NORDIS – NORdic observatory for digital media and information DISorders

Policy approaches to information disorder in the digital welfare state

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Abbreviations and acronyms

MIL - Media and Information Literacy

DIL - Digital Information Literacy

MDM - Media for democracy monitor 2021

IFCN - International Fact-Checking Network

NORDIS countries - Norway, Denmark, Sweden and Finland

DSA - The Digital Services Act

NORDIS

Executive Summary

This progress report presents ongoing work conducted as part of NORDIS Activity 3: POLICY & INFORMATION LITERACY by Helsinki University. In this report the most interesting findings from the research on policy approaches to the information disorder in the Nordics are presented. The countries studied in this report, Norway, Denmark, Sweden and Finland, are performing very well in many statistical reports on media and democracy.[1] Recent quantitative international studies on the subject of resilience to disinformation has been published by Humprecht et al. (2020, 2021). This prompts a closer qualitative study of the Nordic fact-checkers and their work. This report present findings from the interviews with the four largest Nordic fact-checking organisations: Faktisk.no (NO), Tjekdet (DK), Källkritikbyrån (SE) and Faktabaari (FI). The research question is:

How do the Nordic fact-checkers operationalise their policies and codes of principles?

Key areas of interest that have been studied are:

1. What fact-checking means as a concept for the Nordic fact-checking organisations.
2. How the Nordic fact-checkers define their policies and codes of conducts.
3. How the Nordic fact-checkers structure their work in their newsrooms.
4. How the Nordic fact-checkers view their work in relation to the news media.
5. How the Nordic fact-checkers relate to their audiences.
6. What economic challenges the Nordic fact-checkers are facing.
7. What technological challenges the Nordic fact-checkers are facing.

The preliminary findings are summarised as a list in section 2.8, followed by a discussion where the findings are reviewed in terms of relevance to policy approaches on three levels: in relation to the Nordic discourse on policy, in relation to national media funding policies and in relation to Meta, EDMO, the EU and the Digital Service Act (DSA). The findings are also contextualised in relation to a 23.2.2022 hearing of Frances Haugen[2] where the theme, "online disinformation and media literacy", was discussed.[3] The hearing gave an interesting overview of the best practices and challenges on regulating Facebook, it also demonstrates why the fact-checking institutions are needed and why they should be given special attention when making policy decisions on different levels in the Nordic countries, EDMO and in the EU.

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[1] See e.g.: The Press Freedom Index 2021 – Reporters Without Borders – ISRM Students; Interactive | Reuters Institute for the Study of Journalism; Trust in government - OECD Data
[2] Who is Frances Haugen, the Facebook Whistle-Blower? - The New York Times
[3] https://www.oireachtas.ie/en/oireachtas-tv/video-archive/committees/5334

About this report and its context

This progress report presents ongoing work conducted as part of NORDIS Activity 3: POLICY & INFORMATION LITERACY by Helsinki University.

The Nordic Observatory for Digital Media and Information Disorder (NORDIS) is a consortium of researchers and fact-checkers from Denmark, Norway, Sweden, and Finland. Working in conjunction with the European Digital Media Observatory[4], NORDIS has members from four universities and four fact-checking organisations: Aarhus University (Denmark),[5] University of Helsinki (Finland)[6], University of Bergen (Norway),[7] Uppsala University (Sweden),[8] Faktisk.no (Norway),[9] Källkritikbyrån (Sweden),[10] TjekDet (Denmark)[11] and Faktabaari (Finland).[12] The project is co-financed by the Connecting Europe Facility of the European Union.[13]

Activity 3 in the NORDIS project examines the literacy needs of different sectors, disseminates the information to different stakeholders within and outside of NORDIS, and pilots an educational activity to strengthen digital information literacy in different sectors.

This progress report is one of the two deliverables of Activity 3.1. It complements the recently published policy brief 'Assessing Information Disorder in the Digital Media Welfare State: A Rights-Based Approach' (Horowitz, 2022). This report summarises the progress of the ongoing work with the closely related academic article and follows a similar structure. The objective of this report is to present the most interesting findings together with a first analysis of what can be derived from the conducted interviews. The final analysis and review process will then supplement the findings presented in this report.

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[4] EDMO
[5] Aarhus University
[6] University of Helsinki
[7] University of Bergen
[8] Uppsala University
[9] Faktisk.
[10] Kallkritikbyran
[11] Tjekdet
[12] Faktabaari
[13] Agreement No INEA/CEF/ICT/A2020/2394203

1.0 Introduction

Disinformation is one of three terms with similar meanings that are commonly used in research. Wardle and Derakhshan (2017) define *disinformation* as misleading information spread with an aim of harming others. *Misinformation* is when false information is shared unintentionally and *malinformation*, when genuine information is shared with intentions to cause harm. Together, these three types are elements of the umbrella term *Information Disorder* that connote the combined effect of how the online media platforms pollute our information streams (Wardle & Derakhsan, 2017).

The four Nordic countries studied in this report, Norway, Denmark, Sweden and Finland (NORDIS countries) are similar in many respects. Sharing a common democratic corporatist tradition (Hallin, 2004), they are often characterised as "Media Welfare States" (Enli & Syvertsen, 2020; Syvertsen, 2014). Also, the Nordics share a common trait in that the countries have been shown to be particularly resilient to disinformation. According to Humprecht et al. (2020, 2021), the NORDIS countries belong to a media-supportive, consensual cluster. They are resilient to online disinformation because they have low levels of polarisation, limited populist communication but high levels of trust in news and a strong Public Service Media (Humprecht et al., 2020; p.507). The NORDIS countries were ranked highly in these studies and were regarded as among the most stable of the 24 countries examined.

The NORDIS countries are doing well also according to other important indicators. They are ranked first through fourth in the Reporters Without Borders' Freedom of the press index for 2021.[14] Furthermore, according to the Reuters News Report,[15] they are among the top five in terms of general trust in news. The confidence in the national governments is also high, all four countries are in the top eight of the OECD indicators.[16] Together, these indicators support the conclusions made by Humprecht et. al. (2020), that the Nordic countries belong to the group they deem resilient to the effects of disinformation. As was shown in detail in the extensive policy brief (Horowitz, 2022) delivered as a part of this same NORDIS 3.1 task, there are several other possible factors contributing to the resilience of the Nordic countries. However, there are also some factors that increase vulnerability to disinformation specifically in the Nordics.

