

1 MARZO 2022



Italian Digital
Media Observatory

POLICY DIALOGUE CONCEPT PAPER



Co-financed by the Connecting Europe
Facility of the European Union

Disclaimer

This report was written as part of the Italian Digital Media Observatory project under EC grant agreement INEA/CEF/ICT/A2020/2394428. The information, documentation and figures available in this deliverable were written by the Italian Digital Media Observatory project consortium and do not necessarily reflect the views of the European Commission. The European Commission is not liable for any use that may be made of the information contained herein.

Statement of originality

This deliverable contains original unpublished work except where clearly indicated otherwise. Acknowledgement of previously published material and of the work of others has been made through appropriate citation, quotation or both.

How to quote this document

De Rosa S., Nicolai A. (2022), Policy Dialogue Concept Paper.



This deliverable is licensed under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International (CC BY-NC-SA 4.0).

Table of Contents

Executive Summary	5
1 Policy dialogue: the state of the debate at European level	6
2. The Italian landscape: why policy dialogue is needed	12
2.1 Stakeholder mapping: who are the stakeholder to engage	13
2.2 Process and methods to implement	15
2.3 Timeline	16
3 Conclusions	18
4 References	20

List of Figures

Figure 1. EC action against Disinformation	7
Figure 2. Stakeholders engaged in the IDMO policy activities	15
Figure 3. IDMO policy dialogue process	17

Executive Summary

Nowadays, the magnitude of disinformation and its effects is causing significant concern (Edwards et al. 2021). One of the major challenges of the current information ecosystem is the rapid spread of fake news through digital media (Tandor et al., 2019; Fletcher et al. 2018). In line with this, disinformation spreading on social media can be easily manipulated and distorted creating ad-hoc disinformation effects. To face this issue, an articulated and forward-looking policy for countering threats in the information space is needed at European level. In particular, it is crucial to design i) an approach that draws on a variety of effective tools non-regulatory principles and norms to enable a healthy digital public sphere, and ii) regulatory interventions to ensure that platforms adhere to a clear set of norms, principles and possible sanctions. However, disinformation needs to be carefully discussed also at national level. In the case of Italy, at the moment of the writing, no effective measures have been adopted to counteract disinformation online.

Among its scope, IDMO has the task to set up a structured conversation with policy makers and sectorial stakeholders to establish a protocol to discuss disinformation to convey concrete recommendations for decision makers in terms of regulatory and non-regulatory measures. To achieve this aim, IDMO has developed a policy dialogue strategy that intends to create a recognized forum discussion where stakeholders can exchange ideas, debate and finally develop structured recommendations which will support the next steps of the agenda for policy makers.

D4.1 summarises the measures adopted at EU level and reports the state of the art of the discussion Italy. Furthermore, D4.1 describes the framework of reference for the definition of a policy dialogue led by IDMO at Italian level.

The deliverable is a public document, and its final aim is to report how the process and protocols to define policy recommendations for Italian policy makers have been conceived.

1 Policy dialogue: the state of the debate at European level

As claimed by several scholars, among the other by Edwards et al. (2021) the magnitude of disinformation and its effects is causing significant concern. One of the major challenges of the current information ecosystem is the rapid spread of fake news through digital media (Tandor et al., 2019; Fletcher et al. 2018). This statement opens the debate on the fact that information spreading on social media can be easily manipulated and distorted creating ad-hoc disinformation effects.

Therefore, disinformation recently became a field of media studies but also a relevant political issue. To face this issue, an articulated and forward-looking policy for countering threats in the information space is needed in the European Union (EU), especially for the threats posed by disinformation, influence operations, and foreign interference. EU officials and their counterparts in EU member states have the task to design i) an approach that draws on a variety of effective tools non-regulatory principles and norms to enable a healthy digital public sphere, and ii) regulatory interventions to ensure that platforms adhere to a clear set of norms, principles and possible sanctions. As a general approach disinformation is considered a fundamental problem for democracy that should be addressed with the improvement of the health of public sphere debate in EU member states, but at the same time the foreign disinformation campaign and external interference are treated as security concern. As a matter of fact, any countermeasure action and policy intervention need to consider the two sides of the problem to establish a sound foundation of disinformation policy. Any regulatory and non-regulatory policy proposal on disinformation should not only be designed in terms of data access and transparency but also in terms of its geopolitical impact. Raising costs, denying benefits, de-monetization strategy, denying capabilities and sanctions application should be among the motivations driving policy interventions.

