

**Submission to Joint Committee on Tourism, Culture, Arts, Sport and Media on the State's response to online disinformation and media/digital literacy, including social media and fake news.**

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The Institute for Future Media, Democracy and Society (FuJo) is a research centre in Dublin City University. FuJo's multidisciplinary research investigates how to mitigate digital challenges including disinformation and digital hate; how to enhance public participation through democratic innovations; and how to secure the sustainability of high-quality media. The Institute coordinates EDMO Ireland, one of fourteen hubs established to combat disinformation across the EU as part of the European Digital Media Observatory (EDMO).

[www.fujomedia.eu](http://www.fujomedia.eu)

<https://edmohub.ie>

## DCU FuJo's work on disinformation and related areas

DCU FuJo is a multidisciplinary research centre focused on the digital transformation of media, democracy, and society. DCU FuJo researchers investigate how to counter digital problems including disinformation and digital hate; how to enhance public participation through democratic innovations; and how to secure the future of high quality media and information. The institute has conducted wide-ranging research on disinformation including Irish and EU-funded projects. DCU FuJo is also the Irish partner for ongoing international investigations into changing patterns of news consumption and the diversity of media ownership.

Since 2021, DCU FuJo has coordinated the Ireland Hub of the European Digital Media Observatory (EDMO). This initiative is part-funded by the EU to coordinate cross-sectoral responses to disinformation. With our direct partners (TheJournal.ie and Newswhip) and our key collaborators (Media Literacy Ireland, Coimisiún na Meán), the hub has made significant contributions to expanding knowledge of disinformation, factchecking, platform oversight, and media literacy in Ireland. Through EDMO Ireland, DCU FuJo has played a key role in the development of the National Counter Disinformation Strategy and has provided insights to multiple government departments and regulatory bodies. It has also provided a means through which Ireland can share and exchange best-practices with European counterparts. Regrettably, while the EU achieved success in establishing EDMO hubs, the funding has been drastically reduced.

A selection of our outputs is summarised below:

- **Novel research on disinformation countermeasures:** There are major questions about the effectiveness of disinformation countermeasures. Working with colleagues in the University of Cambridge, DCU FuJo recently published an extensive review of the latest research<sup>1</sup> and is undertaking research on whether 'pre-bunking' techniques can correct misperceptions. DCU FuJo also pioneered work investigating the potential for deliberation and citizen assemblies to aid the correction of misperceptions<sup>2</sup>.
- **Monitoring day-to-day dynamics of disinformation:** In our disinformation research, we have consistently identified the need to understand the over contexts and dynamics of disinformation and manipulation<sup>3</sup>. To do so, it is necessary to maintain an up-to-date understanding of disinformation actors, narratives, and tactics across different platforms. It is also necessary to keep abreast of international trends as these have the potential to emerge, in some form, in the Irish context. Through the EDMO Ireland Hub, we have published briefing reports that take stock of disinformation in Ireland<sup>4</sup> and we have translated these insights into accessible media coverage<sup>5</sup>.

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<sup>1</sup> Roozenbeek, Culloty, & Suiter, (2023). [Countering misinformation: Evidence, knowledge gaps, and implications of current interventions](#). *European Psychologist*, 28(3), 189–205.

<sup>2</sup> Muradova, Culloty, & Suiter (2023) [Misperceptions and Minipublics: Does Endorsement of Expert Information by a Minipublic Influence Misperceptions in the Wider Public?](#) *Political Communication*. 40(5), 555-575

<sup>3</sup> Culloty & Suiter (2021). [Disinformation and manipulation in digital media](#). London: Routledge.

<sup>4</sup> <https://edmo.eu/edmo-reports/edmo-ireland-hub-briefing-report/>

<sup>5</sup> <https://www.rte.ie/brainstorm/2023/1124/1341505-far-right-ireland-refugees-plantation-history-racism-misinformation/>

- **Expertise on platform accountability and compliance measures:** DCU FuJo has established itself as an expert in the implementation of the EU Code of Practice on Disinformation. The institute has authored four reports and given invited presentations to the European Commission and the European Regulators Group for Audiovisual Media Services (ERGA). Through EDMO, DCU FuJo partnered with colleagues across Europe to lead a report on the major platforms compliance with the Strengthened Code of Practice<sup>6</sup>.
- **Advancing evidence-based approaches to media literacy:** in 2023, DCU FuJo and EDMO Ireland collaborated with Media Literacy Ireland to deliver new resources and a training programme to librarians, media companies, and teachers across Ireland<sup>7</sup>. This programme was the first-of-its-kind in Ireland and builds on DCU FuJo research on the media literacy needs of teachers.

Based on the expertise and experience accrued through these projects, we offer the following overview of the state's response to disinformation and related issues.

