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Italian Digital  
Media Observatory

## D4.4 Policy Dialogue final report and recommendations



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## **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. The discussion needs to be taken in serious consideration also from national governments and not only from European institutions.

To facilitate the reflection in Italy, Italian Digital Media Observatory (IDMO) has planned and implemented a structured conversation with policy makers and sectorial stakeholders, according to a defined protocol, to discuss disinformation to provide concrete recommendations for decision makers in terms of regulatory and non-regulatory measures. To achieve this aim, IDMO has developed a policy dialogue strategy through conferences, events, bilateral discussions and meetings where stakeholders exchanged ideas and needs. Thanks to the analysis of the findings emerged from the structured conversations, it has been developed structured recommendations which will support the next steps of the agenda for policy makers.

D4.4 provides an update about the measures adopted at EU level and reports the state of the art of the discussion Italy. Indeed, D4.4 report about the policy dialogue structured with the stakeholders and strategies identified in D4.1. According to main findings coming from literature review, desk research and input from sectorial stakeholders, the deliverable provides a list of main topics to be faced in Italy and main recommendations for Italian policy makers to tackle disinformation.

The deliverable is a public document, and its final aims is to reports how the process and protocols have been implemented by IDMO and described the results in terms of policy recommendation to convey to policy makers.

# Chapter 1. Major updates about the European and Italian framework against disinformation

## *1.1 The implementation of the Digital Services Act*

The Digital Services Act (DSA) was published in the official EU journal on 27 October 2022 and entered into force on 16 November 2022. The regulation, directly applicable across the EU, proved to be a monumental step forward in the Union's decade long attempt to create a safer online environment that ensures the protection of consumer's rights and promotes greater accountability for providers of digital services<sup>1</sup>. The reason why the regulation of such actors has become necessary for the EU is due to their transition into "gatekeepers" of all types of information while playing an active and decisive role in the media today. The biggest actors today host large platforms where all kinds of information is shared worldwide, often blurring the line between "mass media" and "personal communication" while simultaneously growing in market power and impacting public debates (Parcu & Brogi, 2021)<sup>2</sup>.

As platforms enlarge their influence on the digital market, the DSA pushes for the empowerment of users and to limit the asymmetric structure of powers under which these platforms operate currently, be it for the sheer size of their active users or due to the massive volume of data they can collect (Pollicino, 2023)<sup>3</sup>. This framework of accountability is accentuated by the transparency obligations that platforms will have to abide by<sup>4</sup>. The regulation puts forward a one of its kind model of collaboration between public institutions and the private tech sector where positive obligations are distributed among platforms, EU institutions and national authorities. These obligations translate into taking action in combatting illegal goods, services or content online as well as focusing on targeted advertising and algorithmic transparency. In this context, the DSA serves as an instrument aimed at motivating online platforms to play a more proactive role in combating disinformation. It also ensures that these platforms have the necessary mechanisms in

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<sup>1</sup> The Digital Services Act: ensuring a safe and accountable online environment | EC (europa.eu) :

[https://EC.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment\\_en#documents](https://EC.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment_en#documents)

<sup>2</sup> Parcu, P. L., & Brogi, E. (2021). "Introduction to Research Handbook on EU Media Law and Policy: understanding the EU approach to media law and policy. The scope of the Handbook and a presentation of the contributions". In Research Handbook on EU Media Law and Policy . Cheltenham, UK: Edward Elgar Publishing  
<https://doi.org/10.4337/9781786439338.00005>

<sup>3</sup> Pollicino, O., The Quadrangular Shape of the Geometry of Digital Powers and the Move Towards a Procedural Digital Constitutionalism ( 2023). Pollicino, Oreste, The quadrangular shape of the geometry of digital powers and the move towards a procedural digital constitutionalism, European Law Journal, Forthcoming, Available at SSRN:  
<https://ssrn.com/abstract=4540109>

<sup>4</sup> The measures for algorithmic accountability and transparency, adopted under the Digital Services Act will see their enforcement by the newly established European Centre for Algorithmic Transparency (ECAT). The Centre will support the work of the EC in risk assessment and mitigation obligations for VLOPs and VLOSEs. See more:  
[https://algorithmic-transparency.ec.europa.eu/index\\_en](https://algorithmic-transparency.ec.europa.eu/index_en)

position to prevent the dissemination of false or harmful information. These platforms are mandated to establish systems that can identify and remove content infringing upon their policies or legal requirements, such as hate speech, terrorist content, child exploitation, and counterfeit products, all while safeguarding freedom of expression and media pluralism<sup>5</sup>.

Platforms will have to adhere to the commitments of the DSA as well as the 2022 Strengthened Code of Practice on Disinformation as the Code is cited to become a code of conduct under the regulation (recital para.106). Although the Code of Practice is not legally binding and is more a self-regulatory tool for platforms to employ, compliance with it will be linked to a stronger assessment of “systemic risks” under the DSA as well as allow for a better evaluation of platform’s engagement in the fight against disinformation.

After the promulgation of the legislation, major platforms had to communicate their number of active end users by February 2023 with the EC designating 17 Very Large Online Platforms (VLOPS) and 2 Very Large Search Engines (VLOSEs) 2 months later. These platforms are of a crucial importance to the implementation of the DSA as they reach a minimum of 45 million monthly users and pose various systemic risks due to their size and reach. The DSA will become applicable to all service providers by February 2024 which is also the deadline for Member States to name their Digital Services Coordinators (DSC), the national authority invested with the competences to oversee the moderation of content and online activity on a national level (recital para.110). The implementation of the DSA rests, to various levels, on Member States, service providers and EU institutions alike. While the EC will be the principal actor in assessing the risks of VLOPs and VLOSEs activities, it is in close collaboration with each National Digital Services Coordinator (DSC) that such moderation will have a stronger impact, especially in combatting disinformation. In chapter IV of the regulation, Digital Service Coordinators are empowered with the supervision of providers of intermediary services and the enforcement of this legislation in cooperation with the EC.

Coordinators are obliged to perform in an “impartial, transparent and timely manner” (Article 50) and are vested with the power to accept commitments offered by providers, impose fines and

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<sup>5</sup> The regulation of digital services on major platforms, in the context of EU media law and policy, sits between the necessity to protect freedom of expression and media pluralism while fighting polarization of public opinion and disinformation in the online sphere. As the latter requires new standards and rules, the EU framework has to balance the protection of fundamental democratic principles with appropriate policy responses. An example of such response is the Media Pluralism Monitor (MPM), an EU wide instrument implemented since 2013 by the Centre for Media Pluralism and Media Freedom (CMPF) of the European University Institute in Florence. See more at: Brogi, E., Carlini R., Nenadić I., Parcu P.L, and de Azevedo Cunha M.V. 2021. "EU and Media Policy: Conceptualising Media Pluralism in the Era of Online Platforms: The Experience of the Media Pluralism Monitor." In Research Handbook on EU Media Law and Policy, 16-31. Northampton: Edward Elgar Publishing. <https://hdl.handle.net/1814/74812>.

penalty payments when necessary, and order the cessation of infringements when appropriate (Article 51). Thus, the Digital Service Coordinators will act as an authority with clear enforcement responsibilities to overlook the compliance of the regulation by platforms and service providers within the EU territory. Furthermore, DSCs are expected to be fully politically independent in their line of work as well as be fast in adapting and responding to the fast pace at which digitalization is moving currently. Additionally this means that DSCs will have to establish clear data access procedures in collaboration with vetted researchers for the mitigation of systemic risks brought upon by platform content (Darius et al. 2023).<sup>6</sup> The selection process for such a national authority seems to vary from one state to another with the only consistency being that most of them prefer to name an existing regulatory or supervisory body as the Coordinator.

Ireland, one of the countries with the highest number of headquarters for tech companies in the Union, has named its media regulator Coimisiún na Meán for the job. Belgium, Hungary and Slovakia followed suit naming their media regulators respectively. France also named the Audiovisual and Digital Communication Regulatory Authority (Arcom) as its Coordinator, while countries such as Finland and the Netherlands appointed their consumer protection authority for the task. A majority of the countries however chose to go with Telecommunications regulators.<sup>7</sup> It remains to be seen how the enforcement of the DSA will play out as different authorities take on the role. For example, the German proposal for the DSC authority aims to involve external experts in the form of an advisory board including academia and civil society more in the process (Jaursch, 2023).<sup>8</sup>

In the case of Italy, the Communications Regulatory Authority (Autorità per le garanzie nelle comunicazioni “AGCOM”) was chosen as the Digital Services Coordinator of the country. Established in 1997 as a convergent authority, AGCOM carries both supervisory and regulatory functions in sectors such as broadcasting, telecoms and press. Recently the authority has taken on online platforms as well, as digitalization brought forth new services which required state regulation<sup>9</sup>. As an authority with supervisory competences, AGCOM has various active observatories for the monitoring and analyzing of the flow of information within the online sphere. Reference should be made in particular to the Observatory on online disinformation, among a long

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<sup>6</sup> Darius, P., Stockmann, D., Bryson, J., Cingolani, L., Griffin, R., Hammerschmid, G., & Stockreiter, S. (2023). Implementing Data Access of the Digital Services Act: Collaboration of European Digital Service Coordinators and Researchers in Building Strong Oversight over Social Media Platforms.

<sup>7</sup> Bertuzzi, L. “National regulators face an uphill battle in enforcing EU digital rulebook” EURACTIV, 28 June 2023 <https://www.euractiv.com/section/platforms/news/national-regulators-face-an-uphill-battle-in-enforcing-eu-digital-rulebook/>

<sup>8</sup> Stellungnahme zum Referentenentwurf des Bundesministeriums für Digitales und Verkehr für ein deutsches Digitales Dienstengesetz “ (Berlin: Stiftung Neue Verantwortung, August 2023). Available at: <https://www.stiftung-nv.de/en/publication/public-comment-how-germanys-draft-dsa-implementation-law-can-be-improved>

<sup>9</sup> <https://www.agcom.it/tavolo-pluralismo-e-piattaforme-online>

list of bodies active at the moment.<sup>10</sup> Italy was one of the countries that faced the largest amount of disinformation and fake news online during the Covid-19 pandemic and the ongoing conflict in Ukraine. The general elections in 2022 were also witness to foreign influence with the objective of skewing public opinion. In a 2022 report by the Security Committee of the Italian Senate, AGCOM was at the forefront of combatting disinformation during these critical times, listed as one of the crucial “instruments for the fight against disinformation” (Italian Senate, 2022).<sup>11</sup>

The authority made a significant commitment to the governance of ERGA, with President Lasorella taking up the role of vice-president in 2022 and subsequently assuming the presidency from 2023 onwards. During these years the authority was involved in diverse forums dedicated to regulatory examination and in-depth discussions, including the task force established under The Strengthened Code of Practice on Disinformation 2022 and the High-Level Group for the Digital Markets Act. Furthermore it was AGCOM that represented ERGA during negotiation talks with co-legislators for the adoption of the Digital Services Act (DSA). Other contributions within its capacity at ERGA include participation in legislative initiatives with topics such as political advertising regulation, and the European Media Freedom Act (EMFA). Additionally, AGCOM contributed to various analyses concerning the implementation of the Audiovisual Media Services Directive within the EU.<sup>12</sup>

The Digital Services Act already prescribes a complex web of interdependent tasks that the EC will hold in collaboration with Coordinators for supervision. The EC is responsible for obligations that apply exclusively to VLOPs and VLOSEs (Article 56) while jurisdiction is shared between national coordinators and the EC, should investigations and potential violations arise. Within Member States, Digital Service Coordinators will be forced to work with other national authorities on specific issues that are within the competence of bodies such as data protection authority, the telecommunications regulator or competition regulator. This further complicates the effective enforcement of the DSA depending on which Member State one chooses to focus on and the relationship between these public bodies and within their structures. In addition, the moderation of illegal content is dependent on how relevant national laws define such content within their territory and consequently push major platforms to adhere by those norms (Echikson & Knodt, 2018)<sup>13</sup>. The

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<sup>10</sup> Other observatories include the Observatory on online platforms, Observatory on journalism, Observatory on national and local online newspapers, Communications Observatory and the Observatory on advertising and below the line. See: <https://www.agcom.it/osservatori>

<sup>11</sup> Comitato parlamentare per la sicurezza della repubblica, relazione sull'attività svolta dal 10 febbraio 2022 al 19 agosto 2022, pg.44. See: <https://www.senato.it/service/PDF/PDFServer/BGT/1360852.pdf>

<sup>12</sup> See: Autorità per le garanzie nelle comunicazioni (AGCOM) Relazione annuale 2023 sull'attività svolta e sui programmi di lavoro <https://www.agcom.it/documents/10179/31023367/Documento+generico+19-07-2023/bd485435-0467-4bf1-9a87-f074b4525ac7?version=1.0>

<sup>13</sup> The definitions of content moderation and illegal content laid down in the Digital Services Act are broad in their interpretative capacity aiming to highlight the wide-scope of the regulation. However, it remains to be seen how the



implementation of the DSA therefore depends not only on the supervisory and enforcement procedures that Member States will have to take but also on platforms and their involvement in content moderation (with a much higher level of scrutiny than before).

Indeed, the DSA includes multiple articles concerning transparency of content moderation activities handled by platforms. These tech companies already publish their own version of such activities as more often than not they're part of an internal company policy, however, the DSA puts forth a wider category of content in need of analysis. For example, the obligation for platforms to publish annual reports of illegal content identified, as well as collaboration with trusted flaggers and national authorities in combatting such content (Article 14). Another novelty of this regulation is the transparency requirements for the recommender systems of platforms and the parameters that define these systems (Article 27). While the obligations presented by the DSA are in theory a strong first step in creating a safe online environment, scholars believe that more precise measures might be needed as higher usage of automated tools increases the risk for errors made in content moderation and recommender systems utilized daily by service providers. By complying with the DSA, platforms will be obliged to act within a reasonable time frame in detecting, notifying and removing illegal content or harmful activity (G'sell, 2023)<sup>14</sup>.

Important parties to this framework are also vetted researchers who will be able to attain data access from large platforms under the regulation which will be crucial for "the detection, identification and understanding of systemic risks" (Article 40 (4)). The vetting process and the list of criteria by which access to data will be granted, is left in the hands of the Digital Service Coordinator for each member state. The call for evidence to establish a framework on this was published in April 2023 and is planned to be adopted by the EC by the first quarter of 2024<sup>15</sup>. It is clear from the commitment of platforms in compliance with the Code of Practice and the DSA, the inclusion of third party actors such as researchers was engineered to specifically bring forth a stronger approach in combatting disinformation (Vermeulen, 2022)<sup>16</sup>. In addition, the stipulation of norms such as

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differences in regulating illegal content on a Member State level will impact the enforcement of the DSA with each country providing different interpretations to what constitutes punishable content and its moderation. An example of such national legislation is the German NetzDG law : <https://www.ceps.eu/ceps-projects/the-impact-of-the-german-netzdg-law/>

<sup>14</sup> Antje von Ungern-Sternberg (ed.), Content Regulation in the European Union – The Digital Services Act, SCHRIFTEN DES IRDT - TRIER STUDIES ON DIGITAL LAW, Volume 1, Verein für Recht und Digitalisierung e.V., Institute for Digital Law (IRDT), Trier April 2023 The Digital Services Act: a General Assessment\* Florence G'sell.

<sup>15</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13817-Delegated-Regulation-on-data-access-provided-for-in-the-Digital-Services-Act\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13817-Delegated-Regulation-on-data-access-provided-for-in-the-Digital-Services-Act_en)

<sup>16</sup> Vermeulen, M. (2022). Researcher Access to Platform Data: European Developments. Journal of Online Trust and Safety, 1(4). <https://doi.org/10.54501/jots.v1i4.84>

Article 40 can be seen as recognition of the vital role that independent scientific research plays in analyzing and evaluating transparency efforts for platforms in the EU (Ginsburg & Gori, 2023)<sup>17</sup>.

However, the road to platforms accepting the Code of Practice and the DSA hasn't been an easy one. In May 2023, X (formerly known as Twitter) declared it would leave the Code of Practice and the voluntary commitments that come with it. Regardless of its exit from the Code, as a designated Very Large Online Platform (VLOP), X will be obliged to follow through with their duty in fighting disinformation under the DSA framework.<sup>18</sup> The platform is the only one so far choosing to go against EU regulators as the Code of Practice on disinformation currently has over 40 signatory parties. With regards to compliance, X has not published its plan yet along with a handful of other platforms. The DSA has been officially in full effect for all designated VLOPs and VLOSEs since August 2023. Previously in April 2023 when designated VLOPs and VLOSEs were published by the EC, both Zalando and Amazon filed legal actions against their classification as very large online platforms. Both platforms argue that the definition given by the DSA, and employed by the EC, do not fit the reality of their business as retailers.<sup>19</sup> Besides the designation as a VLOP, Amazon's lawsuit includes two other interesting pleas in which the company claims the requirements of transforming its recommender systems and publishing an advertisement repository go against "the principle of equal treatment and the company's fundamental rights"<sup>20</sup>. With ongoing lawsuits, neither Amazon nor Zalando have published any information on complying with the DSA so far.