European political institutions and the European Commission (EC), committed to defend European values and European democracy limiting the spread of harmful disinformation. The reason behind the massive focus on disinformation is explained by the following statement expressed by the High Level Expert Group (HLEG) created by the EC. Accordingly, disinformation “represents risks for our democratic processes, national security, social fabric, and can undermine trust in the information society and confidence in the digital single market” (HLEG report, 2018). As reported in the *Figure 1*, since 2015, with the launch of the European External Action Service (EEAS) East StratCom Task Force, the EC has been attentive on the topic. Just to mention some examples reported in the *Figure 1*, a Joint Framework on countering hybrid threats was implemented in 2016 and further measures have been deployed to protect elections in 2018 and in 2019. In parallel, many activities have been promoted to increase media literacy skills.

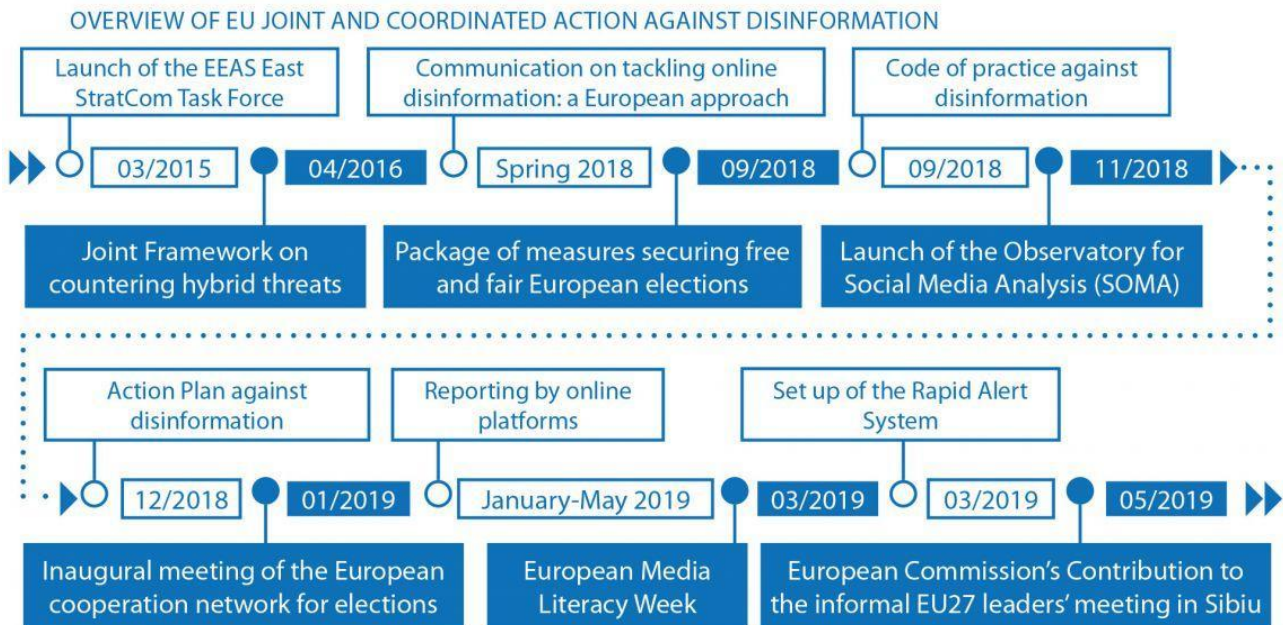


Figure 1. EC action against Disinformation¹

Core actions pursued by the EC are: European Action Plan² and Code of Practice³ who both focuses on the following five key focal points to tackle disinformation:

- 1) enhance transparency of the digital information ecosystem;
- 2) promote media and information literacy;
- 3) develop tools to enhance the empowerment of users and journalists and foster positive engagement;
- 4) safeguard the diversity and sustainability of the European news media ecosystem;
- 5) conduct continuous research on the impact of disinformation in Europe.

All this action points need to be supported by evidence-based approaches based on increase transparency and access to relevant data. An evidence-based approach can be efficiently pursued only if needed knowledge, data and information is accessible. Despite some experience regarding online advertising transparency archives or the Social Science One (SSO) initiative, namely a platform that allowed researchers to apply for data access to Facebook, there's a clear and persistent lack of access to relevant data allowing analysis and monitoring of disinformation campaigns.

