



Rialtas na hÉireann  
Government of Ireland

# National Counter Disinformation Strategy



Prepared by the Department of  
Tourism, Culture, Arts, Gaeltacht, Sport and Media  
[gov.ie](http://gov.ie)



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## Chair's Foreword

Disinformation is a complex global challenge that threatens human rights and democratic values. It deceives citizens, distorts evidence, and erodes trust. But this is not new.

Powerful actors have always weaponised disinformation and used it for financial gain, political influence, and social advancement.

What is new is how the attention economies of the online world are able to propel disinformation faster and further than ever before. Personal data and algorithmic systems can be used to exploit the valid fears and concerns of people, ultimately distorting public debate and amplifying social divisions.

What is also new is how information is created. Some information is produced by media that adhere to professional and ethical standards, and some information is produced by individuals or media that do not. The difference is not always well understood, making it harder to judge the reliability or accuracy of information, and new AI technologies can make it even easier to create inauthentic or manipulative content. This situation is made worse by targeted attacks on journalists and researchers who investigate disinformation.

We are all vulnerable to disinformation depending on our personal circumstances, existing beliefs, levels of critical thinking and our awareness of our own biases. Disinformation can be a matter of debate because some issues are fundamentally matters of ideology, opinion and culture and it is not always possible to establish clear-cut facts. In a free society, people are entitled to express and believe things

that are contrary to existing evidence, to question received opinion, or offend others, within legal boundaries.

Across the EU, disinformation is understood as 'legal, but harmful' content and States can mitigate that harm in different ways.

The National Counter Disinformation Working Group was established in response to a Recommendation of the Future of Media Commission report, which called for the development of a National Counter Disinformation Strategy to help address the harmful effects of disinformation.

Disinformation has a corrosive influence across all spheres of life from public health to trust in democratic institutions. As such, countering disinformation should be viewed as a cross-policy issue that requires a coordinated approach, grounded in the protection of fundamental human rights. This was recognised in the membership of the Working Group, which comprised relevant Departments and agencies, the Irish EDMO Hub, industry stakeholders, news organisations, civil society groups and Irish fact-checkers and disinformation researchers.

This Strategy was developed by consensus and agreement. The Working Group heard from a range of experts during its deliberations and established sub-groups, comprising outside experts and members of the Group, to examine key issues. The expert contribution and the input of stakeholders from outside the Group was essential to the Strategy development process, as was consultation with the public.



The Strategy deliberately does not make recommendations. Instead, it sets out 9 overarching commitments and 36 specific, achievable actions. Each of these actions has been designed in conjunction with their owners who will take them forward.

Disinformation is a dynamic and ever-evolving problem, and there is no quick fix or comprehensive solution to it. As technology evolves and society develops, policy and legislation will also grow and change, and new actions and approaches will be required.

This Strategy is designed to encourage cross-sector cooperation, collaboration and coordination on an ongoing basis and will need regular monitoring and updating so that it can respond to global, national and local developments. The work of the Oversight Group, which will be established to oversee implementation, will be fundamental to the success of coordinating national efforts to counter disinformation.

The eradication of disinformation is not the goal of this Strategy. The problem will persist and evolve. Rather, success should be measured by the ability of multiple bodies to communicate, collaborate and respond effectively to produce the expertise, insights and support necessary to protect the public interest.

I want to thank all members of the Working Group for their engagement in this process, and the members of the Sub-Groups and individual experts for sharing their experience, knowledge and insights as the complexity of the problem was examined in detail. I also wish to thank all the members of the public who contributed to the discussion via the public consultation.

In particular, I would like to thank the secretariat who worked hard to produce a strong inclusive framework against which good progress can be made in the challenging fight against disinformation now, and into the future.

Finally, this Strategy is not about anyone, including Government, deciding what is or is not disinformation. This Strategy is actually about allowing people in Ireland exercise all their rights - the right to freedom of expression alongside the right to privacy and the right to freedom from discrimination. No one right or set of rights is absolute or trumps other rights - a functioning democracy must balance these rights. Disinformation disrupts a functioning democracy by sowing artificial divisions. This Strategy will help us all to deal with its damaging effects, strengthen our society and make Ireland a better, safer country.

**Martina Chapman**

*Independent Media Consultant &  
National Coordinator of Media Literacy  
Ireland*

April 2025



## Executive Summary

This Strategy fulfils a recommendation of the Future of Media Commission (FoMC), which recognised that disinformation is a growing challenge.

The Strategy explores the challenge of disinformation in Ireland, its harmful effects on society and its complexity as a policy issue. It seeks to identify how the challenge of countering disinformation may be met. This Strategy is not about deciding on individual instances of disinformation but instead focusses on those harms arising from it. The process of strategy development is then summarised, including how the working group was independently chaired, multi-stakeholder and operated by consensus.

The Strategy sets out how the Group sought inputs from experts, including as part of three subgroups which examined and reported on existing countermeasures, the current and emerging regulatory environment and the support of free independent high-quality journalism and the protection of public interest information. The Working Group also arranged a public consultation and an in-person stakeholder consultation forum to help inform its work and get the views of people in Ireland.

It takes a rights-based approach and is built around five key principles:

- Counter Disinformation, and Protect Freedom of Expression using a Rights-Based Approach
- Counter Disinformation by Building Resilience and Trust at Individual and Societal Levels

- Counter Disinformation through Increased Cooperation, Collaboration and Coordination
- Counter Disinformation through Corporate Accountability and Regulatory Enforcement
- Counter Disinformation through Evidence-Based Countermeasures and Interventions

The Strategy seeks to set the context for its work and identify key considerations. Key pieces of national and EU legislation and regulation are described along with relevant national and international networks and structures. The rise of Foreign Information Manipulation and Interference (FIMI) and the role played by the amplification of harmful online content are analysed. Artificial Intelligence (AI) and electoral integrity are addressed, along with the role of public communications. Finally, media literacy, the changing media landscape and the importance of access to data for researchers are dealt with.

In framing the Strategy around the 5 principles, the Working Group agreed to 9 commitments together with 36 actions designed to make the principles a reality.

In summary, there is a commitment to build knowledge of effective counter disinformation strategies through identifying trends and gaps and supporting collaborative research. The importance of public communications and trust in public institutions<sup>1</sup> is acknowledged as well as the commitment to promote trust in the media and support media pluralism

<sup>1</sup> <https://www.edelman.com/news-awards/2025-edelman-trust-barometer-reveals-high-level-grievance>



and media freedom, including through implementation of the European Media Freedom Act (EMFA) and awareness raising on human rights, particularly for children and young people.

The need to adopt a lifelong approach to empowering all citizens with media literacy is set out in the Strategy, with training, awareness and public library and literacy strategies identified as actions. The Strategy highlights the importance of fact-checking and pre-bunking expertise in Irish media with actions to support its growth and identify funding.

The vital role of effective implementation of legislation and regulation is clearly acknowledged with actions relating to the Digital Services Act (DSA) and the General Data Protection Regulation (GDPR) described.

The development of a coordinated approach to effectively counter FIMI is identified as an action along with the need to support international initiatives to counter disinformation and promote information integrity, consistent with human rights and freedom of expression.

Finally, the Strategy commits to the establishment of a counter disinformation oversight group to coordinate, implement and monitor the progress of these commitments, and their related actions.

The Strategy's commitments, actions and owners are set out in table form in Appendix 1, while more detail on how the Working Group developed the Strategy, including membership details, can be found in Appendix 2.



# Abbreviations

**AI** - Artificial Intelligence

**DCEDIY** - Department of Children, Equality, Disability, Integration and Youth

**DFA** - Department of Foreign Affairs

**DFHERIS** - Department of Further and Higher Education, Research, Innovation and Science

**DHLGH** - Department of Housing, Local Government and Heritage

**DoJ** - Department of Justice

**DPENDPR** - Department of Public Expenditure, NDP Delivery and Reform

**DSA** - Digital Services Act

**DSC** - Digital Services Coordinator. The national coordinator for the implementation of the DSA in each Member State

**DTCAGSM** - Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

**EBDS** - European Board for Digital Services

**EDAP** - European Democracy Action Plan

**EDMO** - European Digital Media Observatory

**EEAS** - European External Action Service

**EMFA** - European Media Freedom Act

**ERA** - Electoral Reform Act

**ERGA** - European Regulators Group for Audiovisual Media Services

**EU** - European Union

**FIMI** - Foreign Information Manipulation and Interference

**FoMC** - Future of Media Commission

**GDPR** - General Data Protection Regulation. This regulates information privacy in the EU and the European Economic Area (EEA)

**GIS** - Government Information Service (within the Department of the Taoiseach)





**LGMA** - Local Government Management Agency

**MLI** - Media Literacy Ireland

**NCSC** - National Cyber Security Centre

**NUJ** - National Union of Journalists

**OECD** - Organisation for Economic Co-operation and Development

**OGCIO** - Office of the Government Chief Information Officer

**OSMR** - Online Safety and Media Regulation. Usually refers to Ireland's Online Safety and Media Regulation Act 2022, which established Coimisiún na Meán as Ireland's new national media regulator

**TCOR** - Terrorist Content Online Regulation

**UN** - United Nations

**VLOPs** - Very large online platforms

**VLOSEs** - Very large online search engines

**VSPS** - Video-sharing platform services



# Introduction

## The Challenge of Disinformation in Ireland

The challenge of disinformation is complex. Although disinformation has existed in some form throughout history, it is a growing phenomenon, both in Ireland<sup>2</sup> and internationally.<sup>3</sup> The rise of digital media has revolutionised how content is created, distributed, and consumed. While increased availability of diverse quality information has the potential to make democratic processes more participatory and inclusive, manipulative behaviour used to spread disinformation online can make it increasingly difficult for individuals to judge what is and is not accurate and reliable, and who to trust.

Disinformation can be defined, per the European Democracy Action Plan (EDAP), as “false or misleading content that is spread with an intention to deceive or secure economic or political gain and which may cause public harm.”<sup>4</sup> Disinformation does not, however, include misleading advertising, reporting errors, satire and parody, or clearly identified partisan news and commentary. This definition is without prejudice to binding legal obligations, self-regulatory advertising codes and standards regarding misleading advertising.

That erosion of trust is potentially one of the most challenging and damaging aspects of disinformation. It threatens human rights and democratic values. It exploits economic or social inequalities

and seeks to prey on the fears and concerns of individuals. Democracies rely on free, open and accurate information to function. If the integrity of the information that people rely on to make informed decisions is damaged, our society and the way we engage in public debate is also damaged.

The sources of disinformation vary greatly and can include states and non-state foreign actors. There is particular concern internationally regarding the threat posed by FIMI.<sup>5</sup>

Similarly, the motivations for the creation and distribution of disinformation vary significantly, as well as the methods, duration and target audiences for disinformation. Common disinformation tactics include targeting groups in society to increase division, targeting marginalised groups, or promoting disinformation campaigns.