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[14] The Press Freedom Index 2021 – Reporters Without Borders – ISRM Students
[15] Interactive | Reuters Institute for the Study of Journalism
[16] Trust in government - OECD Data

Since the Nordic countries have universal access to the Internet[17] and a high usage of social media, the populations are correspondingly more exposed to doubtful information. The Eurobarometer dataset 'Evaluating data, information and digital content (2021 onwards)', can be used to calculate the amount of disinformation exposure and the extent to which the content has been checked by the population. As shown in table 1, the population in the NORDIS countries has seen more and checked more doubtful information on the Internet than the population in the EU on average. Finland has the most exposure, Denmark has the lowest checking percentages:

Amount of population that:	Norway	Denmark	Sweden	Finland	EU average
Have seen untrue or doubtful information on the Internet	61%	58%	57%	68%	49%
Have checked the truthfulness of the doubtful information	38%	25%	36%	34%	25%

Table 1. Exposure to and checking of doubtful information in the NORDIS countries. (Eurobarometer: isoc_sk_edic_i21-dataset, computed by the author)[18]

The increased exposure to disinformation combined with larger structural phenomena such as a decline in media pluralism (Karppinen, 2013), may lead to a general distrust of news media and create a vulnerability to disinformation. It is therefore likely that a continuous Nordic resilience to disinformation cannot be taken for granted.

Clearly disinformation is a prevalent challenge in the Nordics. However, there is still a lack of understanding about *how* the social resilience to disinformation is achieved, as well as what types of policy approaches and epistemic dimensions[19] in society contribute to the Nordic resilience to disinformation.

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[17] Digital economy and society statistics - households and individuals
[18] https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=isoc_sk_edic_i21&lang=en#
[19] See e.g. (Habermas, 2006)

1.1 Research aims, scope and motives

The aim of the forthcoming academic article is to examine the roles, policies, and interplay of key Nordic epistemic- and policymaking-institutions to gain a better understanding of how the aforementioned resilience has developed and how it is being maintained. It is reasonable to assume that the various epistemic institutions involved in the study "Fighting fakes the Nordic Way" (Lundgren et al., 2018) commissioned by the Nordic Council of Ministers, plays a significant role. Hence, the Nordic fact-checkers, the Media, and Information Literacy institutions (MIL), the leading news media (both private and public service) and various policy-making institutions and ministries, form the basis of the research for the academic article.

Ministry-level institutions (e.g., culture and media-related ministries) have a regulatory and legislative function that affects the policy and funding of others and are thus policy-relevant.

The work of MIL institutions has been studied in some detail. According to Sonia Livingston, MIL is frequently cited as a silver bullet to a variety of problems caused by society's digitalisation "Yet oddly, this rarely results in concrete policies or resources to increase the media literacy of the public"[20] she concludes. Moreover, there is a close relationship between the MIL institutions and the NORDIS fact-checking organisations making this dynamic interesting.

Public Service Broadcasters and the commercial media policies have also recently been analysed in relation to disinformation. According to the extensive Media for Democracy monitor 2021 (MDM) study[21], which was done in 18 countries, including Sweden, Denmark and Finland (Trappel & Tales, 2021; Trappel & Tomaz, 2021), the leading Nordic news media in general have their journalists check the facts in-house, without any help from external fact-checking organisations. Mayerhöffer et al. (2022, p. 36) conclude that the leading news media are therefore critical actors for both the proliferation and the containment of online misinformation. The platformization of both society and journalism (Poell et al., 2019), as well as the resulting reduction in financial resources due to a changing media logic (Asp, 2014), makes adhering to the journalistic core tasks of source verification and fact-based reporting increasingly difficult (Mayerhöffer et al., 2022).

However, fact-checking is not limited to the major news organisations; independent fact-checking organisations conduct a large portion of the fact-checking of online social media. With the ongoing platformization of our societies, there has been a rapid increase in online

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[20] Media literacy: what are the challenges and how can we move towards a solution? | Media@LSE
[21] https://euromediagroup.org/mdm/

disinformation, polarisation, and audience fragmentation (McNair, 2018). Notably, during the COVID-19 epidemic online misinformation was a major source of confusion and insecurity among the public (Tagliabue et al., 2020). Moreover, with widespread propaganda and systematic online disinformation about Russia's motives for attacking Ukraine, the work of international fact-checkers has assumed unprecedented global importance. It is also clear that fact-checkers have an important role to play in serving the Nordic democracies as independent watchdogs and innovators in digital information literacy (Horowitz, 2022).

1.2 Research focus

In order to gain an insight into policy issues pertaining to the information disorder in the Nordic digital welfare states, it is motivated to focus this NORDIS report on the lesser-known but increasingly important work of the fact-checking organisations.

This report has a narrower scope than that of the academic article. The report presents findings from interviews conducted with the four largest independent fact-checking organisations in the Nordics. These organisations are all members of the NORDIS consortium: Faktisk.no (NO), Tjekdet (DK), Källkritikbyrån (SE) and Faktabaari (FI). The report's focus is on policy approaches. The main goal of this report is to show how these policies are operationalised and how they affect their everyday work, as well as what the main challenges and possible solutions are in the work of the Nordic fact-checkers.

Policy-wise, in the updated code of conduct by the EU Commission the importance of the fact-checker's role in fighting disinformation has been emphasised. Fact-checkers have an impact and can contribute considerably to the success of the Code:

> New signatories could also include other stakeholders that can have a significant impact through their tools, instruments, solutions or relevant specific expertise, including fact-checkers, …. Such organisations can contribute considerably to the efficient implementation of the Code and its success.[22]

Following that, the ambition and overall aim of the forthcoming academic is to further examine further the roles, policies, and interplay of key Nordic epistemic- and policymaking institutions to gain a better understanding of how the resilience has developed and how it is being maintained.

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[22] COM(2021,p. 6) 262 final (COM(2021) 262 final). (2021). European Commission. Guidance on Strengthening the Code of Practice on Disinformation | Shaping Europe's digital future

In the academic article, the scope of the policy approaches covered will be widened to include the Nordic Media and Information Literacy institutions (MIL) and key representatives from the Nordic Journalist's Unions, as they have a deep understanding of the journalistic work conducted at the leading news media, (both private and public service). Finally, the higher level insights into policy-making will be gathered from the ministry level interviewees. When complete, the empirical material should sufficiently cover the necessary layers of policy approaches involved to provide for a better understanding of the roles and interoperability of the various organisations involved in countering disinformation in the NORDIS countries.