¹ Source: European Commission, <https://ec.europa.eu/digital-single-market/en/tackling-online-disinformation>

² https://eeas.europa.eu/sites/eeas/files/action_plan_against_disinformation.pdf

³ <https://ec.europa.eu/digital-single-market/en/news/code-practice-disinformation>

As reported by Bechmann (2020) *“The platforms’ recurrent answer is privacy and GDPR. Instead, platforms have tried to use differential privacy as the golden standard for securing (social) data that cannot be de-anonymized. This, in turn, means that only high-level data can be shared and thus leaves little room for graph data and textual/visual data mining that can inform a better understanding of disinformation circulation logics, identify best predictors of such, and redesign algorithms, policies and infrastructures for less efficient circulation. And due to intellectual property rights, the disinformation labeling done by the platforms to increase the performance of their machine learning detection algorithms is not a public good, and thus not available to nor consistent with the standards of the independent research community”*.

Create a responsible media infrastructure that takes into consideration the global nature of media industries should be a primary goal at EU level, as the ever-increasing role of data and machine learning algorithms as fundamental fabrics of modern media platforms is at the core of infodemics and disinformation. Media regulation activities have been increasingly active in the last few years at EU level. A quick summary is reported hereafter.

New Proposal for a Regulation on the transparency and targeting of political advertising⁴

On 25th November 2021 the European Commission presented a proposal on transparency and targeting of political advertising⁵ *“This proposal aims first and foremost to contribute to the proper functioning of the internal market for political advertising by laying down harmonised rules for a high level of transparency of political advertising and related services. These rules will apply to providers of political advertising services. It also aims to protect natural persons regarding the processing of personal data by laying down rules on the use of targeting and amplification techniques in the context of political advertising. These rules will apply to all controllers -i.e., beyond providers of political advertising services, making use of such targeting and amplification techniques”*⁶. The proposal will establish harmonized transparency measures to bring uniformity to the diverse regulations adopted in the Member States, enhancing trust in the political debate and the integrity of the political debate. The proposal complements the Digital Services Act (DSA)⁷, which includes certain general

⁴ Link to the proposal for transparency and targeting of political advertising <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52021PC0731>

⁵ https://ec.europa.eu/commission/presscorner/detail/en/ip_21_6118

⁶ <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52021PC0731>

⁷ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12418-Digital-Services-Act-package-ex-ante-regulatory-instrument-of-very-large-online-platforms-acting-as-gatekeepers_en

transparency obligations for online intermediaries as regards the transparency of online advertising, and the wider EU framework for the digital services market⁸.

Digital Services Act

The Digital Services Act proposal⁹, released in December 2020, already included some rules for targeted advertising but will act as a *lex generalis*, *lex* which only applies in the absence of a more specific regime. The new proposal on political advertising will therefore act as a *lex specialis* to the regime of online advertising regulation. The distinction between commercial and political ads is finally enshrined in the EU proposal. This will permit to adopt a framework considering the peculiar challenges that political advertising and targeting create for individuals' fundamental freedoms such as freedoms of opinion and information, to make political decisions and exercise their voting rights. The proposal has now made its way through the EU co-legislators the European Parliament and the Council of the European Union. As a reminder, the DSA will uniformly harmonize rules on intermediaries' obligations applicable across the Digital Single Market and revise the e-commerce Directive. It defines clear responsibilities and accountability.

The first to adopt its position¹⁰ was the Council in late November 2021¹¹. The Council, while expanding the scope of the proposal and clarifying certain aspects, did not drastically change the provisions related to Artificial Intelligence (AI) media applications set in the proposal. The European Parliament finally adopted January 20, 2022 its position on the DSA proposal¹². Last-minute amendments in the plenary vote introduced important changes to the proposal. The respective positions of the two institutions will be discussed in trilogues reuniting the EC, the European Parliament (EP) and the Council in order to find a common voice among the different positions. There are currently five political trilogues scheduled the process can be followed on the legislative observatory portal of the EP¹³, on the legislative train schedule portal¹⁴ and on the EUR-lex information site¹⁵

⁸ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12417-Digital-Services-Act-deepening-the-Internal-Market-and-clarifying-responsibilities-for-digital-services>

⁹ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=COM%3A2020%3A825%3AFIN>

¹⁰ <https://data.consilium.europa.eu/doc/document/ST-13203-2021-INIT/en/pdf>

¹¹ <https://data.consilium.europa.eu/doc/document/ST-13203-2021-INIT/en/pdf>

¹² <https://www.europarl.europa.eu/news/en/press-room/20220114IPR21017/digital-services-act-regulating-platforms-for-a-safer-online-space-for-users>