Disinformation is a global problem with potentially significant implications at national and local levels, as a result there is no one size fits all solution.

## Meeting the Challenge

Ireland's FoMC considered how media should serve Irish society. Its report (published in July 2022) made 50 recommendations, including that a “National Counter Disinformation Strategy should be developed to coordinate national efforts to counter this complex issue.”<sup>6</sup> The report also stated, “An effective response to

<sup>2</sup> <https://www.isdglobal.org/isd-publications/uisce-faoi-thalamh-summary-report/>

<sup>3</sup> <https://edmo.eu/resources/edmo-publications/>

<sup>4</sup> <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation>

<sup>5</sup> [https://www.eeas.europa.eu/eeas/beyond-disinformation-what-fimi\\_en](https://www.eeas.europa.eu/eeas/beyond-disinformation-what-fimi_en)

<sup>6</sup> <https://www.gov.ie/en/publication/ccae8-report-of-the-future-of-media-commission/>



disinformation should not rely solely on regulation, and should involve a wide spectrum of Irish society in dialogue with Ireland's digital industry."

Therefore, this Strategy aims to:

- support the building of public knowledge
- build resilience to disinformation
- support the effective implementation of existing legislation and regulations
- identify and coordinate efforts to counter disinformation across a range of policy areas
- bring together a broad range of disinformation counter measures to ensure cross-sector coordination, collaboration and cooperation.

The Strategy does not aim to judge whether or not individual pieces of content or information should be categorised as disinformation or true or false. The focus is on the potential of disinformation to damage the integrity of democratic processes, social cohesion or public health or to seek to incite hatred against certain social groups because it undermines people's ability to make informed decisions.

Therefore, the Strategy sets out 9 commitments supported by 36 actions, aimed at empowering people and supporting the provision of public interest information, fact-checking services and research into disinformation. In doing so, the broader social issues and inequalities that make people vulnerable to disinformation, including the erosion of trust in experts and institutions, must be considered. The role of the European regulatory framework, in particular the DSA, cannot be underestimated, so long-term oversight of the effective

implementation of this framework is important.

**Misinformation:** False or misleading content shared without harmful intent though the effects can be still harmful, e.g. when people share false information with friends and family in good faith. (EDAP)

**Disinformation:** False or misleading content spread with an intention to deceive or secure economic or political gain and which may cause public harm. (EDAP)

### **Information Integrity:**

Information Integrity is a key part of countering disinformation. The UN recommendations state that "Promoting information integrity involves empowering people to exercise their right to seek, receive and impart information and ideas of all kinds and to hold opinions without interference. In an increasingly complex digital information environment, this means enabling individuals to navigate information spaces safely with privacy and freedom." (UN Global Principles for Information Integrity)

### **Foreign Information Manipulation and Interference (FIMI):**

This is a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character, conducted in an intentional and coordinated manner. Actors can be state or non-state, including their proxies inside and outside of their own territory. (EEAS)



## How the Strategy was Developed

In line with the FoMC recommendation, an independently chaired multi-stakeholder Working Group was established. It comprised representatives of a range of organisations, including government departments and agencies, independent regulatory bodies, civil society organisations, academia,

research and industry. The Working Group heard from experts on different aspects of disinformation and examined a number of current key issues (existing countermeasures, regulatory landscape and supporting high quality public interest information) in more detail through subgroups. The Group consulted with the public and held a stakeholder consultation forum. Details of this, including background papers and reports are in Appendix 2.

# Principles

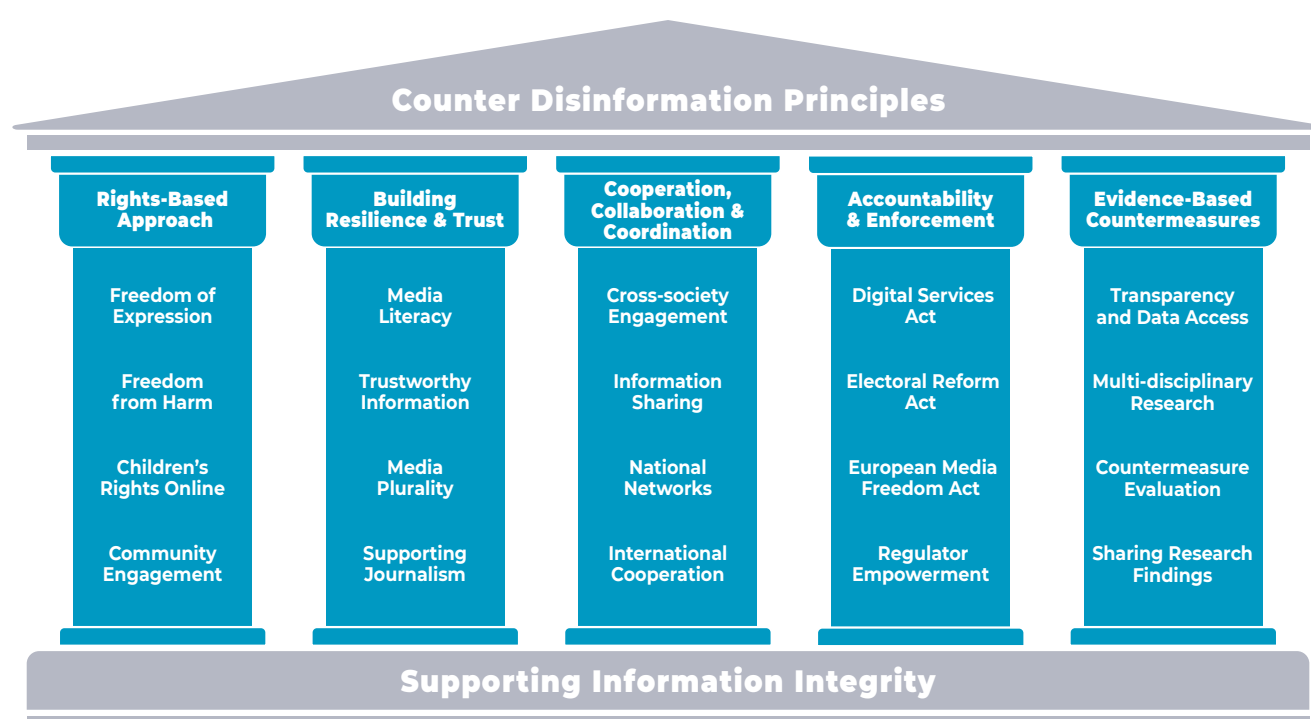




# Principles

A principles-based approach was adopted by the Working Group, in line with evolving international approaches like the United Nations Educational, Scientific and Cultural Organisation (UNESCO)<sup>7</sup> guidelines for the governance of digital platforms and safeguarding freedom of expression and access to information and the Santa Clara<sup>8</sup> principles.

The five principles underpinning this Strategy are interdependent and act as a framework. Appendix 1 sets out which commitments and actions support which principle(s).



**Figure 1: Principles Overview**

<sup>7</sup> <https://www.unesco.org/en/internet-trust/guidelines>

<sup>8</sup> <https://santaclaraprinciples.org/>



## Principle A: Counter Disinformation, and Protect Freedom of Expression using a Rights-Based Approach

Measures to counter disinformation must ensure a human rights-based approach, including reaffirming the right to freedom of opinion and expression. All members of society should be empowered to seek, receive and impart information and ideas, while acknowledging that the right to freedom of expression must be balanced with rights such as privacy, protection from discrimination and data protection under the GDPR. This is also in line with Article 11 of the European Union's (EU) Charter of Fundamental Rights in relation to access to information and freedom of expression.<sup>9</sup>

Disinformation can be used by bad actors to violate and abuse these rights, and can impact people's ability to make free and informed choices. However, measures taken to counter disinformation may themselves limit freedom of expression and media freedom, and should therefore comply with the principles of legality, necessity and proportionality.

Additionally, the United Nations (UN) Convention on the Rights of the Child General Comment No. 25 recognises the unique opportunity for children to realise the right to access information provided by the digital environment but notes that the digital environment can include, among other harmful content, "false narratives, misinformation and disinformation." It specifies that "States parties should protect children from harmful and untrustworthy content and ensure that relevant businesses and other providers of digital content develop and implement guidelines to enable children to safely access diverse content, recognizing children's rights to information and freedom of expression, while protecting them from such harmful material in accordance with their rights and evolving capacities."<sup>10</sup>

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<sup>9</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12012P%2FTXT>

<sup>10</sup> <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>





## Principle B: Counter Disinformation by Building Resilience and Trust at Individual and Societal Levels

It is important to raise awareness and encourage use of supports that enable a trustworthy information environment and to educate and empower users, including:

- Encouraging a strong, independent media sector that provides high-quality journalism as an important bulwark against misinformation.
- Promoting media literacy and core critical skills as an important mechanism of countering disinformation. The importance of media literacy has been recognised recently in the EDAP, the Media and Audiovisual Action Plan, the Digital Education Action Plan, and the Code of Practice on Disinformation, which will be converted to a Code of Conduct on 1 July 2025<sup>11</sup>.
- Ensuring public access to trustworthy and reliable public-interest information, including via libraries.
- Ensuring children's access to trustworthy and reliable information, and that they have access to a diversity of information including information held by libraries and public bodies about culture, sports, the arts, health, civil and political affairs and children's rights.
- Equipping people with the skills and knowledge about digital, media, and information literacy to empower them to make informed choices about the media they consume, create and disseminate in a critical, creative and responsible manner, including highlighting how bad actors may use technology to spread disinformation.
- Promoting diversity and plurality of information and access to high quality ethical journalism by regulating and supporting the media sector, highlighting the system of regulation operated by the Press Council of Ireland and Office of the Press Ombudsman for the print and online journalism sectors.

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<sup>11</sup> <https://digital-strategy.ec.europa.eu/en/library/code-conduct-disinformation>





## **Principle C: Counter Disinformation through Increased Cooperation, Collaboration and Coordination**

Disinformation cuts across multiple spheres of society and is an issue which, given its complexity, requires a coordinated international response. A whole of Government approach to countering disinformation similarly cuts across multiple and diverse departments and institutions. An effective, long-term, sustainable strategy for countering disinformation will require broad stakeholder engagement, a shared commitment to human rights, cooperation and alignment of existing countermeasures, both nationally and internationally.

At national level, stakeholders include Government departments/agencies and public authorities, regulators, researchers, educators, industry/online platforms, advertisers, journalists, media groups, children and young people, community and voluntary groups and trusted third party intermediaries.

The Government's Consultative Forum on International Security Policy<sup>12</sup> highlighted how important cooperation is in the effort to forge effective regulation. At international level, it will require collaboration with other EU Member States, in multilateral fora including the UN, the Council of Europe and the Organisation for Economic Co-operation and Development (OECD), and with other countries through fora such as the Freedom Online Coalition and the European Centre of Excellence for Countering Hybrid Threats and supporting efforts in partner countries.

