

# Assessing Information Disorder in the Digital Media Welfare State: A Rights-Based Approach



## Executive Summary

In European comparisons, Nordic countries are often considered exceptionally robust in their media systems and highly resilient against disinformation. Even so, so-called platformisation—the penetration of infrastructures, economic processes and governmental frameworks of digital platforms in different economic sectors and spheres of life—has enriched opportunities but also caused serious harms, such as the viral spread of disinformation, in the Nordics.

To provide NORDIS a baseline overview of the national contexts in the participating countries (Denmark, Finland, Norway and Sweden) and to design a framework for further research on policy and literacy analyses, this brief offers an overview of the Nordic digital media welfare states by combining secondary statistical data; 32 original expert interviews with fact-checkers, media literacy experts and policymakers; and an exploratory policy roundtable discussion.

This material reveals a strong Nordic digital media welfare state that is replicated in Denmark, Finland, Sweden and Norway. These countries are structurally highly resilient against disinformation and active on many fronts in conducting related literacy education. Even so, secondary data and interviews still reveal existing challenges and potential risks. Most importantly, they reveal a narrowing down of diversity in national media systems; siloed approaches to disinformation by stakeholders; relatively limited resources and tools, as well as the vague institutional standing of fact-checkers; a lack of (shared) data and frameworks to understand the phenomenon of disinformation; and an absence of citizen-centric core standards to assess digital media and information environments.

Drawing from a set of EU policy initiatives, and in line with the ideals of the so-called Digital Media Welfare state, this brief proposes for its further work on policy and literacy a citizen-centric, rights-based approach to assessing the contexts and impacts of so-called information disorder. The focus of the framework is on the capabilities of citizens to participate in society in a highly digitalised environment and on the challenges and opportunities for key stakeholders to support those capabilities. The purpose of the brief is also to elicit discussion on central role of fact-checkers, literacy and related research in support of right-based, citizen-centric approaches to disinformation.



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## Introduction

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,<sup>1</sup> NORDIS has members from four universities and four fact-checking organisations: Aarhus University (Denmark),<sup>2</sup> University of Helsinki (Finland),<sup>3</sup> University of Bergen (Norway),<sup>4</sup> Uppsala University (Sweden),<sup>5</sup> Faktisk.no (Norway),<sup>6</sup> Källkritikbyrån (Sweden),<sup>7</sup> TjekDet (Denmark)<sup>8</sup> and Faktabaari (Finland)<sup>9</sup>. The project is co-financed by the Connecting Europe Facility of the European Union.<sup>10</sup>

This policy brief, the first in a series for NORDIS, is conducted within Activity 3. The Activity examines policies and digital information literacy in Denmark, Finland, Norway and Sweden and develops academic curricula for future communication experts. The brief is a part of the first research effort of the Activity 3, titled Approaches to Information Disorder in the Digital Welfare State, an interview study of key Nordic stakeholders.<sup>11</sup>

While other Activities focus on detecting specific online disinformation content and spread and offering new innovations for fact-checking, literacy, and journalistic work, this task sets the contextual baseline for the project and its outcomes:

1. This Activity provides an outlook that provides a national-regional Nordic context for the other Activities.
2. Following key recommendations of the EU's High-level Expert Group (HLEG) on fake news and online disinformation,<sup>12</sup> the European Commission's Guidance to Strengthen the Code of Practice on Disinformation (May 2021)<sup>13</sup> and the

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<sup>1</sup> <https://edmo.eu/>

<sup>2</sup> <https://international.au.dk/>

<sup>3</sup> <https://www.helsinki.fi/en>

<sup>4</sup> <https://www.uib.no/en>

<sup>5</sup> <https://www.uu.se/en>

<sup>6</sup> <https://www.faktisk.no/>

<sup>7</sup> <https://kallkritikbyran.se/>

<sup>8</sup> <https://www.tjekdet.dk/>

<sup>9</sup> <https://faktabaari.fi/>

<sup>10</sup> Agreement No INEA/CEF/ICT/A2020/2394203

<sup>11</sup> A scientific research paper for NORDIS by J. Grövall (in progress, 2022). Upcoming NORDIS scientific research paper on stakeholder interviews. 32 original interviews (12 for NORDIS, others conducted in 2021 for the Media for Democracy Monitor project, <https://www.norden.org/en/publication/media-democracy-monitor-2021>; and for the project Communication Rights in the Era of Digital Disruption, <https://cordi.blog/>), two analyses of interviews (the Media for Democracy Monitor), one policy roundtable on platformisation policies and digital literacy (October 2021; co-organized with NORDIS).