1.3 Research questions and objectives

As demonstrated in the recently published NORDIS Policy Brief (Horowitz, 2022), there are significant discrepancies in the policies governing the modes of operation of the four largest independent fact-checking organisations: Faktisk.no, Källkritikbyrån, TjekDet and Faktabaari, all of which are members of the NORDIS consortium. Keeping these distinctions in mind, the research question for this report becomes:

How do the Nordic fact-checkers operationalise their policies and codes of principles?

The article aims to attend to the following research objectives, it will analyse:

1. What fact-checking means as a concept for the Nordic fact-checking organisations.
2. How the Nordic fact-checkers define their policies and codes of conducts.
3. How the Nordic fact-checkers structure their work in their newsrooms.
4. How the Nordic fact-checkers view their work in relation to the news media.
5. How the Nordic fact-checkers relate to their audiences.
6. What economic challenges the Nordic fact-checkers are facing.
7. What technological challenges the Nordic fact-checkers are facing.

1.4 Method, material, and timetable for the remaining work.

To get insights for the above objectives, in-depth, semi-structured expert interviews[23] were conducted with all four NORDIS fact-checking organisations: Faktisk.no, Källkritikbyrån, TjekDet and Faktabaari. The interviews conducted over Zoom, were 60min long. The audio recordings were transcribed, coded, and analysed in accordance with the overarching themes that emerged from the material.

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[23] Interviews are a widely used method in media production studies (Bruun, 2016)

Additionally, all public policy documents were gathered from all four fact-checkers and have been used to analyse the policy approaches of the fact-checkers.

The interviews were conducted with the goal of gaining a broad understanding by what codes-of-conducts the fact-checkers work, what their main challenges are, what possible solutions to these challenges already exist, and how NORDIS researchers could contribute for critical information needs. The chosen organisations represent all four countries of interest. Interviews three and four were partly overlapping with two persons from Faktabaari. The organisation and roles of the interviewees were:

Interview	Organisation	Interviewee position	Interview date
Int. 1	Källkritikbyrån (Sweden)	Fact-checker, CEO	24.9.2021
Int. 2	Faktisk.no (Norway)	Fact-checker	6.10.2021
Int. 3,4	Faktabaari (Finland)	Fact-checkers	11.10.2021
Int. 5	Tjekdet.dk (Denmark)	Fact-checker, CEO	2.11.2021

Table 2. The Fact-checker interviews

We present the key findings from the interviews in section 2.0, using the same structure as with the objectives in section 1.3 above.

For the academic article, in the second phase of the research process the following interviews will be completed. The national media literacy organisations: Medietilsynet (NO),[24] Statens medieråd (SE),[25] Medierådet for børn og unge (DK),[26] and KAVI (FI)[27]. In phase three the journalist' sunions: Norsk Journalistlag (NO),[28] Journalistförbundet (SE),[29] Dansk Journalist-forbund (DK), [30] and The Union of Journalists in Finland.[31] The interviews with the Finnish Ministry of Transport and Communications and the Ministry of Education and Culture have

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[24] https://www.medietilsynet.no
[25] About the Swedish Media Council - Statens medieråd
[26] https://www.medieraadet.dk
[27] National Audiovisual Institute
[28] Norsk Journalistlag
[29] Journalistförbundet
[30] Dansk Journalistforbund
[31] Journalists in Finland

been conducted in a closely related CORDI[32] project. The use of the transcriptions has kindly been approved by the authors and CORDI management. The interviews with The Swedish Civil Contingencies Agency and with The Nordic Council of Ministries were conducted in December 2021 by the author. All remaining interviews will be conducted during spring 2022. The academic article will be submitted to an academic journal by the end of June 2022.

1.5 The interviews and their relation to task 4.2 "Analysing user needs"

In addition to the outline of the work of Task 3.1 as described in the grant agreement, it was decided at the NORDIS meeting on September 14th, 2021, that these first interviews could help with gathering a baseline of claims for the corpus of the NORDIS project. Some basic technical questions were therefore included in the interviews, already ahead of Task 4.2 in the project schedule. The purpose was to identify what type of data structures and methods were used to store and analyse the claims and fact checks. A short report was submitted by the author to the Aarhus, Uppsala and Bergen teams. Since Task 4.2 is a part of the Software Development Life Cycle, those task-specific user needs, and requirements are inherently technical. These interviews, on the other hand, should provide a basic overview that can be used as part of task 4.2 to present some of the basic technical challenges that fact checking work presents in practice.

Additionally, one question asked in the interviews was "what are the main challenges in your work?". Oftentimes the answers relate to a technical challenge. These answers have been gathered into section 2.7 in this report. Therefore, there is a small overlap between the tasks 3.1 and 4.2. However, the reports should be seen as complementing each other and not competing.

The next section presents findings from the interviews conducted with the fact-checkers. The findings relate to how they work and what policy approaches they have, followed by the other aims above, using verbatim quotations as illustrations and evidence for the analysis.

2.0 Findings

Of the four fact-checking organisations studied, Faktisk.no have the most elaborate arrangements with external organisations that fund their work, use their services, and collaborate with them. In connection with the launch of the NORDIS project the Editor-in-

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[32] COMMUNICATION RIGHTS IN THE AGE OF DIGITAL DISRUPTION Interviews conducted by Minna Aslama-Horowitz and Esa Sirkkunen.

chief of Faktisk.no presented an overview[33] of what fact-checking is, what it means and how it is performed at Faktisk.no. The following were the main points of the presentation. They serve as a solid foundation for describing the generic meaning of what fact-checking is.

2.1 The fact-checking concept

According to the interviews, the four fact-checking organisations principally agree on the following basic premises of what fact-checking means as a concept.

- Fact checking is seen as a subgenre of investigative journalism.
- It is meant for publishing; in practice it means writing stories.
- It means checking claims, not opinions.
- It means using classic news criteria for selecting claims with local relevance.
- It means finding the combination of what is viral and what is important.
- It means not just checking the claims but also giving context about the check.