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<sup>12</sup> <https://www.gov.ie/en/publication/36bd1-consultative-forum-chairs-report/>



## Principle D: Counter Disinformation through Corporate Accountability and Regulatory Enforcement

Digital technologies may be used by bad actors to spread disinformation at speed. Measures to counter this, and the spread of illegal content, should uphold the lawful use of personal data and ethical business models. Coimisiún na Meán, as Ireland's independent online safety and media regulator is charged with implementing the Online Safety and Media Regulation (OSMR) Act, the DSA (as Digital Services Coordinator (DSC)) and Terrorist Content Online Regulation (TCOR). In doing so, An Coimisiún works with key European regulatory networks like the European Regulators Group for Audiovisual Media Services (ERGA), the European Board for Digital Services (EBDS), as well as other regulators in related sectors, which play an important role in implementing these laws.

Measures should also:

- Consider ways to disrupt the disinformation business model, for example, by promoting high quality news media and address the use of online advertising systems by bad actors to spread disinformation.
- Ensure platforms fulfil their legal obligations, including those in the GDPR, DSA, and Digital Markets Act (DMA).
- Ensure regulatory coherence and implementation by adequately resourcing independent regulatory authorities to supervise and ensure compliance.
- Ensure implementation of the DSA will empower civil society and research organisations to access data to research digital technologies and facilitate measures outlined in Principle E.



## Principle E: Counter Disinformation through Evidence-Based Countermeasures and Interventions

The disinformation environment is constantly evolving, and countermeasures should be based on robust research evidence. Key stakeholders need access to a well-maintained evidence base to provide in-depth awareness of disinformation trends i.e. bad actors, narratives and tactics across different platforms as well as international developments. Evidence could take the form of, for example:

- Research insights e.g. research on susceptibility, current and developing disinformation narratives, changing tactics, including age-specific research, to include children and young people.
- Multi-disciplinary academic research, including quantitative and qualitative research, from a number of disciplines relevant to the area.
- Evaluation, risk and impact assessments including impact assessments on the rights of children and other vulnerable people.
- Sector expertise (fact-checkers, disinformation experts, communications experts, regulators, civil society and other actors working directly with affected communities) that would enable effective information sharing between experts and platforms.
- Publications and notifications by international partners and bodies, such as the European External Action Service (EEAS) and European Centre of Excellence for Countering Hybrid Threats.
- Insights from regulators which supervise relevant online platforms.
- Access to appropriate datasets from digital service providers in line with the legal framework set out by the DSA. Under Article 40 of the DSA, vetted researchers<sup>13</sup> will be able to request data from very large online platforms (VLOPs) and video-sharing platform services (VLOSEs) to conduct research on systemic risks in the EU when certain conditions are met.

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<sup>13</sup> Vetted researchers are researchers who have been certified by the DSC and have met the required conditions.  
[https://algorithmic-transparency.ec.europa.eu/news/faqs-dsa-data-access-researchers-2023-12-13\\_en](https://algorithmic-transparency.ec.europa.eu/news/faqs-dsa-data-access-researchers-2023-12-13_en)

# Considerations





## Considerations

This section summarises the main issues that the Working Group considered in arriving at the set of five principles and accompanying commitments and actions.

### Legislation and Regulation

The legislative and regulatory background is an important framework around which counter disinformation measures can be built.

The DSA aims to contribute to the proper functioning of the EU's internal market for online intermediary services by setting out harmonised rules for a safe, predictable and trusted online environment that facilitates innovation, and in which fundamental rights enshrined in the EU Charter of Fundamental Rights, including the principle of consumer protection and freedom of expression, are effectively protected.

Coimisiún na Meán, as Ireland's DSC, is the competent authority responsible for the supervision and enforcement of this EU regulation, alongside the European Commission. The Competition and Consumer Protection Commission is also a competent authority for the DSA, with responsibility for DSA articles related to online marketplaces.

The DSA complements and works in tandem with other key pieces of legislation within the EU regulatory framework, such as:

- The EU GDPR (2018), which aims to enhance individuals' control and rights over their personal information and simplify regulations for international business. It requires

organisations or companies in possession of personal data to take adequate steps to ensure this data is processed in a lawful, fair and transparent manner and transferred securely, with a view to preserving the privacy rights of the data subject.

- The EU Audiovisual Media Services Directive (AVMSD) (2018), which aims to govern EU-wide coordination of national legislation on all audiovisual media and is implemented in Ireland through the OSMR Act 2022 and online safety, video-on-demand and broadcasting and media service codes and rules.
- EMFA will establish a common framework for media services in the internal market, introduce measures to protect media pluralism (Ireland currently has legislative protections through the media mergers regime under Part 3A of the Competition Act 2002) and independence in the EU and establish a new European Board for Media Services comprised of national media regulators. Amongst EMFA's provisions are important safeguards for the independence of public service media and of editorial independence more widely, and the protection of journalists and journalistic sources. EMFA also seeks to provide enhanced protections on VLOPs for content provided by editorially independent media services adhering to established regulatory standards. EMFA includes corresponding obligations for media, for example, a requirement for transparency of audience measurement and for all media services to publish information on their ownership, and for this



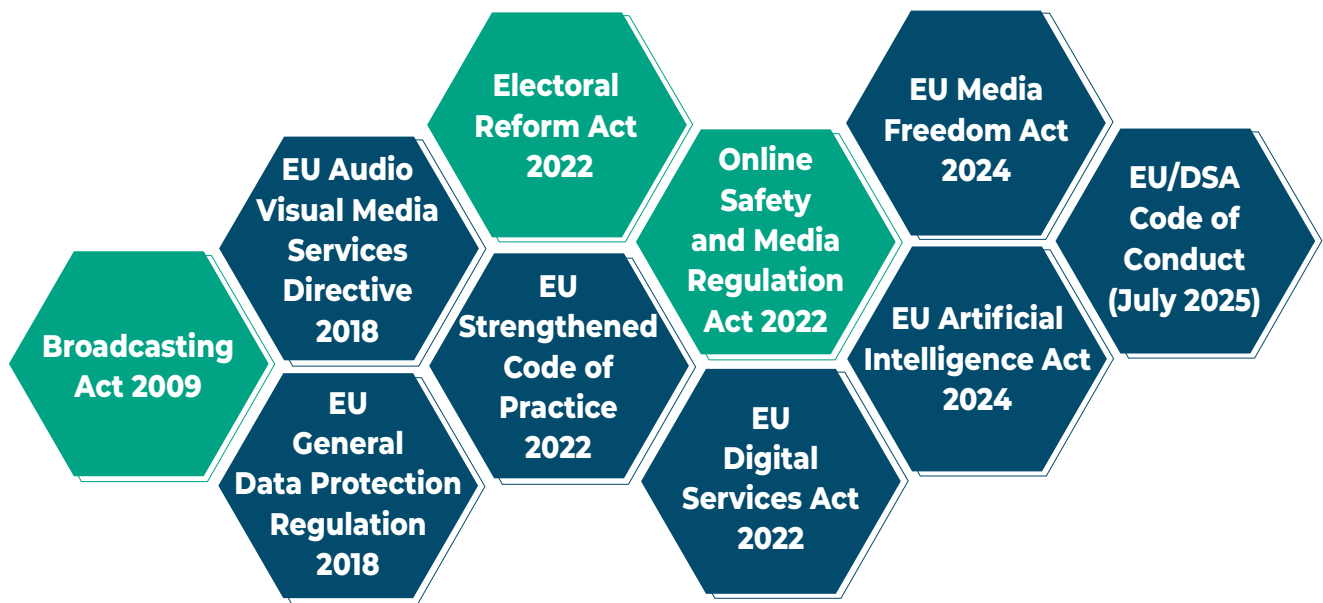
information to be compiled in national databases.

- Given the importance of the integrity of elections, the Government is committed to putting in place a robust regime to provide for transparency in political advertising and to protect our elections against malign or hidden influence, including foreign interference. Provisions to protect elections from electoral disinformation are set out in Part 5 of the Electoral Reform Act (ERA) 2022. Part 5 has not been commenced pending the resolution of a number of issues that have been raised by the European Commission and the technology sector. In light of these issues and having regard to recent developments at EU and national level, the Department of Housing, Local Government and Heritage prepared a General Scheme of the Electoral Reform (Amendment) Bill which proposes to amend Part 5 to focus on “electoral process disinformation”. The General Scheme was approved by Government on 25 June 2024 and, to prevent the creation of any potential barriers to trade in the internal market, was notified to the European Commission under the Technical Regulations Information System (TRIS) notification procedure. The Department will continue to work with the Office of the Attorney General and the European Commission to ensure that the provisions of the Electoral Reform (Amendment) Bill 2024 will align with EU law in respect of digital services. In addition, Part 4 of the ERA 2022, which deals with political advertising, will also be brought into alignment with the EU Regulation on the Transparency and Targeting of Political Advertising (2024/900) in
- advance of its full entry into force on 10 October 2025. CR 2024/900 sets out rules regarding the transparency and targeting of political advertising, with a view to countering information manipulation and FIMI during elections or referenda.
- The EU Artificial Intelligence (AI) Act strives to balance the risks with the rewards of AI systems. This Act entered into force on 2 August 2024, and will apply in a phased manner over the period to August 2027. The AI Act sets out the rules for the advancement of responsible practices in the development and use of AI systems, including, for example, the management of risks specifically created by AI applications and the prohibition of AI practices that pose unacceptable risks.
- The 2022 Strengthened Code of Practice on Disinformation, which built on the 2018 Code of Practice on Disinformation, is a voluntary framework to combat disinformation. The Code was signed by 34 stakeholders, including online platforms, trade associations, online advertising entities, fact-checkers, civil society and research organisations, as well as tech companies providing relevant tools to fight disinformation. The Code asks platforms to adhere to a range of commitments relating to: de-monetisation of disinformation; transparency of political advertising; measures to reduce manipulative behaviour; transparency of policies, tools and procedures being used to combat disinformation; a strengthened framework for monitoring policy enforcement; empowerment of; and to demonstrate engagement with researchers and fact checkers;



and cooperation with and other platforms. Following assessment by the European Commission and the EBDS, it was announced on 13 February 2025 that the Code of Practice on Disinformation will be converted into a Code of Conduct,

tying it to the legal framework of the DSA. The conversion will come into effect on 1 July 2025, meaning that commitments under the Code of Conduct will be auditable from that date onwards.