¹³ [https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2020/0361\(COD\)](https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2020/0361(COD))

¹⁴ <https://www.europarl.europa.eu/legislative-train/theme-a-europe-fit-for-the-digital-age/file-digital-services-act>

¹⁵ <https://eur-lex.europa.eu/legal-content/en/HIS/?uri=COM:2020:825:FIN>

Code of practice update

On July 2021 the assembly of the signatories of the Code has met to start the process that will strengthen the Code of Practice on Disinformation¹⁶. 26 new prospective signatories joined the drafting process, broadening the participation in the strengthened Code, the current and prospective signatories are now expected to deliver the strengthened Code of Practice by the end of March 2022. In September 2020, after a year of existence, the Code received an unsatisfactory assessment¹⁷ by the EC. Strong of its findings, the EC announced in its EU Democracy Action Plan¹⁸ (December 2020) the need to revise the Code to solve its shortcomings and announced the future publication of guidance to strengthen the Code of Practice on disinformation. The Guidance (May 2021)¹⁹ aims at reducing the financial incentives for disinformation actors, empowering users and encouraging flagging harmful content. The signatories of the Code of practice on disinformation were working on the Code since then but the revision took longer than initially expected (end of 2021). This might be due to the new joiners to the Code as 26 new signatories, the new participants include civil society groups, software companies, and marketing agencies. The signatories are now expected to deliver the strengthened Code of Practice by the end of March 2022.

Meanwhile, the EP and the Council are calling for effective EU action on interference from foreign actors. The Council adopted on 24th January 2022 conclusions²⁰ on the European security situation. The ministers reiterated their request to intensify the work on cyber-hybrid attacks, foreign information manipulation and interference. The EP adopted on January 25th 2022 recommendations on how to address urgently the threats caused by foreign interference, solve the EU legislation loopholes and the lack of coordination between EU Member States²¹. EU members urge the EU to raise public awareness through training for people in sensitive functions and general information campaigns. In addition, the EU should beef up its capabilities and build a sanctions regime against disinformation. Rules on social media platforms, which serve as vehicles for foreign interference, have to be tightened.

From this brief recap of the policy train of the EU tackling the media and disinformation space it is evident that a regulatory intervention which is adequate and effective to tackle the effects of disinformation remains somehow unclear. Indeed, solution derived from media regulations, financial regulations, or cybersecurity measures might provide a guide, while disinformation may prove to be

¹⁶ <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

¹⁷ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1568

¹⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423>

¹⁹ https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2585

²⁰ <https://www.consilium.europa.eu/media/53949/st05591-en22.pdf>

²¹ <https://www.europarl.europa.eu/news/en/press-room/20220119IPR21313/eu-should-build-a-sanctions-regime-against-disinformation>

a specific problem requesting an unique mix of policy solutions. EU regulators need to elicit clear and shared outcomes based on key performance indicators, and on damage mitigation rules for digital platforms and a control or auditing mechanism should be established to independently verify such compliance. One of the most critical areas of EU monitoring is how to assess the preparedness of internal platforms' processes for managing the risks and damage of disinformation campaign. Policymakers should have a better knowledge into how platforms manage risks and on procedures for identifying, analyzing, and removing disinformation.

As stated above, access to digital platforms' proprietary data is one fundamental struggles in the relationship between platforms and EU. Platforms frequently refer to privacy concerns, including the EU's General Data Protection Regulation (GDPR), as obstacle to their ability to share data. Researchers and EU officials disagree that the GDPR hinders access to platform data for research purposes. It should be within the EU's power to clarify this point of contention and if necessary make amendments to the GDPR to overcome any such obstacles. Initiatives involving the set-up of data sandboxes to enable partnerships between universities and other stakeholders, might a way forward to address technical and governance data challenges, particularly in relation to privacy concerns. However, the principle of transparent and fair access for researchers should be the foundation of any future policy. For example, France has tested an online front end that enables searches of platform data and gives aggregated results without granting access to the raw data itself. If such a format were considered desirable, access to the back end could still be granted to EU officials and/or member-state policymakers. Areas of data transparency that should be considered include sample data, advertising transparency, and aggregate platform information. At the same time there's an urgent need of quickly harmonizing approaches in the Eu Member states, while concerns raise during political campaign it leads to regulatory responses, as evidenced in individual countries in Europe. In France, social media platforms must comply with court orders to delete fake news during elections, while in Germany, there is no explicit ban on disinformation, but the Network Enforcement Act applies to disinformation that constitutes criminal offenses such as insult, defamation and hate speech. Governance responses vary from country to country, national governance responses lead to stronger regulation of internet platforms and a weakening of long-established liability protections and demonstrate that individual European countries are taking individual steps beyond pan European approaches.