## The state response to disinformation and related issues

The advent of online and digital technologies has radically transformed how media and information are created, distributed, and consumed. There are many benefits to these changes, but they are also associated with wide-ranging harms. Democratic legitimacy and scientific evidence are undermined by disinformation, which is amplified by algorithms and partisan media<sup>8</sup>. Children are regularly exposed to inappropriate content on platforms that fail to enforce safety measures<sup>9</sup>. Public participation by women and minorities is subject to coordinated campaigns of online abuse<sup>10</sup>. Unequal access to digital resources exacerbates social divisions<sup>11</sup>. Meanwhile, technology companies accumulate unprecedented power and profits through the commodification of personal data<sup>12</sup>. These issues are all interconnected.

Given the interconnectedness of the issues, it is important to recognise that disinformation is not an isolated or discrete problem. Yet, there is an unfortunate tendency in much international debate, and even research, to attribute the challenges of democracy to disinformation and to reduce disinformation to social media<sup>13</sup>. If the nature of the problem is oversimplified or misunderstood, the proposed responses are unlikely to be effective. At the same time, given the urgency of the concerns surrounding disinformation, there is a tendency to embrace a simplistic rhetoric of 'solutions'. Media literacy, for example, is often invoked as a solution that will help people distinguish fact from fiction. This greatly minimises the value of media literacy while also overstating the evidence for its specific effects.

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<sup>6</sup> <https://edmohub.ie/index.php/major-platforms-disinformation-fight-under-scrutiny-in-new-cop-monitor-report/>

<sup>7</sup> <https://edmohub.ie/index.php/be-media-smart-community-training-programme-a-summary/>

<sup>8</sup> Culloty & Suiter (2021). [Disinformation and manipulation in digital media](#). London: Routledge.

<sup>9</sup> Ofcom (2022). [Research into risk factors that may lead children to harm](#). London: Ofcom.

<sup>10</sup> Kirk, Ging, Murphy (2023). [The impact of the use of social media on women and girls](#). European Parliament STU(2023)743341.

<sup>11</sup> Rasi-Heikkinen & Doh (2023). [Older adults and digital inclusion](#). *Educational Gerontology*, 49(5), 345-347

<sup>12</sup> Zuboff (2019). *The Age of Surveillance Capitalism*. London: Profile Books.

<sup>13</sup> Kreiss, D. (2021). "Social Media and Democracy: The State of the Field, Prospects for Reform" *IJPP*, 26(2), 505–512.

If these are noted international trends, Ireland is fortunate in that there is a robust network of stakeholders to inform, critique, and implement the state response to disinformation and related issues.

### **Multi-stakeholder collaborations**

To date, the state response has been characterised by collaboration and deliberation. The Future of Media Commission represented an important development because it took stock of the Irish media environment and its challenges, including disinformation. The recommendation to establish a National Counter Disinformation Strategy has, we believe, been fruitful in terms of creating a multi-stakeholder forum where representatives of different sectors, state agencies, and government departments come together to hear evidence and discuss potential responses. Relatedly, the establishment of Media Literacy Ireland in 2017 by the Broadcasting Authority of Ireland/Coimisiún na Meán was a valuable development insofar as it enabled a diverse set of stakeholders to come together for knowledge exchange and collaboration. The significance of these multi-stakeholder efforts has been recognised at the European level.

More generally, it is worth noting that the state is active in many international networks including the International Grand Committee on Disinformation, the European Centre of Excellence for Countering Hybrid Threats, and related efforts. Indeed, we note that many state bodies offered support for the establishment of the EDMO Ireland Hub on the basis that it would deliver important insights and opportunities.

### **Regulatory expertise and the EU Code on Disinformation**

The Broadcasting Authority of Ireland/Coimisiún na Meán has played a major role in evaluating the 2018 EU Code of Practice on Disinformation. It commissioned DCU FuJo to deliver three reports on the implementation of the Code, making Ireland the only country to have undertaken systematic research on the Code<sup>14</sup>. DCU FuJo continues to work closely with Coimisiún na Meán in our capacity as coordinators of the EDMO Ireland hub. Indeed, Coimisiún na Meán and DCU FuJo are now recognised as experts on the Code having published four reports and serving as regular contributors to reviews by EU regulators<sup>15</sup>. This is significant as the Code of Practice on Disinformation is likely to become a Code of Conduct under the Digital Services Act (DSA). We suggest the strong relationship between the academic and regulatory sector is important more generally under the DSA given its provisions for researcher access to data.

### **Electoral integrity**

The establishment of An Coimisiún Toghcháin with its mandate to respond to mis/disinformation in the context of elections is another critical development. Research by the EDMO Taskforce on EU elections<sup>16</sup> (of which DCU FuJo is a member) found that all elections held in the EU during 2023 were accompanied by false accusations of electoral fraud. An Coimisiún's powers to regulate political advertising and combat electoral disinformation are thus hugely important. Of course, this requires that An Coimisiún is adequately resourced and informed to assess the media environment on an ongoing basis.

