



European Fact-Checking
Standards Network

Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms and Search Engines

A systematic review of the
implementation of big tech
commitments to the EU Code of
Practice on Disinformation

January, 2024



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Summary

In September 2023, the Digital Services Act (DSA) became applicable for the services that [have been already designated](#) as Very Large Online Platforms (VLOPs) or Very Large Online Search Engines (VLOSEs). As a key part of their renewed obligations, these companies are now responsible for having “reasonable, proportionate and effective risk-mitigation measures” for the systemic risks “stemming from the design or functioning of their service and its related systems, including algorithmic systems, or from the use made of their services”.

As disinformation is one of those risks that have “actual or foreseeable negative effects on democratic processes, civic discourse and electoral processes” it is worth looking at how some of the designated services are approaching one of the best known risk mitigation tools available: independent fact-checking. Particularly since most of those services are also signatories of the Code of Practice on Disinformation that is slated to become a DSA Code of Conduct.

The key commitments of the Code of Practice on Disinformation’s chapter on the empowerment of fact-checkers are (1) that platforms conclude agreements with independent fact-checking organizations to have complete coverage of the EU member states and official languages, (2) that they integrate or consistently use fact-checking in their services for the benefit of their users, and (3) that they provide fact-checkers with access to the data that they need to maximize the quality and impact of their work.

Using public data from those companies’ last DSA and Code of Practice semiannual reports, plus the insights of the European fact-checking community, the European Fact-Checking Standards Network (EFCSN) has produced this thorough evaluation of how and if the very large online platforms/search engines are fulfilling their commitments to the self-regulatory Code in force since early 2023. Major findings include:

- **YouTube** lists as partners “EU based fact-checking organizations” that are in Myanmar, Indonesia, or Brazil.
- **Google Search**’s reported integration of fact-checking fully relies on the unpaid contributions of fact-checking organizations to ClaimReview, in direct contradiction with the Code of Practice.
- **TikTok** does not work with a local fact-checking organization in 19 out of 27 EU member states and in some “covered” countries, they reviewed less than 15 videos over six months.
- **Facebook** does offer independent fact-checking to users in almost every EU member state, but more country-specific data would be welcome to assess the depth of that fact-checking coverage.
- **Instagram** shows substantially fewer fact-checking labels than Facebook even though it has access to the same fact-checks, indicating difficulties in access to data for the fact-checkers or lack of better scaling systems within Meta.



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- **WhatsApp** partners with fewer fact-checking organizations in fewer countries than in the previous reporting period.
- **Bing**, despite saying that it relies on ClaimReview to integrate fact-checks in search results, showed not even one fact-check on the first page of results in 15 different countries over a period of six months.
- **LinkedIn** is using automatic translation tools to moderate disinformation as its only fact-checking partner does not work in 75% of the official languages of the EU.
- **X-Twitter** ranks worst in a survey of European fact-checkers as not a single fact-checking organization considers the company to take disinformation seriously.
- **Telegram** is a critical actor in the dissemination of disinformation in the EU and more attention should be devoted to effective DSA implementation on its public components.































About the EFCSN:

The European Fact-Checking Standards Network is a registered association that represents more than 50 independent fact-checking organizations from over 30 European countries that are committed to the highest standards of independence, transparency, and methodological quality as required by the European Code of Standards, and whose adherence to those is evaluated periodically by independent experts.

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Compliance at a glance

-  **No progress or no information**
-  **Not enough progress or not enough information**
-  **Some progress**

Service	Agreements and fact-checking coverage	Integration and use of fact-checking	Access to information for fact-checkers
YouTube			
Google Search			
Facebook			
Instagram			
TikTok			
WhatsApp			
Bing			
LinkedIn			
X - Twitter			
Telegram			

Service by Service Analysis

YouTube

According to [YouTube's own reporting](#), the video platform has over 900 million monthly users in the European Union, likely making it the biggest platform in Europe. At the same time, YouTube has played [a central role](#) in the dissemination and monetization of disinformation globally, and in the [growth of conspiracy theories](#) and polarization. The fact-checking community has reached out to YouTube about this repeatedly, [publicly](#) and privately. In a recent EFCSN survey of European independent fact-checking organizations, YouTube was considered to be the very large online platform that took the disinformation problem least seriously among all of the current Code signatories.