**Figure 2: Disinformation relevant legislation and policy overview**





## International Approaches

There is a range of national and international platforms and mechanisms for cooperation in place. A non-exhaustive list of national and international organisations working in this area is set out below:

- Alliance4Europe<sup>14</sup>
- Dublin City University Institute for Future Media, Democracy and Society (DCU FuJo Institute)<sup>15</sup>
- EU Knowledge Hub on Prevention of Radicalisation<sup>16</sup>
- European Board for Digital Services, under the DSA
- European Centre of Excellence for Countering Hybrid Threats<sup>17</sup>
- European Commission
- European Digital Media Observatory<sup>18</sup>
- European Media and Information Fund<sup>19</sup>
- European Platform of Regulatory Authorities<sup>20</sup>
- European Regulators Group for Audio-Visual Media Services<sup>21</sup>
- European External Action Service
- Forum on Information and Democracy<sup>22</sup>
- Journalism Trust Initiative<sup>23</sup>
- Media Literacy Ireland<sup>24</sup>
- OECD Mis & Disinformation Hub<sup>25</sup>
- Open Society Institute<sup>26</sup>
- SMIDGE (Social Media Narratives: Addressing Extremism in Middle-Age)<sup>27</sup>
- The UN Committee on the Rights of the Child<sup>28</sup>

Furthermore the OECD adopted the Recommendation on Information Integrity in December 2024.<sup>29</sup> The Recommendation seeks to establish

<sup>14</sup> <https://alliance4europe.eu/>

<sup>15</sup> <https://www.dcu.ie/communications/fujo-institute-future-media-democracy-and-society>

<sup>16</sup> [https://home-affairs.ec.europa.eu/networks/eu-knowledge-hub-prevention-radicalisation\\_en](https://home-affairs.ec.europa.eu/networks/eu-knowledge-hub-prevention-radicalisation_en)

<sup>17</sup> <https://www.hybridcoe.fi/>

<sup>18</sup> <https://edmo.eu/>

<sup>19</sup> <https://gulbenkian.pt/emifund/>

<sup>20</sup> <https://www.epra.org/>

<sup>21</sup> <https://erga-online.eu/>

<sup>22</sup> <https://informationdemocracy.org/>

<sup>23</sup> <https://www.journalismtrustinitiative.org/>

<sup>24</sup> <https://www.medialiteracyireland.ie/>

<sup>25</sup> <https://www.oecd.org/en/topics/sub-issues/disinformation-and-misinformation.html>

<sup>26</sup> <https://osis.bg/wp-content/uploads/2023/06/MLI-report-in-English-22.06.pdf>

<sup>27</sup> <https://www.smidgeproject.eu/about-smidge>

<sup>28</sup> General Comment No. 25 (2021) of the United Nations Committee on the Rights of the Child references how disinformation can encourage children into unlawful or harmful activities, and provides guidance on relevant legislative, policy and other measures.  
<https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

<sup>29</sup> <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0505>





a wide-ranging and applicable policy framework for adherents - including Ireland - to address threats posed by information manipulation and to put in place measures that promote information integrity in line with the universal human rights of freedom of opinion and expression. Countries have different approaches to countering disinformation because they face different types and levels of threats (see box below).

**France:** VIGINUM agency was established by the French government in July 2021. VIGINUM is a national agency tasked with the detection of online instances of FIMI. Notably, in February 2024, the VIGINUM report 'Portal Kombat' exposed Russia's network of 193 "information portals" used to distribute pro-Russian content in the West.

**Lithuania:** Lithuania has implemented an intricate and formal 'Information Integrity Coordination Model', which formally outlines clear information flows and responsibilities of numerous government agencies, in terms of efforts to counter disinformation. The Information Integrity Coordination Model includes a 24/7 Situation Centre, an Analysis Bureau, a Planning Bureau and a Strategic Communications Unit, as well as ministries, public institutions and non-government partners.

**Netherlands:** There is a two-track government-wide strategy to counter disinformation:

- Track 1: Strengthening free and open public debate

- › Retaining the pluralistic media landscape
- › Strengthening citizens' resilience
- › Stimulate and use public alternatives to online platforms
- Track 2: Reducing the influence of disinformation by four key factors:
  - › Content
  - › Producer or spreader
  - › Responsibilities of traditional and social media
  - › Knowledge development

Ireland actively engages with disinformation-related processes taking place at the UN, including as part of the Secretary General's "Our Common Agenda". One such process is the "Pact for the Future", which includes the Global Digital Compact (GDC). The GDC aims to identify principles, objectives and actions for advancing an open, free, secure and human-centred digital future, anchored in human rights and that enables the attainment of the Sustainable Development Goals (SDGs). Also as part of the Our Common Agenda process, the UN has launched "Global Principles for Information Integrity"<sup>30</sup> to address some of the challenges around misinformation, disinformation and information integrity on digital platforms. It is hoped that the Principles will provide guiding action to Member States and other stakeholders to strengthen information integrity.

There is a growing body of evidence regarding the negative impact of disinformation and hate speech in the Global South. Ireland has an important role to play in supporting

<sup>30</sup> <https://www.un.org/sites/un2.un.org/files/un-global-principles-for-information-integrity-en.pdf>



international efforts to effectively counter disinformation and to support information integrity in multilateral fora, such as the UN, and by supporting relevant initiatives in partner countries. This work is consistent with our foreign policy to promote our values and advance our interests overseas.

## Foreign Information Manipulation and Interference (FIMI)

FIMI is a growing political and security challenge across the EU and affects all Member States, including Ireland. The EEAS has defined FIMI as a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character and is conducted in an intentional and coordinated manner both independently or as part of a broader hybrid campaign.

Since March 2022, there has been a sharp increase across Europe of malicious FIMI campaigns by state and non-state actors. The Russian state, their proxies and aligned groups are responsible for much of this activity. As the EEAS has noted, other foreign actors are also engaging in the intentional manipulation of public conversations.<sup>31</sup>

The EU has introduced a suite of relevant measures since 2022, including a new EU FIMI Toolbox, agreed in 2023. Work to counter FIMI here in Ireland will require strong coordination by relevant national actors, working in close

cooperation with international partners.

The EU has included a number of media entities as part of restrictive measures in order to prohibit continuous and concerted propaganda actions in support of military aggression against Ukraine by the Russian Federation, targeted at civil society in the EU and neighbouring countries.<sup>32</sup> The EU has also introduced restrictive measures targeted at Russia's destabilising actions, including disinformation and the coordinated use of FIMI, within the EU and other countries.<sup>33</sup>

## Amplification of Disinformation

A key challenge in tackling disinformation is addressing how bad actors may use online technologies to amplify illegal, harmful, false and/or misleading content online.<sup>34</sup> Reducing the amplification of such content helps counteract the reach and impact of disinformation while not affecting freedom of expression to the same degree as attempting to remove it altogether.

The misuse of sensitive personal data without appropriate regard to the GDPR can serve to amplify disinformation by bad actors. In addition to the GDPR conditions for any personal data processing, the DSA prohibits that providers of online platforms target advertisements using user profiling that relies on the special categories of data specified in the GDPR (Article 9(1)). Moreover, any use of profiling to present

<sup>31</sup> 2nd EEAS Report on Foreign Information Manipulation and Interference Threats (January 2024), [https://www.eeas.europa.eu/sites/default/files/documents/2024/EEAS-2nd-Report%20on%20FIMI%20Threats-January-2024\\_0.pdf](https://www.eeas.europa.eu/sites/default/files/documents/2024/EEAS-2nd-Report%20on%20FIMI%20Threats-January-2024_0.pdf)

<sup>32</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20240913>

<sup>33</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202402642](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202402642)

<sup>34</sup> <https://www.iccl.ie/>



targeted advertisements is prohibited, when the providers are aware with reasonable certainty that the user is a minor.

Article 38 of the DSA requires VLOPs and Very Large Online Search Engines (VLOSEs) to give users the choice of a non-profiling option for each of their systems. Furthermore, Articles 34 and 35 oblige VLOPs to conduct systemic risk assessments and put in place reasonable, proportionate and effective mitigation measures. Such risk assessments should analyse whether they are influenced by intentional manipulation of the service including by inauthentic use or automated exploitation of the service along with the amplification and potentially rapid and wide dissemination of illegal content and of information that is incompatible with their terms and conditions. Mitigation measures must be tailored to the specific risks identified, with particular consideration to the impacts of such measures on fundamental rights. The European Commission, in cooperation with Digital Service Coordinators, may issue guidance on measures to mitigate systemic risk.

## Electoral Integrity

Concerns over the impact of disinformation on elections and democracy have grown in recent years with work being undertaken by the EU,<sup>35</sup> OECD and individual countries to mitigate what has been described as one of 'the biggest

threats to democracy in the 21st century.'<sup>36</sup> Research conducted by the International Institute for Democracy and Electoral Assistance (International IDEA) has found that cases of disinformation against elections (processes, organizations, individuals supporting the management of the processes) were identified in 92% of the 53 election-hosting countries across the globe between 2016 and 2021.<sup>37</sup>

A study by the European Digital Media Observatory (EDMO) of eleven elections in ten European countries in 2023 found 'widespread disinformation during the election campaigns in all the considered countries, particularly about the electoral process, with false narratives often aimed at delegitimizing elections through unfounded claims of voter fraud, foreign influences and unfair practices.'<sup>38</sup> While neither of these studies focused on Ireland, there is no reason to believe Ireland would be immune from similar activity.

In 2025 - and for the second year in a row - the World Economic Forum noted in its Global Risks Report that the most severe global risk anticipated over the next two years is disinformation and misinformation - specifically, in the context of foreign and domestic actors misleading voters in the lead-up to elections.<sup>39</sup>

An Coimisiún Toghcháin (The Electoral Commission) has a range of electoral functions including promoting public awareness and participation in electoral events and democracy

<sup>35</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AC\\_202403014](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AC_202403014)

<sup>36</sup> <https://www.oecd-ilibrary.org/docserver/af1def37-enpdf?expires=1721813538&id=id&accname=guest&checksum=45E0BD35D588C97841ECA69F78E99E59>

<sup>37</sup> <https://www.idea.int/theme/information-communication-and-technology-electoral-processes/information-environment-around-elections>

<sup>38</sup> [https://edmo.eu/wp-content/uploads/2024/03/EDMO\\_TFEU2024-Narratives\\_Report-National\\_Elections-2nd-edition-1.pdf](https://edmo.eu/wp-content/uploads/2024/03/EDMO_TFEU2024-Narratives_Report-National_Elections-2nd-edition-1.pdf)

<sup>39</sup> [https://reports.weforum.org/docs/WEF\\_Global\\_Risks\\_Report\\_2025.pdf](https://reports.weforum.org/docs/WEF_Global_Risks_Report_2025.pdf)



through education and information programmes and conducting research on electoral policy and procedure through the delivery of research programmes.

In early April 2024, An Coimisiún Toghcháin conducted a social media campaign focusing on the need to be vigilant for misinformation and disinformation.<sup>40</sup> Later that month, it published a 'Framework on Online Electoral Process Information, Political Advertising and Deceptive AI content' and for the June 2024 local elections, it developed impartial information (pre-bunking and debunking) explaining the electoral process. An Coimisiún Toghcháin updated and expanded these campaigns for the General Election in November 2024.