2. The Italian landscape: why policy dialogue is needed

Referring to Italy, as also observed by EDMO (2020) “*Despite the growing debate on disinformation, no widespread and effective initiatives have been implemented in the country. There are no specific laws to counteract disinformation online. Instead, the general law applies: the Criminal Code, when the false or inaccurate news is a criminal offence; and the civil law, in cases in which a person damaged by false information may ask for a compensation. A self-regulatory code of conduct exists for journalists, and the Ordine dei Giornalisti (national journalists' association) supervises its implementation, but it is an old tool, not very effective in the past and not suitable to deal with misinformation online*”²².

This means that, so far, there are no measures already in place to regulate and punish suspicious actors. Indeed, political and legislative initiatives could be perceived as a limit to the freedom of expression. To avoid this, regulation is mainly left to self-regulatory approaches based on voluntary code of conduct. However, more stringent measures are needed.

Nevertheless, according to the desk research carried out, it is possible to stress that some efforts to tackle disinformation have been conducted at national level. Not mentioning research organisations, university and fact-checkers, but focusing on the work more related to the political sphere, working groups have been funded to improve the debate, and research have been conducted on the topic by national authorities.

Focusing on the working groups, it is possible to mention the following stakeholders addressing the topic in Italy. In 2017, AGCOM has launched the "Table for the guarantee of pluralism and correctness of information on digital platforms" which aims to favor and promote the self-regulation of platforms and the exchange of good practices for the identification and contrast online disinformation. The initiative, decided with resolution 423/17/CONS, is part of the institutional path undertaken by AGCOM, starting from 2015, with the publication of reports and fact-finding surveys on the online information system. In 2019, among the actions pushed by the SOMA project, the Aletheia Centre of excellence has been hosted by Luiss University making the bridge among European stakeholders and national ones. In addition to the established forum for discussions, several reports and research have been published by national authorities. Among the others, an annual report on the status of information and security is released by the “Information system for the security of the Republic” working under the Presidency of the council of Ministries. As a matter of fact, over the last years, in the reports it is possible to retrieve insights about disinformation as a national threat. Also, the Ministry of Foreign Affairs is highly involved in fighting disinformation, indeed the

²² Full report is available here <https://edmo.eu/wp-content/uploads/2021/12/Policies-to-tackle-disinformation-in-EU-member-states-during-elections-Report.pdf>

Ministry launched with Luiss University specific research²³ to reflect on disinformation in Italy. The Ministry of Health launched a dedicated page against fake news on Covid 19²⁴. In some cases, it is also possible to find some local initiatives against disinformation, as the informative materials against disinformation created by Piemonte region²⁵.

As observed so far, the status of conversation on disinformation is still vague and quite fragmented. Several stakeholders are trying to achieve some results, but this is not easy, also due to the thin limit between the urgency to regulate online debate and the need to guarantee freedom of expression. Accordingly, the role of IDMO seems crucial to set up a structured conversation with policy makers and sectorial stakeholders to establish a protocol to discuss disinformation to finally convey into suggestions for decision makers also benefiting with the strong connection with European Commission and European initiatives such as EDMO.

2.1 Stakeholder mapping: who are the stakeholders to engage

To foster the debate and agree on the kind of measures to adopt, a stricter collaboration is needed at national level. Following the European example, as suggested by the High-Level Expert Group, “*multi-stakeholder collaborations should be developed in order to independently identify, monitor, document, and alert citizens to hostile information operations from foreign states or domestic groups (especially in advance of elections)*”.

In Italy, this kind of approach has been adopted in 2018 by AGCOM who has established an Observatory on disinformation²⁶. As reported by AGCOM “*current analyses have shown that the examination of the online disinformation phenomena requires a multidisciplinary approach, as well as the adoption of cooperation and comparison initiatives with the subjects operating in the online information system, research institutions and sector associations, in order to acquire an adequate knowledge of complex phenomena, such as the impact of platforms on public opinion, and to encourage forms of self regulation by those involved in the information system*”²⁷.