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<sup>14</sup> BAI (2021) [New report recommends development of robust procedures for reporting and monitoring online disinformation](#)

<sup>15</sup> <https://edmohub.ie/index.php/edmo-ireland-presents-cop-analysis-to-erga-subgroup/>

<sup>16</sup> EDMO (2023) [Disinformation narratives during the 2023 elections in Europe](#)

## Education and media literacy

There have been significant developments in the area of education and life-long learning. The National Council for Curriculum and Assessment organised a review of the Junior Cycle Digital Media Literacy Short Course, which has been one of the most significant achievements for media literacy education in the Irish educational system. In our submission, we argued that the course is narrowly focused on the acquisition of technology skills at the expense of broader concerns around digital citizenship including disinformation<sup>17</sup>. Relatedly, in our submission on the National Strategy for Literacy, Numeracy, and Digital Literacy, we welcomed the inclusion of digital literacy but cautioned against the conflation of the ability to use technology with the kind of critical knowledge that is required for literacy<sup>18</sup>. The National Cyber Security Strategy 2019-2024 highlighted the importance of digital literacy. In our submission, we recommended a broader focus on aspects of media literacy, including disinformation<sup>19</sup>. Beyond formal education, DCU FuJo was pleased to collaborate with the public library service to apply for projects and provide training in the area of media literacy. Relatedly, we collaborate with WebWise, the national Safer Internet Centre in a similar capacity.

The above list is not exhaustive. There are a wide range of additional actions by government departments and agencies. DCU FuJo, for example, has worked with the Department of Foreign Affairs to research the potential effectiveness of pre-bunking campaigns.

## Recommendations and observations

In light of the above, we present the following observations on limitations in the national response and recommendations for action. For brevity, these are consolidated into major areas of concern. It is not an exhaustive list of recommended actions.

### 1. **A fundamental lack of knowledge about disinformation dynamics in Ireland:**

Although many researchers and journalists have produced insightful investigations into disinformation in Ireland, these insights date quickly. The lack of a dedicated entity with situational awareness of disinformation actors, narratives, and tactics as they evolve day-to-day and across different platforms is a major limitation. It means there is no reliable source for up-to-date context that can inform the work of state bodies such as Coimisiún na Meán and An Coimisiún Toghcháin and the work of journalists, civil society actors, and academic researchers. Consequently, should a disinformation crisis emerge, these actors are often in the dark as to how it unfolded and who is involved. We note, regrettably, that the part-funding provided by the EU for the EDMO Ireland hub does not facilitate this kind of work.

- **Recommendation:** fund a dedicated entity that will provide independent and transparent insights into day-to-day disinformation trends in Ireland and thereby provide an essential knowledge base for the work of all those seeking to counter disinformation.

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<sup>17</sup> <https://edmohub.ie/index.php/edmo-ireland-and-fujo-submission-to-the-public-consultation-on-the-junior-cycle-digital-media-literacy-short-course/>

<sup>18</sup> <https://edmohub.ie/index.php/edmo-ireland-and-fujo-call-for-a-deeper-focus-on-media-literacy-in-the-new-national-strategy-for-education/>

<sup>19</sup> DCU FuJo and EDMO Ireland (2023) [Submission to the National Cyber Security Strategy Consultation](#).

2. **A lack of coordination to prevent fragmentation:** Disinformation necessarily cuts across government departments, agencies, and non-governmental sectors. This is a significant challenge as it means there is potential for great fragmentation and there is no overall ownership of the counter disinformation response. As noted, the working group for the National Counter Disinformation Strategy - operating from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media - has been notable for bringing together a multi-stakeholder community. It is not yet clear, however, how or whether this will evolve into something sustainable.
- **Recommendation:** maintain a coordinating function within the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media to ensure there is knowledge-exchange and collaboration across key stakeholders.
3. **A lack of data access from the platforms:** There are many unanswered questions about the nature of disinformation on social media. This is due, in large part, to the fact that social media platforms have not facilitated adequate access to relevant data. The Digital Services Act has specific provisions in this regard and experts<sup>20</sup> highlight the need for a strong exchange between national Digital Service Coordinators (i.e., Coimisiún na Meán), civil society, and academia in order to fulfil the envisioned research functions. From an international perspective, this is critical for Ireland given that Coimisiún na Meán will be responsible for research requests relating to platforms that have their European HQs in Ireland.
- **Recommendation:** monitor progress on the implementation of Article 40 of the DSA and ensure Coimisiún na Meán is sufficiently resourced to fulfil its obligations.

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<sup>20</sup>Darius & Stockman (2023) [Implementing Data Access of the Digital Services Act](#)