Fact-checking also means that there is a common procedure in place, a pipeline starting with the monitoring of the media, spotting the claims - checking the claims - publishing and spreading the checked claims. The overarching goal is to contribute to an open, inclusive, and fact-based public debate relevant to local discourse.[34]

2.2 Fact-checker policy and codes of principles

The International Fact-Checking Network[35] (IFCN) works as a certification agency that gathers international fact-checking organisations from around the world. All except the Finnish fact-checkers are IFCN members and have adapted their policy requirements accordingly. A commitment to the IFCN code of principles is required to be accepted as verified signatories:[36]

1. A commitment to Non-partisanship and Fairness.
2. A commitment to Standards and Transparency of Sources
3. A commitment to Transparency of Funding & Organisation
4. A commitment to Standards and Transparency of Methodology
5. A commitment to an Open & Honest Corrections Policy

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[33] Faktisk.no in Practice, Kristoffer Egeberg, Editor-in-Chief
[34] Faktisk.no in Practice, Kristoffer Egeberg, Editor-in-Chief
[35] International Fact-Checking Network - Poynter
[36] The commitments of the code of principles

When reading the policy-documents of the NORDIS fact checkers, they share these principles as a foundation of their own working policies. These are then supplemented with other rigorous ethical principles, such as the national Ethical Codes of Practice for the Press, which are followed closely by the fact-checkers.

2.3 Working procedures in the fact-checker's newsrooms

There are large differences in the size of the four organisations. The larger companies Faktisk.no (13 full time staff) in Norway and Tjekdet (9 in staff) in Denmark are working with fact-checking in a traditional newsroom type of setting. Faktabaari (2-3 part-time in staff) also has a substantial focus on MIL activities. Källkritikbyrån in Sweden has a staff of three and have worked as fact-checkers in the form of Viralgranskaren, a fact-checking department of the Swedish Metro tabloid since 2014, until starting their own fact-checking bureau.

In Norway and Denmark, the working day starts with a newsroom meeting where the tasks are discussed and divided among the staff. The newsroom editor chooses what to check. The used filtering mechanisms for deciding on what to evaluate are based on several criteria that are very similar across all four fact-checking institutions as can be seen from the following quotes:

- Is it a factual statement at all? (sine qua non). (Int.2)
  Is the claim unique? Can it be understood in various ways, or can we say this is an actual factual based claim? (Int.5)

- We do not fact-check the news, rather if someone spreads a statement, if it should be relevant. …We see what has virality. … Spread, many people wonder if it is true or not. There must be a specific question that fits the fact-checking, it must be a limited statement. (Int. 1)

- [H]ow resource intensive would the checking this claim, is it worth it? (Int.2)

- Who says it? Is it somebody important, decision maker in any way? (Int.5)

- traditional news criteria, is it important? Traditional newsworthiness: if it goes viral or a prominent politician says something, it is also newsworthy. (Int. 2)

- Spreading. How much has it spread? (Int.5)

- How relevant is it to the public democratic debate? (Int.5)

All the fact-checkers have webforms that can be used by the public to request a fact check. Oftentimes the requests are not checkable claims but rather someone's opinion:

> If we are sent a request, which is clearly an opinion, then we will not check the opinions. In other words, it must first be considered whether it is such a verifiable matter at all (Int. 3).

The fact-checkers usually do not check the news but rather claims that are spreading on social media, most often on Facebook and all of them, except Faktabaari, are official third-party fact-checkers affiliated with Facebook. In return Facebook provides special access to their data sources and analysis tools like Crowdtangle,[37] that shows how public content spreads across Facebook and Instagram.

The essence of their work is one of verifying what seems to be factual claims and then report on the veracity of the claim. They work with text in different forms, as well as with images that may have been taken out of context and videos that may have been manipulated. The fact-check can be a time-consuming process, which can take days and involves the use of various tools (such as Crowdtangle or Google reverse image search) that together form the toolbox that help the fact-checkers analyse the claims. The fact-checkers have a tradition of actively collaborating across borders and help each other out in the process. They compare claims with the other Nordic countries to see if they have already turned up previously somewhere else, maybe in some other language, as seen in the next example from Sweden:

> But before that, we look at what is spread in Finland, Norway, Denmark then it leads to 'ah - but it maybe in Sweden as well' people talk about the same thing. This digital society is after all a Global Village. (Int.1)

Faktabaari has divided their resources equally between a focus on MIL related work and doing the fact checks:

> After all, [we do] not only do factual checks, but also make …and even half [of our work] is meant for making background articles or blogs like this. That is how both will probably be connected to education as well. (Int. 3)

Faktabaari has also actively been involved in educating both journalism students and creating Digital Information Literacy (DIL) education for adults. Their "FaktabaariEDU" initiative is actively involved in several international projects on DIL.[38]Teaching and supporting Media Information Literacy is an important part of work for all four fact-checkers. These activities take on different forms: in Norway, the "Tenk."- group of Faktisk.no, produces educational material in critical media analysis meant for teachers working with teenagers.

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[37] https://help.crowdtangle.com/en/articles/4201940-about-us

[38] Edu - Faktabaari

The materials are openly accessible on their website.[39] According to the Fatisk.no interviewee, their MIL department is functioning well and has managed to secure its own funding:

> It's working really well, their materials are popular, and can be downloaded for free by teachers. They are holding a lot of workshops with teachers and schools. They have been giving actual classes, like in high schools, I've been taking part in some. "Look at this fact-checker, you can ask him questions" and so on. It's important to know that Tenk. have been able to arrange permanent financing. The age group is 13–19-year-olds. (Int.2)

According to the Fatisk.no interview, these teenagers are generally alert, and Tenk. helps them become more aware about the underlying logic of the platforms and how filter bubbles and silos are formed:

> Regarding silos, I think the important thing is to know that the content you're being served, whether its images or textual or whatever, is not based on your interests alone. There's a different kind of interest at work there providing what you see. And that's people that want to keep you watching for as long as possible, to learn as much as possible about your behaviour and then being able to use that for something…To my mind at least, teenagers have this anarchic spirit and way of thinking. If they learn that someone else is controlling behind the scenes what they're seeing, they might not like that and be more reflective about how it works (Int.2)

In Denmark, Tjekdet have their "Undervisning"[40] department which likewise provides a lot of educational content for students from grade one to grade ten (7-17year olds).