Agreements and Fact-checking Coverage

During the reporting period, YouTube made little progress towards fulfilling its commitment under the Code of Practice to “*set up agreements between them and independent fact-checking organisations to achieve fact-checking coverage in all EU Member States*”. In the aforementioned survey, no European fact-checker reported having that kind of agreement with YouTube. Subsequently, YouTube was not able to produce any significant reporting on the impact, nature, coverage, or effectiveness of a fact-checking program that does not exist.

Regardless, the most worrisome aspect of YouTube's report is the apparent misrepresentation of some of its current actions as if they were the implementation of the Code of Practice. For example, the company lists 10 “EU-based fact-checking organisations in the YouTube Partner Program (YPP)”:

- Some of the fact-checking websites mentioned focus on markets as far from the EU as Myanmar, Indonesia, or Brazil.
- Most, if not all, of fact-checkers mentioned appear to be on the list only because they are part of a larger Media house that does have a YouTube channel while most of the fact-checking operations themselves do not have one.
- The “YouTube Partner Program (YPP)” is a monetization scheme for any type of content creator in the platform that YouTube is passing as a genuine partnership with the European fact-checking community.

In its report, YouTube also highlights some grants (mostly those by the Google News Initiative or GNI) to fact-checking organizations in previous years as if they were partnerships to provide specific fact-checking coverage of an EU member state. Most of the time, though, those grants are funding programs in which fact-checkers provide training to third-party organizations or execute Media Literacy campaigns, rather than funding to produce fact-checking to be showcased or used by YouTube in any way.



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The action most often mentioned in YouTube’s report is GNI’s contributions to the European Media and Information Fund (EMIF) and to the International Fact-Checking Network (IFCN), which need some additional context:

- Taking into account EMIF’s 52 active grants as of October 9, 2023, over 76% of the funding goes to projects that do not include any EU-based fact-checking organizations. Actually, among EMIF’s 110 recipients, only 17% are EU-based fact-checking organizations, coming from just 11 EU member states.
- Of the recipients of the IFCN-administered fund, according to YouTube’s report, 17% are EU-based fact-checking organizations located in 4 member states.
- 96% of the European fact-checking organizations do not think YouTube offers a “fair financial contribution for fact-checkers to combat disinformation on its service” as it committed to do in the Code of Practice.

The lack of progress by YouTube in concluding agreements with fact-checkers that allow for complete coverage of the EU and its official languages stays in the way of YouTube making meaningful advances in many other key areas of the Code. It is all the more regrettable because 63% of European fact-checking organizations say they already monitor YouTube for disinformation or publish debunks about content widely seen on the platform, while 92% express an interest in having an agreement with YouTube to provide fact-checking coverage of the platform in their countries.

Integration and use of fact-checking

This aspect is again the area where YouTube has made no progress whatsoever since joining the Code of Practice, despite repeated assurances in writing that it would “explore opportunities” to do so. In its report, the company says now that it “needs to have more video fact-checking content on the platform” before taking action, effectively putting the burden on the fact-checkers to produce video content while committing no long-term resources to this and offering no guarantees on how and if that content would be used, promoted, or compensated.

Assertions such as “YouTube allows fact-checkers to post and share both short- and long-form video content” or “users can subscribe to fact-checking channels to get notifications when new content has been uploaded” are the perfect illustration of how lack of action sometimes finds a way to be reported as implementation of the Code of Practice: yes, YouTube allows fact-checkers and everyone else on the planet with an account to post and share videos and get subscribers. The fact that YouTube does not intend to actively prevent fact-checkers from using its service cannot be construed as collaboration and is opposed to both the letter and the spirit of the “Empowering the Fact-Checking Community” chapter.

There are many different ways to at least test the integration of fact-checking in videos through overlays and other visual cues to add context. A wide variety of different solutions could have already

been deployed in line with YouTube's commitment to use the work of independent fact-checkers consistently and collaborate with them "starting by conducting and documenting research and testing".

However, if YouTube wishes to state that its vision for integrating fact-checking depends on the production of video content by fact-checking organizations, that would require more information about how those videos would be used by the platform and how it intends to support it. Video production requires more time and more investment, and certainly more resources than "an open session about content strategy and best practices" that YouTube has reported. Its current actions do not in any way align with YouTube's assertion that supporting fact-checking is "a critical piece of the product integration commitment".

Access to information for fact-checkers

YouTube has committed to "provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximise the quality and impact of fact-checking" through "appropriate interfaces (...) to access information on the impact of contents on their platforms" and to work with EFCSN and EDMO in a framework to that purpose. While those conversations can advance, it is worth analyzing the specific challenges presented by YouTube in this aspect and highlighting some assertions in its report that do not align with the expressed commitment.