Coimisiún na Meán supported the EDMO-led social media campaign, "Be Election Smart" and the ERGA-led social media campaign that focused on safeguarding oneself against deceptive content. On 1 November 2024, it announced the outcome of its review of the Broadcast Moratorium. Under revised Election Guidelines it introduced an additional care requirement that will apply during the Critical Election Period (24 hours before polls open until polls close).<sup>41</sup>

## Artificial Intelligence (AI)

It is important to consider the opportunities and risks that AI, and in particular generative AI, presents. AI is used positively to support content moderation efforts and to

enhance broader risk mitigation efforts but it may also be used by bad actors to generate and disseminate disinformation. The UN AI Advisory body, in its Final Report, identified misinformation and disinformation, deep fakes and personalized news as risks to information integrity.<sup>42</sup> There are also data protection concerns around Generative AI tools and how they could be used in disinformation campaigns as well as the impact of 'hallucinated content' on information integrity.

As part of the national response, the Government's AI Strategy, AI - Here for Good,<sup>43</sup> was refreshed in November 2024 to reflect the EU AI Act and further the ways that government, civil society and industry can work together in order to harness the benefits of AI and identify ways to mitigate emerging risks.

## Media Literacy

Media literacy describes a critical set of skills and knowledge that people need to navigate a complex information environment. At the heart of media literacy is the ability to understand and critically evaluate media content - whatever the source - in order to make an informed decision about the use of media. These critical thinking skills are also at the heart of maintaining information integrity and media literacy is increasingly being recognised as a tool for helping to counter disinformation. This is reflected by its rise on policy agendas such as the Adult Literacy for Life programme, the National Public Library strategy, and legislation. Under the OSMR, Coimisiún

<sup>40</sup> <https://www.electoralcommission.ie/media-release/treat-every-day-like-april-fools-day-when-sourcing-information-for-junes-elections/>

<sup>41</sup> <https://www.cnam.ie/coimisiun-na-mean-removes-traditional-broadcast-moratorium-for-election-coverage/>

<sup>42</sup> <https://www.un.org/en/ai-advisory-body>

<sup>43</sup> <https://enterprise.gov.ie/en/publications/publication-files/national-ai-strategy-refresh-2024.pdf>



na Meán has a duty to promote media literacy, while the EU Code of Practice on Disinformation (due to be converted to a Code of Conduct on 1 July 2025) requires signatories to partner or consult with media literacy experts in the EU, including for instance the Commission's Media Literacy Expert Group, the Media Literacy Action Group (a part of the ERGA), EDMO, its country specific branches, or relevant Member State universities or organisations that have relevant expertise.

International best practice indicates that a cross-sectoral multi-stakeholder approach that embeds media literacy learning across a person's lifetime is essential. However, the cross-cutting nature of media literacy policy can make effective coordination challenging.

Coimisiún na Meán, as part of its media literacy programme, funds and facilitates Media Literacy Ireland (MLI). This is an informal alliance of over 350 members working together on a mainly voluntary basis to promote media literacy in Ireland. MLI, along with a diverse range of cross-sector stakeholders, is responsible for the Be Media Smart campaign,<sup>44</sup> which is a national awareness raising campaign that encourages people to Stop, Think and Check that their information is accurate and reliable. A key partner in this work is EDMO Ireland, coordinated by the DCU FuJo Institute, which contributes to the development of EU-wide standards for media literacy.

However, while media literacy is a vital part of the response to disinformation, it is not in itself a complete solution because disinformation is a complex problem that requires a multifaceted

approach. Empowering people with the knowledge and skills to interrogate content does not guarantee those skills will prevail and it cannot correct systemic issues in the media environment.

Moreover, it is important to recognise that media literacy is both multi-dimensional and dynamic. It is multi-dimensional because it encompasses a wide range of knowledge and skills about, for example, advertising, news, AI, and content creation. It is dynamic because the nature of media literacy necessarily evolves in response to changes in technology, social norms, and politics. Media literacy needs vary across the population and across the life course. Thus, media literacy must be viewed as a life-long learning process involving a range of stakeholders providing support to people of all ages, on their individual learning journeys.

## Research and Data Access

Research on disinformation is spread across a wide range of disciplines and has generated essential insights into the effectiveness of countermeasures. Researchers in Ireland working nationally and across the EU - for example, the Adapt Centre, DCU FuJo Institute, University College Dublin (UCD) Digital Policy Centre - have contributed to a critical body of expertise that can continue to be built upon. The EDMO Ireland Hub (part of the EU-wide network of EDMO hubs set up to fight disinformation) is also well positioned to liaise with national and international research partners across the academic, industry, non-governmental, and regulatory sectors.

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<sup>44</sup> <https://www.bemediasmart.ie/>



Up until the introduction of the DSA, access to data for independent researchers was based on voluntary initiatives by online platform providers. A 2020 Broadcasting Authority of Ireland (BAI) study indicated there were varying approaches to transparency on the performance of fact-checking procedures in relation to content flagged as disinformation<sup>45</sup>.

The DSA introduces requirements for platforms to publish transparency reports (Article 24) and signatories to the Code of Practice on Disinformation (due to be converted to a Code of Conduct on 1 July 2025) are required to publish transparency reports. Transparency must respect data privacy rights, while enabling an understanding of platforms' processes and any potential risks of misuse impacting on democracy, infringement of rights or potential harms.

Under Article 40 of the DSA, vetted researchers (i.e. those who have been certified as such by the DSC) will be able to request data from VLOPs and VLOSEs to conduct research on systemic risks in the EU when certain conditions are met.

## Public Communications

Supporting the development of strong public communications and the provision of reliable, clear and accessible public information can play an important role in reducing the impact of disinformation and supporting trust in government.

Government departments and public bodies engage in a range of strategic communication activities, including

providing information on policy and services. The Government Information Service (GIS) within the Department of the Taoiseach has an important role in seeking to ensure that government communications are coordinated, coherent and aligned. GIS also manages and promotes a unified government identity, which provides clarity of provenance to government messaging.

There are a range of other agencies involved in the communication of trustworthy information, including the Citizens Information Board (CIB), the Central Statistics Office (CSO), libraries and others. There are also a number of civil society organisations involved in circulating information that communities need, and that have an active role in countering disinformation narratives.

## Changing Media Landscape

A media landscape consisting of a diverse range of trustworthy voices and opinions facilitates a healthy information environment and is essential for a functioning democratic society which in turn fosters resilience to disinformation. This is recognised in the FoMC's Recommendations that call for the independent oversight of all public funding schemes for journalism.

Media pluralism, access to a diversity of views and transparency of who ultimately owns and controls a media service, is essential for people in determining the reliability of information they are receiving and in tackling disinformation. However, the changing media landscape poses new challenges for media pluralism, in particular online. Notably, the 2023

<sup>45</sup> <https://www.bai.ie/en/new-report-highlights-inconsistencies-across-digital-platforms-in-tackling-disinformation/>





Media Pluralism Monitor has identified market plurality as being ‘high risk’ across Europe, including in Ireland, citing ownership transparency and plurality in digital markets as some of the relevant issues.

Coimisiún na Meán plays a key role here and has supported a number of initiatives, such as the Media Ownership Ireland database<sup>46</sup>, and supports the DCU-led project, the Media Ownership Monitor in Ireland.<sup>47</sup> The Press Council of Ireland and the Office of the Press Ombudsman regulate the print and online media sectors, supporting access, diversity and media plurality in those areas.

It is clear that the digitisation of media content and services in Ireland will be a continuing trend. In the context of the global digital transformation, the key challenge facing the Irish market is one of sufficient revenue to allow media producers to invest in and produce high-quality Irish content. While there is more content coming from both new and established creators than ever before, key revenue streams that fund Irish content are under significant threat.<sup>48</sup>

The FoMC acknowledged the importance of ensuring a career in media is an attractive option. This is reflected in actions to create a Media Access and Training Scheme as part of the Media Fund (recommendation 3.4) and also the allocation of €6 million for news and current affairs content, through the Sound and Vision scheme, ring-fenced for the commercial radio and TV sector. The latter is subject to the necessary legislative underpinning and State Aid approval by the European Commission.

The Code of Fairness, Objectivity and Impartiality in News and Current Affairs overseen by Coimisiún na Meán is an important component in ensuring the right balance between freedom of expression and responsible broadcasting and supports electoral integrity, with additional requirements applied in the immediate run-up to elections or referendums. These guidelines are subject to regular review and updates to reflect the changing political, media and social landscape.

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<sup>46</sup> <http://www.mediaownership.ie/>

<sup>47</sup> <https://ireland.mom-gmr.org/en/media/>

<sup>48</sup> [https://www.screenireland.ie/images/uploads/general/The\\_Skills\\_Challenge\\_for\\_the\\_Screen\\_Sector\\_in\\_Ireland\\_2023.pdf](https://www.screenireland.ie/images/uploads/general/The_Skills_Challenge_for_the_Screen_Sector_in_Ireland_2023.pdf)

# Commitments







# Commitments

This section outlines the 9 commitments developed by the members of the Working Group, the specific actions under each commitment and the lead organisations. Implementation of these commitments and actions will help to counter disinformation in line with the key principles of the Strategy.

## 1. Build knowledge of effective counter disinformation strategies

### Rationale:

As outlined in the 'Considerations' section, access to data about digital platforms has been an obstacle to research on disinformation and the effectiveness of countermeasures. The DSA makes provision for vetted researchers to access certain data from online platforms to help identify and understand systemic risks and support the design and development of reasonable, proportionate and effective countermeasures.

### Specific actions:

- **1.1 - Identify major trends and knowledge gaps in disinformation research** and disseminate the results to stakeholders via the Oversight Group (Commitment 9) and relevant networks.

**Lead organisation: EDMO Ireland** in conjunction with national and international partners across the academic, industry, non-governmental organisations, and regulatory sectors

- **1.2 - Support nuanced, collaborative research on different aspects of disinformation**, which will involve research across multiple disciplines and networks with national and international partners.

**Lead organisations: Coimisiún na Meán and EDMO Ireland** in conjunction with national and international partners across the academic, industry, non-governmental, and regulatory sectors

- **1.3 - Advance empirical knowledge of effective media literacy strategies to counter disinformation as well as insights into the needs and capacities of different sectors delivering media literacy across the life course.** Dublin City University Institute for Future Media, Democracy and Society (DCU FuJo Institute), as coordinator of EDMO Ireland, will develop research proposals to identify the media literacy needs of different sectors and promote evidence-based approaches to media literacy provisions. Findings will also be used to advance collaborations on best practices with international partners.

**Lead organisation: EDMO Ireland** in partnership with MLI, the MLI network and Coimisiún na Meán



- **1.4 - Ensure appropriate access to data for vetted researchers.** Access to relevant data will be ensured for vetted researchers under Articles 40.4 to 40.11 of the DSA. Article 40.12 of the DSA provides for access to public data for researchers, including those affiliated to not for profit bodies, organisations and associations (see Commitment 6).