<sup>12</sup> (HLEG 2018). *A multidimensional approach to disinformation*. Report of the independent High-level Group (HLEG) on fake news and online disinformation.

<https://op.europa.eu/en/publication-detail/-/publication/6ef4df8b-4cea-11e8-be1d-01aa75ed71a1/language-en>

<sup>13</sup> European Commission (2021). *Guidance to strengthen the Code of Practice on Disinformation*.

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2585](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2585)



Commission's proposals for the European Declaration on Digital Rights and Principles for the Digital Decade (January 2022),<sup>14</sup> this Activity focusses on views of different expert stakeholders with regards to awareness-raising and improving societal resilience.<sup>15</sup>

3. This Activity takes a citizen-centric focus on contextual outlook and thus supports work on information and media literacy, both in terms of policymaking and in terms of concrete campaigns by the NORDIS fact-checker partners.
4. This Activity suggests a novel cross-national analytical framework that
  - a. Proposes a shared, conceptual, rights-based baseline for policymakers, fact-checkers and media literacy experts to assess citizens' communication rights as a safeguard for a healthy communication environment that is resilient against disinformation.
  - b. Follows, as well as extends, the EU Code of Practice on Disinformation, Commitments II D. and E<sup>16</sup> by expanding the needs of consumers to the rights of citizens.
  - c. In alignment with the Declaration on Digital Rights and Principles, and the European Democracy Action Plan,<sup>17</sup> offers the rights-based framework as an operationalisable outline for indicators applicable to other contexts than Nordic countries.

NORDIS, including Activity 3, has four starting points. First, the project is founded on the idea and the ideal of the digital media welfare state that serves and supports its citizens' capabilities to communicate and participate in society. The focus here is thus on a framework for national stakeholders, not for global platforms—although the normative approach of rights proposed here can be extended to them as operating in nation-states.

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<sup>14</sup> European Commission (2022). *European Declaration on Digital Rights and Principles for the Digital Decade*. <https://ec.europa.eu/newsroom/dae/redirection/document/82703>; the European Parliament and the Council are to endorse the declaration at the highest level by summer 2022.

<sup>15</sup> See also, European Court of Auditors (2021). *Disinformation affecting the EU: Tackled but not tamed. Special report No 09, 2021*, Publications Office, 2021, <https://data.europa.eu/doi/10.2865/337863>

<sup>16</sup> European Commission (2018). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Tackling online disinformation: a European Approach*. COM/2018/236 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018DC0236>; see also, <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

<sup>17</sup> European Commission (2020). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. On the European democracy action plan*. COM/2020/790 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423>; see also, European Democracy Action Plan: making EU democracies stronger. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_2250](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2250)



Second, the ideal entails policies and other tools and practices by a variety of stakeholders (at the macro, structural level of global and national media systems, at the meso-level of (media) organisations and at the micro-level of consumer-user-citizens) that address a variety of dangers and ills manifesting as false or misleading information. These phenomena are collectively called information disorder.

Third and fourth, both fact-checking and media and information literacy are seen among the key tools to combat information disorder. However, NORDIS expands the concept of media and information literacy to digital information literacy. These new terms emphasise new and complex critical thinking, information gathering and skills required for full participation in the digital welfare state, including the ability to correctly assess false content and its motivations, both on and offline. Similarly, fact-checking not just claims but the nature of evolving information environment we navigate.

This policy brief first introduces these key terms as policy concepts (see Figure 1). It then describes the NORDIS context with statistical secondary data including a range of indicators on media freedom, plurality and resilience against disinformation, as well as with semi-structured theme interviews of Nordic experts in fact-checking, policy and media literacy.<sup>18</sup> The brief then proposes a framework of communication rights to assess the opportunities for, and competencies of, digital information literacy as a tool against information disorder, including citizens' rights to access and availability of truthful information, the right to personal privacy and dialogical communication rights.

This brief builds its framework on both the aforementioned significant EU policy initiatives (European Democracy Action Plan, Guidance to Strengthen the Code of Practice on Disinformation, European Declaration on Digital Rights and Principle) and recognises the connections of the rights-based approach to the proposed Digital Services Act Package<sup>19</sup> and the Media Freedom Act.<sup>20</sup>

The key proposal of the analysis positions fact-checkers in a distinct role in the Nordic digital media welfare state: they support citizens' rights and aid policymakers and media literacy experts to support citizens' capabilities. As such, fact-checkers should also hold a special, independent but institutional position in a digital media welfare society. Parallel, the brief also provides context and baselines for researchers focusing on information disorder.