The technical panel established by AGCOM invites to join the discussion the following stakeholders: online platforms, traditional publishers with online information offers and those operating exclusively online, journalists, advertising and consumer associations.

²³ The report is available at

https://www.esteri.it/mae/resource/doc/2021/08/luiss_come%20individuare%20e%20contrastare%20le%20operazioni%20coordinate%20di%20disinformazione%20in%20italia.pdf

²⁴ Ministry of health: <https://www.salute.gov.it/portale/nuovocoronavirus/archivioFakeNewsNuovoCoronavirus.jsp>

²⁵ An example is available at http://www.cr.piemonte.it/dwd/organismi/corecom/2021/disinformazione_e_fake_news_-_corecom_2021_3.pdf

²⁶ Available at <https://www.agcom.it/osservatorio-sulla-disinformazione-online>

²⁷ Available at <https://www.agcom.it/documents/10179/10875949/Allegato+4-9-2018/f9befcb1-4706-4daa-ad38-c0d767add5fd?version=1.0>

The table set up by AGCOM is an interesting reference to take in mind. However, starting from this bounce of stakeholders, the aim of IDMO is also to enlarge other interested parties, such as research organizations and universities, who are key players in informing the state of the art of the phenomenon.

The aim of IDMO is to keep collaboration and discussion on the topic with high level stakeholders. Considering the need to establish a multi-stakeholder collaboration, the stakeholders we want to include into the dialogue, in addition to the IDMO partners, are divided into the following categories: policy stakeholders, private sector, media ecosystem, foundations, associations, research institutions.

Policy stakeholders

Public authorities

- Department for information and publishing, Presidenza del Consiglio dei Ministri
- Ministry of Foreign Affairs and International Cooperation
- Ministry of Education
- Ministry of Defence
- Autorità per le Garanzie nelle Comunicazioni AGCOM
- Agenzia per la Cybersicurezza Nazionale National Cybersecurity Agency)
- Ministry of Economic Development
- Italian Law enforcement agencies
- Infrastructure management (Ferrovie dello Stato, Terna, Snam Rete gas)

Private Sector

- Online platforms (Facebook, Google Italia, Twitter)
- Industry (Finmeccanica, Leonardo, TIM, Pirelli)
- Utility and infrastructure (Eni, ENEL)
- ICT (Reply, Accenture)

Media ecosystem

- Journalists (FNSI, Ordine Giornalisti, etc.)
- Media Outlet (e.g Gruppo GEDI, RCS MediaGroup, Mediaset, etc.)
- Fact-checkers

Associations

- Advertising and consumer associations

Research institutions

- CINI Cybersecurity National Lab

- IMT Lucca
- Università la Sapienza Roma
- Ca' Foscari Venezia. European Centre for Living Technology
- ISI Torino
- Fondazione FBK
- CoMuNe Lab Università di Padova
- CNR
- Istituto geopolitica digitale
- Enrico Fermi Research Center (CREF)

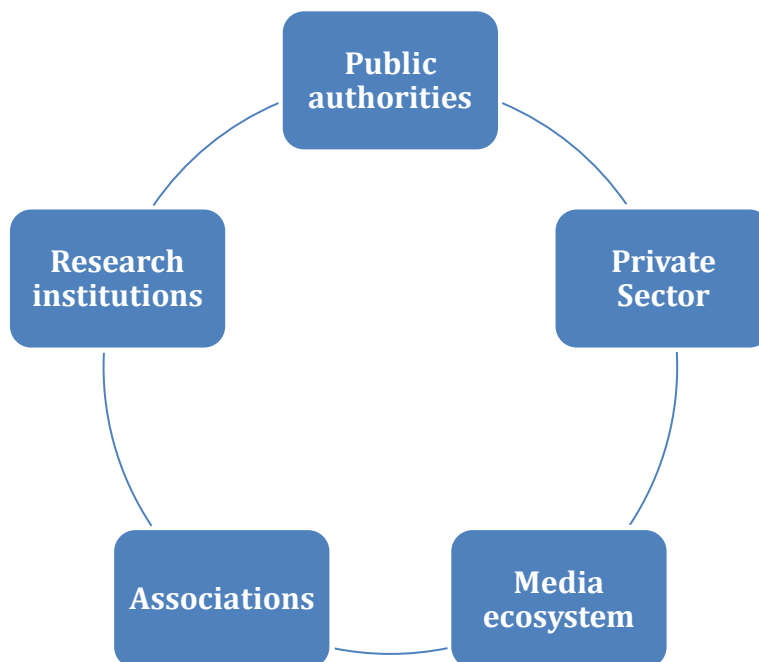


Figure 2. Stakeholders engaged in the IDMO policy activities

2.2 Process and methods to implement

Main aim of the policy dialogue set up by IDMO is to create a platform for representatives from different sectors (academia and research organisation, private sector, public sector and policy makers) to discuss main issues related to disinformation in order to provide suggestions and recommendations for Italian policy makers.