Google published its compliance plan for the next stage of the DSA enforcement on 24 August. As one of the largest online search engines in the world, and part of the "Tech Giants", Google has claimed to be at the forefront of investing resources for the safety of their consumers and the online sphere, now in accordance with the pillars of the DSA as well. In 2012 it established the Priority Flagger program for reviewing content flagged by experts while in 2021 it blocked personalized advertising to minors and has since published additional metrics such as the Violative View Rate to protect users from harmful content online. In terms of compliance with the DSA they have expanded the Ads Transparency Center as well as data access for researchers for content risk assessments in the EU. With regards to disinformation, Google has pledged to expand its

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<sup>17</sup> Ginsburg, L., Gori, P., 2023 "Will independent research help the EU tackle disinformation?" Available at: <https://euideas.eui.eu/2023/04/03/will-independent-research-help-the-eu-tackle-disinformation/>

<sup>18</sup> Pitchers, Ch. "Twitter has chosen 'confrontation' with Brussels over disinformation code of conduct" EURONEWS, 5 June 2023. Accessible on: <https://www.euronews.com/my-europe/2023/06/05/twitter-has-chosen-confrontation-with-brussels-over-disinformation-code-of-conduct>

<sup>19</sup> Tar, J. "Amazon Joins Zalando in Challenging 'Very Large Online Platform' Designation". EURACTIV, 11 July 2023 <https://www.euractiv.com/section/platforms/news/amazon-joins-zalando-in-challenging-very-large-online-platform-designation/>

<sup>20</sup> Action brought on 5 July 2023 – Amazon Services Europe v EC (Case T-367/23).

Transparency reporting and how content moderation is handled across its many services. In addition, Google pledged its participation in the assessment and mitigation of systemic risks related to illegal content dissemination by agreeing to publish a public summary in the near future for this objective<sup>21</sup>. Another Very Large Online Search Engine (VLOSE) is Bing, a crucial part of Microsoft's products. The company published an in-depth compliance plan that includes the launch of a new Digital Safety website and the creation of an Ad Library for greater transparency. By October 2023, the company will publish biannual reports focusing on the compliance with the DSA and updating its average monthly users of Bing as prescribed by the regulation. As regards disinformation, Microsoft will update its processes of reporting for Bing to include concerns in generative AI, protection of minors and the removal of nonconsensual intimate imagery including synthetic "deepfake" images.<sup>22</sup>

Meta, previously known as Facebook, declared that it has assembled "one of the largest cross functional teams" in their history, to work in the compliance of the DSA. They have pledged to expand their Ad Library in displaying all ads targeting people in the EU and the parameters used in the process. They have also put restrictions for ads targeting minors, removing the algorithm based on app activity for under 18 users. In terms of algorithmic transparency, they have released 22 system cards providing information on how their AI ranks content and generates predictions based on the data it is given. Regarding disinformation, Meta published two new tools for researchers, the Meta Content Library and API<sup>23</sup>. TikTok published similar measures to Meta concerning algorithmic transparency and granting users the choice to turn off their AI-generated personalization feature. The company promised to provide further reporting options to users for content and advertising that is deemed illegal in the EU and provide clearer information of its content moderation activities<sup>24</sup>. Snapchat followed suit with removing personalized ads for minors, publishing reports on posts & feed ranking and providing more information on removed content all within the framework of compliance for the DSA<sup>25</sup>. Pinterest also pledged in February 2023 that it will publish updated information a year later in 2024 and provide a single point of contact for authorities regarding the application of the DSA<sup>26</sup>.

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<sup>21</sup> <https://blog.google/around-the-globe/google-europe/complying-with-the-digital-services-act/>

<sup>22</sup> <https://blogs.microsoft.com/eupolicy/2023/08/25/microsoft-digital-services-act-online-safety/>

<sup>23</sup> <https://about.fb.com/news/2023/08/new-features-and-additional-transparency-measures-as-the-digital-services-act-comes-into-effect/>

<sup>24</sup> <https://newsroom.tiktok.com/en-eu/fulfilling-commitments-dsa-update>

<sup>25</sup> <https://newsroom.snap.com/digital-services-act-snap>

<sup>26</sup> <https://help.pinterest.com/en/article/digital-services-act>

One of the biggest platforms that present a high risk to disinformation and misinformation is Wikipedia. However the platform has a unique internal structure as it is led by the Wikimedia Foundation and relies on contributions from the community of users for its content. The VLOP was one of the first platforms to publish its commitment in enforcing the DSA by making changes in future Transparency Reports and how the Foundation itself will handle Office Actions for content moderation rather than the Wikipedia community. The Foundation also cited its obligations to systemic risk assessment and mitigation under the DSA which will be essential in evaluating whether the Foundation is accurately targeting systemic risks, most importantly disinformation<sup>27</sup>. LinkedIn also published in August that it will heighten transparency and reporting standards in line with the DSA requirements. This will consist in expanding the information given on content restriction and whether reviews were conducted by automated systems or humans. The platform published its global Ad Library as well, which allows users to access information on ads shown across LinkedIn<sup>28</sup>. Another platform, famous for providing digital services and part of the VLOPs category, is Booking.com which created an ad repository for the purpose of compliance with the regulation<sup>29</sup>.

The DSA puts forth a plethora of obligations for platforms and member states to comply by 2024. Firstly, each member state will have to name a Digital Service Coordinator for its territory and form the Advisory Board which will collaborate with platforms and the EC in enforcing the rules. The DSC will have various functions, from supervisory to executive competences. As with every European framework of cooperation, we are expected to witness two models: one at a national level as well as between member state's DSCs. It remains to be seen how the chosen authorities will cooperate with each other as their nature of work varies from competition to telecommunication and even consumer protection. Secondly, with regards to major platforms, most of their commitment to the implementation of the DSA follows a pattern of similar actions taken. As two of the biggest concerns companies face with the DSA are algorithmic transparency and content moderation, most platforms put into place measures such as expanding reporting options and transparency standards for content removed. For advertising, companies published ad libraries, repositories or archives to comply with the regulation. Consideration was also given to AI and recommender systems for which platforms have disabled personalization based on content for minors and some companies even granted the choice to users to terminate the feature if they decide to do so. Lastly, most companies vowed to grant wider access to data for researchers and prioritizing the collaboration

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<sup>27</sup> <https://diff.wikimedia.org/2023/05/04/wikipedia-is-now-a-very-large-online-platform-vlop-under-new-european-union-rules-heres-what-that-means-for-wikimedians-and-readers>

<sup>28</sup> <https://www.linkedin.com/pulse/welcoming-digital-services-act-patrick-corrigan/>

<sup>29</sup> <https://shorturl.at/mopuM>

with trusted flaggers in an ex-ante approach with the “notice and action” mechanism included in the DSA. Most of these measures adopted are regarded as “protectionist” as they empower users to behave more rationally online while granting a more transparent look within the platforms activities. Rather than police a user’s activity, the measures present both an ex-ante and ex-post approach to the transformation of the digital information sphere (Leiser, 2023).<sup>30</sup>

It remains to be seen how the DSA will interact with the AI Act potentially entering into force in the near future. The proposal for the regulation was presented in 2021 and awaits approval after the political deal achieved in December 2023 by the MEPs and the Council.<sup>31</sup> The proposal divides the AI systems currently at use in four levels of risk ranging from High-risk to minimal risk and even AI systems with limited risks (Ebers, 2021).<sup>32</sup> While the DSA puts forth strong transparency obligation for recommender systems of VLOPS, the AI Act applies obligations of the same nature only to high-risk AI systems. This means that an overlap between the VLOPs recommender systems and the high-risk AI systems is highly unlikely (Schwemer, 2021).<sup>33</sup>

However it is believed that the DSA, along with all the other legislative initiatives taken by the EU lately, are meant to assist one another in better compliance, even in the context of disinformation and media. Title IV of the AI Act specifically cites AI systems which interact with humans, exploit biometric data to detect emotions, or manipulate content.<sup>34</sup> The Article focuses primarily on informing end users on the presence of AI rather and taking measures to improve transparency from the provider’s side. It remains to be seen how the enforcement of this specific article will interact in combination with the DSA’s content moderation obligations for VLOPs. Additionally, compliance with the AI Act means that VLOPs would comply also with Article 34 & 35 of the DSA regarding risk assessment and risk mitigation even though, Annex III of the proposal lists AI high risk systems, the majority of which are not utilized by VLOPs currently (Rampášek, 2023).<sup>35</sup>

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<sup>30</sup> Leiser, M. R. (2023). Analysing the European Union’s Digital Services Act Provisions for the Curtailment of Fake News, Disinformation, & Online Manipulation. Disinformation, & Online Manipulation (April 24, 2023)

<sup>31</sup> Artificial Intelligence Act: deal on comprehensive rules for trustworthy AI. Press Releases Available at: <https://www.europarl.europa.eu/news/en/press-room/20231206IPR15699/artificial-intelligence-act-deal-on-comprehensive-rules-for-trustworthy-ai>

<sup>32</sup> Ebers, M., Standardizing AI - The Case of the European Commission's Proposal for an Artificial Intelligence Act (August 6, 2021). The Cambridge Handbook of Artificial Intelligence: Global Perspectives on Law and Ethics, Available at SSRN: <https://ssrn.com/abstract=3900378>

<sup>33</sup> Schwemer, S.F., Recommender Systems in the EU: from Responsibility to Regulation? (September 13, 2021). FAccTRec Workshop '21, September 27–October 1, 2021, Amsterdam, Netherlands, Available at SSRN: <https://ssrn.com/abstract=3923003>

<sup>34</sup> Article 52, Title IV Proposal COM/2021/0106 final draft available on: <https://artificialintelligenceact.eu/documents/>

<sup>35</sup> Rampášek, M. (2023). AI CYBERSECURITY STANDARDISATION AND ITS OVERLAP WITH DSA AND CRA. Acta Facultatis Iuridicae Universitatis Comenianae, 42(2), 14-14.

Besides recommender systems and content moderation, the crossover between the DSA and the AI Act includes also researcher's data access. While the DSA grants vetted researchers the opportunity to investigate how VLOPs algorithms work, the AI Act does not provide for the same level of oversight and auditing of high-risk AI systems built into VLOPs (Bogucki et. al, 2022).<sup>36</sup> Nevertheless, the AI Act presents itself as the latest manifestation of the EU's top-down approach and risk-based model, having emerged from the DSA previously as well. The latter focused on transparency and protecting the end user of a platform while the AI Act is much more concerned with the design and development of AI systems and grants the Commission a wide discretion in assessing risk (Dunn & De Gregorio, 2022).<sup>37</sup> The proposal is expected to undergo changes until its adoption as an EU regulation, however the categories of risk and prohibited AI systems are a clear example of this proposal suggesting the Union will tighten its hold on tech giants and the latest technology employed by them.

## ***1.2 Preliminary attempts in assessing the code of practices***

The strengthened Code of Practice on Disinformation (CoP) was presented in June 2022 after the revision process of the 2018 version under the EC's Guidance. The Code is considered a "first-of-its kind tool to fight disinformation" involving relevant stakeholders by implementing self-regulatory standards<sup>38</sup>. The strengthened Code of Practice contains 44 commitments and 128 specific measures, in several areas such as demonetization, transparency of political advertising and empowering fact checkers and researchers. At the moment, the Code has 44 signatory parties which include companies that own very large online platforms (VLOPs) and very large online search engines (VLOSEs) in accordance with the definition of the DSA. This category of signatory parties is especially important for the assessment of the Code as the activity of large platforms can impact how disinformation evolves and manifests in the online sphere (Van Raemdonck, N., & Meyer, T. 2022)<sup>39</sup>. The Code is planned to become a Code of Conduct for the enforcement of the DSA (recital 106). As the regulation will enter into full effect by the first quarter of 2024, the positioning of the

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<sup>36</sup> Bogucki, A., Engler, A., Perarnaud, C., & Renda, A. (2022). The AI act and emerging EU digital acquis: Overlaps, gaps and inconsistencies

<sup>37</sup> Dunn, P., & De Gregorio, G. (2022). The Ambiguous Risk-Based Approach of the Artificial Intelligence Act: Links and Discrepancies with Other Union Strategies. In Proceedings of the Workshop on Imagining the AI Landscape after the AI Act (IAIL 2022) (Vol. 3221, pp. 1-9). CEUR Workshop Proceedings.

<sup>38</sup> <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

<sup>39</sup> Van Raemdonck, N., & Meyer, T. (2022). Why Disinformation is Here to Stay. A Socio-technical Analysis of Disinformation as a Hybrid Threat. In L. Lonardo (Ed.), Addressing Hybrid Threats: European Law and Policies Edward Elgar



CoP within the DSA framework will render this a strong policy commitment (Gori, 2023)<sup>40</sup> going from a self-regulatory tool to a co-regulation mechanism and an instrument to fulfill prescribed obligations under EU law.

Following the 2022 strengthened Code, it is now time to see what shortcomings the implementation period presented, specifically the publication of baseline reports in February 2023 by the major signatories designated as VLOPs and VLOSEs. Although the Code relies on the voluntary nature of commitment expressed by the signatories, baseline reports were an important milestone for the enforcement of the Code by some of the biggest platforms online today, namely: Google, Meta, Microsoft, TikTok and X. The reports, whose performance will be summarized further below, were assessed by relevant stakeholders such as EDMO Ireland Hub and the German-Austrian Digital Media Observatory (Park & Mündges, 2023)<sup>41</sup>, the Bulgarian-Romanian Observatory of Digital Media (Kiely, K. P., et al. 2023)<sup>42</sup> and the European Regulators Group for Audiovisual Media Services (ERGA)<sup>43</sup>. All of them have published their recommendations on the monitoring of the CoP and the assessment of quantitative and qualitative data provided by the reports. Following X's exit from the CoP in May 2023, the baseline report handed by the company fell short of data and various commitments weren't included<sup>44</sup>. According to the assessments, the report provided by X before its exit from the Code gave the impression of "blatant non-compliance" (Park & Mündges, 2023) where responses lacked relevant data or simply redirected to the X Help Site (Kiely, K. P., et al. 2023).

This first assessment of the baseline reports is important in further improving the Code and adapting it to fit current developments in EU digital policy. As the Code presents commitments on various levels of units (such as Measures, qualitative reporting elements (QREs), and service level indicators (SLIs)), the methodology of assessment for authors of EDMO Ireland Hub, German-Austrian hub and Bulgarian-Romanian one was chosen to be on a Measure level. Additionally, the assessment scheme involved both quantitative and qualitative variables. Points were given from 1 (poor), 2 (adequate) and 3 (Good) as average overall scores for each signatory.

In order to identify discrepancies in the information provided, research was divided by areas covered respectively by the CoP. In the first assessment led by the Ireland and German-Austrian

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<sup>40</sup> "The Strengthened Code of Practice on Disinformation – Many stakeholders, one goal" by Paula Gori, MediaLaws blog, 9 January 2023. See: <https://www.medialaws.eu/the-strengthened-code-of-practice-on-disinformation-many-stakeholders-one-goal>

<sup>41</sup> Park, K., & Mündges, S. (2023). CoP Monitor Baseline Reports: Assessment of VLOP and VLOSE Signatory Reports for the Strengthened Code of Practice on Disinformation

<sup>42</sup> Kiely, K. P., et al. (2023). Evaluating VLOP and VLOSE Implementation of the Strengthened EU Code of Practice on Disinformation in Bulgaria. White Paper.

<sup>43</sup> ERGA. (2023). Report on the first year of the Strengthened Code of Practice on Disinformation.

<sup>44</sup> <https://time.com/6283183/twitter-withdraws-from-eu-disinformation-code-ECer-says/>

hubs, (Park & Mündges, 2023) the results were divided by the 6 areas of interest in Ad placement, Political advertising, integrity of services and empowerment of users, researchers & fact-checkers. The assessment focusing on Bulgaria regrouped the 6 areas into 3 pillars, namely Advertising, Integrity of services & Empowerment. In line with the report of ERGA as well, these publications focus on showing not only the shortcomings of the Signatories reports but also Code specific remarks addressed to the TaskForce and the EC. In reporting the main findings and recommendations offered by the publications, the next section will follow the structure of the Code and its 3 main pillars. Firstly, the findings by the EDMO Ireland and the Austro-German Hubs will be presented, followed by the assessment of the Code's implementation on a member state level (specifically for Bulgaria) and ERGA's publication of its own assessment of the reports. Lastly a summary of recommendations by the assessments will be presented, followed by a list of barriers that ultimately preclude the effective assessment of the Code in the foreseeable future.