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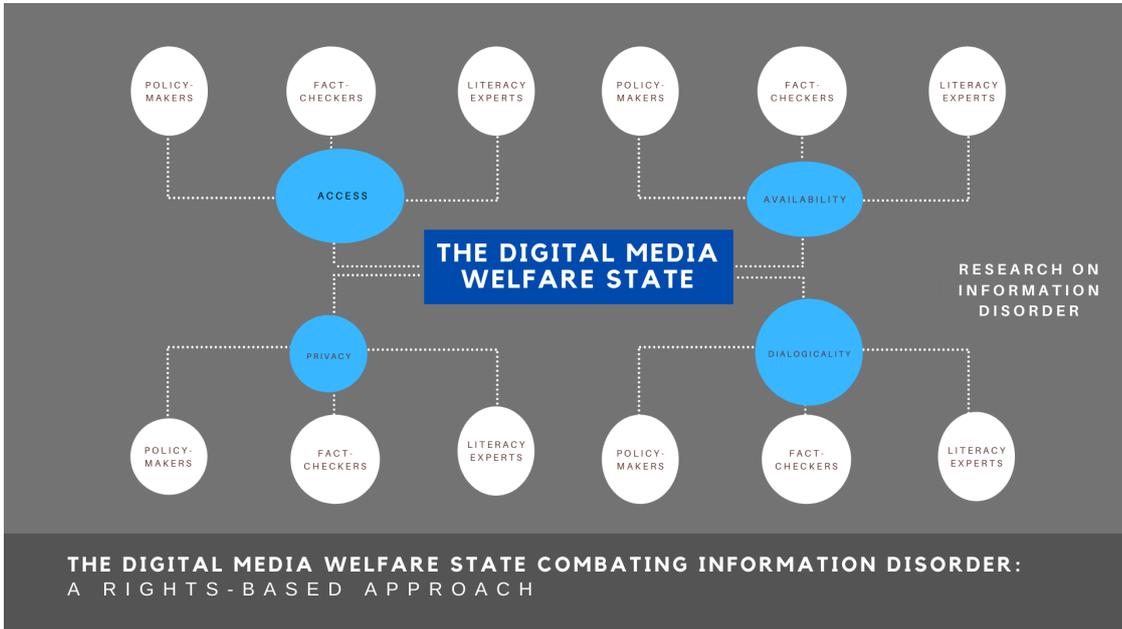
<sup>18</sup> See Grönvall, J. (2022). Upcoming NORDIS scientific research paper on stakeholder interviews.

<sup>19</sup> European Commission (n.d.). *The Digital Services Act Package*. <https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package>

<sup>20</sup> European Commission (2022). *European Media Freedom Act: Commission launches public consultation*. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_22\\_85](https://ec.europa.eu/commission/presscorner/detail/en/ip_22_85)



**Figure 1. The approach of the policy brief**



# Key Terms: Welfare State, Disorder, Fact-checking and Literacy

## The Digital Media Welfare State

The four NORDIS countries have been described as media welfare states,<sup>21</sup> characterised by universal media and communications services, strong and institutionalised editorial freedom, a cultural policy for media and policy solutions that are consensual and durable, based on consultation with both public and private stakeholders. They are a part of the Nordic tradition of epistemic commons, that is, the ideals of knowledge and culture as a joint and shared domain, including civic education, universal literacy, and mass media.<sup>22</sup>

The concept of the digital welfare state has been understood as policies and practices of digitalisation serving all citizens in all possible aspects of their lives. Recently, however, this understanding has prompted criticism, both in international and Nordic contexts,<sup>23</sup> as ‘systems of social protection and assistance, driven by digital data and technologies that are used to automate, predict, identify, surveil, detect, target and punish’.<sup>24</sup> Similarly, the existence of the contemporary Nordic media welfare state has been put into question and seen as ‘an image in the rearview mirror’<sup>25</sup> due to recent developments in media markets and policies, including the increased power of global platforms.<sup>26</sup>

Still, while the ideal Nordic media welfare state may not exist, Nordic countries rank exceptionally high in press freedom.<sup>27</sup> They also exhibit strong trust in news media.<sup>28</sup> Most importantly, they have been found to be highly resilient to online disinformation compared to other European countries.<sup>29</sup>

That is why the term ‘digital media welfare state’ is here used to describe the ideal context of the NORDIS countries that focusses on citizens’ well-being in relation to digital, mediated communication. This term sets the baseline for a society that emphasises in