> But we also wanted to create a section, a portal. Which gathers all kinds of learning material or science within misinformation and disinformation. I mean primarily Danish until because what we've learned over the years is, there is so much good material out there, there's so much good science done on the Danish university on this topic, but it's spread everywhere you know all over the Internet. (Int. 5)

Tjekdet launched two portals in April 2021: a first portal with educational material (600+ articles at the time of writing) aimed at young people and a second portal with pedagogical

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[39] Om oss | Tenk
[40] Undervisning | Tjekdet

material aimed at educators. The portal has a motto: "Stop, Tænk, Tjek det"[41] meaning, stop and think before you share on social media and if the claim seems too spectacular to be true, then check who is behind this information. Finally, Källkritikbyrån in Sweden, like the others, also presents their fact-checks on their website. Moreover, they collaborate actively with the Swedish Public Service: "UR" (Utbildningsradion) to create educational video material on important issues in society, especially on issues that are important for young audiences.[42]

In this regard, the term "fact-checker" does not do full justice to the work performed; the four fact-checking organisations have an important role to play as MIL experts, especially considering their knowledge within digital information literacy (DIL). With it they contribute to the larger Nordic field of national media literacy organisations, Medietilsynet (NO),[43] Statens medieråd (SE),[44] Medierådet for børn og unge (DK),[45] and KAVI (FI),[46] all of which collaborate with their respective National fact-checking organisations.

2.4 How the Nordic fact-checkers view their relation to the news media.

According to the extensive Media for Democracy 2021 study,[47] the Nordic traditional news media regard fact checking to be something that the journalists do as part of their day-to-day work. They do not in general utilise external fact-checkers in their work. The exception is Norway, where the biggest owners NRK, TV2, and VG are working closely with Faktisk.no, and utilise the content produced in their own programmes and reporting, allowing for a functioning synergy with the fact-checkers:

> The NRK, TV2 are owners and members of the board, we have our own journalists. No conflict there. They can publish all of our content for free. That generates traffic and readership. Some of our material is used for seminars, workshops and other educational stuff and used as a resource in the newsrooms, to discuss with the journalist. Finally, the Public Image of funding a fact-checking organisation.There's a PR-benefit for the owners. Relationship is the same with all owners. (int.2)

In this case, the advantages of collaboration are obvious and well understood. Even though some journalists and editors-in-chief are less interested[48] in what the objectives of fact-

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[41] Stop. Tænk. Tjek Det | Tjekdet
[42] Algoritmen: Sant, falskt eller mitt emellan? - Intervju med Källkritikbyrån | UR Play
[43] https://www.medietilsynet.no
[44] About the Swedish Media Council - Statens medieråd
[45] Medierådet
[46] National Audiovisual Institute
[47] https://euromediagroup.org/mdm/
[48] This was common for Sweden, Denmark and Finland in the MDM report.

checking institutions are because their domains are different, the work is usually well understood and agreed upon among fact-checkers themselves.

When discussing the general ethos of fact checking, the consensus across the field (int.1,2,4,5) is that fact checking is an auditing and exposing activity, instrumental for determining whether a claim is legitimate. Journalists, on the other hand, usually work as reporters. However, investigative journalism corresponds closely to what the fact-checkers do, as both are researching the truth of claims. Some fact-checkers view their work as being a sub-genre of investigative journalism. In comparison to other journalists however, they are probably the only ones using forensic tools to detect image manipulation and trying to locate places and signs such as billboards or road names, that help reveal the locations of images.

Journalists create and report the news which are then rarely directly verified by fact-checkers since they usually do not work with traditional media as a source but rather with Facebook and other social media platforms. The journalistic institutions in Finland do not in general use external fact checking services rather they take care of the fact-checking in-house:

> [I]t became clear from the questions asked that one could interpret that the significance of fact-checking is considered rather small. … It seems that Finland has a very strong traditional idea that the media itself checks and takes care of its own work, that there is no need for an external fact-checker. (Int. 3)

According to the Media for democracy 2021 study,[49] a common opinion among the editors-in-chief interviewed, was that good journalistic principles are the basic method for countering disinformation in the newsrooms, not just in Finland, but also in Denmark:

> There is high awareness on the issue of misinformation on digital platforms in Denmark; the actual amount of fake news and disinformation campaigns on social media appears, however, to be comparatively low. Defence mechanisms are in place, but they mostly rely on established journalistic fact-checking (Trappel, J., & Tomaz, T., 2021, p. 364).

And likewise in Sweden:

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[49] https://euromediagroup.org/mdm/

Newsrooms are generally aware of the risks of misinformation and information coming from social media platforms and regularly discuss these problems. Even though there are no specially trained experts in place, leading news media maintain professional journalistic values such as fact-checking and getting. (Trappel, J., & Tomaz, T., 2021, p. 159).

2.5 How the Nordic fact-checkers relate to their audiences

One of the most difficult challenges that all fact-checkers face is how to deliver their fact-checks to the public, to reach their audience. The Nordic fact-checkers' primary work domain is social media, particularly Facebook, which is the most common platform where fact-checking is performed. The fact-checkers use labels to tag claims on Facebook, and they often post the claims they have debunked on Facebook, alongside information and videos that explain in greater detail why the claim is false. All four fact-checkers use Twitter, and their websites display the claims they have investigated. The question of reach and impact is a recurring theme:

How does one do a fact-check so that it has the greatest possible Impact? … Then there are those sitting on the fence, followers or relatives who do not really know what to believe, how do you write, so that you reach them? (Int. 1)

It is unclear why these groups are especially vulnerable to disinformation:

The key question is why people follow disinformation and misinformation. This is what media educators should think about … there is a real risk to become cynical here ... to end up in a situation where people think 'since everything is more or less disinformation I can propagate my world view any way I want to' (Int 4)

For some citizens, be it due to some form of confirmation bias or a need to feel part of a tribal or cult-like community, some people tend to avoid information that contradicts their own beliefs. Once inside a group, the facts and fact-checking does not really matter anymore. You end up in an echo chamber and accept the norms and the truth of the camp:

If you want to be in a camp then you will accept everything happening there. If you want to be in a certain group then you're willing to have the whole package. (Int. 1)

As agreed by another fact-checker, this makes some subsets of the population unreachable for the fact-checkers:

> I think there is a subset of the population that is so convinced that what they want to believe is also true. They are not really reachable by fact checks. And I don't think it's even worth the effort to try. … [B]ut I think this group is quite small, it would take a lot of time and energy to reach them. (Int. 2)

As this group is likely to be small and hard to reach, it is better to focus the fact-checking efforts on larger demographics that are more prone to misinformation:

> It's more important for fact-checkers to focus on people who are susceptible to end up in that place [fallen down the disinformation rabbit hole] but haven't yet done so. I think that's more important. I suspect that the susceptible groups have more demographic variables in common than the people who have actually fallen into the rabbit hole. Int 2.