**Lead organisation:** Coimisiún na Meán in collaboration with other key stakeholders

- **1.5 - Commission research on online electoral process disinformation and other online electoral interference, its impacts and potential mitigation measures and tools.** Under the ERA 2022, An Coimisiún Toghcháin (The Electoral Commission) is mandated to conduct and commission research. Its first Research Programme was published in July 2024, and An Coimisiún Toghcháin has already commenced the delivery of an ambitious, longitudinal National Election Study and both this and the wider Research programme should include research and data collection relevant to online electoral process disinformation and online electoral interference.

**Lead organisation:** An Coimisiún Toghcháin (The Electoral Commission)

## 2. Strengthen public communications and trust in public institutions

### Rationale:

People may be influenced by those they trust most, and judge information based on the trustworthiness of its source. As highlighted under 'Considerations', transparency and trustworthiness are important issues and good public communications are important in countering disinformation.

### Specific actions:

- **2.1 - Coordinate the development of public communications capacity** across government departments and agencies, including through specialist recruitment and learning and development programmes.

**Lead Organisation:** Department of the Taoiseach, Government Information Service

- **2.2 - Continue to develop and embed a unified government identity** to signify government information and support trust in government.

**Lead organisation:** Department of the Taoiseach, Government Information Service

- **2.3 - Continue to support and manage Gov.ie** and seek to position the website as a reliable and accessible source of public information.

**Lead organisation:** Department of Public Expenditure, NDP Delivery and Reform, Office of the Government Chief Information Officer



### 3. Promote trust in the media and support media pluralism and media freedom

#### Rationale:

As outlined in the 'Considerations' section, the Irish media landscape is undergoing significant change, with the digitisation of media content and a shift in advertising revenue presenting as challenges for the media sector.

#### Specific actions:

- **3.1 - Implementation of the European Media Freedom Act (EMFA).** The majority of the provisions of EMFA will apply from August 2025. EMFA is a regulation and directly applicable but some elements will require transposition into Irish law. The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media has commenced work on these elements, with a view to having legislation enacted by July 2025. Measures required to ensure compliance with EMFA's provisions on the protection of journalistic sources are under consideration by the Department of Justice.

**Lead organisation: Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media with Department of Justice (in relation to protection of journalistic sources)**

- **3.2 - Identify, map and review current pathways to a career in the media sector.** This will help to ensure that there are clear pathways to careers in areas such as journalism, production, creative roles etc.

**Lead organisation: Coimisiún na Meán,** in conjunction with Department of Further and Higher Education, Research, Innovation and Science and relevant stakeholders

- **3.3 - Implement independent oversight of all public funding schemes for journalism.** In line with the FoMC's Recommendations calling for the independent oversight of all public funding schemes for journalism, a Working Group will be established to identify and engage with relevant public funding stream administrators to establish what the current processes and procedures are with a view to exploring possible ways for Coimisiún na Meán to be involved.

**Lead Organisation: Coimisiún na Meán**

- **3.4 - Implementation of the Local Democracy and Courts Reporting Schemes.** Implementation of this scheme will support the production of high quality local public service content of relevance to local communities in Ireland. This will include conducting ongoing research on this matter and sharing findings and recommendations with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.

**Lead Organisation: Coimisiún na Meán**



- **3.5 - Awareness raising on human rights, including the right to freedom of expression, particularly in child and youth friendly formats.** Under Young Ireland's enabling environment, Department of Children, Equality, Disability, Integration and Youth will develop and maintain a website to promote the rights of children and young people across society and develop training for the public sector on children and young people's rights.<sup>49</sup> Documents and consultations that relate to children's rights should be made available in child and youth friendly formats.

**Lead Organisation: Department of Children, Equality, Disability, Integration and Youth**

- **3.6 - Application of the revised broadcasting election guidelines** including the additional care requirement during the critical election period. Continue to review broadcasting election and referendum guidelines in advance of election periods.

**Lead organisation: Coimisiún na Meán**

## 4. Adopt a lifelong approach to empowering all citizens with media literacy

### Rationale:

As outlined in the 'Considerations' section, media literacy is increasingly important and its multi-dimensional, dynamic and life-long nature must be recognised.

### Specific actions:

- **4.1 - Develop bi-annual 'Countering disinformation via media literacy' summits.** These summits, to include participation by a range of key stakeholders, would be aimed at identifying gaps in existing media literacy provision and provide a platform for knowledge and evidence exchange to support effective counter disinformation media literacy interventions, as well as opportunities for further collaboration.

**Lead organisation: MLI** with support from Coimisiún na Meán and relevant stakeholders

- **4.2 - Embed media literacy training into existing training programmes and networks to advance a life-long learning approach.** MLI will expand phase two of its community media literacy training programme to include bespoke media literacy training for trainers embedded within existing sector-specific training networks, and supported with annual training follow-ups.

**Lead organisation: MLI** with support from Coimisiún na Meán, EDMO Ireland and other relevant partners

<sup>49</sup> [www.gov.ie/YoungIreland](http://www.gov.ie/YoungIreland)



- **4.3 - Increase public awareness of how to improve media literacy skills to counter disinformation.** The existing Be Media Smart campaign will be further developed to target specific groups and the existing media literacy network will be used to promote additional counter disinformation campaigns led by other organisations. In addition, three publicly accessible events will be delivered annually to help raise awareness of how to develop media literacy skills that may help to counter disinformation.

**Lead organisation:** MLI in partnership with EDMO Ireland and the MLI network, supported by Coimisiún na Meán

- **4.4 - Implement Ireland's national public library strategy for 2023-2027 'The Library is the Place'.** This national strategy aims, as part of the national Skills for Life umbrella programme, to develop and deliver media literacy and basic digital skills resources and activities through all library authorities by the end of 2024.

**Lead organisation:** Libraries Development, Local Government Management Agency (LGMA)

- **4.5 - Implement Ireland's Literacy, Numeracy and Digital Literacy Strategy 2024-2033: Every Learner from Birth to Young Adulthood.** The Strategy recognises that an increased focus on the development of digital literacy skills is needed to enable primary and post-primary learners/teachers to navigate the digital landscape responsibly and critically including recognising and counteracting misinformation/disinformation. It aims to help learners and teachers become more media literate, and includes improving teacher awareness of supports in recognising and countering disinformation in primary and post-primary schools. In addition, the Strategy aims to encourage and support youth services to provide training in digital literacy to their members, in particular in the identification of disinformation and misinformation online.

**Lead organisation:** Department of Education

- **4.6 - Implement a Digital Citizenship Champions primary-school programme.** This programme aims to provide professional development in Digital Citizenship to about 90 primary school teachers from the six regions of the Education Support Centre Network. As a result of their engagement with this professional development programme, these teachers will provide professional supports to schools and teachers in their local regions.

**Lead organisation:** Oide Technology in Education, specifically Webwise, and the primary digital technology team



## 5. Support the growth of fact-checking and pre-bunking expertise in Irish media

### Rationale:

News media are ideally placed to communicate accurate information to their audiences including fact checks and explanatory 'pre-bunks' and have innovated in response to the rise of disinformation and information manipulation. However, as outlined in the 'Considerations' section the changing media landscape represents a challenge.

### Specific actions:

- **5.1 - Support the growth of expertise on fact-checking and pre-bunking in Ireland.** Despite the recognised role of fact-checking and pre-bunking in countering disinformation, more support in the form of training and knowledge-exchange for media practitioners is required for the timely and effective dissemination of fact-checks, pre-bunks, and disinformation analysis.

**Lead organisation: EDMO Ireland** with support from Coimisiún na Meán, the Office of the Press Ombudsman and the National Union of Journalists (NUJ)

- **5.2 - Identify sources of funding for fact-checking and pre-bunking activities.** It is essential that fact-checking and pre-bunking activities are resourced properly and sustainably and that the resourcing is transparent in order to maintain trust. The feasibility of a funding strand under the Media Fund for the fact-checking/pre-bunking community should be explored.

**Lead organisation: Coimisiún na Meán** in collaboration with other key stakeholders

- **5.3 - The Press Ombudsman will explore with the Press Council's Code Committee on an ongoing basis whether revisions are required in the Code of Practice** to ensure publications strive to avoid reproducing disinformation and fake images, and related issues.

**Lead Organisation: Office of the Press Ombudsman**



## 6. Effective Implementation of Legislation and Regulation

### Rationale:

As set out in Considerations, legislation and regulation is vital to addressing disinformation. The Online Safety and Media Regulation Act, the Digital Services Act and the Terrorist Content Online Regulation underpin Ireland's Online Safety Framework and have an important role to play in countering disinformation. These regulations carry with them significant enforcement powers, including financial sanctions.

Online platforms are simultaneously in scope of the DSA and GDPR and must comply with those regulations. They must continually assess, identify and mitigate systemic risks to prevent the amplification of disinformation online. Measures to combat disinformation must respect individuals' right to privacy and data protection, freedom of expression and access to information rights.

Parts 4 and 5 of the Electoral Reform Act (ERA) 2022, which deal with political advertising and electoral disinformation, are under review to ensure consistency with the latest EU developments. Specifically, Part 4 of the ERA 2022 will need to be brought into alignment with the EU Regulation on the Transparency and Targeting of Political Advertising (2024/900) in advance of its full entry into force on 10 October 2025.

### Specific actions:

- **6.1 - Ensure compliance with the DSA.** Coimisiún na Meán will work in conjunction with the EU Commission to ensure compliance with the DSA, including in relation to countering disinformation, by regulated entities established in Ireland.

**Lead organisation: Coimisiún na Meán**

- **6.2 - Ensure compliance with the GDPR.** The Data Protection Commission will use its regulatory mechanisms, including via supervision and enforcement, to ensure compliance with the GDPR and support the objectives of the Strategy.

**Lead organisation: Data Protection Commission**

- **6.3 - Support effective implementation of the upcoming Code of Conduct on Disinformation** as provided for under Article 45 of the DSA.

**Lead organisation (in Ireland): Coimisiún na Meán**

- **6.4 - Amend and commence Parts 4 and 5 of the ERA 2022 in order to align and harmonise their provisions with the requirements of Regulation (EU) 2024/900 (political advertising) and Regulation (EU) 2022/2065 (DSA) respectively.** Once amended, enacted by the Oireachtas and commenced by the Minister for Housing,



Local Government and Heritage, it will fall to An Coimisiún Toghcháin (The Electoral Commission) to implement, as appropriate, these revised parts of the legislation.

**Lead organisation: Department of Housing, Local Government and Heritage**

- **6.5 - Further develop resources and education campaigns regarding the electoral process and democracy** to mitigate and prevent electoral process disinformation being used to undermine the integrity of Ireland's electoral events.

**Lead organisation: An Coimisiún Toghcháin (The Electoral Commission)**

## 7. Effectively counter Foreign Information Manipulation and Interference (FIMI)

### Rationale:

As referenced in the 'Considerations' section, effectively countering FIMI is a priority for the EU. Work to counter FIMI here in Ireland will require strong coordination by relevant national actors, working in close cooperation with international partners.