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<sup>21</sup> Svvertsen, T., Enli, G., Mjøs, O. J., & Moe, H. (2014). *The media welfare state: Nordic media in the digital era*. University of Michigan Press. <https://doi.org/10.2307/j.ctv65swsg>

<sup>22</sup> Nieminen, H. (2014). A short history of the epistemic commons. *Javnost—The Public*, 21(3), 55-76. DOI: [10.1080/13183222.2014.11073413](https://doi.org/10.1080/13183222.2014.11073413)

<sup>23</sup> Jørgensen, R. F. (2021). Data and rights in the digital welfare state: The case of Denmark. *Information, Communication & Society*. <https://doi.org/10.1080/1369118X.2021.1934069>

<sup>24</sup> United Nations General Assembly (2019). *Extreme poverty and human rights*. Note by the Secretary-General. A/74/493. <https://undocs.org/A/74/493>

<sup>25</sup> Ala-Fossi, M. (2020). Finland: Media welfare state in the digital era? *Journal of Digital Media & Policy*, 11(2), 133-150. [https://doi.org/10.1386/jdmp\\_00020\\_1](https://doi.org/10.1386/jdmp_00020_1)

<sup>26</sup> See, e.g., Sirkkunen, E. et al. (2021). *Media platformisation and Finland: How platforms have impacted the Finnish mediasphere and public life*. Tampere University Press. <https://urn.fi/URN:ISBN:978-952-03-2110-9>

<sup>27</sup> Reporters without Borders (2021). *World Press Freedom Index*. <https://rsf.org/en/ranking>

<sup>28</sup> Newman N. et al. (2021). *Digital News Report*. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021>

<sup>29</sup> Humprecht, E. et al. (2020). Resilience to online disinformation: A framework for cross-national comparative research. *The International Journal of Press/Politics*, 25(3), 493-516. <https://doi.org/10.1177/1940161219900126>; Lessenski, M. (2021). Media Literacy Index 2021. Double trouble: Resilience to fake news at the time of Covid-19 infodemic. [https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021\\_ENG.pdf](https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021_ENG.pdf)



policies and other activities the centrality of digital communication to the citizenry and functioning democracy, instead of framing audiences as digital media consumers. While digitalisation encompasses a variety of societal issues and processes, for society, the focus here is on the functions of the media as organization and as a system, including shared knowledge and culture. The emphasis on citizens' capabilities to participate in a society, based on information they can trust, is essential in framing both policy discussions and actions against disinformation and other harms caused by the digitalisation, in terms of individual media organizations and specific genres such as news, and in terms of entire national media systems.

## Information Disorder

Today's media landscape in Nordic countries and elsewhere faces profound problems in terms of business models and governance. Namely, the line between platforms and media is blurred, and that calls for a reorganisation of the ways in which media and communication policies and regulation should exist.<sup>30</sup> These complex problems contribute to significant, multidimensional harms to democracy and cannot be discussed simply as the spread of false and misleading information. This is why NORDIS uses the term 'information disorder' as an umbrella term for the harms and the conditions that cause them.

Information disorder refers to all forms of false and misleading information created for profit or to provoke social conflicts.<sup>31</sup> Information disorder intensifies during turbulent times, as evidenced by the global rise of xenophobic movements, disbelief in science (including climate change and vaccination) and beliefs in conspiracies.<sup>32</sup> The term highlights the structures, preconditions, and practices that produce and facilitate the circulation of disinformation, which make some societies, media structures in societies and subpopulations in those societies vulnerable to false and misleading information.<sup>33</sup>

## Fact-checking

Fact-checking is a concept that takes several meanings and is used in different contexts. First, it can be viewed as a step in the journalistic process of verification, that is, the act of verifying information in news media's own content prior to publication. In NORDIS, fact-checking is understood as a journalistic genre in and of itself: it is an act of verifying publicly made claims and ensuring that the content is evaluated for its truthfulness. Fact-

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<sup>30</sup> Bechmann, A. (2020). Tackling disinformation and infodemics demands media policy changes. *Digital Journalism*, 8(6), 855-863. <https://doi.org/10.1080/21670811.2020.1773887>

<sup>31</sup> Benkler et al. (2018). *Network propaganda: Manipulation, disinformation, and radicalization in American politics*. Oxford University Press; Wardle, C., & Derakhshan, H. (2017). *Information disorder: Toward an interdisciplinary framework for research and policy making*. <https://edoc.coe.int/en/media/7495-information-disorder-toward-an-interdisciplinary-framework-for-research-and-policy-making.html>

<sup>32</sup> Swami, V., & Furnham, A. (2014). Political paranoia and conspiracy theories. In van Prooijen, J.W. & van Lange, P. A. M. (Eds.), *Power politics, and paranoia: Why people are suspicious about their leaders* (pp. 218-236). Cambridge University Press.