Concerning scrutiny of ad placements, according to the analysis by EDMO Ireland and the German-Austrian hub, platforms had a below-adequate level of performance with a total average score of 1.9 across all signatories' services'. Meta's services, both Facebook and Instagram, performed poorly, receiving an average score of 1.7 and 1.6, respectively. Microsoft Advertising and TikTok, on the other hand, received an overall score of 1.9 in this category. These scores suggest that their overall performance in this section fell below the adequate threshold of 2. The highest average scores were achieved by Google Advertising with 2.3 and LinkedIn with 2.6. It is worth mentioning that all the participating entities seem to have shared information regarding their policies and procedures for demonetizing disinformation. However, the specific requests of the QRE (Qualitative Reporting Elements) were not fulfilled, with signatories often relying on external links instead of providing the relevant information directly. Furthermore, assessors found that 64% of the measures lacked quantitative information with the number reaching 100% for Meta's platforms. Signatories were found to not have clearly understood the distinction between Commitments 1,2 and 3 which led to responses for Commitment 2 to be brief and redirected to responses under Commitment 1. Limited detail was given as well in responses to the measures in Commitment 3.

For political advertising, the assessment shows the performance of signatories was at an adequate level with an overall score of 2.2. Qualitative information was lacking in this section while platforms such as Twitter and TikTok had declared that most measures in this section were non-applicable to them as signatories. Although TikTok claimed it banned political and issue advertising, it was noticed by assessors that cause-based advertising is still allowed, but found no reference to this activity in the baseline report of the platform. For Google and Meta, the analysis



shows an adequate performance with shortcomings concerning certain measures under Commitment 6 (enhancing user transparency for political or issue ads) and Commitment 7, Measure 7.4 on “reporting ....the effectiveness of platform’s attempts to verify the identity of political or issue ad sponsors”. Overall, in the remarks specific to Google and Meta assessors observed that insufficient information was provided on several occasions and even quantitative data should’ve been more detailed (Park & Mündges, 2023).

For the Advertising and Political Advertising Pillar, authors of the assessments for Bulgaria noticed a prevalence of brief responses that lacked the necessary level of detail or information aligned with the stipulated requirements. A significant number of responses lacked the requested data, especially at the state level. Concerns also arise regarding the verifiability of the information provided. Specifically for Bulgaria, Google furnished data across various measures. In contrast, Microsoft made only one mention of Bulgaria, while TikTok, Twitter, and Meta did not include any specific data for the country (Kiely, K. P., et al. 2023).

Regarding Integrity of services, in the assessment by EDMO Ireland and the German-Austrian hub, the overall average score for this section stands at 1.9, falling below the acceptable threshold (Park & Mündges, 2023). Google and Meta performed marginally better, achieving scores above 2. However, the notable percentage of Measures lacking quantitative data to some extent raised concerns amongst the authors. LinkedIn's performance in this category was also worrisome. The findings led to the conclusion that all Signatories have room for improvement across each Commitment within this section. Concerning individual Signatories, Microsoft's report on LinkedIn showed that responses lacked substance and detail, particularly in commitments with QREs like QRE 14.1.1 and QRE 14.2.1. TikTok's disclosure of a lower number of fake accounts than previously identified by experts prompted assessors to call for a more thorough investigation in this instance.

In the context of Bulgaria, authors observed that the responses by TikTok and LinkedIn within this pillar did include specific data regarding fake accounts removed, fake likes, fake followers, and accounts banned in the country, while Google was named as the signatory with the most detailed explanations (Kiely, K. P., et al. 2023). Meanwhile, X's responses remained superficial and lacked relevant information. Overall, the assessment on Bulgaria concluded that the responses from the platforms were comparatively better than the previous pillar however more clarity was advised on how the data was compiled specifically for each country.

In the section for empowering users, according to the assessment of EDMO Ireland and The German Austrian hub the total average score stood at 1.9, suggesting a performance below an adequate level (Park & Mündges, 2023). TikTok received the highest score at 2.5, followed by LinkedIn, Bing Search, and Google Search with scores between 2 and 2.3. Facebook and Instagram closely followed with a score of 1.9, and YouTube with 1.7. Specifically for Commitment 17 which deals with media literacy, assessors found that signatories would focus on media literacy initiatives but not on the development of tools for the achievement of the goal. For Commitment 18 on the safe design of recommender systems, TikTok was reported as the only signatory with a good grade while in general vague information was provided for this section. Commitment 21, which deals with tools that allow users to access fact-checks and warning labels, witnessed the lowest scores among the signatories' responses. Lastly, for Commitment 25 on the critical assessment of content by users on messaging apps, Messenger had a grade of 1 (poor) overall while WhatsApp attained a score of 2 (adequate) in the assessment.

Following the same assessment report, the performance in empowering researchers was noticeably subpar, with all Signatories except YouTube receiving scores below an adequate level. Assessors observed a consistent issue with SLIs, as all of them had a 100% missing rate, except for Google. A considerable amount of measures were noted as non-applicable in this section since work for the fulfillment of the measures is yet to take place. Commitments and measures for which signatories provided responses for were Commitment 26 (public access to data), Measure 27.4 (engagement in pilot programs for data sharing), Measure 28.1 (adequate human resources to engage with the research community) and Measure 28.2 (transparency on what data is currently available). However, authors noticed a lack of clarity on these responses which is concerning when seen in connection to Article 40 of the DSA for which these signatories will have to abide by the obligations on access to data for researchers (Park & Mündges, 2023).

For the section of empowering the fact-checking community, signatory's scores varied from poor to adequate levels with a total average score of 1.7. Assessors noted that Google achieved the highest overall score although most measures lacked qualitative information and all measures with SLIs lacked quantitative data. For LinkedIn, all relevant Measures were missing both qualitative information and quantitative data, with the platform scoring a total score of 1.1. Authors noted that most Signatories, with the exception of Meta, have limited agreements with fact-checkers. For Measures such as 32.1 and 32.2 that oblige signatories to provide assistance to fact-checkers in their activities, quantitative data is missing and the "the information provided as part of the QREs is often irrelevant" (Park & Mündges, 2023).

The report focusing on Bulgaria assessed that for the pillar of empowering users, researchers, and fact-checkers, significant gaps that need to be addressed exist in the baseline reports. Concerning specific data on a member state level, signatories such as Google, Meta, Microsoft, and TikTok reported more data with respect to Bulgaria compared to the other two pillars. Meta's media literacy campaigns since the invasion of Ukraine were documented in the baseline report as activities done in partnership with local fact-checking partners in various European countries including Bulgaria. In response to commitments on content removal, Google, Meta, Microsoft, and TikTok all provided data but the assessment signals a lack of details on how the data was obtained, what methods were used, and who was involved on a local level for calculating such results. In addition, platforms such as for example Microsoft, failed in providing required metrics choosing to use other types of counts. Lastly, the authors advise that for the empowerment of users, researchers and the fact-checking community it is instrumental that data access and proportional focus on countries such as Bulgaria are prioritized in policy making. (Kiely, K. P., et al. 2023).

It is vital to take into consideration also ERGA's assessment of the baseline reports which unravels a series of shortcomings from the signatories part. Firstly, the recommended reporting period as well as the target character limit was not met by several platforms. Secondly, the Group reports a tendency for signatories to focus "on quantity rather than quality of provided information" subsequently inviting platforms to report more concise information and more comprehensive quantitative data (ERGA, 2023). The Group identified also a lack of contextualization when reporting SLIs and advised platforms to adopt a comparative approach when highlighting measures across different reporting periods. Lastly, the lack of data on a Member State level, identified by both assessments cited above, is noticed by ERGA as "concerning and with an inadequate and vague level of indications" on when signatories plan to provide locally specific data in the future (ERGA, 2023).

Based on the recommendations provided by these bodies, signatories have a long road ahead for the proper implementation of the CoP. Major Platforms were advised to provide responses with higher clarity and avoid redirection to links on their websites with generic information. In addition, the assessments encouraged platforms to have greater transparency in quantitative data reporting, including member state level data and trusted third party information (Park & Mündges, 2023). These recommendations show a propensity to advocate for more comprehensive reporting for pillars 1 & 2 while for pillar 3 signatories are advised to cooperate more and improve their policies concerning access to data and collaboration with researchers and fact checkers in monitoring disinformation.

As underlined in the beginning of this section, the analysis done on the baseline reports doesn't show just the flaws in signatories' reporting but also the shortcomings of the strengthened code. Overlapping between measures of the same commitment was a common phenomenon, in addition to the doubling of QREs over multiple measures. Recommendations also included improving the wording of commitments. In some instances, wording was too broad (e.g. commitment 18) or did not transmit a clear understanding of the objective pursued, leaving signatories the option to potentially circumvent measures and not provide relevant information (Park & Mündges, 2023). Further recommendations, mostly from the assessment on Bulgaria emphasize the active role of the EC in holding VLOPs and VLOSEs compliant with the Code and invest in more protectionist actions to facilitate researchers and fact-checkers work (Kiely, K. P., et al. 2023).

The effective assessment of major platforms' compliance with the Code faced various barriers with the first batch of reports. There was a necessity to improve reporting and transparency standards for signatories while aiming for higher quality information. Signatories did not provide sufficient nor relevant enough data at a satiable level, while some of the Code's own measures and commitments required changes in wording. In terms of monitoring, a clear need for the standardization of reporting formats, reporting periods and data access was identified. Marginalization of researchers from smaller countries, non-university-affiliated institutions or organizations was also a widely accepted concern. Lastly, as the ERGA report implies, for the CoP to be enforced more effectively the data on member states needs to be on a more granular level. These documents showed an overarching theme for the need to improve transparency, data quality and cross-stakeholder cooperation in the near future.

Already with the second set of baseline reports, improvements can be noticed. They are the first to report a full 6 month period of activity of major online platform signatories as well as of four new signatories of the Code (Seznam, Alliance4Europe, Newtral and EFCSN). On 26 September 2023 the EC published the news about the reports stating that signatories had made "improvements in providing more granular and insightful data, closing data gaps identified in their February 2023 reports" (EC, 2023)<sup>45</sup>. The Commission pointed out the efforts of the signatories on establishing safeguards for the use of generative AI and the fight against disinformation in relation to the war in Ukraine and the upcoming 2024 EU elections (EC, 2023). Indeed when opening the baseline reports one can notice instantly how the usage of AI is prefaced by Meta, Google and Microsoft also. Additionally, referencing the previous reports and their shortcomings Google declared the new

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<sup>45</sup> European Commission, Publication 26 September 2023, Code of Practice on Disinformation: new reports available in the Transparency Centre. <https://digital-strategy.ec.europa.eu/en/news/code-practice-disinformation-new-reports-available-transparency-centre>

report includes “new metrics and narrative details”<sup>46</sup> while Meta declared that it has improved two metrics previously shared at EU level now broken down by country<sup>47</sup>. TikTok simply confirmed its commitment to build upon its previous report while adding that it has scaled up its fact-checking programme and advancing its rules on synthetic media.<sup>48</sup>

Regarding disinformation, companies Google, Tik Tok and Microsoft declared a total of 12 interventions in their reports mainly on Commitment 17 and its Service level indicators. Meta however did not provide data in this policy category and its appropriate commitments. Furthermore, demonetization and advertisement had more granular data than before, particularly from Google and Microsoft who used internal data on click-through rates while Meta and TikTok reported on user’s share cancel and click through rates when seeing flagging labels. While improvements from the first baseline reports can be noticed, preliminary assessments of the July reports show that they make up only a small percentage of the reporting.<sup>49</sup> For example, concerning only SLI 1.1.1, SLI 14.2.1 and SLI 17.2.1 companies Meta, TikTok and Microsoft had measured action, impression and impact while for other commitments the data lacked one or the other category.<sup>50</sup>

An important issue concerning the effective assessment of the reports lied in the development of Structural Indicators. As prescribed by Commitment 41 of the CoP, the design and implementation of the Structural Indicators is left to the signatories in collaboration with the relevant actors within the Task-force such as EDMO, ERGA and other third party experts.<sup>51</sup> EDMO tabled the first proposal for Structural Indicators in September 2022 initially identifying six areas of measurement for each member state and across the EU (Nenadic et. al, 2023)<sup>52</sup>. In 2023 TrustLab was selected to conduct a pilot analysis as an independent third party. Due to time and resource constraints, the publication features the analysis of a smaller set of indicators (2 in total) and only three EU member states (Poland, Spain and Slovakia). The indicators chosen were prevalence and sources of disinformation measured across all major platform signatories (Facebook, Instagram, LinkedIn, TikTok, X and YouTube). Framed and inspired by the EDMO proposal on the topic, the analysis however stands on its own as an independent work, even introducing the utilization of

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<sup>46</sup> Code of Practice on Disinformation – Report of Google for the period 01 January 2023 to 30 June 2023. Available at: <https://disinfocode.eu/reports-archive/?years=2023>

<sup>47</sup> Code of Practice on Disinformation – Report of Meta for the period 01 January 2023 to 30 June 2023. Available at: <https://disinfocode.eu/reports-archive/?years=2023>

<sup>48</sup> Code of Practice on Disinformation – Report of TikTok for the period 1 January 2023 - 30 June 2023. Available at:

<sup>49</sup> Lai, S., & Yadav, K. (2023). Operational Reporting in Practice: The EU’s Code of Practice on Disinformation.

<sup>50</sup> Database of Baseline Reports by the Cargenie Endowment for International Peace. Accessible at:

<https://ceip.knack.com/pcio-baseline-datasets#code-of-practice-on-disinformation/>

<sup>51</sup> The Working Group for the design and development of Structural Indicators was created in June 2022. See more: <https://disinfocode.eu/structural-indicators/>

<sup>52</sup> Nenadic, I., Brogi, E., & BLEYER-SIMON, K. (2023). Structural indicators to assess effectiveness of the EU’s Code of Practice on Disinformation.

discoverability metric as a new approach to assess effectiveness of the Code and monitoring of disinformation (EDMO, 2023)<sup>53</sup>.

### ***1.3 The Italian code of practice***

Pagella Politica along with other partners in the IDMO partner consortium (including RAI, GEDI Group, Newsguard, and Luiss University) have been working throughout 2023 on drafting a national Code of Practice to combat disinformation in Italy.

During the first quarter of the year, Pagella Politica/Facta.news studied existing documents and codes, both in Italy and abroad, that contained measures to combat disinformation and promote factually correct information. Examples of such documents include the European Union's 2022 Code of Practice on Disinformation and regulations from various international media outlets like the BBC, CBC, El Pais, Financial Times, and Le Monde. The material was initially collected and analyzed by the RAI Research Office. Following the completion of the analysis phase, in July 2023, a preliminary draft of the IDMO Code was prepared, following the example of the European Code of Practice and containing various "Commitments" to counter disinformation. These commitments range from correcting errors to distinguishing between facts and opinions and ensuring the proper use of sources and images.

The preliminary draft was shared with consortium partners who played a role in its development in order to gather feedback. In October 2023, a polished version of the Code was then disseminated to a broader audience, encompassing other consortium partners and a selection of external organizations. This group comprises various stakeholders, including the Italian Order of Journalists, associations, and journalism unions, all of whom share a keen interest in the discussions surrounding the Code's content.

After gathering further input from the aforementioned stakeholders, the Code's draft was finalized by mid-November 2023, with a public launch held on November 28th at Luiss University. The event hosted guest speakers such as Gianni Riotta, Director of the Master in Journalism and Multimedia Communication at LUISS and IDMO project coordinator; Alberto Rabbachin, Deputy Head of Unit at the European Commission; Paula Gori, Secretary General of the European Digital Media Observatory (EDMO); Francesco Giorgino, Journalist at RAI; Walter Galbiati and Filippo Davanzo of GEDI Group; Giovanni Zagni, Director of Pagella Politica/Facta.news; and Tommaso Canetta, Deputy Director at Pagella Politica/Facta.news.

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<sup>53</sup> <https://edmo.eu/2023/10/06/the-first-pilot-measurement-of-structural-indicators-published-lessons-learnt-steps-ahead/>

During the first panel, speakers delved into European efforts against disinformation, encompassing the European Digital Media Observatory (EDMO) and its national hubs, and the significance of regulatory tools like the Digital Services Act and the 2022 Code of Practice on disinformation. Paula Gori stressed the necessity of a multidisciplinary approach by EDMO and highlighted the vital role of the national hubs within this extensive network.

In the second panel discussion on IDMO partners' activities in preparing the National Code, Giorgino highlighted the code's tangible and impactful commitments, particularly in influencing the phases of news making and generating information. On the other side, Filippo Davanzo and Walter Galbiati detailed the feedback-gathering process and acknowledged the extensive participation of all stakeholders, with a special mention of RAI Research Office's substantial contribution during the drafting period.

The event ended with Canetta presenting the preamble and commitments of the Code. He reflected on the lengthy process and emphasized the Code's wording, describing "the price that is paid by believing in disinformation" and its detrimental role in ongoing conflicts around the world. The conclusion of this event marked the official start of a 12-month period of promotion in which relevant stakeholders in the Italian media sector will be invited to become signatories and endorse the Code. The document serves as an additional mechanism, this time on a national level, in combatting disinformation. By providing a toolkit of general principles and good practices, the IDMO Code represents a significant milestone for the Observatory and its partners, highlighting a longtime commitment to impactful policy initiatives and delivering concrete results. Furthermore, the collaboration between the consortium partners in delivering such a document shows an unwavering commitment by IDMO in fostering a stable policy dialogue with a multistakeholder approach united by the common objective of improving the Italian and European media and information landscape.