As in some other parts of the report, YouTube implies that the information already available to all users is the same necessary to "maximise the quality and impact of fact-checking" whereas we beg to differ. While YouTube provides users with information about the impact of their own contents, what fact-checkers are more concerned about is information about public content by other users, particularly as they investigate claims.

In that sense, those interfaces could be extremely valuable if fact-checkers were to use them to run, for example, keyword searches on the transcription of videos (data that should already be available through the automatically-generated subtitles in some cases). Or if they could obtain information on the patterns of consumption of a given content through time, geographically, and whether or not it has been promoted or monetized and how. This was already communicated to YouTube after the publication of its baseline report in January 2023.

If YouTube still has not been able to report any data on the use of such an interface (SLI 32.1.1) it is because the interface does not exist and its reported actions in this area are thus not serving the purpose envisioned by the Code to provide pertinent information to fact-checkers to do their job. Again, YouTube reports that it does not discriminate against fact-checkers, so unless they did so before signing the new Code of Practice, it is hard to see any advancement at all.

Google Search

Google Search, with [over 800 million monthly users in the EU](#), is by far the largest search engine there is and consequently the most influential service in shaping what Europeans see when they look for information online. For years now, European fact-checkers have alerted Google Search that its anti-disinformation strategy, based on the use of ClaimReview review mark-up, was not sustainable as it relied on the good will of fact-checking organizations contributing their content and marking it up without compensation. As explained to Google also after its baseline report, this goes strongly against its commitment to “provide fair financial contributions to the independent European fact-checking organisations for their work to combat Disinformation on their services”.

Agreements and Fact-checking Coverage

In this section of its report, Google Search portrays the contributions of the Google News Initiative (GNI) to the European Media and Information Fund (EMIF) and to the International Fact-Checking Network (IFCN) as if those were agreements to provide fact-checking coverage of the European Union. As was the case with YouTube, this is not accurate; it is again helpful to provide some context to the grants already in place:

- Of EMIF’s 52 active grants as of October 9, 2023, over 76% of the funding goes to projects that do not include any EU-based fact-checking organizations. Actually, among EMIF’s 110 recipients, only 17% are EU-based fact-checking organizations, coming from just 11 EU member states.
- Of the recipients of the IFCN-administered fund, according to YouTube’s report, 17% are EU-based fact-checking organizations located in 4 member states.
- According to the European fact-checking organizations themselves, only 15% have an agreement with Google and over 95% do not think Google offers a fair financial contribution to fact-checkers to combat disinformation on its service, as it committed to.
- Even with all those caveats and limitations, those resources are welcome and much needed. The EFCSN is as always open to discuss how they can better serve the needs of the independent fact-checking organizations and the overall objective of providing full fact-checking coverage of all EU member states and languages, with a particular focus on funding being more stable and not subject to yearly projects not always related to fact-checking.

Some of the other additional partnerships Google Search reports with fact-checking organizations in EU member states are grants that fund programs in which they provide training to third-party organizations such as Media outlets or execute Media Literacy campaigns. The funding is not dedicated to provide fact-checking coverage of a member state and it does not entail Google Search using the fact-checks produced by those organizations in any way.

For all those reasons, Google Search is unable to provide any information on the number of Member States and languages covered by its agreements with fact-checking organizations (SLI 30.1.1) again



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because it does not have any. There is a clear possibility to address this key shortcoming in the future, as 100% of European fact-checkers, all of those that were surveyed, said they were “interested in entering an agreement with Google to provide fact-checking coverage” of their countries.

Integration and use of fact-checking, and access to information for fact-checkers

According to Google Search’s own reporting, there have been no changes in the way the service uses and integrates fact-checking during this reporting period, and it does not plan to implement any in the next one. The surfacing of fact-checking rich snippets for users when they search for information on already-debunked claims is a valid and significant way to empower users of search engines, but it is impossible not to question the sustainability of this model if it continues to rely entirely on the unpaid work of the European fact-checking organizations.

Google Search’s current approach depends on the fact-checkers voluntarily marking the articles they produce in the ClaimReview Schema so they can be surfaced for users. The EFCSN has been in touch with Google about options to fairly compensate for that labor-intensive and much-specialized work, as it is an issue that greatly concerns the fact-checkers and has had an impact on the availability of fact-checks through ClaimReview across different European countries.