<sup>33</sup> E.g., Horowitz, M. (2019). Disinformation as warfare in the digital age. *Journal of Vincentian Social Action*, 4(2). <https://scholar.stjohns.edu/jovsa/vol4/iss2/5>



checking often examines political actors' statements, comparing their claims with information from sources such as academic studies, statistics or expert interviews.<sup>34</sup>

A fact-checking organisation can exist independently or within a journalistic outlet. The first organisations dedicated to publicly evaluating the truth of political claims appeared in the United States in the early 2000s.<sup>35</sup> In the 2010s, the concept became highly popular, with the global number of sites actively conducting fact-checking rising from 44 in 2014 to 300 in 2020. In 2018, of 126 fact-checking organisations, 74 were affiliated with larger media outlets, and 52 were independent.<sup>36</sup>

NORDIS, and this brief, focusses on independent fact-checking, although it does make references to the role of legacy media in combatting disinformation.<sup>37</sup> The four NORDIS partners represent a variety of independent organisational configurations, from size to activities to funding models, that is reflected in the recommendations of the brief and that support the transferability of the results to other (European) contexts.

## Digital Information Literacy

Media literacy is a wide concept that, according to the definition elaborated by the EU Media Literacy Expert Group, 'includes all technical, cognitive, social, civic and creative capacities that allow a citizen to access, have a critical understanding of the media and interact with it'.<sup>38</sup> In a digital media welfare state, with the conditions of information disorder, this definition needs to be broadened to knowledge and understanding of the complex conditions of today's digital media. This is why NORDIS employs the concept of digital information literacy, which is understood as follows:

[A] set of skills and abilities which everyone needs to undertake information-related tasks; how to discover, access, interpret, analyze, manage, create, communicate, store and share information in the digital environment. In short, digital information literacy is the ability to think critically and make balanced judgments about any information we find and use - whether or not materials under analysis are valid, accurate, acceptable, reliable, appropriate, useful, and/or persuasive.

Digital information literacy allows us to understand the power and the need for accountability of numerous stakeholders who create technologies, platforms, and content for us in the digital age. Being able to critically evaluate the multiple sources

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<sup>34</sup> Uscinski, J. & Butler R. (2013). The epistemology of fact checking. *Critical Review* 25(2), 162-180. <https://doi.org/10.1080/08913811.2013.843872>

<sup>35</sup> Graves, L. & Cherubini, F. (2016). *The rise of fact-checking sites in Europe*. <https://reutersinstitute.politics.ox.ac.uk/our-research/rise-fact-checking-sites-europe>

<sup>36</sup> Stencel, M. & Luther, J. (2020). *Fact-checking count tops 300 for the first time*. <https://reporterslab.org/fact-checking-count-tops-300-for-the-first-time/>; Singer, J.B. (2019). Fact-checkers as entrepreneurs. *Journalism Practice* 13(8), 976-981. <https://doi.org/10.1080/17512786.2019.1646613>

<sup>37</sup> Further research of the NORDIS Activity 3 will focus on the role of public service media organisations combatting disinformation.

<sup>38</sup> European Audiovisual Observatory (2017). *Reporting on Media Literacy in Europe*. <https://digital-strategy.ec.europa.eu/en/library/reporting-media-literacy-europe>



of information empowers us as citizens to reach and express informed views and to engage with society from an informed point of view. With the tools of digital information literacy, we can assess the accountability of different actors in the field and demand a better digital environment for us as citizens and consumers, both from corporations and decision-makers.<sup>39</sup>

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<sup>39</sup> Faktabaari Edu (2021). *Digital Information Literacy Skills Needed to Tackle Online*. <https://faktabaari.fi/edu/digital-information-literacy-skills-needed-to-tackle-online-disinformation/>



## The NORDIS Context of Information Disorder

We know relatively little about the extent of information disorder in Nordic countries, including the extent of disinformation on various platforms, the key sources of disinformation and the spread of disinformation across borders within the Nordic region. Indeed, it is the urgent need for such knowledge that gave birth to NORDIS. The lack of specific, systematic research may be partly due to the seemingly robust and free context of communication and the media in the four NORDIS countries of Denmark Finland, Norway and Sweden.