However even some larger segments may be isolated to the extent that they do not register on the fact-checker's sensors. It is as if there was a two-tier division of society, with fact-checkers only having access to one side:

> If we look at a post on Facebook that has many, many shares, there are still a lot of people who haven't seen it. And I think that creates a problem… sometimes we have, like you know, two audiences. … we have friends that all pretty much never share anything misinformative, there will be a lot that we don't see. But on the other side, on track two, there are …80,000 people that have seen a certain claim and sometimes I feel there is a group of people that … don't understand why we are fact checking a specific claim. (Int. 5)

The key dilemma with filter-bubbles and echo-chambers will be amplified considerably when some of the social media platforms become walled off or point-to-point encrypted. This will make fact checking more difficult in the future. The freedom brought by a generic anonymity online can be a bliss, but it also brings with it some ethical challenges regarding how one should use this freedom in a responsible manner in this digital world (int.1).

Isolation and separating citizens into smaller groups walls off sensible critique from the rest of society. Today, with Facebook tools like Crowdtangle, it is possible for fact-checkers to screen the spread of openly shared information. However, an increasing problem is the encryption of platforms like Whatsapp, it allows for a hermetically sealed echo-chamber effect that could let this type of disinformation ferment undetected until it explodes, which is worrying for fact-checkers as well:

> I worry more about insular communities being allowed to ferment on their own, spreading their misinformation in ways that we cannot monitor or access. Something like "Stop the steal" groups, …you can imagine if no one knew about them - but everything else works as usual. You'd have the algorithm that rewards engagement and gives you visibility once you generate engagement, then those groups would have had the same amount of members, but had very little public attention to them and they would probably just explode in the open. (Int. 2)

The platformization and the resulting changes in the traditional media logic (Asp, 2014) is one reason behind these trends. Where the gatekeeping function in news media traditionally ensured a balanced news content. Today however, the whole fence is gone (Grönvall, 2015) and everyone is responsible for aggregating their own news feed. With the increase in personal responsibility, the risk of the spreading of disinformation also increases. News that triggers an emotional response have been shown to travel faster (Vosoughi et al., 2018). These risks combined with a lack of understanding of their consequences, create similar effects across different segments of society; citizens from diametrically opposed social groups, who are vulnerable to political and general populist pressure, begin to form eerily similar discourses:

> When you then see someone who is angry at the establishment, then you know where he will land and who his bed mates will be. And this has shocked many when you see that the soft Yoga people suddenly join forces with… right-wing extremist people who talk about the Jewish world conspiracy. (Int. 1)

When discussing the social challenges associated with fact-checking activities, one recurring theme was that younger media users frequently have a better understanding of social media than their parents.

> The problem with the young group, they may know technology and stuff, but they do not know society yet, so they do not know what is plausible and they can be duped for that reason, Facebook is not a platform for young people. (Int. 1)

Younger people tend to choose newer platforms such as TikTok and Whatsapp:

> I think older people are more susceptible to being caught by misinformation, although it's hard to tell, because the platforms where young people are mostly active don't share much data, so it's hard to know what's actually going on there, like Snapchat and TikTok are much more walled of in terms of sharing data and API's (Int.2)

2.6 Economic challenges for the Nordic fact-checkers

The funding of their work were the main concerns for the fact-checking organisations. The best way to make sure that fact-checkers can check everyone else's activities independently, is by making sure they are self-funded independent organisations. However, this presents some challenges.

In Norway, Faktisk.no has managed to find a working solution with their owners, the largest public service and commercial media in Norway[50]. There have been efforts made in Denmark and Finland to create a similar collaborative milieu but without success so far. In Denmark, the owners wanted to keep an arm's length principle towards Tjekdet:

> And I think part of that perhaps was the reason why the old media houses rejected the invitation. Saying we could do that ourselves, we fact check ourselves. We can handle our own mistakes. We don't want you to Fact Check us and then own you at the same time. We tried it twice to ask them but were rejected so that is why it was never, it could, It cannot be financed the same way as Norway. (Int. 4)

Also in Finland, Faktabaari commented that such arrangements are unlikely, due primarily to the generic lack of possible owners:

> Probably this is because the media is surprisingly concentrated in Finland. When you realise that Faktisk was set up by 6 different media houses, … we don't even have that [many] … Here is such a tense imbalance that we have a couple of really big ones who for many reasons are quite satisfied with their own work. (int.3)

In Finland, there are very few large media companies, and they are hesitant to collaborate with Yle, the PSM. Making the Norwegian model a difficult concept to implement (int.3,4). In Sweden, Källkritikbyrån is making a living by combining several different income sources:

> You can build collaborations and lectures and so, you get money that can go to do what we really want: to sit and fact-check things. … [T]here was a need in connection with Covid, suddenly people were really interested in digital media literacy….do tasks with different people who want to hire us as experts, or we get involved in different productions. Our money stems from many places. (Int.1)

Nonetheless, the fact-checkers play an important role in checking disinformation and assisting citizens who frequently rely on social media for information.

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[50] https://www.nrk.no/kultur/historisk-samarbeid-om-faktasjekking-1.13438305

Therefore, initiatives such as the EU Code of Conduct[51] that do recognise the importance of the fact-checkers, would need to coordinate with national policymakers in discussing feasible policies and funding principles for supporting the fact-checking work. Currently three out of four fact-checkers face economic challenges that limit their agency.