To achieve this aim, IDMO has developed a policy dialogue strategy that intends to create a recognized forum discussion where stakeholders can exchange ideas, debate topics and finally develop structured recommendations which will support the next steps of the agenda for policy makers. This process will be implemented with the use of proper tools that will allow covering

different kinds of interactions. The plan is to structure first of all bi-lateral conversations with some of the stakeholders identified so far. During bi-lateral meetings we will collect insights from most urgent topics to be solved regarding disinformation.

Once we will gather a priority list of topics to be discussed, we will organize plenary meetings with all stakeholders. When applicable and possible, those meetings will be organised following dedicated facilitation methodology to guarantee participation and exchange and will be held in accordance with the Chatham House rule. The private conversation will allow stakeholders to be free of express position and concern.

After each meeting a report will be provided to the attendees and made available on the IDMO website. At the end of the rounds of interaction, we will define a list of policy recommendations to be passed to Italian policy makers. The recommendations will be validated by the stakeholder group and publicly presented during the IDMO final event. The stakeholders who will accept to take part in this forum will be declared IDMO supporting partners.

2.3 Timeline

The policy dialogue will be structured according to the following three phases.

First phase (September 2021-March 2021)

The first phase runs from the beginning of the project until March 2021, when it is due the D4.1. During the first phase, the aim is to define the strategies to implement and the stakeholders to engage to guarantee a structured policy dialogue. This activity is performed mainly through desk research. By observing other examples of forum for discussion, we will be able to design an ad-hoc protocol for IDMO starting from experience already validated in other contexts.

Second phase April 2021- December 2021

The second phase of policy activities runs from April 2022 to January 2023, the aim is set up bilateral conversations with policy makers that already manifested a strong interest into IDMO activities. As anticipated, those meetings will allow us to gather data and information. In particular, we will ask high level stakeholders to share their perception about the most urgent topics or issues around disinformation. Also, we will run a snowball sampling asking those stakeholders to suggest additional names to be included in the next phase of interaction. What will emerge from this first investigation, will be then discussed with a larger audience to find out possible solutions.

Third phase (January 2022– March 23)

From the definition of topics to discuss it will start the final phase. All stakeholders already engaged in the discussions, together with additional stakeholders that will be selected, will be invited to attend at least two policy events. During the plenary meetings we will have deep discussions to find out recommendations to tackle disinformation in Italy. In addition, a final event will be organised to present the work performed by IDMO together with the supporting partners.



Figure 3. IDMO policy dialogue process

3 Conclusions

As anticipated, D4.1 is the first deliverable to contain the strategy and the actions to implement for IDMO policy dialogue. Through desk research it has been summarized the state of the art in terms of actions pursued at EU and national level. It emerged from the analysis that despite the needs for measures and regulations, the task to regulate online discussion is hard. To achieve the aim the only strategy is to find a reasonable balance between guarantee a safe online environment for discussions without harm freedom of expression.

To find a solution it is crucial to establish a solid and structured conversations among interested parties. IDMO will set up and foster the discussions under the principle of multi-stakeholder approach. Bi-lateral meetings will be organized to narrow the scope of the discussions to most urgent topics; afterwards, enlarged discussions will be launched to convey recommendations and measures to be adopted. Meetings and roundtables will be organized with the presence of a mixed group of stakeholders. Among the others, researchers, policy makers, platforms will be invited to join the IDMO policy dialogue. Only by achieving a structured and balance conversation with all parties involved it will be possible to convey meaningful and applicable suggestions for policy makers.

Accordingly, policy discussions have been already started. On February 7th 2022 the Italian Ministry of Foreign Affairs together with IDMO coordination office organized the first action of a plan of cooperation between IDMO and the Italian Ministry of Foreign Affairs to tackle disinformation. The title of the joint event was: "(Dis)information, international challenges and domestic resilience"²⁸. Objective of the meeting was to discuss the challenges of a correct use of communication, against disinformation, misinformation and information manipulation. Main topics discussed have been: risk mitigation, public and private sector guidelines, prevention and remedies, economic impact, international and national legal framework.