### Robust Structures and Trust

NORDIS countries fare remarkably well by many measures that assess democratic and robust communication environments. To start with, they occupy the top four places in the 2021 Press Freedom Ranking by Reporters without Borders.<sup>40</sup> The situation is echoed in several rankings of the state of democracy that include measures of civil liberties and media freedom.<sup>41</sup> Similarly, trust in institutions in NORDIS countries is strong: 2020 OECD data on the percentage of people who trust their governments indicates globally remarkably high figures in the NORDIS countries, ranging from 67% in Sweden to 83% in Norway.<sup>42</sup> Similarly, when examined in terms of citizens' participation in society, the United Nations N E-government Development Index ('using information technologies to promote access and inclusion of its people'<sup>43</sup>) and the E-participation Index ('how the use of online services to facilitate the provision of information by governments to citizens, interaction with stakeholders, and engagement in decision-making processes'<sup>44</sup>), trust in the public sector in these digital media welfare states is further confirmed. As Figure 2 illustrates, trust in abilities for societal participation, and related opportunities in digital forms, seem notably strong in the global context: the respective rankings place the NORDIS countries in the top 20 of a total of 193 countries, with Denmark leading the E-government Development ranking.

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<sup>40</sup> Newman N. et al. (2021). *Digital News Report 2021*. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021>

<sup>41</sup> The Economist (2021). *The Economist Intelligence Unit Democracy Index 2020*. <https://www.eiu.com/n/campaigns/democracy-index-2020/>; Freedom House (2021). *Freedom in the World 2021.1* <https://freedomhouse.org/report/freedom-world/2021/democracy-under-siege/countries-and-regions>; Sustainable Governance Indicators 2020 <https://www.sgi-network.org/2020/>.

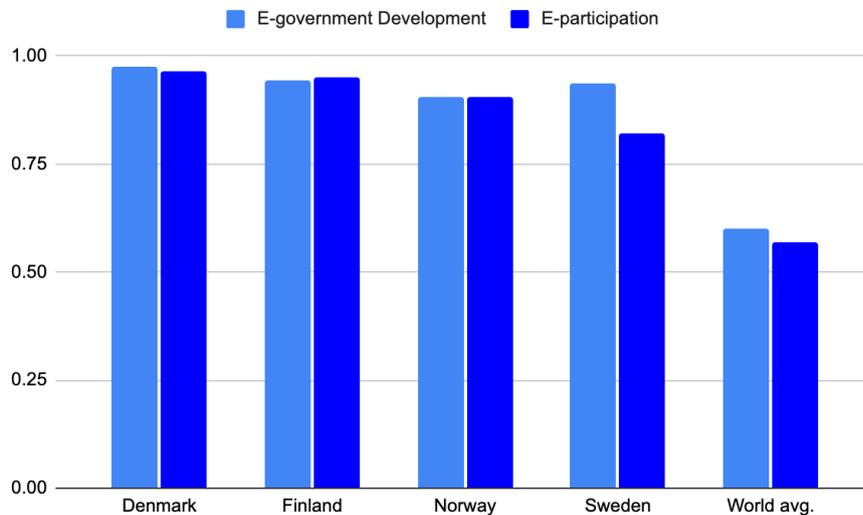
<sup>42</sup> OECD (n.d.) *Trust in government*. <https://data.oecd.org/gga/trust-in-government.htm>

<sup>43</sup> United Nations (n.d.). *E-Government Development Index (EGDI)*. <https://publicadministration.un.org/egovkb/en-us/About/Overview/-E-Government-Development-Index>

<sup>44</sup> United Nations (n.d.) *E-Participation Index*. <https://publicadministration.un.org/egovkb/en-us/About/Overview/E-Participation-Index>



**Figure 2. UN E-government Development and E-participation scores, NORDIS countries and world average, 2020 (range: 0-1)<sup>45</sup>**