### ***1.3 The role of RAI as public broadcaster in fighting disinformation***

Rai decided to participate in the Italian Observatory on Digital Media (IDMO), proposing itself mainly in the action of Media Literacy, in the certainty that any strategy to counter disinformation must include a literacy plan aimed at increasing the resilience of the population towards a phenomena that, in our democratic societies, can be contained but not eliminated.

Rai's action in IDMO, in its articulated architecture, was made possible by many years of experience in educational television, propitiated by a clear regulatory framework. In fact, it should be remembered that Rai is the exclusive concessionaire of the public service media and, as such, sees its activities governed by the Convention for the concession of the public service and by the Public Service Contract (Cds).

Education is part of Rai's mission, and was highlighted with Law No. 103 of April 14, 1975, through the establishment of the School Education Department (DSE), a department responsible for the creation of didactic-informative programs with the task of "enhancing the scholastic and educational activities of the radio and television medium". Since then, a rich thematic production has been consolidated, curated by the various departments that have succeeded one another over time: in 1995 the DSE department changed its name for a few years to *Videosapere*, then passed to the name of *Rai Educational* (1997) and became *Rai Cultura* (2014).

Within the scope assigned, Rai has been able to proactively interpret public service obligations in many areas. A case in point precisely concerns the fight against disinformation and the Media Literacy of the population. The specific issue of computer literacy of the population has been raised since the Public Service Contract of 1997<sup>54</sup> (art.26b), then enriched by communication education

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<sup>54</sup> D.P.R. 29 October 1997 "Approval of the service contract stipulated between the Ministry of Communications and Rai – Radiotelevisione Italiana s.p.a." (published in the Official Gazette no. 286 of 9 December 1997).

Art. 26 - Multimedia services

1. The concessionaire, in agreement with the Ministry, shall provide: a) to ensure opportunities and capacities to experiment with new forms of multimedia production and new television and sound languages, including for offers abroad (e.g. internet services); b) **to enhance the synergies between telecommunications, information technology and television for the purposes of multimedia services, also with the aim of literacy among the general audience as well as a service aimed at marginalised areas**; c) to continue and develop digital technologies, with particular reference to the entire production chain (e.g. virtual scenography, post-production), the archiving of television and radio programmes (e.g. audio-video library) and broadcasting (e.g. terrestrial and satellite); (d) to enhance datacast-type services and develop "DMB" multimedia services; e) to contribute, in the context of national research, to the definition of new systems also with regard to high-quality digital television systems and electronic cinema applications; the concessionaire will also be able to experiment, subject to the authorization of the Ministry, new more advanced wire and cable systems; to collaborate with the Ministry on projects related to the development of the so-called "information society".



(Cds 2000-2002<sup>55</sup>) and by multimedia literacy (Cds 2003-2005<sup>56</sup> and following Public Service Contracts).

However, it is in the 2018-2022 Public Service Contract that the issues of Digital Literacy and Media Literacy (art.25, letter x) <sup>57</sup> and the fight against the spread of fake news (art. 25, letter e, point iii) are clearly explained both in the general principles (art.2) and in the specific obligations of the public service. Particular attention is paid to the Digital Literacy of minors<sup>58</sup> (art.8, letter d).

Certainly, the provisions of the new Convention for the public service concession launched by Decree of the President of the Council of Ministers of 28 April 2017 have contributed to this leap in quality. The Convention, in fact, provided for the exclusive concession to Rai – for the first time in its history – also to promote the country's digital and multimedia literacy process<sup>59</sup>.

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<sup>55</sup> D.P.R. 8 February 2001 "Approval of the service contract between the Ministry of Communications and Rai Radiotelevisione Italiana S.p.A. for the three-year period 2000/2002"

Art. 2 - Television programming

Paragraph 1. (...). The concessionaire is committed to consolidating its educational and informative mission, strengthening the structure of its offer of information, culture and entertainment in the direction of product qualification linked to the characteristics of the public service. Particular attention will be paid to the issues of computer literacy and communication education.

<sup>56</sup> Decree of the President of the Republic of 14 February 2003 "Approval of the service contract between the Ministry of Communications and Rai – Radiotelevisione Italiana spa for the three-year period 2003 – 2005"

Art. 23. Experimentation and introduction of digital television and radio broadcasting services

(...) paragraph 3. Rai is also committed to promoting production projects based on new technologies of creation, production and broadcasting, as well as the use of television as a tool for information and multimedia literacy, and to promoting the training of operators in the audiovisual sector, particularly in the areas of use of new technologies.

<sup>57</sup> Ministry of Economic Development "Approval of the National Service Contract stipulated between the Ministry of Economic Development and Rai – Radiotelevisione italiana s.p.a." 2018-2022

Art.25. Specific obligations (...):

paragraph 1, (x) Digital and media literacy (education in the use of media):

Rai, also through agreements with central and local institutions, with specialized study institutes, with foundations and associations of social promotion, plans and implements specific digital and media literacy projects with the aim of raising awareness, in particular, of students with respect to a responsible and critical use of the media, with particular attention to television and the web.

Art. 25, Information (...) lett. e, point iii : Rai is required to activate tools aimed at countering the spread of fake news and provide in this regard: - the establishment of a permanent internal observatory; - the development of specific products of an educational and didactic nature; - the implementation of promotional initiatives regarding the risks arising from the spread of fake news; iv) sensitize program presenters and its employees and collaborators, including through specific training actions, to scrupulously adhere in their activities to the principles of fact checking, adopting the best practices in the sector;

<sup>58</sup> Art. 8 Minors - Rai 2. In order to achieve the objectives referred to in paragraph 1, Rai undertakes to ensure that the offer dedicated to minors: (...) d) is characterized by a priority care for language, with reference to an appropriate use of the Italian language, the learning of English and other languages, and digital literacy, with an action of positive education on the web; (f) to increase the critical skills of minors so that they can make better use of the media and the Internet, both qualitatively and quantitatively, also taking into account current and future developments in terms of interactivity, and therefore offers programmes dedicated to the promotion of skills in the management of their 'profile' on the various social media; also in relation to the issue of the protection of privacy and personal information and with the aim of developing a culture of combating cyber bullying; (...).

<sup>59</sup> Decree of the President of the Council of Ministers of 28 April 2017 "Concession of the public radio, television and multimedia service and approval of the attached draft agreement

Art 3. (t) the promotion of technological innovation and digital education, including through the testing of programmes, formats and content that bring citizens closer to digital technologies and digital literacy.

While it is therefore clear that it was the institutions that recognized Rai as having a primary role in the broad-based literacy work of the population, it is equally true that Rai, in the exercise of its editorial freedom, has been able to decline Digital, Media and Information Literacy in its offerings in an anticipatory manner.

The Media *Literacy versus Fake News* (MLvFN) research, carried out by Rai Ufficio Studi in IDMO framework collaboration with the Università Cattolica del Sacro Cuore of Milan, provides an eloquent image of the Rai programmes made on these topics between 2015-2021, with a particular focus on building skills related to fighting fake news<sup>60</sup>. Here, to better understand Rai's action carried out in IDMO, it is useful to go beyond the temporal and objective boundaries (fighting against fake news) of the MLvFN research in order to benefit from an overview of Rai's experience in the field of Media Education.

The catalogued programs, only those that in a structured way can be unequivocally traced back to the Media Education strand, are listed in the synoptic map of the editorial offer (List of Figures) in which, for completeness of information and ease of reading, the programs already mapped in the mentioned MLvFN research have been integrated.

The richness of Rai's offer could offer content for an entire publication, but for the purposes of this contribution, what is important is the continuous process of experimentation, sedimentation and updating of programs and languages that has affected various sectors of the Company, from the dawn of the Internet in Italy to the present day.

There are many emblematic programs, the result of specific educational know-how and editorial creativity, but to highlight the path of mass computer literacy, and therefore of Media Literacy, there are some milestones to remember.

The beginning of Rai's journey in the era of convergence is marked by *MediaMente*. Aired from 1994 (the year in which the Internet became truly accessible to all in Italy<sup>61</sup>) to 2002, *MediaMente* introduced the general audience to new communication technologies and digital culture.

Alongside the popular episodes, *MediaMente* was enriched with some educational initiatives aimed at the world of schools, such as the Multimedia Education course, distributed online and disseminated as an editorial product through handouts, videotapes and CD-ROMs, and the Multimediascuola Project (one of the first computer literacy courses aimed at teachers). *Mediamente* also offered a Learning Center as an internal section of its website: the first website

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<sup>60</sup> MLvFN <https://www.idmo.it/en/2022/05/19/media-literacy-versus-fake-news-the-research-by-rai-and-the-catholic-university-of-milan/>

<sup>61</sup> On April 30, 1986, the first Italian Internet connection was established, between the headquarters of the then CNUCE-CNR (National University Center for Electronic Computing - CNR) and the US Arpanet Network (progenitor of the Internet) but the Internet became commercially accessible between 1993 and 1994.

created by Rai (1995)<sup>62</sup>. Such a long-lasting experience (1994 - 2002) would not have been possible without the commitment of a specialized channel with an educational vocation.

If the medium is the message, as McLuhan stated, Rai Educational is Rai's educational message par excellence, having represented a primary laboratory of experimentation, languages, incubation and dissemination of training products that, from linear TV to satellite TV and the web, have involved students, teachers and families over the years.

Thanks to the advent of satellite television first and digital terrestrial television later, in fact, Rai Educational was able to expand the offer, with the creation of channels directly entrusted to the structure, Rai Edu 1 and Rai Edu 2, evolved in 2009 into Rai Storia and Rai Scuola.

This role has been strengthened over time by collaborations with institutions, and in particular with the Ministry of Education, which have strengthened the scientific and technological dissemination first by Rai Educational and then by Rai Cultura, in the vision of a virtuous model that has introduced methodologies and tools in schools for an integrated and stable use of audiovisual materials in traditional teaching.

Underlining the role of television in the dissemination of scientific and technological culture, was the Framework Agreement signed on 7 August 2003<sup>63</sup> between Rai and the Ministry of Education, University and Research (MIUR), which, in reaffirming its commitment to computer literacy and scientific culture through several innovative programs (i.e., Explora), envisaged an ambitious plan to distribute satellite dishes in Italian schools<sup>64</sup>. As part of this collaboration, indeed, over a three-year period, over 20,800 satellite dishes were installed in comprehensive schools and high schools, equipping Italian schools with access points to view to Rai Edu 1 and Rai Edu 2<sup>65</sup>.

And it is precisely from the experience of Rai Educational that the main channel of today's educational offer was born in 2009: Rai Scuola (an important player in IDMO), the channel dedicated to formal and informal training, educational, informational, scientific, and technological literacy: culture and learning at the center of the public service function of support for educational activities. In 2014, as mentioned, Rai Educational changed its name to Rai Cultura, which is now the point of reference department for literacy actions.

Another milestone of the Media Education offer is represented by the Rai programming dedicated to teenagers and children, under the responsibility of the Rai Ragazzi Department, that begins its

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<sup>62</sup> Unfortunately, the "MediaMente" website is no longer available, and it is therefore necessary to search through the network or through the RAI showcases to retrieve its contents.

<sup>63</sup> <https://archivio.pubblica.istruzione.it/ministro/comunicati/2003/070803.shtml>

<sup>64</sup> [MIUR - News 2003 - Protocolli d'intesa \(istruzione.it\)](https://www.edscuola.it/archivio/software/tic_22705.pps)

<sup>65</sup> [https://www.edscuola.it/archivio/software/tic\\_22705.pps](https://www.edscuola.it/archivio/software/tic_22705.pps) ;  
[https://archivio.pubblica.istruzione.it/news/2006/convenzionempi\\_rai221106.shtml](https://archivio.pubblica.istruzione.it/news/2006/convenzionempi_rai221106.shtml)

programming with the Gulp and YoYo channels on 27 April 2010. In 2022 Rai Ragazzi becomes Rai Kids.

Thanks to Rai Kids, Rai is now the leading Italian publisher of audiovisual content for children and one of the main ones in Europe. It has fostered the birth in Italy of an industry for the production of cartoons dedicated to school and pre-school children and has become the driving force behind leading Italian animation companies and studios. Rewarded by good audience, these programs aim to stimulate the children growth with content rich in ethical values, which help them understand and comprehend reality with a language appropriate to their age. Understanding and comprehending reality with a language suitable for a young audience is the leitmotif of the offer for young people indeed.

In this sense, among the most significant experiences of Information and Media Education, a prominent place belongs to Tg Ragazzi, which since 2 February 1998 has marked several television seasons, changing its name over the years to Gt Ragazzi and finally to Tiggi GULP<sup>66</sup>. A news program designed for children without imposing pre-packaged information but elaborated with their involvement by organizing forums in schools. The students were invited to report their experiences, propose items, ask questions, comment on facts of interest to them, by fax or email.

Compared to the adult news, the children's news has always paid particular attention to “news format” (language, simple and direct; use of explanatory graphic elements); making children and young people protagonists, turning them into young reporters or just putting their point of view in the foreground.

The news dedicated to children, in its continuous experimental research, has gone through several phases. After closures and reopenings, in May 2022 Rai returned to producing the news, with 15-minute episodes, designed and tailor-made for boys and girls between 8 and 14 years old: *Tg Kids*, thanks to the collaboration between Rai News, Rai's all-news channel and Rai Kids. The format of *Tg Kids* includes the presentation of the news of the day, the explanation of the key word of the moment, current affairs, and an in-depth analysis with particular attention also to topics of particular interest to children such as technology, the environment, or the world of entertainment. The TG Kids suspended broadcasts again in June 2023.

Among the latest creations at Rai Kids, more specifically on the subject of fake news, it is worth mentioning, *Not to be believed! Fake or real* is the social media campaign created by Rai Kids as part of the activities of the Rai Fake News and Media Literacy Committee<sup>67</sup>. A well-known Italian

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<sup>66</sup> From 12 September 2010, after the closure of the so-called "children's TV" on the third network, it was moved to [Rai Gulp](#), becoming Tiggi Gulp in [2012](#). The program closes again in [2014](#).

<sup>67</sup> The "Fake News and Media Literacy" Committee, created in 2021, includes the following departments and structures: Editorial Department for Information Offering, President's Staff, Approfondimento Department, Rai Kids, Rai per il

influencer (Emma Galeotti) was chosen for this campaign, who in a fun but rigorous way, addressed the issue of fake news, with concrete examples: from color tattoos banned in the European Union, to cricket flour. The campaign includes videos lasting just a few minutes spread on the social networks of Rai Play and Rai Gulp, and broadcast on Rai Gulp. "Be critical and think before you share" is the key message of the campaign.

The thematic channels - Rai Scuola, Rai Gulp and Rai YoYo - represent the main vectors of Media Education for specific targets, Rai continues to cultivate its primary vocation as a universal TV, in an uninterrupted process of accompaniment of the country into the digital era.

As part of activities aimed at Digital Literacy, awareness and digital skills development, Rai *"carried out studies and in-depth analyses on issues related to the digital transformation of the country system and Italian citizens; the designing and planning of actions and editorial content for the three-year period 2017/2020 - in line with the European Digital Agenda and the work of the Digital Italy Agency - the coaching and authorial support to the editorial areas to make the existing offer more inclusive; the launch of the development of new inclusive content, digital native and intended for the various digital distribution platforms"*<sup>68</sup>.

In this framework, for example, through a newly established structure (Rai Digital Inclusion), the Company *"performed activity aimed at basic literacy, development of digital skills and citizen awareness. These included initiatives proposed in Rai 1's program l'Eredità and the second season of the fiction Complimenti per la Connezzione, produced by Rai Fiction and broadcast by Rai 1 in the access prime time"* <sup>69</sup>. The two initiatives earned Rai a special mention in the 2017 Italian Digital Agenda Award.

Thanks to a collaboration with the Minister of Technological Innovation and Digital Transition, in 2022 Rai also promoted a campaign on digital skills: *"The words that connect us"*, aimed at familiarizing the public with a new technological glossary (spid, Cloud, electronic identity card, digital payment, fake news...). These words have been included into the narrative of the main programs on the generalist channels, thanks to the active role of some well-known presenters of the main programs of Rai 1, Rai 2, Rai 3, and Radio Rai. The

contents developed during the campaign were then extrapolated from the programs and turned into clips for the web and social media.

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Sociale, Institutional Relations, International Relations and European Affairs, Marketing, Ufficio Studi, RaiPlay & Digital, Human Resources and Organization, CTO. This Presidium on Fake News and Media Literacy is based on the previous experience of the task force against fake news on coronavirus, created in 2020.

<sup>68</sup> [https://www.rai.it/dl/doc/1536229057967\\_Bilancio%20Rai%202017%20-%20Inglese%205.09.2018.pdf](https://www.rai.it/dl/doc/1536229057967_Bilancio%20Rai%202017%20-%20Inglese%205.09.2018.pdf)

<sup>69</sup> See note n°68.