As for the metrics provided in the report, Google offers the number of impressions of rich snippets and the number of available fact-checks that can be surfaced, both per member state, but it would be useful to add the number of unique articles used per member state for both categories, as it would provide a more meaningful measure of how the integration benefits users in each member state.

Google Search reports that its “use of fact-checks does not involve taking specific actions with regards to content that is fact-checked” and so far refuses to clarify whether the insights of fact-checkers have any influence on its judgments on the authority or reliability of a site when building search results. What we know for sure is that users have no way to flag a particular search result or link as containing disinformation, depriving Google of useful insights on the content it puts in front of the users, insight that could be invaluable for researchers and fact-checkers as well.

Another topic of concern about Google Search is related to the display of disinformation on privileged and curated spaces such as Google News, Google Discover or functionalities like snippets or “People also ask”. The impact of those on how users acquire information is considerable and the EFCSN calls on Google to work with fact-checkers to make sure authoritative information is promoted and disinformation gets at least contextualized.

Facebook

Meta's Facebook has reported having [well over 250 million monthly users](#) in the EU and it is the most popular service among those considered strictly as social media. After playing a central role in the first large-scale controversies about disinformation online, Facebook became the first major digital platform to enter a global partnership with fact-checking organizations in 2016 to build a third-party fact-checking program that was later implemented in other Meta services.

Agreements and Fact-Checking Coverage

As a result of that long-standing relationship, Facebook reports that it has agreements with at least one fact-checking organization in all but one of the EU member states (Malta) to provide fact-checking coverage. While Meta withholds specific information on how they ensure fair financial contributions, 74% of the European fact-checking organizations believe Meta does, according to an EFCSN survey. There is almost unanimous agreement that contributions offered are enough to cover costs and that editorial independence is respected at all times.

Integration and use of fact-checking

Meta's third-party fact-checking program allows partner organizations to proactively flag contents on Facebook as containing disinformation, resulting in the labeling of that content so users can access the evidence on why an independent fact-checker has rated a particular claim as false, partially false, lacking context... According to Facebook's report, some of those ratings are also used to reduce the virality of some contents.

EFCSN believes that proactive flagging contributes to ensuring the editorial independence of fact-checkers to make their own decisions on what to investigate and prevents artificial limitations on their work, but also keeps most of the contents online for users to have the final say on whether they want to interact with them or not. This aligns with the Code's overarching objectives of empowering users and fact-checkers.

Facebook's assessment of the impact of this integration model includes the number of contents treated with a label due to fact-checkers' assessment and the percentage of attempted reshares of fact-checked content that were not completed after a fact-checking warning was surfaced, both reported on a member-state level as suggested by the EFCSN after Meta's baseline report. It speaks to the effectiveness of the integration that 37% of EU users who saw the warning chose not to share the content, a level of impact unheard of in organically curbing the dissemination that is 100% respectful of freedom of speech, too.

This level of granularity can and should be extended to SLI 31.1.1 as the "number of articles written by third party fact checkers" is only provided through a global single figure that gives no meaningful



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information on how and if users are benefitting from this integration differently in different EU countries. There should also be more information on the relationship between fact-checking and repeat offender policies and the challenges of independent verification of AI-generated content.

Access to information for fact-checkers

In line with the Signatories' commitment to "provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximize the quality and impact of fact-checking", Meta reports that they gather "signals, including how people are responding and how fast the content is spreading" that might indicate that a content is disinformation, and use them to surface those contents to their fact-checking partners.

More clarity could be provided on those signals but more importantly, as EFCSN has expressed repeatedly to Meta, the content surfaced is rarely relevant for the fact-checkers that operate in languages different from English. It is also important to stress that, among the tools provided by Meta to its partners in the last few years, access to CrowdTangle has been clearly the most useful for the work fact-checkers do on Facebook. As Meta has reported a move towards funding Newswhip during the last reporting period, it is unclear whether this new tool would be equally effective.

Instagram

Instagram also has [over 250 million monthly users](#) in the EU and the platform is also covered by Meta's Third-Party Fact-Checking Program. In the past Instagram has been shown to play a significant role in the [dissemination and amplification of harmful disinformation](#) and, because the service mostly showcases images and short videos, it is a particularly hard one for fact-checkers to monitor for disinformation.

Agreements and Fact-Checking Coverage

Through Meta's Third-Party Fact-Checking Program, Instagram reports that it has agreements with at least one fact-checking organization to cover all but one of the EU member states (Malta), partnerships that according to 74% of the European fact-checking organizations represent a fair financial compensation "for their work to combat Disinformation on their services" as committed to in the Code of Practice.