### Specific actions:

- **7.1 - Develop a coordinated national approach to countering FIMI, to be elaborated in the upcoming National Security Strategy.** Close cooperation and information sharing across Government will form the central element of this approach. This will be complemented by partnership and engagement with civil society, academia, industry and regulators.

**Lead organisation: Department of the Taoiseach,** with the support of the Department of Justice, Department of Foreign Affairs and the National Cyber Security Centre (NCSC)

- **7.2 - Contribute to the development of the EU approach to countering FIMI,** including through close cooperation with EU Member States.

**Lead organisation: Department of Foreign Affairs together with other relevant stakeholders**

- **7.3 - Enhance Ireland's relationship with other countries and international organisations to develop national capacity to counter FIMI,** including through our membership of the European Centre of Excellence for Countering Hybrid Threats in Helsinki.

**Lead organisation: Department of Foreign Affairs**





## 8. Support international initiatives to counter disinformation and promote information integrity, consistent with human rights and freedom of expression

### Rationale:

Disinformation and challenges to information integrity are complex and multi-faceted challenges that affect all countries and international coordination and collaboration are vital to meeting those challenges.

### Specific actions:

- **8.1 - Support overseas partners on capacity building** to counter disinformation, primarily through resilience building and support for independent media.

**Lead organisation: Department of Foreign Affairs**, together with other relevant stakeholders

- **8.2 - Actively engage in discussions in multi-lateral fora on countering disinformation and promoting information integrity**, including at the OECD, through the UN Human Rights Council and the UN Secretary General's Global Digital Compact, as well as via the Freedom Online Coalition (of which Ireland is a founding member), the Media Freedom Coalition and the International Partnership for Information and Democracy.

**Lead organisation: Department of Foreign Affairs**, together with other relevant stakeholders



## 9. Establish a Counter Disinformation Oversight Group

### Rationale:

The purpose of an Oversight Group would be to ensure coordination, monitoring and implementation of the Strategy's commitments and actions, in line with the Principles outlined in this Strategy. It could facilitate the sharing of cross-sector information and highlight funding opportunities to support the implementation of commitments. It could promote and share information in multilateral formats, such as the UN Human Rights Council, the UN Secretary General's Global Digital Compact, the OECD Expert Group on Governance Responses to Mis- and Disinformation, ERGA and Council of Europe and related measures.

### Specific actions:

- **9.1 - Establish the Counter Disinformation Oversight Group.** Ensure the first meeting of the Oversight Group takes place within four months of the publication of the National Counter Disinformation Strategy. Revised terms of reference in line with the Strategy to be agreed at the first meeting.

**Lead organisation:** Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

- **9.2 - Agree a review process to monitor progress on implementation of commitments and actions in the Strategy, including consideration of where new actions may be of benefit.**

**Lead organisation:** Counter Disinformation Oversight Group supported by Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

- **9.3 - Encourage the participation of children and young people in the Counter Disinformation Oversight Group,** in line with the *Participation of Children and Young People in Decision Making Action Plan 2024-2028*, working with Comhairle na nÓg and the National Youth Assembly of Ireland.

**Lead organisation:** Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media supported by the Department of Children, Equality, Disability, Integration and Youth

# Appendices





## Appendix 1: Commitments and Actions

Commitments	Specific Actions	Underlying Principles	Owners
1. Build knowledge of effective counter disinformation strategies	1.1 - Identify major trends and knowledge gaps in disinformation research	C, E	EDMO Ireland with other key national and international partners
	1.2 - Support nuanced, collaborative research on different aspects of disinformation	A, C, E	Coimisiún na Meán and EDMO Ireland with other key national and international partners
	1.3 - Advance empirical knowledge of effective media literacy strategies to counter disinformation as well as insights into the needs and capacities of different sectors delivering media literacy across the life course	A, C, E	EDMO Ireland in partnership with MLI, the MLI network and Coimisiún na Meán
	1.4 - Ensure appropriate access to data for researchers	A, C, E	Coimisiún na Meán with other key stakeholders
	1.5 - Commission research on online disinformation and other online electoral interference, its impacts and potential mitigation measures and tools	D	An Coimisiún Toghcháin (The Electoral Commission)
2. Strengthen public communications and trust in public institutions	2.1 - Coordinate the development of public communications capacity	A, B	Department of the Taoiseach, GIS
	2.2 - Continue to develop and embed a unified government identity	A, B	Department of the Taoiseach, GIS
	2.3 - Continue to support and manage Gov.ie	A, C	DPENDPR, OGCIO



3. Promote trust in the media and support media pluralism and media freedom	3.1 - Implementation of EMFA	D	DTCAGSM with DoJ (in relation to protection of journalistic sources)
	3.2 - Identify, map and review current pathways to a career in the media sector	B, C	Coimisiún na Meán, with DFHERIS and relevant stakeholders
	3.3 - Implement independent oversight of all public funding schemes for journalism	B, C	Coimisiún na Meán
	3.4 - Implementation of the Local Democracy and Courts Reporting Schemes	B, C, E	Coimisiún na Meán
	3.5 - Awareness raising on human rights, including freedom of expression rights, particularly in child and youth friendly formats	A, B, E	DCEDIY
	3.6 - Application of the revised broadcasting election guidelines including the additional care requirement during the critical election period	A, D, E	Coimisiún na Meán
4. Adopt a lifelong approach to empowering all citizens with media literacy	4.1 - Develop bi-annual 'Countering disinformation via media literacy' summits	B, C, E	MLI with support from Coimisiún na Meán and relevant stakeholders
	4.2 - Embed media literacy training into existing training programmes and networks to advance a life-long learning approach	B, C, E	MLI with support from Coimisiún na Meán, EDMO Ireland and others
	4.3 - Increase public awareness of how to improve media literacy skills to counter disinformation	A, B, C, E	MLI with EDMO Ireland and the MLI network, supported by Coimisiún na Meán



	4.4 - Implement Ireland's national public library strategy for 2023-2027 'The Library is the Place'	A, B, E	Libraries Development, LGMA
	4.5 - Implement Ireland's Literacy, Numeracy and Digital Literacy Strategy 2024-2033: Every Learner from Birth to Young Adulthood	B, C, E	Department of Education
	4.6 - Implement a Digital Citizenship Champions primary-school programme	B, C, E	Oide Technology in Education, specifically Webwise, and the primary digital technology team
5. Support the growth of fact-checking and pre-bunking expertise in Irish media	5.1 - Support the growth of expertise on fact-checking and pre-bunking in Ireland	B, C, E	EDMO Ireland with support from Coimisiún na Meán, the Office of the Press Ombudsman and the NUJ
	5.2 - Identify sources of funding for fact-checking and pre-bunking activities	B, C	Coimisiún na Meán with other key stakeholders
	5.3 - The Press Ombudsman will explore with the Press Council's Code Committee on an ongoing basis whether revisions are required in the Code of Practice	A, B, D, E	Office of the Press Ombudsman
6. Effective Implementation of Legislation and Regulation	6.1 - Ensure compliance with the DSA	C, D	Coimisiún na Meán
	6.2 - Ensure compliance with the GDPR	C, D	Data Protection Commission
	6.3 - Support effective implementation of the upcoming Code of Conduct on Disinformation	C, D	Coimisiún na Meán (in Ireland)



	6.4 - Amend and commence Parts 4 and 5 of the ERA 2022 in order to align and harmonise their provisions with the requirements of Regulation (EU) 2024/900 (political advertising) and Regulation (EU) 2022/2065 (DSA) respectively	C, D	DHLGH
	6.5 - Further develop resources and education campaigns regarding the electoral process and democracy	D	An Coimisiún Toghcháin (The Electoral Commission)
7. Effectively counter Foreign Information Manipulation and Interference (FIMI)	7.1 - Develop a coordinated national approach to countering FIMI, to be elaborated in the upcoming National Security Strategy	C, D, E	Department of the Taoiseach, with the support of the DoJ, DFA and the NCSC
	7.2 - Contribute to the development of the EU approach to countering FIMI	C, D, E	DFA together with other relevant stakeholders
	7.3 - Enhance Ireland's relationship with other countries and international organisations to develop national capacity to counter FIMI	C, D, E	DFA
8. Support international initiatives to counter disinformation and promote information integrity, consistent with human rights and freedom of expression	8.1 - Support overseas partners on capacity building	C, E	DFA together with other relevant stakeholders
	8.2 - Actively engage in discussions in multi-lateral fora on countering disinformation and promoting information integrity	A, C, E	DFA together with other relevant stakeholders



9. Establish a Counter Disinformation Oversight Group	9.1 - Establish the Counter Disinformation Oversight Group	A, B, C, D, E	DTCAGSM
	9.2 - Agree a review process to monitor progress on the implementation of commitments and actions in the Strategy, including consideration of where new actions may be of benefit	A, B, C, D, E	Counter Disinformation Oversight Group supported by DTCAGSM
	9.3 - Encourage the participation of children and young people on the Counter Disinformation Oversight Group	A, B, C, E	DTCAGSM supported by DCEDIY





## Appendix 2: The Working Group

From the start, the Working Group agreed to operate by consensus and to consult with the public. It agreed to publish minutes of its meetings and associated papers as soon as they were finalised.

The Working Group sought expert input on a range of issues and agreed to examine three key issues in more detail - existing countermeasures, existing regulatory and research mechanisms and independent journalism and public service media. The Working Group established subgroups to examine each issue. Each subgroup comprised working group members and other invited subject matter experts. The sub group reports were published in September 2023 and are available at <https://www.gov.ie/en/publication/04f9e-national-counter-disinformation-strategy-working-group/#subgroups>.

In terms of consultation, the Working Group agreed to conduct a written public consultation and to hold an in-person stakeholder consultation forum. The Working Group prepared a Scoping Paper,<sup>50</sup> to help structure the public consultation. It opened on 25 September 2023 and ran for five weeks. The Secretariat reviewed each of the approximately 450 submissions received, looking to identify key themes and issues. It drafted a review of the submissions, which was agreed by the Working Group and published in December 2023. The in-person stakeholder consultation forum was held on 29 November to discuss the

work of the Group so far, the results of the public consultation process, and to focus on possible commitments and actions that would comprise part of the Strategy. A summary of that event was published in February 2024.

Detailed drafting was then undertaken including bilateral engagements with Working Group members led by the Secretariat.

In June 2024, the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media, as Secretariat to the Working Group, was invited, along with the independent chair and other interested parties like Coimisiún na Meán and An Garda Síochána, to discuss its work with the the Joint Committee on Tourism, Culture, Arts, Sport and Media as part of the Committee's work on 'the State's response to online disinformation and media/digital literacy, including social media and fake news'. The Committee published its report in November 2024.

Minutes of meetings, reports of the subgroups, presentations by experts and reviews of the consultations are all available at <https://www.gov.ie/en/publication/04f9e-national-counter-disinformation-strategy-working-group/>.