The meeting was held bringing together different expertise.

High level representatives opened the discussion in the persons of Minister Luigi Di Maio, the Secretary General, Ettore Francesco Sequi and Director General for Public and Cultural Diplomacy, Pasquale Quito Terracciano.

Scientific insights have been given by Prof. Sinan Aral, "David Austin" Professor of Management at MIT Sloan School of Management, Prof. Luisa Chiodi, Director of the Osservatorio Balcani Caucaso Transeuropa/Centro per la Cooperazione internazionale and Dr. Elena Musi, Associate Professor of Communication and Media, University of Liverpool.

²⁸ Meeting recordings is available at <https://www.youtube.com/watch?v=JCtFFcmZvM>

Representative of the social media platforms have attended the meeting, Angelo Mazzetti, Head of Institutional Relations Italy and Greece, Meta and Dr. Diego Ciulli, Head of Institutional Relations, Google Italy.

Prof. Paola Pisano, Scientific, expert for digital economy and evolution of technological innovation at Farnesina, and Prof. Gianni Riotta, Director of the Master in Journalism and Multimedia Communication at LUISS and IDMO project coordinator, moderated and closed the events. Also, the meeting was attended by a significant number of relevant stakeholders among which On. Pietro Fassino Chair Foreign Affair Committee Italian Parliament; Prof. Giacomo Lasorella., President AGCOM; Dr. Giuseppe Moles, Undersecretary of State Department for Information and Publishing. The meeting established the basis for a solid collaboration for future events and actions.

Following the first results gained during the first event, over the next months, we will proceed in implementing the strategy described. Results will be then reported in the document “Policy Dialogue final report and recommendations”.

4 References

- AGCOM (2018) Interim report in the context of the joint inquiry on “Big data” launched by the AGCOM deliberation No. 217/17 / CONS. More information are available at https://cordis.europa.eu/article/id/435197-counterering-social-media-disinformation?WT.mc_id=exp
- Bechmann, A. (2020) Tackling Disinformation and Infodemics Demands Media Policy Changes, *Digital Journalism*, 8:6, 855-863
- Edwards, L. Stoilova, M., Anstead, N., Fry, A., El-Halaby, G. and Smith M. (2021) Rapid Evidence Assessment on Online Misinformation and Media Literacy: Final Report for Ofcom. Available at: www.ofcom.org.uk.
- Eurobarometer 464. (2018). Final results of the Eurobarometer on fake news and online disinformation.
- European Commission. (2018). Action Plan against disinformation
- Fletcher, R., Cornia, A., Graves, L. and Nielsen, R.K. (2018). Measuring the reach of "fake news" and online disinformation in Europe. *Australasian Policing*, 10(2).
- Tandoc Jr, E. C., Lim, D., & Ling, R. (2020). Diffusion of disinformation: How social media users respond to fake news and why. *Journalism*, 21(3), 381-398.

Abbreviation List

AGCOM	Autorità per le Garanzie nelle Comunicazioni
AI	Artificial Intelligence
DSA	Digital Service Act
EC	European Commission
EDMO	European Digital Media Observatory
EEAS	European External Action Service
EP	European Parliament
GDPR	General Data Protection Regulation
HLEG	High Level Expert Group
SOMA	Social Observatory for Disinformation and Social Media Analysis
SSO	Social Science One

More Information about this Document

Project acronym	IDMO
Project full title	Italian Digital Media Observatory
Grant Agreement no	INEA/CEF/ICT/A2020/2394428
Deliverable number	D4.1
Deliverable title	Policy Dialogue Concept Paper
Deliverable nature	Reporting policy dialogue strategy
Dissemination level	Public
Work package and Task	WP4. T4.1
Contractual delivery date	1.03.2022
Actual delivery date	1.03.2022
Authors	Simona De Rosa, T6 Ecosystems; Andrea Nicolai, T6 Ecosystems
Reviewers	Gianni Riotta (Luiss), Livia De Giovanni (Luiss), Salvatore Custureri (Luiss)

Revision History

Version	Date	Name
ToC and first draft	15.02.2022	Simona De Rosa
Input provision	26.02.2022	Andrea Nicolai
Second draft	28.02.2022	Simona De Rosa Andrea Nicolai
Sent to internal review	28.02.2022	Simona De Rosa
Final submission	01.03.2022	Salvatore Custureri Gianni Riotta Livia De Giovanni



Italian Digital
Media Observatory