Integration and use of fact-checking, and access to information for fact-checkers

While the integration of fact-checking in Instagram is designed to be similar to that in Facebook, differences in the actual impact might appear. Meta reports significantly fewer labels applied in Instagram and, while some may view this as an indication of less prevalence of disinformation in the service, there are other considerations to be made that are related to both the integration and access to data issues.

As mentioned above, the quality of Meta's system to surface potential disinformation to its fact-checking partners is generally very poor for those working in languages other than English. In Facebook, that shortcoming is addressed by the fact-checkers through their own proactive flagging of disinformation in the service, but locating disinformation in Instagram through text-based native searches is more difficult because of the image-based nature of the service.

As with the other video or image-first services, it is crucial that platforms provide better monitoring tools for fact-checkers, including those that could allow keyword searches in databases that include the texts of the automatically generated subtitles and graphics. Also, the automated matching of already available fact-checks to the Instagram contents containing debunked claims could be improved and the EFCSN is ready to help in that process to the best of our ability.

TikTok

TikTok [declares 134 million ‘monthly active recipients’](#) in the EU and it is the most popular platform among the European youth, as [59% of them are users](#) of the service. TikTok has a fact-checking partner program, though small and with only six fact-checking organizations based in the EU. The EFCSN has voiced concerns in the past about the apparent reluctance to work with local organizations to cover their particular member states, as well as the lack of integration of fact-checking in the platform, preferring to remove most of the content it considers disinformation rather than provide users with additional contextual information.

Agreements and Fact-Checking Coverage

Since their last report in January 2023, TikTok has incorporated only one fact-checking partner, a US-based organization. Its fact-checking program claims to cover 22 EEA countries with just nine partners, only six of them based in the EU. Users in 19 out of 27 EU member states do not benefit from the insights of a local fact-checking organization with specific expertise in the country.

These limitations weigh heavily on the actual fact-checking coverage users receive: even in countries that are reportedly covered, like the Czech Republic or Slovakia, TikTok admits that less than 15 videos have been fact-checked during the reporting period of six months. In Poland, where TikTok had 10 million users¹ with a crucial election around the corner, 18 videos were fact-checked. In a full third of all “covered countries”, one or less videos were removed as a result of a fact-checking assessment over six months.

While the detailed reporting deserves praise, many of those metrics are simply indicative of a fact-checking coverage that is clearly insufficient or outright nonexistent in most member states and far from the objectives and the commitments of the Code of Practice. This is certainly not due to the unwillingness of fact-checkers to work with TikTok, as 73% of the European fact-checkers already monitor the platform for disinformation or publish debunks about content widely seen in it, while 91% would be interested in entering into an agreement with TikTok to provide fact-checking coverage of their countries.

According to its report, TikTok has made changes and all of their partner organizations are now able to proactively flag disinformation, something EFCSN long advocated for as a way to ensure the editorial independence of the fact-checkers in the program that were previously limited to analyze whichever contents were forwarded to them by the platform. However, this proactive flagging still happens outside of the usual fact-checking workflow, and the key issues remain: TikTok moderators receive the assessments by the fact-checkers, but might decide not to act on them or come to different conclusions, and editorial independence is not included in the core process of the workflow. It would be important to have metrics of how often moderators’ actions are guided by fact-checkers’ ratings, and

¹ TikTok DSA report, October 2023

clear rules on how moderation decisions are applied to ensure freedom of speech is respected on the users side.

Some fact-checking organizations reached out to the EFCSN to say this procedure affects their independence in that “everything has to be vetted by them”, and another that was in initial conversations with TikTok about a potential agreement was concerned that their work would be “returned to TikTok moderators for action” and “the results of which would not be clear or under the control of a fact-checking organization”.

Integration and use of fact-checking

According to TikTok, the main service that its fact-checking partners provide is to “review, assess and rate video content uploaded to their fact-checking queue”. After receiving the assessment, the platform’s moderators might decide to remove the video according to TikTok’s disinformation policies or, when the assessment is inconclusive, attach an “unverified” label that prevents it from being recommended and surfaces a warning to users before they are able to share it.