2.7 Technological challenges for the Nordic fact-checkers

There are needs for new tools. Most fact checking activities are slow, and is mostly done with manual labour, and the promise of AI are so far mostly promises:

> We are ordinary journalists, and there are few tools at our disposal, … any tools that can improve the situation is positive. … In that work [with AI] we discovered the great difficulty of building yourself out of the problem of fact-checking. There will always be a basic job that must be performed by a human being somewhere. (Int. 1)

One AI function that would be important is automatic claim recognition, determining what claims are check-worthy in the first place:

> Now we are quite relying on tips from our readers, we collect a lot of social media data just to see if there is something worth checking there. We would need a more automated claim collection and claim recognition would be useful. (int.2)

One threat with the increasing point-to-point encryption is that the users disappear under the horizon and take their misinformation with them. Then tools like Crowdtangle will become useless, making it harder to trace the origins of misinformation (Int. 2). Current trends predict that also Facebook is likely to close off more:

> If you develop a new tool that could help us on Facebook, they will, you know, find an easy way to block it. And that's something we have seen over the years, especially after the Cambridge Analytica case, they started blocking and also rejecting scientists who [now] can't get API access. (Int. 5)

Meanwhile, the feed of claims served by Facebook via Crowdtangle to their third party fact-

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[51] COM(2021) 262 final (COM(2021) 262 final). (2021). European Commission. Guidance on Strengthening the Code of Practice on Disinformation | Shaping Europe's digital future

checkers contain a lot of redundant data. A lot of fact-checking time is wasted on insufficient claim recognition capability by the machine learning algorithms that are lacking an understanding for the local languages:

> And 90% of the content has no relevance for us … I think the problem is that it takes time for the algorithm to learn what we want, … now it has to learn Danish, Norwegian, Swedish. But over the last two years, it's been more and more precise, but still there's a lot of noise (Int. 4)

AI is not just an opportunity; it is also a threat. GPT3[52] and similar NLP language model algorithms are already capable of providing disinformation in text form indistinguishable from those written by humans. Fact checking images and videos are even more difficult, and AI generated deep fakes will be a problem in the near future, demanding new tools:

> It's not common, yet. It's going to be an issue, definitely. We fact-checkers will not be able to solve these challenges on our own. We will have to follow what will be an arms race between forensic people and the creators of fake videos.

Other common wishes for improvements in the fact-checker tool bags would be some form of sentiment analysis that could analyse emotional states underlying the claims:

> If that system could also predict where, how and how far those claims would spread that would be ideal. We could see that this is that type of claim that will probably spread within this or that social network …So it could also do Sentiment analysis on its own, which I think would be an important (Int.2)

> [Go] more into the motivations and "psychology" of people spreading disinformation is very interesting. In general, a sociological analysis of the potential audiences for fact checks. We know we are most likely to reach the highly educated middle class who are the people that don't really need fact checking. …what would be very useful to know, are there demographic commonalities between the people sharing and being more susceptible for disinformation, and how can they be reached. (int.2)

Not all development needs have to do with technical issues, there is also a need for help with structuring information and improving conceptual thinking. (int.1)

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[52] See eg. https://openai.com/

2.8 Summary of the conclusions from the fact-checker interviews

The key findings of the NORDIS fact-checker interviews can be summarised as follows:

1. The importance of the fact-checking organisations has been readily recognized in EU policy
2. The fact-checkers do an important job that is essentially different from that of news journalists. Fact-checking is an auditing activity, instrumental for detecting what can be said about a claim. The journalists traditionally report the news. Investigative journalism however is closer in nature to the fact-checking activities, some fact-checkers consider fact-checking a subcategory to investigative journalism.
3. The roles and importance of fact-checkers and what added value they bring to journalism, is not fully understood by commercial- and Public Service Media in the Nordics. The news media in Denmark, Sweden and Finland handle their fact checking needs in-house using their own journalists.
4. One exception is Norway where the collaboration with the media owners works in a mutually beneficial way.
5. Fact-checker domains are social media, in the Nordics primarily Facebook.
6. The quest for accessing walled off social groups (due to silos or encryption), creating an impact by reaching those that would benefit the most from reading the checked claims, are overarching epistemic challenges for the fact-checkers.
7. The difficulties associated with filter bubbles have increased and are likely to continue, resulting in walled-off segments of society that are inaccessible to fact-checkers.
8. The fact-checker's work is very different in the four countries. There are well developed routines and large newsrooms in Norway and Denmark. In Sweden and Finland, the actors are small in comparison.
9. All except the Finnish fact-checkers are Facebook certified partners. Some end up with a lot of claims fed through Crowdtangle that have proven to create extra work due to the incompleteness of the algorithms in understanding the Nordic languages.
10. All except the Finnish fact-checkers are IFCN members and have adapted their policy accordingly
11. The fact-checkers' funding principles and resources differ greatly.
12. The fact-checkers need a functioning national policy to ensure their funding, a model that at the same time would guarantee their independence.
13. The interoperability with the fact-checkers and the national MIL institutions is an important part of all the fact-checker's work and is integrated in their policies and their modus operandi. In Norway and Sweden there is also collaboration with the PSM.
14. The fact-checkers face difficulties because of the ongoing encryption of platform communication; these issues lack simple solutions and will worsen over time.
15. Similarly, there are issues with Facebook, which has increasingly closed its platform to researchers and fact-checkers.

3.0 Discussion

On February 23rd, 2022, Frances Haugen[53] discussed the options at hand and the responsibilities of Ireland as the European home of Meta in forming a good legislative policy framework to handle the challenges of regulating the platforms. The two-hour hearing[54] on "online disinformation and media literacy" with the Joint committee on Tourism, Culture, Arts, Sport and in Dublin, brought to the fore many important aspects of how one could argue for the best practices of regulation, legislation and policymaking regarding Meta and platforms in general. These issues have fundamental relevance also when assessing the work and responsibilities of the Nordic fact-checking organisations and are used context in discussing the relevance of the preliminary findings listed in section 2.8 above.

3.1 Relevance of findings in relation to the Nordic discourse on policy

In 2018 the Nordic Council of Ministers commissioned a study on journalism policy, the results were disseminated as a report: "Fighting Fakes - The Nordic Way" (Lundgren et al., 2018). In the policy recommendations part of the report, the authors conclude that the best means to fight disinformation in the Nordics is "to improve the quality of journalism and to ensure media pluralism. Ensure robust fact-checking mechanisms, cooperation, and self-regulation". The findings from this NORDIS study are in line with the above, however it should be emphasised that traditional journalism and fact-checking are slightly different activities. While both are instrumental in looking for and presenting the best available truth, their domains and duties are different. The fact-checkers' main job is reducing the threats created by the unruly and unregulated platforms, in the Nordics, explicitly those created by Facebook. This dislocation of news, as "it moves from platforms produced and controlled by traditional news media to platforms outside their jurisdiction" (Ekström & Westlund, 2019) is the key reason why we need fact-checkers in the first place.

However, since the need for fact-checkers has been generally established, their importance should be considered further to ascertain the necessary working conditions and providing for a general arms-length principles towards policy- and decision makers in the Nordics. For this purpose, they should remain independent, organisations fact-checking the public discourses in their respective countries.