The list of broadcasts could go on, but the above is enough to highlight how this wide-ranging action carried out by the various Rai internal publishers has created the propitious and indispensable habitat for the conception and implementation of Rai's participation in IDMO.

#### ***1.4.1 The efforts of RAI on a large scale to tackle disinformation***

Certainly, through the careful planning of the project, the involvement of numerous Rai actors, and the consideration of external impacts, the significance of Rai's contributions to IDMO extends beyond audience-related aspects. These actions contribute significantly to the media-educational landscape of public radio, television, multimedia services, and pave the way for broader possibilities in utilizing television as a potent instrument in advancing Media Literacy at the European level. Rai Ufficio Studi, in carrying out the role of operational coordinator of Rai's participation in IDMO, wanted to take up the challenge of Media Literacy to make it one of the cornerstones of the IDMO Observatory in the fight against disinformation.

On the basis of the experience gained by Rai, the Ufficio Studi has therefore involved some of the company departments, already active on this topic, to promote a concerted action on Media Literacy divided mainly into four areas: 1) research, (Media Literacy and technology); 2) audiovisual productions; 3) training; 4) dissemination and communication. Below is the summary of the action.

##### ***1.4.1.1 Research***

*“Media Literacy versus Fake News”*<sup>70</sup>.

The necessity for a thorough understanding of the landscape emerged as a fundamental prerequisite for impactful efforts in Media Literacy, a point quickly emphasized in discussions with IDMO partners. To enhance the Observatory's effectiveness, a comprehensive mapping was undertaken of the most notable Digital and Media Literacy initiatives developed across the nation in recent years. This included an examination of programs and initiatives by the public service dedicated to fostering digital media literacy and combating misinformation.

Rai Ufficio Studi has therefore promoted a scientific cooperation with the Università Cattolica del Sacro Cuore of Milan to carry out cognitive research. Based on the documentation collected, the Research subjected the mapped experiences to a qualitative analysis aimed at identifying possible good practices. To recognize the projects as such, an analysis grid based on the detection of eleven indicators (or 'markers') was then drawn up based on scientific literature. The objective was to point

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<sup>70</sup> See note n°60.

out some of the most effective experiences, to be replicated in other territorial and school contexts enriching the repository of IDMO and, through this, of EDMO.

### *Digital Media Literacy Gaps and Needs*<sup>71</sup>

On the basis of some of the results that emerged in the MlvFN research, the Ufficio Studi, with the partners T6 Ecosystems, Tim, in collaboration with Luiss, and with the institutional support of the Ministry of Education (MIM), has therefore developed and administered a targeted survey, aimed at a sample of students and teachers of the three-year period of secondary schools, aimed at knowing from the living experience of the protagonists of the school, the literacy needs in relation to disinformation, both in the functional sphere and in that of knowledge of the digital and non-digital media system.

The picture given by the answers to the questionnaire, shared with the MIM, shows that although there is a growing interest in the subject, there are still few hours dedicated to Media Literacy in the total number of hours dedicated to civic education, which has recently been reintroduced in schools. In fact, it has been noted that the National Plan for Digital Development (PNSD) has succeeded in promoting very rich and varied experiences at the territorial level and at the level of individual schools, but they are still fragmented and therefore not likely to produce the critical mass necessary for an organic and effective implementation of the national strategy for the development of digital citizenship.

The research highlighted the need for Media Education outreach, dissemination, and promotion work, with the involvement of media actors, in synergy with school operators. A good combination of educational rigor, which can be provided by teachers, and creativity and know-how, provided by information workers (fact-checkers, journalists, media experts) could open up new avenues. The introduction of a media educator figure who can cross-integrate digital skills applied to different fields of knowledge, also supporting teachers, could also be the key to introducing innovation while respecting the path of each institute's curriculum.

3) In the technological area, the Turin Research Center (CRITS), in synergistic action with TIM, has been working on the detection aspects of fake news, with regard to the textual/visual processing performed on the content disseminated by traditional media.

Specifically, the four main contributions<sup>72</sup> are:

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<sup>71</sup> <https://www.idmo.it/en/2023/12/14/idmo-digital-media-literacy-gaps-and-needs/>

<sup>72</sup> The full report of the activity carried out, including results and code is available at the following link: <https://arxiv.org/pdf/2310.11097.pdf>

1. Creation and implementation of dataset to identify how an erroneous/uninformative statement is mentioned in media content: 1301 documents analyzed, from Rai catalog and Open (online newspaper).
2. Evaluation of the ability of natural language processing techniques (e.g., Transformers and Large Language Models) to automatically recognize and distinguish when a particular statement is mentioned in a text, refuting, or supporting it (Recognize Textual Entailment). The FEVER dataset was used, achieving 90% accuracy for two of the algorithms used.
3. Creating of an algorithm to automatically assign categories to journalists' verdicts (e.g., TRUE, FALSE, EXAGGERATION, OMISSION, etc.). The algorithm again achieved around 90% accuracy on a dataset extracted from fact-checking articles by Pagella Politica (IDMO partner).
4. Creation of a game, FAKE RADAR, to test players' sensitivity in recognizing real or fake news, real or manipulated videos and images. The game was integrated into an iOS and Android application; the code and video were integrated into an iOS and Android application.<sup>73</sup>

#### ***1.4.1.2 Audiovisual Production***

##### *Media Literacy productions and campaigns*

In the digital era, it's crucial that all citizens actively and responsibly engage in the online ecosystem through an inclusive and cohesive approach. Consequently, Media Literacy should encompass individuals from every demographic group: children, teenagers, adults, and seniors.

Rai intended to formulate competence and literacy approaches to the media, according to an articulated vision, on several levels of communication, aimed at different targets and correlating with the different needs of the population. Therefore it created educational and informative content, tailor-made, through the commitment of Rai Cultura and Rai Digital and Transmedia Contents.

##### *Production of Digital Media Literacy for the world of school.*

In this framework, the RAI Culture Directorate has worked on two project directions:

1. Five episodes of 30 minutes each, a spin-off of the third series of the well-known show "Invitation to Reading". The broadcast provided, in the various series, indications, both methodological practical and operational, necessary to transform innovative school libraries

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<sup>73</sup> The code and demo video are available at the following link: <https://github.com/Loricanal/fakeradar/tree/main>



into active centers of Media Literacy and countering disinformation. In the new series created for IDMO, together with young people, teachers and experts in the field, the issue of combating fake news was addressed with a multidisciplinary approach. In addition to the acquisition of some fundamental skills related to Media Literacy and the knowledge of the psychological mechanisms, which influence people's behavior when they inform themselves and share content online, some good practices are proposed to assess the reliability of online information and help young people acquiring the necessary skills to counter disinformation. The programme included testimonies from various experts in the field, from Italy and around the world, who presented new perspectives on how to deal with the phenomenon of disinformation. The five episodes, broadcast on Rai Scuola, Rai3 and on digital platform Raiplay, achieved 1,128,375 total audience.

2. Four special episodes of 30 minutes each of the "Digital World" program, the program that for over six years (2017) has been investigating digital issues in all its aspects. Digital World represents an attentive and punctual observatory on the new realities of the digital environment, conceived with the aim of encouraging the acquisition of critical skills and authoritative and validated information on the development of the digital ecosystem, and on the reflections and technological innovations that these have in the various sectors (information, school, society, finance, environment). In a four-part journey, he enters the heart of fake news, reveals its mechanisms, and gives a voice to those who fight it on a daily basis. Journalists, communication experts, university professors, representatives of the EU and the world of schools, universities tell us what they are doing in their daily battle to fight information disorder. The four episodes, broadcast on Rai Scuola, Rai2 and on digital platform Rai Play achieved 1,134,225 total audience.

#### *Awareness-raising campaign for general audience*

The Rai Digital Content department (now part of the Digital and Transmedia Content Department) has created the "United against disinformation" campaign in collaboration with the Ufficio Studi and the Communication Department. Thirty-one short clips (first series, 10 x 2' + 1 special pill of 1'; second series, 10 x 1'; third series 10 x 1') to promote the development of critical thinking and Digital Literacy of citizens. Each pill (clip) helps to understand how to recognize if a news or an image is fake if news on social media or on messaging chats is credible.

The pills, aired during the 30-month project in three tranches of 10 clips each, touched on all current issues: war, climate, vaccines, migrants, political elections, financial markets.

Disinformation has a negative impact on all aspects of current events and contaminates the media landscape with false news, hoaxes, and conspiracy theories. The objective of the campaign was to promote awareness of this phenomenon, its mechanisms, and the utilization of specific tools to combat it. Similar to the practices observed in Rai, some of the content can be incorporated into educational curriculum to be taught in schools. These materials are specifically tailored for both online and traditional formats.

The videos constitute a part of a communication campaign that has garnered a total of 848 million interactions across three seasons. These remarkable figures exemplify the significant role of public service in today's audiovisual environment, surpassing any logical reasoning.

#### ***1.4.1.3 Training***

Rai has combined the empowerment action (productions) also with a training activity, aimed at the world of schools, involving Rai's internal editors (news). In collaboration with the Rai Offices Coordination and RAINews24, the Ufficio Studi organized 29 online meetings between its journalists and high school classes from different regions of Italy.

In each webinar, each lasting two hours, the journalist or correspondent involved reported his or her experience in the newsroom and offered useful information to young people to navigate the world of online disinformation, verify sources and recognize fake news. The meetings also included a final question-time for a discussion on the topics of the webinar.

#### ***1.4.1.4 Dissemination and communication***

All the actions were accompanied during the project by a dissemination activity, through the organization of six seminars and three special events to enhance experiences and best practices, in synergy with experts from the IDMO network and in collaboration with the leader of the project, Luiss.

In particular, communication on Media Literacy activities at national level has consisted of the organization of events or presence at events; almost always streamed and accompanied by the launch of press released and a social strategy carried out by Rai and IDMO.

Among the most significant events, as part of the European Media Literacy Week, on 27 October 2022 Rai organized *Fake news: instructions for use. The role of Media Literacy in the fight against disinformation*, at the interactive space "Esperienza Europa – David Sassoli, in Rome, in the presence of representatives of the Representation of the European Parliament in Italy.

Also worth mentioning is the event on deep fake, held in Turin as part of the il Salone del Libro on 18 May 2023 entitled: *Generative AI and deep fake: the new challenges of information - A Media Literacy for a conscious digital citizenship*.

The events and workshops aimed mainly to involve high school students, taking advantage of the opportunity of major cultural events such as the Turin Book Fair or the Small and Medium Publishing Fair in Rome "Più libri, più liberi". Another success was the workshop "True or false? The commitment of the public service against fake news", held in the framework of the Giffoni Film Festival on 26 July 2023.

#### ***1.4.2 RAI's main results achieved in the IDMO***

The IDMO experience concludes with a highly positive outcome, not only in terms of numbers but also in terms of knowledge and expertise gained, which will prove valuable for future endeavors of a similar nature. To capture the essential elements of the IDMO experience, the following keywords come to the forefront : motivation, know-how, creativity, sharing, and innovation. Undoubtedly, the next frontier for Rai lies in bolstering its digital offerings.

As already envisaged in the IDMO initiative, there is a need to provide additional momentum to reach an even wider audience, with a particular emphasis on engaging the younger generation.

In this perspective, new tools and new languages will certainly have to find a place, for a creative and participatory Media Literacy, also through gaming and social platforms. It will thus be possible to fully and concretely implement what the PNSD advocates for active participation in the digital society, *“transforming students from mere consumers into critical consumers and producers of digital content and architectures, capable of developing skills across all sectors and occupational fields; to solve problems, concretize ideas, acquire autonomy of judgment, creative thinking, awareness of their own abilities, pliability and flexibility in the search for solutions”*<sup>74</sup>.

Rai has already crossed this frontier. Referring to the synoptic map, we like to remember Rob-O-Cod: the first Italian TV game show dedicated to "coding" and robotics, two disciplines that have now become an integral part of the educational programs of Italian schools. Interrupted due to the pandemic, in the 28 episodes of the program, the competition was divided into four groups that see sixteen teams of twelve-year-old programmers (middle school students), the Robocoders, each with their own robot, compete against each other. In each episode, two teams of Robocoders compete in coding trying to program the robot in the best way to face the obstacles on the competition fields, inspired by fantastic worlds.

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<sup>74</sup> <https://scuoladigitale.istruzione.it/pnsd/ambiti/competenze-e-contenuti/>

In the creative use of social media, it is worth mentioning Explorers, Rai Gulp's weekly magazine, created almost completely remotely by 10–13-year-olds. Each episode tells the story of a city and a young protagonist, a boy or a girl who has come to the fore for something special, and raise many hidden realities worthy of being discovered and explored. Explorers engages the curiosity of the very young and suggests experiences with a social mode to learn, deepen and share. #Explorers is presented as a cross-media program, which provides the possibility of interaction through the channel's social networks, i.e., Instagram, Facebook and X.

Public service multimedia broadcasting is more than the sum of its programs and responds to a vision of changing society and challenges of innovation. As an element that is very particular to the EU and directly linked to the democratic, social, and cultural needs of European society, the public broadcasting system represents a unique and extraordinary vector - in terms of pervasiveness, accessibility, cost-effectiveness, and reliability - for promoting Digital and Media Literacy and to countering information disorder on a large scale.

The European approach to digital transformation, which aims to strengthen the democratic values of the Union, uphold fundamental rights, and foster a sustainable and inclusive economy, requires a credible and high-quality media ecosystem. At the heart of this system, a public service broadcaster plays a crucial role as a foundational pillar. Contrary to numerous predictions of its obsolescence, television is experiencing a period of vitality and renewed potential, which can be further enhanced by technology. While institutions are responsible for designing the framework and regulations, it is the operators' task to enliven the media landscape with expertise, sensitivity, and accountability.

## 2. Chapter 2. Main results from the IDMO policy dialogue

### *2.1 The IDMO policy dialogue: summary of the events organized by the project and main findings*

The fight against disinformation started to gain momentum in the last decade as the magnitude of false information and fake news caused significant concern for both national institutions as well as the European Union. As a consequence, to combat such a threat to our societies there was a necessity to create a harmonized EU action against these hybrid threats (Casero-Ripollés et al. 2023)<sup>75</sup>. However, the proliferation of mis- and misinformation alike has been accelerated by the role of social networks, as traditional media is no more seen as an “information gatekeeper” (Resnik, Ovadya & Gilchrist, 2018).<sup>76</sup> Along with this, the digital transition has shown the need for reliable information that can neutralize the spread of fake news and political propaganda. In fact, fake news has been described as a method for successful foreign interference causing tensions to rise among communities (Allcott and Gentzkow 2017).<sup>77</sup> The European External Action Service (EEAS) has a unique role in addressing foreign information manipulation and interference (FIMI) in the EU online sphere. Since 2018, the Rapid Alert System (RAS) has been in place to coordinate efforts with EU institutions and member states in countering FIMI. A comprehensive framework for collecting evidence of FIMI incidents has also been established, namely the Information Sharing and Analysis Centre (FIMI ISAC), which aims to foster “a defender community” by facilitating information sharing<sup>78</sup>. The focus of the FIMI-ISAC is on identifying and exposing manipulative behavior through a community that shares data and insights crucial for understanding the broader picture of complex FIMI information.

As a consequence, while disinformation manifests itself as a globally rising trend, building social resilience against it requires the establishment of a strong infrastructure protecting citizens against dis- and misinformation but also preparing them in identifying and challenging such information with the right tools and skills (Tumber & Waisbord, 2021).<sup>79</sup> This approach has to be built upon the

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<sup>75</sup> Casero-Ripollés, A., Tuñón, J. & Bouza-García, L. The European approach to online disinformation: geopolitical and regulatory dissonance. *Humanit Soc Sci Commun* 10, 657 (2023). <https://doi.org/10.1057/s41599-023-02179-8>

<sup>76</sup> Resnick, P., Ovadya, A., & Gilchrist, G. (2018). Iffy quotient: A platform health metric for misinformation. *Center for Social Media Responsibility*, 17, 1-20.

<sup>77</sup> Allcott, H., & Gentzkow, M. (2017). Social media and fake news in the 2016 election. *Journal of economic perspectives*, 31(2), 211-236. See also: Egelhofer, J. L., & Lecheler, S. (2019). Fake news as a two-dimensional phenomenon: A framework and research agenda. *Annals of the International Communication Association*, 43(2), 97-116.

<sup>78</sup> EEAS, Tackling Disinformation, foreign information manipulation & interference.. Retrieved from [https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference\\_en](https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference_en)

<sup>79</sup> Tumber, H., & Waisbord, S. (Eds.). (2021). *The Routledge companion to media disinformation and populism*. Routledge.

balancing principle of guaranteeing a safe online environment without encroaching on the fundamental freedom of expression that all citizens possess.