The key criticism offered by most fact-checkers to this approach is that the users that 1) saw the disinformation before; 2) are trying to access the content that has already been removed; or 3) are seeing it with the label “unverified”, all receive no information about why the content has been deemed to be disinformation. This goes against the [evidence from studies](#) that show that users “welcome warning-based approaches to counter fake news and are somewhat critical with less transparent methods [and] want social media platforms to explain why a post was marked as disputed”. The EFCSN thinks this approach goes against the Code’s overarching goal of empowering users to make informed decisions and has raised this concern with TikTok repeatedly, but the company so far rejects changing course even though the rationale for those moderation decisions, at least when fact-checkers are implicated, is already produced.

This is particularly worrying as the use of the label “unverified” has experienced an exponential increase in this reporting period, and users do not have access to any concrete information on why the label is applied. The label itself is an effective integration according to the data reported, since the percentage of users who choose not to share the video after seeing the warning pop up is 29.92%. However, it is lower than in other platforms with similar integration that do have that information available.

TikTok also mentions that it can also ask its partners for written reports about disinformation trends, but it is unclear whether and how that information is integrated or used. It would be valuable to know more about this in the future: how many partners have agreed to this, how many reports have been required, what is the process and regularity, and what are the reports used for.



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Access to information

TikTok mentions a new data-sharing pilot for partners that has been implemented during this reporting period. This bimonthly feedback is centered on the content fact-checked by the partner organization and its impact, namely whether a video was removed as a result of an assessment. We would appreciate more information on the feedback received by partners on this new pilot, but it is evident that (as with the other video platforms) it is crucial that better monitoring tools for fact-checkers are provided, including those that could allow keyword searches in databases that include the texts of the automatically generated subtitles and graphics. This would greatly strengthen the capacity of fact-checkers to spot and evaluate disinformation in the platform.

LinkedIn

Reporting on LinkedIn, a platform that could have up to [147 million](#) users in the EU, Microsoft says that “members do not tend to post reputationally harmful content like misinformation”, but [the use of fake accounts](#) to promote goods and services is well documented, as well as more usual forms of disinformation associated with [election integrity](#) or [conspiracy theories](#). LinkedIn has just one global fact-checking partner.

Agreements and Fact-checking Coverage

In its reaction to Microsoft’s baseline report, the EFCSN questioned whether one single fact-checking partnership could be sufficient to comply with their commitments on empowerment of fact-checkers and to provide effective fact-checking coverage in 27 countries and 24 official languages. In this reporting period, LinkedIn has not concluded any new agreements but has tasked its existing partner with more languages to cover.

Disinformation is strictly linked to the context in which it spreads and it is concerning that LinkedIn does not engage with fact-checking organizations with local expertise and, by its own admission, relies on a translation tool for human moderation in the majority of EEA states. Its partner is in charge of providing fact-checking in six languages, meaning 77% of the official languages of the EU are not covered. This is clearly not because of a lack of availability of partners, as EFCSN organizations already cover over 90% of those languages and 74% declare to be interested in partnering with the company.

Similarly to TikTok, LinkedIn’s policies on disinformation focus on removals and its internal content reviewers have the final say and decide whether to delete the piece of content after the assessment by the fact-checking partner. The importance of moderators is even higher for those countries which are not covered by its fact-checking partner and it is thus surprising that LinkedIn’s moderation team is proficient in only 7 of the languages spoken in the EU² (those currently covered by its partner plus two additional languages) while the rest of languages are moderated with the assistance of a “built-in translation technology”.

Integration and use of fact-checking

For this reporting period, LinkedIn has provided information under SLI 31.1.1 (‘use of fact-checks’) as to the number of publications reviewed by its fact-checking partner globally. EFCSN does not think such a count is adequate for assessing their compliance with a Code that is ‘European’. In addition to that, although the differences in methodology between reports make it hard to compare, the absence of improvement in coverage is quite obvious: in the baseline report, they mentioned 252 publications

² LinkedIn DSA Report October



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reviewed in the EU during one month. In this new report, the reporting period grows to six months and the scope becomes global, but the number of reviews is only three times higher.

Moreover, this SLI alone does not reflect on the impact of the integration of fact-checking in the platform. From the 765 pieces of content reviewed by the news agency, an extremely low number, LinkedIn does not report on the number of contents that are actually actioned as a result of the assessment or any other metric that shows their program is efficient.

LinkedIn does provide information broken down by Member States on the number of removals under Misinformation policy, and those numbers are very telling: in contrast to an average of 2,584 publications deleted in countries whose official language is covered by its fact-checking partner, the average drops to 100 or below in 40% of all the countries within EEA. Even if a focus on removals is not the most adequate in the EFCSN's opinion, it is important to note that even by that standard, LinkedIn is failing to fulfill its commitments.