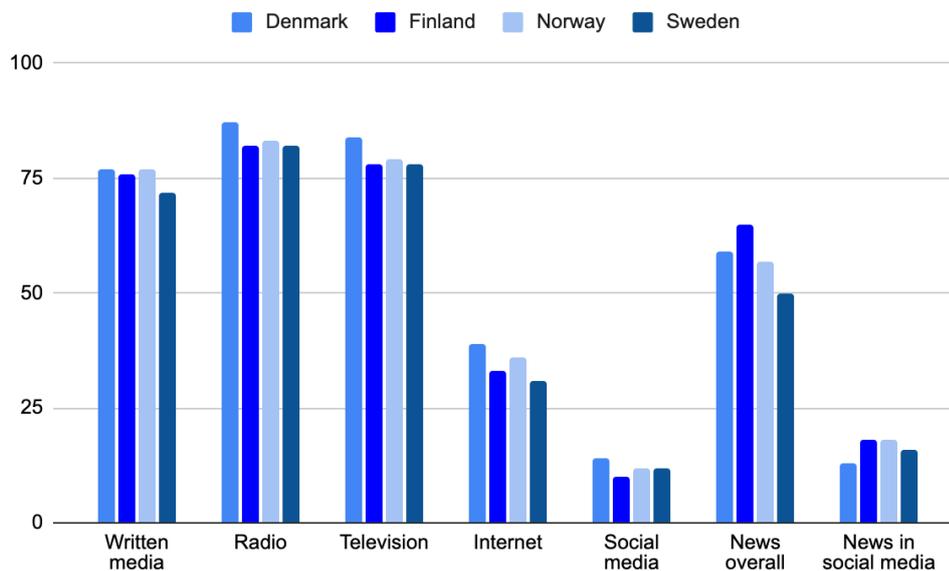
The NORDIS countries are also known for robust national media markets. Although they are challenged by the necessity to rethink journalism and content creation business models, and they face a notable decline of advertising revenue due to Covid-19, these markets still feature strong national media outlets that are consumed and trusted. A part of this is the national, policy-driven principle of supporting journalism and the media in the form of funding public service organisations, as well as by other support mechanisms. Accordingly, during crises such as Covid-19, audiences turn to national media, especially public broadcasting, for trusted information.<sup>46</sup> Public service media is a key feature in these media systems, both as trusted brands but also as online news sources: their weekly reach in Finland is as high as 44%, with Sweden having the lowest reach at 34%, still above the average reach of 18 national public media markets.<sup>47</sup> All in all, trust in different types of media and trust in the news are high, except regarding social media (Figure 3).

<sup>45</sup> United Nations (n.d.). *E-Government Development Index (EGDI)*; United Nations (n.d.) *E-Participation Index*.

<sup>46</sup> Ohlsson, J. et al. (2021). *Covid-19 och de nordiska nyhetsmedierna*. Nordicom. <http://norden.diva-portal.org/smash/get/diva2:1543808/FULLTEXT01.pdf>

<sup>47</sup> Newman N. et al. (2021). *Digital News Report 2021*. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021>

**Figure 3. Trust in types of media<sup>48</sup> and in news<sup>49</sup> in NORDIS countries in 2021 (%)**



As Figure 3 illustrates, even in the global context of diminishing societal and media trust,<sup>50</sup> the NORDIS countries embody trust in traditional institutions, including legacy forms of media. For example, in Europe, trust in television ranges from 86% in Iceland to a mere 25% in Greece. The global average of trust in news in all media, based on 44 media markets, is 44%, whereas in the NORDIS countries it ranges from 50% in Sweden to 65% in Finland.

Conversely, trust in social media and news via social media is remarkably low in NORDIS countries, ranging from 10-18%. There is also very little variation between these countries, whereas, in Europe, trust in social media ranges from 44% in Poland to 5% in the UK. All these statistics speak to certain similarities between the NORDIS countries, at least in terms of the relative stability of the national media landscape and the broad culture of (mediated) trust.

## Resilience with Many Dimensions

Given these figures, it is not unexpected that a recent research effort to discover structural resilience to online disinformation in 18 countries<sup>51</sup> placed the NORDIS countries among the most resilient. Based on seven indices constructed from various comparative statistics as indicators of political, economic and media environments, the study found three different clusters of countries: resilient, challenged/polarised and extremely vulnerable,

<sup>48</sup> European Commission (2021). *Standard Eurobarometer 94*. <https://europa.eu/eurobarometer/surveys/browse/all/series/4961>

<sup>49</sup> Newman N. et al. (2021). *Digital News Report 2021* <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021>

<sup>50</sup> E.g., the *Edelman Trust Barometer*: <https://www.edelman.com/trust/2021-trust-barometer>

<sup>51</sup> Humprecht, E. et al. (2020). Resilience to online disinformation: A framework for cross-national comparative research. *The International Journal of Press/Politics*, 25(3), 493-516. <https://doi.org/10.1177/1940161219900126>

consisting of the US. The NORDIS countries have resilient, media-supportive environments defined by factors such as a relatively low degree of populism and political polarisation, robust public service media, a high amount of shared news content and online users in general and a high degree of trust in news. Based on these indices, Finland and Denmark fared as the most resilient, and Norway and Sweden were in the middle of the list of the countries studied, still all part of the most resilient country cluster.