As part of its scope, the Italian Digital Media Observatory (IDMO) was tasked with the duty to establish a protocol to discuss disinformation and deliver recommendations for future regulatory and non-regulatory measures. The strategy was developed with the objective to foster further dialogue and provide support for policy makers. As the national hub for Italy, IDMO's aim has been to engage in a policy dialogue in collaboration with entities from various sectors. This multi-stakeholder approach includes IDMO's partners as well as actors in policy, the private sector, the media ecosystem, foundations, associations and research institutions (De Rosa & Nicolai, 2022).<sup>80</sup> Structured in three phases, the first one was all about defining the strategies to implement, and the stakeholders to engage for the dialogue. The second phase was centered around conducting bilateral conversations with policymakers interested in IDMO's project, and to gather data on the most urgent topics and issues concerning disinformation. In January 2022 the third and final phase of the policy dialogue started, with stakeholders invited to participate in at least two policy events and the final closing event organized in March 2023 by the Observatory and its supporting partners. The role of IDMO in counteracting disinformation is unequivocally tied to the establishment of a structured conversation within the Italian territory, while also benefitting from the strong connection it nurtures with the European Commission and EU initiatives such as the European Digital Media Observatory.

### ***2.1.1(Dis)information, international challenges and domestic resilience- February 2022***

As established, the policy discussions started in the first quarter of 2022 with the first event being held on February 7<sup>th</sup> 2022 in collaboration between the Italian Ministry of Foreign Affairs and the IDMO office of coordination. The event, titled “(Dis)information, international challenges and domestic resilience”<sup>81</sup> had the objective of discussing the challenges of a correct use of communication, against disinformation, misinformation and information manipulation while establishing a foundation for future events and actions to take. Prof. Paola Pisano, an expert in the digital economy and the 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, was the moderators for the event.

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<sup>80</sup> De Rosa S., Nicolai A. (2022), Policy Dialogue Concept Paper.

<sup>81</sup> Meeting recordings is available at <https://www.youtube.com/watch?v=JCtFFcmZvM>

High-level representatives led the discussion, starting with Minister Luigi Di Maio, who emphasized the engagement of Italy cooperating internationally to counteract disinformation and its active support of regulation initiatives on an EU level. His speech was shortly followed by Secretary General Ettore Francesco Sequi, and Director General for Public and Cultural Diplomacy Pasquale Quito Terracciano opening the conversation afterwards. Professor Sinan Aral, a "David Austin" Professor of Management at MIT Sloan School of Management provided a multidisciplinary insight into how the problem of disinformation is “supported by socioeconomic structures” and dealing with such an issue requires also admitting the fact that the digital world is full of crossroads “between privacy and security, free speech and hate speech, meaningful connections and polarizing sides..”. Another speaker was Professor Luisa Chiodi, Director of the Osservatorio Balcani Caucaso Transeuropa/Centro per la Cooperazione internazionale who coined the problem of disinformation as a “transnational issue” that requires international cooperation. Invited to present key scientific insights on how new digital tools can counteract disinformation, Dr. Elena Musi, Associate Professor of Communication and Media at the University of Liverpool explained what are the challenges for fact-checking and fighting the infodemic of today. Dr. Musi highlighted the necessity of research, such as the one led by Data Lab Luiss and IDMO, in redefining critical thinking via digital tools with relation to media literacy and fact-checking disinformation and misinformation<sup>82</sup>.

Major social media platforms were represented in the event by Angelo Mazzetti, Head of Institutional Relations for Italy and Greece at Meta, and Dr. Diego Ciulli, Head of Institutional Relations at Google Italy. The salient points that rose from their speeches concerned content moderation and ethical considerations for platforms, the current state of the national and EU normative framework and lastly the necessity to undertake collective efforts in combating disinformation. Prof. Gianni Riotta echoed these concerns and further called for the need to deepen the knowledge on the dangers of disinformation and “...what brings individuals to the point of sharing this large amount of disinformation online”. Furthermore, the meeting saw the participation of numerous important stakeholders, including On. Pietro Fassino, Chair of the Foreign Affairs Committee in the Italian Parliament; Prof. Giacomo Lasorella, President of AGCOM; and Dr. Giuseppe Moles, Undersecretary of the State Department for Information and Publishing. As president of AGCOM, Lasorella stressed the importance of Italian institutional support for the EU framework of regulation as “..the protection of internet users poses not only questions of

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<sup>82</sup> The paper referred to by Dr. Musi during the speech can be accessed here: Musi, E., Federico, L. & Riotta, G. Human-computer interaction tools with gameful design for critical thinking the media ecosystem: a classification framework. *AI & Society* (2022). <https://doi.org/10.1007/s00146-022-01583-z>

consumerism but indeed questions of constitutional value in balancing rights with the need for truthful information”.

### ***2.1.2 International Fact Checking Day - April 2022***

Another policy session took place on April 4<sup>th</sup> 2022 in light of the International Fact Checking Day to discuss the role of institutions and platforms in counteracting disinformation. Relevant stakeholders were invited to exchange views and experiences on the topic of fact-checking. Amongst the speakers were Agnese Pini, Director of La Nazione; Mattia Feltri Director of HuffPort; Francesco Bei Vice-director of La Repubblica and IDMO stakeholders such as TIM, RAI, T6 Ecosystems, University of Rome Tor Vergata, Gruppo GEDI, NewsGuard, Pagella Politica and institutional, diplomatic representatives as well as from academia. The speakers addressed various subjects during the event, including the responsibility of traditional media to ensure accuracy when sharing information, the pivotal role played by journalists, and the significance of debunking practices in the battle against disinformation and false news. Regarding the role of institutions, Undersecretary of the State Department for Information and Publishing Giuseppe Moles emphasized the need for public institutions to support journalists and contribute to preserving media diversity in the era of digital transformation. Furthermore, the event underlined the importance of empowering the fact-checking community, commending the efforts of projects such as Pagella Politica and NewsGuard. Lastly, the discussions encompassed related topics, such as media literacy and empowering users. Italian Army Major Sonny Malospiriti pointed out that “combating well-organized propaganda necessitates a multilateral approach involving as many countries as possible, as no single nation can effectively counter such efforts on its own” (IDMO, 2022)<sup>83</sup>.

### ***2.1.3 Lectio Magistralis “Ukraine and the European Union: Together”- May 2022***

On May 23d, IDMO invited Emine Dzhaparova Vice Minister of Foreign Affairs of Ukraine to give a lecture titled “Ukraine and the European Union: Together”. The lectio magistralis became an opportunity for Dzhaparova to showcase “how the impossible is possible even in relation to Ukraine’s integration in the EU”. The vice minister expressed the vision that Ukraine along with Italy and other European states have to resolve the conflict via diplomacy rather than resort only to violence. Dzhaparova’s words however echoed a clear disdain for potential proposals which would

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<sup>83</sup> <https://www.idmo.it/2022/04/05/international-fact-checking-day-2/>



harm Ukraine's territorial integrity and independence as she explained they would be interpreted otherwise as a weakness by Russia (IDMO, 2022).<sup>84</sup>

#### ***2.1.4 “Global Information War: An International Forum” – June 2022***

A month later on June 30<sup>th</sup> 2022 the event titled “Global Information War: An International Forum” brought together 14 ambassadors and other high-level stakeholders to discuss strategies in fighting disinformation in a global scenario. Amongst the invited were representatives from the embassies of Canada, Colombia, Estonia, Ethiopia, France, Germany, Israel, Latvia, Lithuania, Poland, The UK, Romania, The United States of America as well as Ukraine. Speakers included Roberto Viola Director-General for Communications Networks Content and Technology DG; Dr. Aengus Bridgman from the Centre for Media, Technology and Democracy McGill University; S.E Christian Masset Ambassador of France to Italy and S.E Viktor Elbling Ambassador of Germany to Italy. Other speakers included Maia Klaassen, Junior Research Fellow in Media Literacy at the Institute of Social Sciences at the University of Tartu, Paula Gori, Secretary General of the European Digital Media Observatory (EDMO) and representatives of IDMO's partners such as Claudia Mazzola, President of Rai Com; Camilla Vagnozzi, Editorial Manager at Facta News; Giulia Pozzi, Analyst at NewsGuard; Andrea Nicolai, CEO of T6 Ecosystems and Gianluca Di Feo, Deputy Director of La Repubblica.

During the event, esteemed representatives from various embassies contributed their national perspectives on the fight against disinformation. French ambassador Masset emphasized the critical role of spreading awareness, highlighting it as a duty incumbent upon national governments. Additionally he cited the Digital Markets Act (DMA) and the Digital Services Act (DSA) as evidence of the European Union's capacity to establish strict regulations aimed at combating disinformation and safeguarding media pluralism within its territory and internal market. German representative Frank Horst underscored that Germany is currently prioritizing the fight against foreign interference and disinformation within the country. To this end, Germany is not only improving its own communication infrastructure but is also committed to sharing assessments and evaluations with its international allies, thereby fostering a collaborative approach to this global challenge. Polish representative Paulina Derylo Peltz presented the influence of Russian propaganda, particularly pertaining to public opinion on migration and politics during the Ukraine war.

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<sup>84</sup> [https://www.youtube.com/watch?v=1tT\\_1kvPLjc](https://www.youtube.com/watch?v=1tT_1kvPLjc)

Guest speaker Roberto Viola highlighted the Digital Services Act (DSA) and the Code of Practice on Disinformation, drawing attention to their nature as co-regulation mechanisms. His discourse provided insights into how these frameworks could be instrumental in mitigating disinformation.

Academic Maia Klaassen from the Estonian University of Tartu, contributed to the discussion by addressing the advanced stage of media literacy, which she referred to as "Media Literacy 2.0." She advocated for an approach that positions disinformation as a concern for everyone, aiming to dissolve knowledge hierarchies through a trickle-down effect. Lastly, Andy Pryce offered a nuanced perspective on disinformation. He recounted the evolution of disinformation tactics from denial of information at the onset of the Ukraine war to the documentation of information, and eventually to efforts aimed at erasing Ukrainian identity and culture. Pryce noted that the ultimate goal of such disinformation campaigns was to control the narrative, ensure the survival of the regime, and create a false sense of security for Russia. He emphasized the importance of promptly debunking new disinformation and taking swift action to counter it, as well as the necessity of raising awareness and exposure to these phenomena. He concluded by advocating for a long-term, whole-society approach to building resilience against disinformation.

### ***2.1.5 “Beyond Fake News: The Power of Media Professionals in the Fight Against Disinformation”- September 2022***

On September 7<sup>th</sup> 2022, an event in collaboration with the Embassies of Canada, the UK and USA was organized with the aim to bring together media professionals from all four countries in order to share their experiences and best practices on how to counteract disinformation and fake news. Guest speakers included Gianni Riotta Director of the Master in Journalism and Multimedia Communication at LUISS and IDMO project coordinator, Elissa Golberg Ambassador of Canada to Italy, Ed Llewellyn British Ambassador to Italy, Shawn Crowley Deputy Chief of Mission of the US Embassy to Italy, Olga Robinson Assistant Editor for BBC Monitoring, Amy Kazmin journalist at Financial Time, Monica Giandotti journalist at Tg3, and Craig Silverman reporter ProPublica.

As the first guest speaker Goldberg kickstarted the event by highlighting Canada's efforts to end the current ‘infodemic’. Goldberg stressed the critical importance of reliable sources for the formulation of well-informed opinions, pointing out the concerning trend of diminishing trust between Western citizens and their governments. She called for a concerted effort to rebuild this disconnection and restore faith in public institutions. Building on Goldberg's remarks, Llewellyn eloquently characterized disinformation as a "lethal venom," against which truth serves as the

essential vaccine. He emphasized the urgent need for a restoration of society's trust in media professionals and democratic institutions. To this end, he highlighted the UK's strategic collaborations with NATO, EU authorities, and international allies, demonstrating a commitment to a united front in the global battle against disinformation. US representative Shawn Crowley, delved into the geopolitical aspect of disinformation, citing the active online campaigns orchestrated by Russian propaganda, which aim to undermine public confidence in democratic processes. Crowley outlined the proactive steps taken by the U.S. embassy, through partnerships with civil society, academic circles, media, and researchers in Italy. These initiatives are designed to strengthen U.S. support and solidarity with Italy and its government, in an attempt to reinforce defenses against the infodemic.

Adding a global perspective to the discourse, Robinson underscored the transnational dynamics of fake news and disinformation. She noted the unprecedented speed at which disinformation can pass through the web, transcending borders and impacting societies worldwide. Next, Silverman offered a historical context, reminding participants that disinformation is far from a new challenge. For over a decade, it has been damaging the information ecosystem, shifting public opinion, and undermining trust in public institutions.

The role of media professionals in this landscape was brought into sharp focus by Amy Kazmin, who emphasized the journalistic duty to reject the creation and propagation of disinformation. She underlined the imperative of transparency, the pursuit of truth, and the cultivation of discussions within a factual context. Kazmin urged her colleagues to be relentless in their quest for the truth, especially when confronted with alternative narratives. Echoing Kazmin's sentiments, journalist Monica Giandotti highlighted the symbiotic relationship between trust and credibility in journalism. She proposed a reflective approach for journalists to question their own biases, their thinking patterns, and the sources of their information. Giandotti posited that such introspection is crucial for journalists to maintain credibility and uphold the integrity of their profession. Together, the speakers underscored a collective responsibility for media professionals to effectively confront disinformation.

#### ***2.1.6 OECD Global Forum on “Building trust and Reinforcing Democracy” – November 2022***

On November 17<sup>th</sup>, as a partner of IDMO and on behalf of the Observatory, T6 Ecosystems joined the OECD Global Forum on “Building trust and Reinforcing Democracy”. The topic of disinformation was tackled from various fronts in multiple panels, however it was the second plenary session of the forum that held the title “Strengthening information ecosystems and tackling

mis- and disinformation” focusing entirely on the threats to the information ecosystem<sup>85</sup>. During the discussion panelists made a point to accentuate the importance of partnership and a whole society approach. This overarching message can be seen being echoed within multiple events as even Andy Pryce, invited in June by IDMO, called for a similar approach during his speech. Panelists stressed the importance of supporting trusted information sources, strengthening diverse media, increasing citizen resilience to disinformation through "pre-bunking," and promoting digital and media literacy.

### ***2.1.7 “Ukraine in Europe: Identity, Security and Prospects” – December 2022***

The last event for the year 2022 was held on December 16<sup>th</sup> and was organized by IDMO in collaboration with the Embassy of Ukraine in Italy. The event titled “Ukraine in Europe: Identity, Security and Prospects” aimed to address questions about the future of Ukraine in Europe, on the origins of the conflict, the violations of rights and the challenges that disinformation created in relation to the war. Guest speakers include Yaroslav Melnyk, the Ambassador of Ukraine in Italy; Yaroslav Hrytsak and Andrea Graziosi, historians; Stefania Battistini, journalist with Rai; Andrii Shestak, Director of the School of Journalism & Communication at the Ukrainian Catholic University in Lviv; Marina Sorina, writer, essayist, and journalist; Marcello Flores, historian; Nona Mikhelidze, Senior Fellow at the Istituto Affari Internazionali; Eskender Bariiev, Head of the Board of the Crimean Tatar Resource Center; Antonio Stango, President of the Italian Federation for Human Rights (FIDU); Oleksandra Drik, Coordinator of International Cooperation at the Center for Civil Liberties (Nobel Peace Prize 2022); Ruslan Deynychenko, Co-founder and Executive Director of Stop Fake; Eleonora Mongelli, Vice President of FIDU; Olga Tokariuk from the Reuters Institute for the Study of Journalism at Oxford; Anna Ascani, Vice President of the Chamber of Deputies of Italy; Pasquale Terracciano, Director General of the Ministry of Foreign Affairs and International Cooperation; Maurizio Molinari, Director of la Repubblica and Maria Mezentseva, Head of the Ukrainian delegation to the Council of Europe Parliamentary Assembly. Concluding remarks were given by Gianni Riotta, Director of the Master in Journalism and Multimedia Communication at LUISS and IDMO project coordinator.

During the first panel speakers addressed the historical ties between Ukraine and Russia and the countries’ interlinked history throughout the centuries. As Shestak Andrii pointed out, the war is closely connected to the information scale. According to Andrii, the media plays an instrumental role during violent conflicts and the values of truthfulness, simplicity in conveying information and

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<sup>85</sup> <https://www.oecd-events.org/public-governance-ministerial-global-forum/en/session/481791a7-07e8-ec11-b656-a04a5e7d2a9d>

media literacy are fundamental in these scenarios<sup>86</sup>. The second panel discussed the current state of affairs in international relations. Antonio Stango emphasized how the Russian government exploits the current international system to its benefits and thus it requires everyone "...as a collective, to intervene and dismantle a system that clearly doesn't work well". The key note speaker of the event, Oleksandra Drik described the documenting work her and her team have done to report the crimes against civilians during the Ukraine-Russia war. Drik narrated the work of the Center for Civil Liberties in collaboration with the Ukrainian Government in advocating for an ad hoc court for crimes of aggressions against Russia, which would make it the first of its kind to be established in history. During the third panel, focusing on disinformation in the context of war, speakers included academics and experts from civil society. As co-founder of NGO Stop Fake, Deynychenko called on the media to treat Russian media as an arm of Russian foreign policy. Additionally, Eleonora Mognelli highlighted the importance of studying how governments react to external information and manage propaganda while Olga Tokariuk pointed out the intentional and strategic nature of Russian disinformation, targeting various groups, including Russian citizens, Ukrainian audiences, the Western countries supporting Ukraine, and the rest of the world. According to Tokariuk, in Italy, the Russian media propaganda manifests as anti-Western and anti-American propaganda, portraying Ukraine as oppressing minorities and framing the war as a civil conflict. To counter disinformation, Tokariuk suggested having journalists on the ground, utilizing experts knowledgeable about Ukraine, and amplifying Ukrainian voices in the media.