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[53] Who is Frances Haugen, the Facebook Whistle-Blower? - The New York Times
[54] https://www.oireachtas.ie/en/oireachtas-tv/video-archive/committees/5334

3.2 Relevance of findings in relation to national media funding policies

The main existential challenges for the Nordic fact-checkers are that they are non-profit organisations arguably performing a public service. Their role as MIL educators should also be recognised. They have a special skill set and can provide for the DIL part. Naturally, they also have a deeper and more hands-on understanding of the inner workings of how disinformation spreads on social platforms. Because questions of impact and reach are critical aspects of fact-checker activities, there are many benefits in collaborating with the news media.

Faktisk.no is the most advanced role model in this respect. Their operations were created from the beginning in partnership and collaboration with their owners, Norway's leading public service and commercial media businesses.[55] This collaboration has allowed the forming of policies that facilitate good working practices for the various actors. The owners benefit from Faktisk.no's claim checking and in turn, help them gain visibility for the fact-checks via their nation-wide networks.

The Norwegian model could arguably be a step forward to aspire for. However, national differences, as well as an increase in concentration of media ownership,[56] make it difficult to allow for similar solutions in the other Nordic states, as Tjekdet in Denmark experienced when attempting a similar ownership arrangement. In Sweden earlier experiments with Faktisk.se[57] 2018–2019, started from similar premises as Faktisk.no. However, it was not successful, likely due to the challenges with the work being divided across seven different independent newsrooms.[58] In Finland initiatives are being made that may result in a successful collaboration along similar lines to Faktisk.no if a suitable framework can be agreed upon by the interested partners.[59]

There are general national policy challenges with how to maintain sufficient media diversity in the Nordics (see e.g., Ohlsson et al., 2021) and the platformization places increasing demands on effective support measures for the news media. To ensure a future independence for the fact-checkers, it would be beneficial to consider their work when discussing policies for the distribution of national news media subsidies.

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[55] Om oss. Faktisk.
[56] Trappel, J., & Tomaz, T. (2021). The Media for Democracy Monitor 2021 : How Leading News Media Survive Digital Transformation Nordicom, University of Gothenburg. http://urn.kb.se/resolve?urn=urn:nbn:se:norden:org:diva-12097
[57] Faktiskt.se | IDG:s ordlista
[58] Faktisk.no in Practice, Kristoffer Egeberg, Editor-in-Chief
[59] Phone conversation with Mikko Salo, Co-Founder of Faktabaari 12.3.2022

3.3 Relevance of findings in relation to EDMO, EU, Meta and the DSA

As Haugen points out in the hearing, the focus when legislating on issues pertaining to Facebook, should be on regulating their work on a systemic level. It is the recommendation algorithms that are important. More important than any efforts regarding censorship and lengthy documents about what should be considered harmful or illegal content.

In 2018 a systemic change in the algorithms was made at Facebook. According to Haugen, the logic of how the newsfeed is constructed and what posts are prioritised was changed from being based on the *time spent* on Facebook to being based on *meaningful social interactions*. The latter optimises for reactions, and the fastest way to get reactions is by spreading hate.[60] The new algorithm rewards polarising, angry content over content that aims for a common path forward. This 2018 systemic change is likely the main reason for many of the problems Facebook and the Nordic fact-checkers are dealing with today.

Facebook's AI based censorship only really works well for posts written in English. This fact was pointed out by TjekDet whose feed from Crowdtangle consists of 70-90% of non-check worthy claims (see section 2.7 above). The classifier algorithm may conclude that a post is inciting violence, however the AI does not understand the nuances in the language and typically identifies 3-5% of hate speech correctly, primarily in the languages Facebook has invested in, which is mainly English. These machine learning algorithms have to be rewritten and then retrained for every language and even for specific dialects, Haugen points out and continues that there is a very limited number of skilful programmers available that would fathom the connections between the developing AI issues and their larger social implications. Most of the staff is educated inside Meta for specific tasks.

However, in EDMO projects and among the NORDIS partners, there are several skilful AI and machine learning experts that will be able to produce useful tools to help the Nordic fact-checkers. Nonetheless, the underlying problem for EU legislators and policymakers, is that their whole focus is misaligned. The focus should be on forcing Facebook to change their algorithms that define what gets shared and not on focusing only on the content. It is a systemic problem at root and as such language agnostic since the prioritising algorithms themselves are not language bound.

Haugen applauds the Digital Services Act. Her view on what would be the right way to approach the larger issues of disinformation, is to legislate on mandatory transparency and

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60 Vosoughi, S., Roy, D., & Aral, S. (2018). The spread of true and false news online. Science, 359(6380), 1146–1151. https://doi.org/10.1126/science.aap9559

recurring auditing of Facebook, to deal with issues that have been brought forward by the public and NGO's (like the MIL/DIL-experts). This would force Facebook into disclosing weaknesses that have been found in their system and through a feedback loop, make it possible for legislators to follow up on the identified problems and how they are being addressed. Currently Facebook/Meta is only compelled to present their monetary result as gain and losses. The rest of the data of three billion people stays behind their opaque walls. Only Facebook has access to the data and as long as this remains the case, the importance of ongoing fact-checking initiatives should be recognised and encouraged further.

Technology has always outpaced policy and regulation. Considering the amount of European euros that are spent on Facebook ads, the idea that there would be an alternative social media created in Europe is not impossible to operationalise. If based on current initiatives such as the quest for a public service Internet[61], it could be a viable option should Facebook decide to shut down their platform in Europe due to the GDPR issues presented in their annual report.[62]

3.4 Plans for further work

In the academic article that will be the result of this work, the complete set of interviews will allow for further analysis and more informed detail on the issues related to policy approaches. It should be possible to determine in what ways the fact-checker's work is interrelated with the Nordic MIL institutions. Moreover, there will be a better understanding on how fact-checking is viewed by journalistic institutions. The journalists are represented by key executives from the national journalist unions, since they have a deep understanding of policy issues and a good overview of journalistic practices in both commercial and in public service media. Additionally, they understand the challenges with subsidising and supporting journalism and media pluralism on the whole. The relevance and interdependencies of these institutions in comparison to the fact-checking organisations will be discussed further in the relation to the concept of the Nordic Digital Welfare States.

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[61] https://ia601407.us.archive.org/31/items/psmi_20220127/psmi.pdf
[62] Meta Platforms, Inc.

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