Access to information for fact-checkers

In this section, LinkedIn reports that a live link is provided to its partner “which allows partners to easily determine whether that content was thereafter removed by LinkedIn”. This approach seems transparent with their partner and ideally, it would be continued and scaled whenever LinkedIn decides to extend their fact-checking coverage to comply with the Code.

Bing

Microsoft's Bing is the second most popular search engine in the EU, with [119 million average monthly users](#). With a ClaimReview-based approach to fact-checking similar to that of Google Search, Microsoft has been repeatedly told by fact-checkers in Europe about the risks of relying on a schema that expects fact-checkers to contribute their work without compensation, a model that goes against Microsoft's own Code of Practice commitment to "provide fair financial contributions to the independent European fact-checking organisations for their work to combat Disinformation on their services".

Agreements and Fact-checking Coverage

According to Microsoft's report, Bing's cooperation with fact-checking organizations remains nonexistent and unchanged since their baseline report. Currently, the search engine reports zero partners and thus does not comply with its commitment to set up agreements with fact-checking organizations but reports that it "is working to secure agreements with additional fact-checking organizations and is in active, productive discussions with several fact-checking organizations". EFCSN has been in detailed talks with Microsoft about Bing for almost a year, but so far those contacts have not translated into action.

For the time being, Bing relies exclusively on the ClaimReview Schema for its users to benefit from the work of fact-checking organizations when navigating the service. ClaimReview functions thanks to unpaid contributions of some fact-checkers that invest their time and resources in debunking and following the protocol to provide these fact-checks to search engines systems. Depending on organizations working on a voluntary basis is rather the opposite of the stated goal to offer "fair financial contributions" to European independent fact-checkers.

Outside the reporting of the chapter dedicated to the empowerment of fact-checkers, Microsoft mentions a partnership with one fact-checking organization to "identify, track and expose emerging information operations". The EFCSN supports this type of collaboration for exchange of information but it should not be used as a substitute for agreements that provide fact-checking coverage.

Considering the conversations between Microsoft and the EFCSN, their intentions expressed in the report, and that 81% of European fact-checking organizations surveyed by the EFCSN declare that they are willing to enter agreements with Bing, we hope those agreements materialize soon in an appropriate fact-checking program that complies with their signed commitments.

Integration and use of fact-checking & Access to information for fact-checkers

Because of the shortcomings explained above, the ClaimReview-based approach is not currently effective at the moment to reach full fact-checking coverage of all EU member states and official languages, as the Code of Practice envisions. This is seen clearly in the reported impact of the fact-checking integrations in Bing. During the reporting period of six months and in as many as 15 different countries, no ClaimReview tags (i.e. fact-check content) appeared on the first page of Bing search results at all.

Moreover, the difference between the number of tags during one month (included in the baseline report) and those during the six months of the current reporting period (1,090 to 4,184) reflects on the limited growth of a system that does not strengthen fact-checkers' capabilities in any way. Beyond that aspect, the information reported by Bing on the number of fact-checks that are marked on ClaimReview and thus available to be surfaced in rich snippets to users is inadequate: with only a global figure of available fact-checks, it is impossible to understand if users in different member states are having an equal chance of benefiting from the integration of fact-checking, particularly as smaller languages (and generally any other but English) have traditionally received much less resources from platforms.

WhatsApp

As an “interpersonal communication service”, WhatsApp is generally deemed not to be a very large online platform or search engine as defined by the Digital Services Act, and thus not subject to its various requirements including the obligation to report a number of average monthly users in the EU. As with other similar services, it remains to be determined if its public channels part might constitute a platform under the law. Nevertheless, WhatsApp is the only service to sign the Code of Practice on Disinformation’s specific commitment to “curb disinformation on messaging apps”, and is used by 93% of all users of private messaging in [Spain](#) and [Italy](#), or 86% in [Germany](#).

In this reporting period, WhatsApp reports partnerships with 13 fact-checking organizations in six European countries that have access to WhatsApp products (WhatsApp Business App and/or WhatsApp Business Platform). This is three fewer organizations and two fewer countries than reported in its baseline report. On their “Spread the Facts” grant, the amount of funding and the number of organizations that have benefited (three in two different countries) remains the same as in the baseline report.

“Forwarding labels, limits to messaging forwarding, and search the web tool” are the reported initiatives to limit the virality and empower users to fight disinformation. Nevertheless, data to assess the impact of the efforts are either outdated or non-existent. As EFCSN has already raised with Meta, it is important to provide that kind of information.

