.4 | [insert wording if adapted] |

| VIII. Transparency Centre |
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| **Commitment 36** |
| Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted] |

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| **QRE 36.1.1 (for the Commitments 34–36)** [insert wording if adapted] | |

| IX. Permanent Task-Force |
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| **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] |

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| Measure 37.1 | [insert wording if adapted] |
| Measure 37.2 | [insert wording if adapted] |

| Measure 37.3 | [insert wording if adapted] |
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| 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] | Outline relevant actions [suggested character limit: 2000 characters]:<br><br>Fundación Maldita.es takes part in five different sub-groups within the Task-force: Crisis Response SG (and the Elections Working-Group), Monitoring & Reporting SG, Empowering Fact-checkers SG and Generative AI SG. By attending every meeting of these subgroups, we have shared insights from our daily fight against disinformation, different narratives we encounter and the challenges possessed by AI, as well as what we perceive as shortcomings of other signatories when it comes to fighting and measuring disinformation, particularly during crises and elections. Furthermore, we have raised concerns from the fact-checking community and given constant feedback on the decisions that were being taken. |

| X. Monitoring of Code |
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| **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]:<br><br>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.<br>Meanwhile, Fundación 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. |
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| X. Monitoring of Code |
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| **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 | |
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| **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 |
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| **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 |
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| 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] |

Reporting on the service's response during an election

| Reporting on the service's response during an election |
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| **2024 European Parliament Elections** |

Threats observed or anticipated at time of reporting:

In our analysis on "Platform Response to Disinformation during the EU Election 2024" we observed that the five analysed very large online platforms (Facebook, Instagram, TikTok, X and YouTube) did not act against half of the content debunked by independent fact-checking organisations across Europe ahead of the EP Elections (over 1,300 publications). No visible action was taken on 75% of disinformation content on YouTube and 70% on X, while Facebook responded to 88% of debunked posts, Instagram to 70%, and TikTok to 40%. The 20 most viral posts or videos that received no action by the platforms hosting them accumulate over 1,5 million views each.

Full results here: https://files.maldita.es/maldita/2024/06/platform_response_to_disinformation_during_the_eu_election.pdf

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Mitigations in place – or planned – at time of reporting: [suggested character limit: 2000 characters].

Following the results of the analysis of platforms response to debunked disinformation, Maldita.es shared the results of the study with Maldita.es' stakeholders and in the press, including during the Plenary meeting of the Permanent Task-Force of the Code of Practice on Disinformation, with the intention of bringing public attention to the lack of action of these platforms on disinformation during the electoral period.

This analysis was a result of Maldita's involvement in the EFCSN's project Elections24Check, to which we contributed with over 300 articles related to disinformation on the elections. During the electoral campaign and on the date of the EP elections itself, Maldita provided full coverage which included monitoring disinformation, verification and debunking of hoaxes, analysis of trends, and creation of pre-bunking and explanatory content for our community. Maldita also organised an event in which the speakers reflected on how disinformation narratives are influencing public perception and the European electoral process.

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| **Empowering the Fact-Checking Community** |
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Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.

| **Compliance with standards** (Commitment 33, Measure 33.1) | Description of intervention:<br><br>Maldita.es is one of the founders and an active actor of the European Fact-Checking Network (EFCSN). Currently holds the chairmanship of the association's governance body. We have updated our methodologies, policies and procedures to make them even more transparent and accessible, in order to be compliant with the EFCSN Code of Standards.<br><br>Maldita.es has also been a verified signatory of the International Fact-Checking Network (IFCN) Code of Principles since 2018 and has undergone the assessment procedure each year since then. The assessment is accessible here and our declarations on methodology, organisational transparency, and neutrality are also public on our website. |
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