In the final panel on future prospects, Pasquale Terracciano, former Italian ambassador to Moscow and Director General of the Italian Ministry of Foreign Affairs and International Cooperation, discussed the need to shift from a reactive to a proactive approach in strategic communication. He highlighted Zelensky's use of social media and the transition from debunking to pre-bunking disinformation. Terracciano emphasized the importance of coordination among European countries, citing examples like the Digital Services Act (DSA) and the 2022 Code of Practice. Looking to the future, the key points included raising awareness about fact-checking, regulating high-profile platforms, and the necessity of co-regulation while respecting fundamental rights. At the international level, the susceptibility of the global south to Russian propaganda was repeatedly pointed out. Ambassador Terracciano concluded by emphasizing the importance of high-quality journalism, political vision, learning from past experiences, and the role of peace in shaping the international community's future. Maurizio Molinari, Director of La Repubblica made several key points in his concise remarks, stressing the importance of EU unity and coherence amidst the risk

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<sup>86</sup> Recording of the event available at : <https://www.radioradicale.it/scheda/685461/ucraina-in-europa-identita-storia-sicurezza-e-prospettive>

that the Ukrainian crisis could potentially lead to other minor crises thus weakening the Western stance against Russia. Lastly, Molinari spoke about the value of Ukraine's post-war experience as a model for other nations, and reminded the audience about the threats posed to global stability by other autocracies<sup>87</sup>.

### ***2.1.8 IDMO 365: reshaping infosphere - March 2023***

To conclude the year of activities and its multi-stakeholder dialogue, the Observatory organized the event “IDMO 365: reshaping infosphere” which was held on the 10<sup>th</sup> March 2023. The event mapped out the many activities IDMO led and the progress that was made in covering the vast range of themes, in collaboration with its partners TIM, Rai, GEDI Group, Pagella Politica, Newsguard, University of Rome Tor Vergata and T6 Ecosystems. The focus was on the impact that disinformation carries in our societies and how relevant stakeholders have worked to counteract such effects while acknowledging simultaneously the future challenges that await as the digital media expands. The conference featured a diverse lineup of speakers each bringing their unique expertise to the table. Among the speakers were Marco Minniti, President of Foundation Leonardo Med-Or; Alberto Barachnini Undersecretary of the State Department for Information and Publishing; Giacomo Lasorella President of AGCOM; Chloé Fiodiere, Development Manager at Journalism Trust Initiative Reporters Sans Frontières; Caterina Stagno Director Rai Contenuti Digitali 2; Simona de Rosa Co-founder T6 Ecosystems and Angelo Mazzetti Head of Institutional Relations for Italy and Greece at Meta. The lineup also included Gianluca Di Feo, Deputy Director of La Repubblica; Clara Fabiola Oliva, Director for Quality, Research & Data Learning at TIM; Carmen Criminisi, Service Innovation Engineer at TIM; Alessandra Pratesi from Ufficio Studi Rai; Caterina Stagno Director of Rai per il Sociale; Tommaso Canetta, Deputy Director at Pagella Politica, and Giulia Pozzi, Analyst at NewsGuard Tech.

The first panel focused on policy and was moderated by Simona De Rosa, Co-founder of T6 Ecosystems, partner of IDMO. The policy panel reiterated the goal of IDMO in bringing the discussion on disinformation on a national level focusing on the diverse stakeholder relations that currently subsist in Italy. As a representative of the Italian government, Barachini welcomed the initiative of IDMO and its partners in policy research and dialogue to assist the public institutions in making the right decisions in the long run. Concerning platform regulation, Mazzetti highlighted the importance of the CoP as a valuable tool, emphasizing that the baseline reports by the signatories exemplify how platforms are contributing in combatting disinformation. According to him, Meta

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<sup>87</sup> Meeting recording is available at <https://www.radioradicale.it/scheda/685461/ucraina-in-europa-identita-storia-sicurezza-e-prospettive>

was an early pioneer in taking proactive measures for content removal and moderation, striving to balance freedom of expression with user protection. Mazzetti explained that while platforms acknowledge their role, legislators must guide with solid policy work on this frontline. He also noted that platforms don't benefit from increased interaction driven by disinformation, as their survival relies on advertising revenue. He followed the declaration by stating that the fight against disinformation requires it to be focused around three key actions: removal, reduction and awareness.

Furthermore when asked about the current EU digital policy, Barachini pointed out that the interconnected legislative initiatives of the EU are part of a large puzzle where everything falls into place for the common goal. While the DSA will regulate digital services, the Media Act is all about editorial responsibility and the harmonization of Member state legislation in this front. Meta representative Mazzetti reaffirmed the company's commitment in fulfilling accountability and transparency requirements under the EU framework without giving specific details on how they intend to do so. The challenge according to Mazzetti lies in finding a balance between transparency requirements and the duty to fulfill user's requirements as a major platform. Amidst all the obstacles the road ahead presents, Barachini underlined the importance that IDMO and its partners play in "guiding us on where we stand and where we should go" and furthermore, embodying the "collective approach necessary in this scenario", according to Mazzetti.

For the second panel, guest speakers Clara Fabiola Oliva and Carmen Criminisi stressed the importance of data literacy today. Oliva emphasized the need for well-rounded, conscious information and the essential connection between data and media literacy. Criminisi highlighted the potential risks in mishandling data and discussed their dual focus on using technology in services and raising awareness about ethical data usage. Representatives of RAI Alessandra Pratesi and Caterina Stagno presented to the public RAI's initiatives in counteracting disinformation which include "Pillole contro la disinformazione" and various webinars on media literacy done at multiple Italian schools. During the third panel research led by Data Lab Luiss was presented, showcasing a comprehensive analysis of the digital infosphere and its shifts during important events such as the 2022 Italian elections or even in topics such as gendered language and misogyny. Tommaso Canetta from Pagella Politica spoke about all the quantitative work that goes on when monitoring disinformation online and the most prominent arguments that appear online in the timeline of a year. As Canetta notes "...the disinformation that circulates in Italy is not an isolated occurrence but rather is part of a stream of information circulating across Europe and oftentimes even globally already". Giulia Pozzi from NewsGuard focused on AI and the prediction that developments in this field of technology could potentially lead to a higher level of diffusion in disinformation and fake

news. Lastly, as Gianluca Di Feo, Deputy Director of La Repubblica noted “..Disinformation conditions the collective living of society and it is one of the responsibilities and challenges of traditional media to acquire multidisciplinary competences to better understand how to counteract this type of information”.<sup>88</sup>

In the span of a year, the policy dialogue brought forth various themes that connect disinformation to the work of stakeholders across different sectors. Firstly, as mentioned by many guests during the events, there is a need for a whole-society approach. This means that coordinated efforts have to be intensified both on a national level and international one. This can be seen especially during the events focused on the Ukraine war and post-pandemic situation where intervention from civil society and public institutions was equally valuable during critical points in time.

Secondly, the importance of strengthening traditional media and empowering journalists in the era of digital transformation where data and technology are becoming more crucial in providing accurate information. Third, the importance of increasing citizen resilience was emphasized by multiple speakers in the form of media and digital literacy, stronger critical thinking and reliance on trusted information sources. The concept of pre-bunking also seems to be an approach widely supported by stakeholders that believe only debunking might not be able to stop the proliferation of disinformation.

The policy dialogue revealed that the fight against disinformation is a fight with one common goal but that can be fought on various frontlines starting from the cooperation between the EU and member states’ governments and regulatory bodies (such as AGCOM in the case of Italy), the due diligence obligations major platforms are currently required to fulfill and the continuous work that researchers and fact-checkers are carrying out daily to minimize the social impact that mis- and disinformation bring forth.

IDMO’s projects and events for 2023 maintained the momentum of the policy dialogue phase also beyond March of that year. Some of the other achievements in policy for that year include the Italian Code of Practice<sup>89</sup> and the publication of the Research “Digital Media Literacy Gaps and Needs”. The public unveiling of the document took place on December 14th. The research represents a collaborative work involving partners from the IDMO consortium, namely T6 Ecosystems, Ufficio Studi Rai, TIM, and Luiss Data Lab. The study essentially aims to explore the specific needs of teachers and students within the Italian school system regarding digital media literacy. At the event for its publication, Andrea Nicolai (T6 Ecosystems) highlighted that the

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<sup>88</sup> Recording available at: <https://www.radioradicale.it/scheda/692505/idmo-365-reshaping-infosphere>

<sup>89</sup> See Chapter 1, Section 1.3.



study's findings show a specific demand for teachers skilled in digital media literacy and the necessity for open-access resources. He emphasized that the research marks a first step, with the hope that it could lead to a European-wide initiative to positively impact the education of students and teachers across the entire European Union<sup>90</sup>.

## ***2.2 Results from bilateral conversations with main stakeholders***

During the project lifetime, IDMO has established conversations with high level stakeholders already active on the topic of disinformation. In particular, conversations occurred with AGCOM. The first conversation was established to present the work of IDMO and check if there were some possibilities of collaboration. A second call was organized to report to AGCOM the research on media literacy conducted by IDMO. In that occasion, it was also possible to provide some updates. In addition to the bilateral conversations, AGCOM was also invited to participate and attend IDMO's events. Another open channel of conversation was created with a special Commission working on media established by the Senate and led by former diplomat Terzi di Sant'Agata. In occasion of a meeting of the commission discussing media and freedom of speech, IDMO was invited to report about the activities conducted by the Italian Observatory. However, a more structured interaction has been created with the Italian Ministry of Foreign Affairs. The results are reported in the next paragraph.

### ***2.2.1 MAECI***

During the bilateral session, under the moderation of Salvatore Custureri, Project Manager at IDMO, and Andrea Nicolai, CEO of T6 Ecosystems - IDMO partner, the discourse revolved around the pivotal role of institutional entities in the combat against disinformation. Special emphasis was accorded to IDMO's function as an observatory, anticipating a three-year extension commencing April 2024, enabling its continued efforts to counteract disinformation and fake news within the Italian media and information sphere.

In response to inquiries regarding the Italian Ministry of Foreign Affairs' ongoing commitment and strategies concerning disinformation, Davide Marotta, Head of the Communications Unit, detailed their consultations with relevant Italian administrations and foreign affairs ministries of the UK, Canada, and the US. These deliberations sought to deepen overall awareness, particularly since October 2023 following the conflict between Hamas and Israel, which ushered in new sources and

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<sup>90</sup> The research is available online: [https://www.idmo.it/wp-content/uploads/2023/12/IDMO-Digital-Media-Literacy-Gaps-and-Needs-IT\\_finale\\_compressed.pdf](https://www.idmo.it/wp-content/uploads/2023/12/IDMO-Digital-Media-Literacy-Gaps-and-Needs-IT_finale_compressed.pdf)

actors in disinformation. Marotta underscored the importance for a centralized approach at both national and European levels. Within the framework of multistakeholder dialogue, Italy's presidency of the upcoming G7 summit was highlighted as a pivotal platform, emphasizing Italy's leadership in the discourse on disinformation. Marotta affirmed that disinformation would remain a focal point in the country's agenda for the summit. Additionally, the G7 summit will serve as an opportunity to discuss generative AI and its future development.

While contemplating potential collaborations with external actors, due acknowledgment was given to the ongoing projects and their successes. The moderators introduced the newest additions to the partner consortium: ANSA and the cybersecurity agency Cy4Gate, aimed at bolstering IDMO's technological outreach and competences.

Andrea Nicolai highlighted IDMO's outreach capabilities, especially in relation to civil society, and the success of RAI's segments against disinformation (*pillole contro disinformazione*), which reached a substantial audience during Italian TV primetime. This showcased the potential for such initiatives to become national public campaigns adopted by other countries<sup>91</sup>. Ministry representatives reiterated their commitment to supporting the Observatory and its partners in future projects and collaborations with foreign embassies and regional partners. Jessica Cupellini, member of the Ministerial Press and Institutional Communication Services, commended IDMO's recent recognition, winning the "Tech for Social Good" award from Google alongside the Italian Federation for Human Right (FIDU). She also acknowledged the collaboration with the Atlantic Council regarding the fight against disinformation in Africa and emphasized the need for European coverage on this issue.

During the concluding statements, participants collectively expressed an unwavering commitment to fostering ongoing collaboration and expanding IDMO's partnerships with the network of embassies and international stakeholders, facilitated by the steadfast support of the Italian Ministry of Foreign Affairs and International Cooperation.

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<sup>91</sup> Indeed, for Italy, the initiative will continue including 10 new episodes for the upcoming year 2024.

## Chapter 3. Main topics to be addressed

As the national hub for Italy IDMO strives to initiate and engage in policy discussions characterized by multidisciplinary and a multistakeholder approach, collaborating with entities across different sectors within the Italian territory. This inclusive approach involves not only IDMO's consortium partners but also high-level stakeholders in policy, the private sector, the media ecosystem, foundations, associations, and research institutions (De Rosa & Nicolai, 2022). Only during 2022, IDMO engaged in its policy dialogue more than 200 stakeholders, organized 6 high-level policy events in Italy, engaged 14 foreign Embassies, involved in meeting and discussion at least 10 representatives of EU and Italian institutions.

The policy dialogue, spanning a total of 14 months between 2022 and 2023, involved numerous important actors. A non-exhaustive list of notable contributors include IDMO's partner (RAI Radiotelevisione Italiana (RAI), GEDI Group, NewsGuard, Pagella Politica, TIM, T6 Ecosystems, Luiss University, University of Rome Tor Vergata) and many others. Just to mention some of them the Italian Communications Regulatory Authority (AGCOM), the Italian Ministry of Foreign Affairs and International Cooperation and private actors such as Head of Public Affairs for Italy, Malta and Cyprus of Meta and the Head of Public Affairs for Italy of Google. Each event and activity was designed with the aim to foster a better understanding of the complexity of the information ecosystem and how to counteract disinformation.

Following the delineation of the Italian and European Union frameworks pertaining to disinformation, along with a synthesized overview of events that assembled experts from diverse, interconnected disciplines, this chapter articulates the main findings derived from the latest developments in Italy regarding disinformation and media policy.

While the DSA is planned to enhance cooperation between the European Commission and national authorities it will also establish links between the latter through the Advisory Board of the Digital Services Coordinators (DSCs). A distinct issue however arises with the **enforcement procedure set to start in 2024, concerning the functioning of Digital Service Coordinators (DSCs)**. While most member states have appointed existing regulatory bodies, the DSA mandates them to engage in multi-sector collaboration with other national entities, in particular with those concentrating on consumer rights, privacy, and data and other sectors as well, should it be essential. It remains to be seen how national authorities will welcome this new set of obligations and duties and how they will

organize their supervision of major platforms and the process of flagging liable actions. Even in relation to mis- and disinformation, the EC and the DSCs will have to build large and resilient work groups to tackle disinformation in compliance with the DSA. In the case of Italy, the communications regulatory authority AGCOM, as the designated DSC for the country, is expected to initiate its work for the compliance of the DSA in February 2024. It is yet to be determined how this new level of governance will proceed and impact the operational exchange between the Commission and the Italian authority<sup>92</sup>.

As the regulation includes a diverse set of stakeholders for its implementation, an integral part of this collaborative network includes researchers, to whom companies have committed to providing broader data access and prioritizing cooperation. However an overview of the data obtained by the baseline reports for the Strengthened Code of Practice on Disinformation show that major platforms have a long road ahead in complying with Article 40 of the DSA **and granting wider access to researchers**. Another incongruence pertains to **data access for researchers in different EU regulations** at the moment, with significant differences between the levels of cooperation established by the DSA versus the proposed Artificial Intelligence Act (AIA).

AI's usage prominently features in bilateral conversations, highlighted by the Italian Ministry of Foreign Affairs and International Cooperation (MAECI), emphasizing the necessity for a centralized approach as the EU anticipates the future development of this transformative technology within the information ecosystem, particularly in relation to disinformation. In light of the G7 summit, Italy's agenda will aim to promote more effective discourse on the topic of AI and its usage. While the Artificial Intelligence Act (AIA) aims to be groundbreaking in its regulatory scope, the 'net' cast by the DSA for VLOPEs and VLOSEs does not substantially **overlap with the 'net' cast by the AIA for high-risk AI systems**. Annex III of the proposal lists AI high risk systems, the majority of which are not utilized by VLOPs currently.