### Membership<sup>51</sup>

- An Coimisiún Toghcháin (Electoral Commission)
- Coimisiún na Meán (Media Commission)

<sup>50</sup> <https://assets.gov.ie/static/documents/hcds-scoping-paper.pdf>

<sup>51</sup> The Irish Council for Civil Liberties was a member of the Working Group but left during the drafting process.



- Department of Children, Equality Diversity, Integration and Youth
- Department of Education/Webwise
- Department of Enterprise, Trade and Employment
- Department of Foreign Affairs
- Department of Health/Health Service Executive
- Department of Justice
- Department of the Taoiseach
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
- EDMO Ireland Hub at DCU FuJo
- Library Association of Ireland
- Media Literacy Ireland
- National Youth Council of Ireland
- National Cyber Security Centre
- Office of the Press Ombudsman
- Technology Ireland

## Presentations to Working Group

- EDMO Ireland: 'Disinformation and its Countermeasures'
- Institute for Strategic Dialogue: 'An Introduction to ISD'
- Webwise: 'Online Safety and Digital Citizenship Supports'
- The Journal: 'An Introduction to The Journal's FactCheck Unit'
- PERITIA: 'Policy, Expertise and Trust in Action'
- VIGILANT: 'Vital Intelligence to Investigate Illegal Disinformation'
- European External Action Service
- EDMO Ireland & Coimisiún na Meán: 'Code of Practice on Disinformation'
- Irish Council for Civil Liberties
- University College Cork: 'Misinformation Susceptibility'
- National Cyber Security Centre
- Department of Foreign Affairs: 'National Approaches to Countering Disinformation'
- Hope & Courage Collective
- National Youth Council of Ireland: 'Young People, Vulnerability

to Disinformation and Trust in Institutions'

## Subgroup One: Existing Countermeasures

- An Coimisiún Toghcháin
- Department of Education/Webwise
- Department of Foreign Affairs
- Department of the Taoiseach
- EDMO Ireland (DCU FuJo)
- Institute for Strategic Dialogue
- Library Association of Ireland
- Media Literacy Ireland

## Subgroup Two: Emerging Regulatory Environment

- ADAPT Centre, Trinity College Dublin
- An Coimisiún Toghcháin
- Coimisiún na Meán
- EDMO Ireland (DCU FuJo)
- Digital Action
- Institute for Strategic Dialogue
- Library Association of Ireland
- Media Literacy Ireland
- Technology Ireland
- University College Dublin

## Subgroup 3: Supporting Journalism and the supply of Public Interest Information

- Coimisiún na Meán
- Department of Children, Equality, Diversity, Integration and Youth
- Department of Health/Health Service Executive
- EDMO Ireland (DCU FuJo)
- National Union of Journalists
- National Youth Council of Ireland
- Office of the Press Ombudsman
- Office of the Ombudsman



## Glossary

**Algorithm** - Refers to a set of rules that, if followed, will give a prescribed result<sup>52</sup>; often used by social media platforms to determine what content a specific user sees in their feed.<sup>53</sup>

**Amplification** - As noted by the European Commission in its 2018 Communication, '*Tackling Online Disinformation: A European Approach*', 'amplification' can refer to the various mechanics underlying the proliferation of disinformation online, which can result in a disproportionate audience being reached. Amplification may be algorithm-based (potentially involving recommender systems), advertising-driven or technology-enabled e.g. using bots and fake accounts.<sup>54</sup>

**Artificial intelligence (AI)** - As defined in the AI Act, 'AI system' is a machine-based system designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.<sup>55</sup>

**Attention economy** - First conceptualised in the 1960s to characterise the problem of information overload as an economic one, 'attention economy' is increasingly used in the context of internet-based content consumption to describe the ever-increasing supply of information versus a fixed demand for this information, due to limitations on people's attention e.g. competing priorities, limited free time etc.<sup>56</sup>

**Deepfake** - Artificially generated or manipulated image, audio or video content that appreciably resembles existing persons, places, entities or events and would falsely appear to a person to be authentic.<sup>57</sup>

**Digital literacy** - The ability to access, explore, manage, understand, integrate, communicate, evaluate, create, and disseminate information safely and appropriately through digital technologies.<sup>58</sup> In total, it is a set of competencies which allow people to function and participate in a digital world,<sup>59</sup> and is often included as an inter-related component of media literacy.

**Disinformation** - False or misleading content that is spread with an intention to deceive or secure economic or political gain and which may cause public harm.<sup>60</sup>

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<sup>52</sup> <https://csrc.nist.gov/glossary/term/algorithm>

<sup>53</sup> <https://www.scientificamerican.com/article/social-media-algorithms-warp-how-people-learn-from-each-other/>

<sup>54</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52018DC0236>

<sup>55</sup> Regulation (EU) 2024/1689 [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202401689](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401689)

<sup>56</sup> [https://www.un.org/sites/un2.un.org/files/attention\\_economy\\_feb.pdf](https://www.un.org/sites/un2.un.org/files/attention_economy_feb.pdf)

<sup>57</sup> Regulation (EU) 2024/1689 [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202401689](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401689)

<sup>58</sup> <https://www.gov.ie/en/publication/3f341-towards-a-new-literacy-numeracy-and-digital-literacy/>

<sup>59</sup> [https://www.webwise.ie/teachers/digital\\_literacy/](https://www.webwise.ie/teachers/digital_literacy/)

<sup>60</sup> [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy\\_en?ref=american-purpose](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy_en?ref=american-purpose)



Disinformation does not include misleading advertising, reporting errors, satire and parody, or clearly identified partisan news and commentary, and is without prejudice to binding legal obligations, self-regulatory advertising codes and standards regarding misleading advertising.

**Foreign Information Manipulation and Interference** - Foreign Information Manipulation and Interference (FIMI) describes a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character, and conducted in an intentional and coordinated manner. Actors of such activity can be state or non-state actors, including their proxies inside and outside of their own territory.<sup>61</sup>

**Freedom of expression** - The power or right to express one's opinions without censorship, restraint, or legal penalty.<sup>62</sup>

**Harmful online content** - Online content within the meaning given by section 139A of the Broadcasting Act 2009, as amended by the OSMR Act, which includes, among other things, content linked to specific existing offences in Irish law such as incitement to hatred or violence, and serious cyber-bullying material.<sup>63</sup>

**Hate** - An incident or offence which is perceived by any person to, in whole or in part, be motivated by hostility or prejudice, based on actual or perceived age, disability, race, colour, nationality, ethnicity, religion, sexual orientation or gender. It can include malicious communications e.g. email and other internet-based communication.<sup>64</sup>

**Information integrity** - A systemic approach that seeks to focus on a healthy information environment rather than moderation of individual pieces of content.<sup>65</sup>

**Information literacy** - Information Literacy empowers people in all walks of life to seek, evaluate, use and create information effectively to achieve their personal, social, occupational and educational goal<sup>66</sup>. It is often included as a component of media literacy. See media literacy.

**Media Fund** - As recommended by the FoMC, a platform-neutral Media Fund that supports a range of funding schemes for Public Service Content Providers.<sup>67</sup>

**Media and information literacy (MIL)** - Media and information literacy covers all competencies related to information literacy and media literacy that also include digital or technological literacy. MIL constitutes a composite set of knowledge,

<sup>61</sup> [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>62</sup> <https://www.citizensinformation.ie/en/government-in-ireland/irish-constitution-1/constitution-fundamental-rights/>

<sup>63</sup> <https://www.irishstatutebook.ie/eli/2022/act/41/enacted/en/print>

<sup>64</sup> <https://www.garda.ie/en/crime/hate-crime/what-is-hate-crime.html>

<sup>65</sup> <https://www.undp.org/information-integrity>

<sup>66</sup> <https://www.unesco.org/en/ifap/information-literacy>

<sup>67</sup> <https://assets.gov.ie/static/documents/report-of-the-future-of-media-commission.pdf>



skills, attitudes, competencies and practices that allow effectively access, analyse, critically evaluate, interpret, use, create and disseminate information and media products with the use of existing means and tools on a creative, legal and ethical basis<sup>68</sup>. See **digital literacy, information literacy, media literacy**.

**Media literacy** - The skills and knowledge to make informed choices about the media content and services that users consume, create and disseminate.<sup>69</sup>

**Misinformation** - False or misleading content shared without harmful intent though the effects can be still harmful, e.g. when people share false information with friends and family in good faith.<sup>70</sup>

**Online Platform** - As defined in the DSA, a hosting service that at the request of a recipient of the service, stores and disseminates information to the public, unless that activity is a minor and purely ancillary feature of a another service and the integration of the feature or functionality into the other service is not a means to circumvent the applicability of the DSA.<sup>71</sup>

**Online safety code** - A regulatory measure that may be developed and applied by Coimisiún na Meán under Section 139K of the Broadcasting Act 2009, as amended by the Online Safety and Media Regulation Act to designated online services in accordance with Section 139L of the Act.

**Reach** - The extent to which online content is circulated. It can depend on the platform being used and the settings used by users on the platform.<sup>72</sup> The restriction of reach of content can be deployed as a measure to limit the readership of harmful content without impinging on freedom of expression.

**Recommender system** - As defined by the EU DSA, means a fully or partially automated system used by an online platform to suggest in its online interface specific information to recipients of the service or prioritise that information, including as a result of a search initiated by the recipient of the service or otherwise determining the relative order or prominence of information displayed.<sup>73</sup>

**Sound & Vision Scheme** - Funding scheme for television and radio programmes administered by Coimisiún na Meán.<sup>74</sup>

**Very large online platforms (VLOPs)** - A classification of platform under the DSA for very large online platforms that have over 45 million users in the EU.<sup>75</sup>

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<sup>68</sup> <https://iite.unesco.org/mil/>

<sup>69</sup> <https://www.cnam.ie/media-development/>

<sup>70</sup> [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy\\_en?ref=american-purpose](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy_en?ref=american-purpose)

<sup>71</sup> [https://www.oecd-ilibrary.org/science-and-technology/an-introduction-to-online-platforms-and-their-role-in-the-digital-transformation\\_19e6a0f0-en](https://www.oecd-ilibrary.org/science-and-technology/an-introduction-to-online-platforms-and-their-role-in-the-digital-transformation_19e6a0f0-en)

<sup>72</sup> <https://journals.sagepub.com/doi/full/10.1177/2053951716645828>

<sup>73</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R2065>

<sup>74</sup> <https://www.cnam.ie/media-development/>

<sup>75</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R2065>

**Very large online search engines (VLOSEs)** - A classification of search engine under the DSA for very large online search engines that have over 45 million users in the EU.<sup>76</sup>

**Video-sharing platform services (VSPS)** - As defined in the Broadcasting Act 2009 (as amended), certain online services that provide audiovisual programmes or user-generated videos, or both, to the general public, in order to inform, entertain or educate the public. An online service is a VSPS only if service provider does not hold editorial control over the selection of programmes or videos but does determine the organisation (e.g. the sequencing of delivery of those programmes or videos).<sup>77</sup>

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<sup>76</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R2065>

<sup>77</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020XC0707%2802%29>



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Government of Ireland