Finally, the ‘Channels’ functionality has been deployed globally during this reporting period although it has not been mentioned in Meta’s report. From evidence collected in similar unidirectional broadcast tools like Telegram (see page 23), we can foresee disinformation within this platform to diversify and evolve. We urge the company to address potential disinformation spread by the exploitation of these channels through initiatives adapted to its characteristics.

Non-signatories

Having taken into account that some services are extremely relevant to understand disinformation in Europe even though they have not signed or are no longer signatories of the Code of Practice, we have decided to include them in this analysis. That is the case of X/Twitter, that is also a designated very large online platform; and Telegram, which has reported a number of users that puts it well on track to be one if it keeps growing.

X/Twitter

X/Twitter decided to withdraw from the Code of Practice on Disinformation by the end of May 2023. Fears expressed by the EFCSN after their baseline report have materialized ever since: [less content moderation](#), [worse access to data](#), and [growing prevalence of disinformation](#). Inside or outside the Code, X/Twitter is not to be ignored as it is used by an [average of 112.2M active recipients](#) in the EU. For that, the EFCSN wants to share the assessment of X/Twitter's initiatives in the past months:

- In an EFCSN survey of European fact-checking organizations, not a single one considered that X takes the disinformation problem seriously.
- According to the same survey, X/Twitter has no agreements in place with independent fact-checking organizations and already-signed contracts between the company and fact-checking organizations never took effect after the change in ownership.
- The only initiative in place to address disinformation seems to be Community Notes. This community-driven model does not include any professional or methodological review and, by [assigning more weight](#) to users who are more “diligent about vetting details of notes”, is open to manipulation and has been exploited to even [display debunked disinformation](#) in the notes themselves.
- In its baseline report, X's commitment to provide access to relevant data was the only one that seemed on track thanks to its publicly accessible API, which used to stand out for granting public access to the platform's available data. Now, it has become a privilege that only a few can afford. By ending the free access to its API, the work of fact-checking organizations and researchers in the disinformation field has become increasingly difficult.



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Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms

Telegram

Telegram's number of active users in the EU stands at [39.5 million](#), growing closer to the threshold of 45 million users set by the act for a service to be considered a very large online platform and thus have additional obligations. The EFCSN already expressed in its reaction to the baseline reports that Telegram is a critical actor in the dissemination of disinformation in the EU and its absence from the Code is detrimental to its effectiveness.

Telegram users would certainly benefit from the platform implementing measures designed for private messaging apps under commitment 25. Additionally, the presence of representatives from the company in the permanent task-force of the Code of Practice would be convenient to discuss the role that Telegram's channels pose for the spread of disinformation and how to address it.

This type of functionality (also including the newly implemented WhatsApp Channels) has particular implications beyond virality, as these channels are very effective in the creation of communities that expand into other platforms and are [more likely to engage with and be impacted by disinformation content](#).

We encourage the task-force to keep working towards the integration of Telegram into the Code and the European Commission to revise the status of the service under the Digital Services Act (Recital 78, DSA).



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Afterword:

Taking the EU Code of Practice Seriously

As the implementation of the Digital Services Act enters its key stage, an analysis of the fulfillment of the anti-disinformation measures already committed voluntarily by the major platforms is more relevant than ever. This document, looking at the already agreed actions outlined in the Code of Practice on Disinformation regarding fact-checking, presents a tough reality: that most of the very large online platforms and search engines are still far from fulfilling their promises and do not have effective risk mitigation measures against disinformation in place, as DSA requires.

Even though the Code of Practice is still a self-regulatory, voluntary tool, the largest and most influential actors among the signatories are expected to be true to their word and fulfill their commitments. That was certainly the expectation from institutions, stakeholders, and the public when the Code was presented already 18 months ago. As those expectations have not been met yet in terms of actions or reporting, and as the Code of Practice must become an official DSA Code of Conduct, the urgency for the very large online platforms and search engines to step up their efforts increases.

The EFCSN continues to be committed to the Code of Practice on Disinformation as a tool that has the potential to be effective at improving the online experience of 450 million people in the EU and countless in other countries: to empower them to be less vulnerable to deception and manipulation, also through the work of over 50 European independent fact-checking organizations. Still, as the fact-checkers have said from the beginning, the Code will be judged on its results, on the beneficial changes it brings. So far, those results are still few and far between. Much was expected, much was committed, and much has yet to be delivered.