While the DSA functions as a regulation, the self-regulatory nature of the Code of Practice sets a distinct precedent for companies as well. Although signatories have voluntarily signed the Code, expressing their commitment to combating disinformation, preliminary assessments revealed that this dedication has limitations. Initial baseline reports lacked quantitative data and information on a member state level, with companies barely reaching an 'adequate' level in most parts of the assessment, claims which were supported by the ERGA 2023 report also. Lastly, as of the time of

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<sup>92</sup> Italian Communications Authority (AGCOM) Press Release 30 October 2023. Available at: <https://www.agcom.it/documents/10179/31744804/Comunicato+stampa+30-10-2023/dd599025-cd1a-4f16-91c8-b581111ce7cd?version=1.0>

writing this document, the European Commission acknowledged the improvements in the second batch of baseline reports published in July 2023. However, upon closer inspection, a more nuanced transformation is revealed.

While the reports are of a full 6-month period, and companies such as Google, Meta, and Microsoft showed great acceptance of the feedback on the first report's assessment, **the improvements are rather minimal in scale.** This shows that major platforms still have a long way to go when it comes to transparency levels on a sufficient scale. Specifically, signatories are expected to increase their reporting of quantitative data which makes it imperative to further understand **what is hindering companies in providing more granular and precise data on moderated content online.** Platforms assert their current efforts are adequate, anticipating forthcoming stringent EU regulations. Their declarations convey a perception of having fulfilled their responsibilities to the extent feasible, **yet expressing hesitance to proceed further due to concerns about user and advertiser retention.**

Key outcomes from the year-long events include the recognition of the need for a comprehensive societal approach, involving actors from all sectors related to the media and information ecosystem. A call for stronger tools and resilient journalism emerged as essential elements in combating disinformation. There is a growing need for additional Pan-European projects and action models, allowing one country's adopted model to serve as a blueprint for other member states and organizations. In 2023, IDMO's initiatives and activities sustained the momentum of the policy dialogue phase, extending their impact beyond the conclusion of March with noteworthy accomplishments including the presentation of the Italian Code of Practice and the dissemination of the research publication titled "Digital Media Literacy Gaps and Needs."

**The concept of pre-bunking, gaining prominence over debunking,** suggests a change in the paradigm on managing the influx of disinformation. This can be noticed as part of many guest speaker's speeches calling for a proactive rather than a reactive approach which is the idea that disinformation and its expansion can only be fought against with an anticipatory approach.

IDMO and its partners' work in publishing the Italian Code of Practice and the research on digital media literacy highlight the steady progress propelled by collective effort in building citizen resilience against disinformation. However **the research and fact-checking community will require greater support** as the emergence of generative AI raises concerns within these communities on its potential to disseminate propaganda and fake news on a larger-than-ever scale.

## Chapter 4. Policy recommendations

Building upon the report and its key findings, we hereby propose a set of recommendations to enhance the process of building a safer media environment in Italy and to more effectively combat disinformation in the long term.

1. We advise that Strategic Communication (StratComm) be acknowledged as an increasingly critical element in the battle against disinformation, with an imperative to integrate it closely with national defense strategies that address foreign interference in the information space. Echoing the remarks and perspectives of stakeholders during the policy dialogue, global events such as the Ukraine war, the pandemic or election processes throughout the last years show the need for a collaborative framework engaging actors involved in strategic communications and national defense. The focus should shift from mere awareness to decisive action, including the development of real-time detection, rapid response protocols, and cooperation in sharing intelligence and countermeasures. Such an approach requires legislative and regulatory support to ensure accountability, alongside continuous training for StratComm professionals.
2. We recommend significantly expanding data access for researchers, in accordance with the enforcement criteria outlined in the Digital Services Act (DSA) and based on evaluations from the baseline reports for the Strengthened Code of Practice on Disinformation. It is also important to harmonize the cooperation level between researchers and member state authorities across EU legislations. This will significantly facilitate a cohesive implementation that avoids creating future barriers for researchers.
3. It is advised to further motivate major platforms identified as Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), and signatories to the Code of Practice, to raise their transparency levels regarding content moderation and recommender systems. To accurately evaluate the harmful impact of disinformation, it is essential for these major platforms to intensify their efforts in collaborating with both public and private institutions on this objective.

4. We further encourage an ongoing policy dialogue between Italian public authorities, researchers and private sector, with a focus on actively increasing the pool of high-level stakeholders involved. This approach aims to facilitate the adoption of tangible measures and promote the exchange of knowledge and best practices in the near future.
5. In alignment with the main findings, it is strongly recommended to bolster the role of the fact-checking community in combating disinformation. With the EU parliamentary elections approaching, it is crucial for national and European bodies to back and invest in fact-checking experts and organizations. Their contributions in debunking and pre-bunking disinformation will be invaluable in the forthcoming months.
6. We propose that to effectively equip citizens in countering disinformation, a significant enhancement of digital media literacy initiatives is essential, as also shown by the research conducted by T6 and RAI (D5.2). It is imperative that Italian authorities prioritize digital media literacy, thereby cultivating the capabilities of the younger generation to discern between genuine information and various forms of falsehoods, including fake news, disinformation, and AI-generated deceptive content.
7. Given the increasing prominence of AI in digital policy, further research is required to determine its impact on the widespread dissemination of disinformation. As the leader of this year's G7 summit, Italian authorities should advocate for the creation of an appropriate regulatory framework that addresses the future of AI, specifically its effects on misinformation and disinformation on a national and European level. This can be achieved through a long term partnership between the public and private sectors to enhance awareness about AI's application and its influence in the IT/ICT field.

## Conclusions

The significant contributions of IDMO in creating a structured dialogue for addressing disinformation have been pivotal in shaping Italy's media and information sector in the last two years. This document serves as a testimony of IDMO's enduring commitment to formulate effective policy measures and produce meaningful results. The strides IDMO has made in combating disinformation are largely due to the efforts of its consortium partners and external partners, taking knowledge exchange and best practice sharing to new heights. These achievements were facilitated by various activities such as conferences, events, dialogues, and meetings, which progressively shaped a more robust agenda on these issues.

Considering the findings and recommendations presented above, IDMO's role remains crucial in advancing the dialogue on combating disinformation in Italy. This endeavor aligns with the necessity for a cohesive strategy at the national level, encompassing both regulatory and non-regulatory actions. The evolving legislative framework of the European Union, particularly with developments in the enforcement of the DSA, the Code of Practice on Disinformation and the forthcoming AI Act, highlight the importance of Italian authorities adapting to new governance models in the digital realm.

Furthermore, the involvement of researchers and the fact-checking community is vital in two key areas: ensuring major digital platforms meet transparency standards and enhancing public awareness about the impacts of disinformation. As major digital platforms maintain the role of gatekeepers of information, there is a growing need to bolster traditional media and journalism, which are often challenged by disinformation, fake news, and AI-generated content online. This situation underlines the necessity for enhanced journalistic tools, emerging as a focal point in policy discussions.

A holistic societal approach that encompasses public bodies, the private sector, civil society, research, fact-checking entities, and citizens is imperative. Such an inclusive approach is the key to combating the spread of disinformation, emphasizing proactive rather than reactive strategies. Ultimately, unifying efforts across various sectors and communities is essential in effectively countering the rise of disinformation.

To conclude, it is pivotal to keep discussing the topic of regulating media and social media in Italy to establish a trusted and secure ecosystem. For this reason, the recommendations here reported will be further supported and disseminated during the second round of funding of IDMO. Indeed, to gain a concrete impact on the Italian media landscape, it is essential that continuation will be ensured to avoid that the debate and the network created during the project lifetime will end.



# List of Figures

<i>E allora dai!</i>	Rai per il Sociale/Inclusione Digitale	Rai Play	2021	2022						Un programma di Giovanna Ciorcolini e Caterina Mannacio. Conduce Lorenzo Baglioni. Regia di Alessandra Grassi.
<i>ConverseRai - Per capire il mondo che cambia</i>	Direzione Contenuti Digitali	Rai Play	2021	2023						Un programma di Caterina Mannacio, scritto da Caterina Mannacio e Lucia Sirocchi. Regia Carlo De Domenico. Produttore esecutivo Priscilla Salvini.
<i>VivaRaiPlay!</i>	Rai Play	Rai1, Rai Play	2019	2019						Conduce Fiorello; regia di Piergiorgio Camilli.
<i>Tu non sai chi sono io</i>	Rai Play	Rai Play	2020	2022						Regia di Giampaolo Marconato; prodotto da Fremantle per RaiPlay; ideato e scritto da Alessandro Sortino con Arianna Ciampoli; autori Carmen Vogani, Selenia Orzella e Nicola Vicinanza.
<i>Play Digital</i>	Rai Play	Rai Play	2020	2022						Conduce Diletta Parlangeli; scritto con Nicola di Turi; regia di Maurizio Di Cesare; un programma di Diletta Parlangeli, Antonio Losito; Produttore Esecutivo Lorenzo Forges Davanzati.
<i>Sezione Learning di RaiPlay</i>	Rai Play	Rai Play	2020	2023						
<i>Nudes</i>	Rai Play	Rai Play	2021	2021						Prodotta da Bim Produzione in collaborazione con Rai Fiction. Soggetto Emanuela Canonico, Valerio D'annunzio, Matteo Menduni, Giulio Fabroni; Head Writer: Emanuela Canonico; sceneggiature di Emanuela Canonico, Matteo Menduni, Giulio Fabroni; adattamento italiano dell'omonimo teen drama norvegese.
<i>Big-Big News!</i>	Rai Ragazzi	Rai 1	1988	1993						Tra i conduttori di Big! News si citano: l'attore Giancarlo Ratti, l'ex annunciatrice Rai Paola Mari e la doppiatrice Claudia Catani. Dal 1989 al 1991, lo speaker dei servizi giornalistici è Alessio Cigliano e Roberto Giacobbo.
<i>TG Ragazzi</i>	Rai Ragazzi	Rai 1	1998	2000						Ideatrice Mussi Bollini. Con Tiziana Ferrario conduttrice supportata da Filippo Gaudenzi, Lillo Gullo, Monica Carovani, Karina Laterza e Gabriella Leonzi.
<i>GT Ragazzi</i>	Rai Ragazzi	Rai 3	2000	2010						
<i>Screensaver</i>	Rai Ragazzi	Rai 3	2002	2008						Programma ideato e condotto da Federico Taddia. Autore Massimo Bruno. Regia di Polo Severini.
<i>Telegiornale in classe</i>	Rai Ragazzi	Rai 3	2005	2011						
<i>Tiggi Gulp</i>	Rai Ragazzi	Rai Gulp	2010	2014						Produttrici esecutive Paola Angioni e Nadia Chiovolini. Conduttrici Nadia Contino e Carolina Rei.

Programmi/portali mappati	Direzione Rai	Canale/luogo di messa in onda	Anno/i da a	Target della popolazione		Focus			Credits
				Publico generalista	Studenti e formatori	Digital Literacy	Media Literacy	Fake news	
<i>MediaMente</i>	Rai Educational (oggi Rai Cultura)	Rai 3	1994	2002					Un programma ideato da Renato Parascandolo e condotto da Carlo Massarini (ad eccezione delle primissime puntate del 1994, condotte da Gianluca Nicoletti), con la regia di Piccio Raffanini.
<i>Portale Rai Scuola</i>	Rai Cultura	www.raiscuola.rai.it	2012	2023					Un programma di Luigi Bertolo; autrice Daniela Scotti; direttore di produzione Gianni Lauro; produttore esecutivo Diego Garbati; regia Margherita Lamagna; conduce Ivan Bacchi.
<i>Generazione Digitale</i>	Rai Cultura	Rai Scuola	2012	2014					
<i>Invito alla lettura</i>	Rai Cultura	Rai Scuola, Rai Play	2016	2019					Autrice e conduttrice Tiziana Mascia; regia di Giorgia Pini; un programma a cura di Luigi Bertolo; Produttore Esecutivo Rosanna Strone.
<i>Digital World</i>	Rai Cultura	Rai Scuola, Rai3, Rai Play	2016	2022					Conduce Matteo Bordone; regia di Giancarlo Ronchi; un programma di Simone Arcagni, Stefano Sotgia, Alessandro Lippi, Gino Roncaglia; Produttore Esecutivo Luigi Bertolo.
<i>Toolbox</i>	Rai Cultura	Rai Scuola, Rai Play	2017	2019					Autore e conduttore Alessandro Bogliolo; un programma a cura di Luigi Bertolo; Produttore Esecutivo Rosanna Strone; regia di Silvia Di Fonso, Alessandra Peralta, Alberto Polimanti.
<i>Portale Rai Cultura</i>	Rai Cultura	www.raicultura.it	2019	2023					
<i>Coding in famiglia</i>	Rai Cultura	Rai Cultura	2020	2021					Conduce Alessandro Bogliolo; puntate ideate e realizzate da Alessandro Bogliolo.
<i>Complimenti per la connessione</i>	Rai per il Sociale/Inclusione Digitale	Rai1, Rai Play	2016	2017					Una produzione LuxVide in collaborazione con Rai Fiction; regia e soggetto di serie Valerio Bergeso; sceneggiatura Fabio Morici, Marco Diotallevi, Nino Frassica.
<i>Web Side Story - Quando la rete fa storia</i>	Rai per il Sociale/Inclusione Digitale	Rai4, Rai Play	2020	2022					Un programma di Carlo Durante e Marina Liuzzi; art director Davide Di Stadio; scritto con Nicola Di Turi, Nicola Nosegno, Diletta Parlangeli.
<i>Domande Snack</i>	Rai per il Sociale/Inclusione Digitale	Rai Scuola, Rai Play	2020	2021					Un programma di Caterina Mannacio, con la collaborazione di Luciano Mazzone e Lucia Sirocchi. Produttore esecutivo Priscilla Salvini.
<i>Young Stories</i>	Rai per il Sociale/Inclusione Digitale	Rai Play	2021	2021					Regia di Emanuele Pisano; scritto con Giulia Santi; un programma prodotto da Stand by me; Produttore Esecutivo Alessandro Grillo; delegato Rai Caterina Mannacio; capoprogetto Claudio Moretti.

<b>Rob-O-Cod</b>	Rai Ragazzi, in collaborazione con CRITS	Rai Gulp, Rai Play	2019	2020						Un programma condotto da Silvia Lavarini e Matteo Sintucci. Regia Andrea Apuzzo. Autori Armando Traverso e Mario Bellina
<b>#Explorers</b>	Rai Ragazzi	Rai Gulp, Rai Play	2019	2021						Con Chiara Emanuele, regia di Claudia Pascozi e Francesca Baileirini. Autori Paola Angioni e Stefano Acunzo.
<b>La banda dei fuoriclasse</b>	Rai Ragazzi	Rai Gulp, Rai Play	2020	2021						Un programma condotto da Mario Acampa. Regia di Marta Manassero.
<b>TG Kids</b>	Rai Kids, Rai News 24	Rai Gulp, Rai News 24	2022	2023						Direttori: Paolo Petracca e Luca Milano. Condotta a turno da Alessandro Baracchini e Serena Scorzoni.
<b>Da non crederci! Fake or Real</b>	Rai Kids	Rai Gulp, Rai Play	2023	2023						Un programma condotto da Emma Galeotti. Regia Marco Maiello. Autrici Donatella Rorro e Lucia Rossetti.
<b>Non ce lo dicono</b>	Rai Play Sound	Rai Play Sound	2022	2023						Un podcast di 10 puntate scritto e condotto da Errico Buonanno con la regia di Savino Bonito.

#### Produzioni audiovisive Rai per IDMO

Programmi/portali mappati	Direzione Rai	Canale/luogo di messa in onda	Anno/i		Target della popolazione		Focus			Credits
			da	a	Pubblico generalista	Studenti e formatori	Digital Literacy	Media Literacy	Fake news	
<b>Invito alla lettura : Media Literacy contro la disinformazione - Speciale per IDMO</b>	Rai Cultura	Rai Scuola, Rai Play, Rai 3	2022	2022						Scritto da Tiziana Mascia e Rosanna Strone. Produttore esecutivo Rosanna Strone. Programma realizzato per IDMO (Italian Digital Media Observatory) e cofinanziato dalla Commissione Europea.
<b>Pillole contro la disinformazione - Speciale per IDMO</b>	Direzione Contenuti Digitali Transmediali in collaborazione con Rai Ufficio Studi e Direzione Comunicazione	Tutti i canali Rai, Rai Play	2022	2023						Un programma scritto da Carlo Durante, Nicola Di Turi, Alberto Puoti. A cura di Lucia Sirocchi. Produttrice esecutiva Fabrizia Biondi.
<b>Digital World vs Fake News - Speciale per IDMO</b>	Rai Cultura	Rai Scuola, Rai Play, Rai 2	2023	2023						Conduce Matteo Bordonese; Regia di Giancarlo Ronchi.

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## 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

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