This analysis, however, is just one outlook on national resilience against (online) disinformation. For example, it does not take into account efforts related to education and media literacy. In contrast, the cluster analysis of the annual Media Literacy Index<sup>52</sup> uses a partly different set of indicators in its outlook on resilience against information disorder. In addition to press freedom rankings, it includes the so-called PISA scores<sup>53</sup> on education, the proportion of the population with university degrees and interpersonal trust and citizens' e-participation. Yet, the result is the same: Denmark, Finland and Sweden, together with Estonia, receive the top scores, with the conclusion that 'these countries have the highest potential to withstand the negative impact of fake news and misinformation due to the quality of education, free media and high trust among people'.<sup>54</sup> Furthermore, the Mapping of Media Literacy Practices and Actions in EU-28 report,<sup>55</sup> as well as an analysis of Nordic approaches to media literacy in the Nordic media welfare states,<sup>56</sup> confirm that NORDIS countries host a wide array of stakeholders, ranging from specific organisations with statutory responsibilities to audio-visual stakeholders such as public broadcasters, and numerous civil society actors and initiatives.

## Challenges of Digitalisation and Information Disorder

The rankings and indices are coupled with the recognition of media independence and pluralism in these countries, but also the growing impact of digitalisation and platformisation. As everywhere, digital and especially social media platforms are transforming the Nordic media landscape, attracting politicians as well as advertisers.

All in all, the NORDIS countries rank extremely high in internet access, the percentage of households with internet access ranging from 93% in Sweden to 99% in Norway.<sup>57</sup> This is coupled with avid use of mobile communication, with mobile phone subscriptions per

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<sup>52</sup> Lessenski, M. (2021). *Media Literacy Index 2021. Double trouble: Resilience to fake news at the time of Covid-19 infodemic*. [https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021\\_ENG.pdf](https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021_ENG.pdf)

<sup>53</sup> <https://www.oecd.org/pisa/>

<sup>54</sup> Lessenski, M. (2021). *Media Literacy Index 2021. Double trouble: Resilience to fake news at the time of Covid-19 infodemic*. [https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021\\_ENG.pdf](https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021_ENG.pdf) (Norway was not included in this analysis.)

<sup>55</sup> European Audiovisual Observatory (2017). *Reporting on Media Literacy in Europe*.

<https://digital-strategy.ec.europa.eu/en/library/reporting-media-literacy-europe>

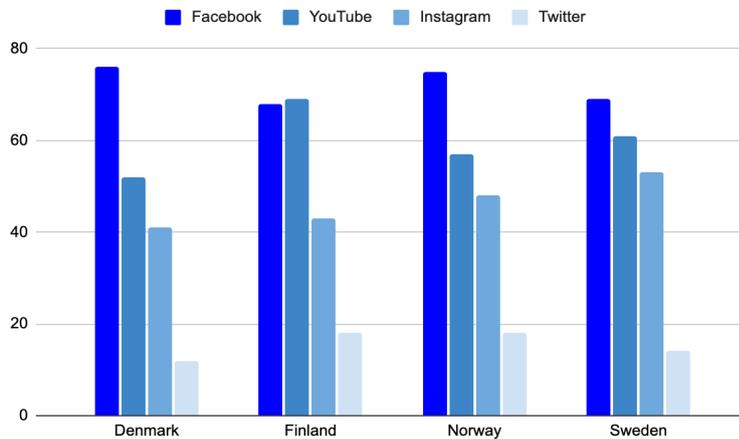
<sup>56</sup> Forsman, M. (2020). Media literacy and the emerging media citizen in the Nordic media welfare state. *Nordic Journal of Media Studies*, 2, 59-70. <https://www.doi.org/10.2478/njms-2020-0006>

<sup>57</sup> Internet access per household %, 2021: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Digital\\_economy\\_and\\_society\\_statistics\\_-\\_households\\_and\\_individuals](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Digital_economy_and_society_statistics_-_households_and_individuals)



capita ranging from 1.14 in Norway to 1.44 in Denmark.<sup>58</sup> As Figure 4 illustrates, several social media platforms occupy a significant space in these countries.

**Figure 4. Popular social media platforms in NORDIS countries in 2021 (%)<sup>59</sup>**



There are some differences between countries. Facebook Messenger is popular in Norway (61%) and Sweden (52%) and somewhat popular in Finland (37%). In contrast, LinkedIn is among the top six most used platforms in Denmark (19%), and SnapChat has high penetration in Norway (52%).

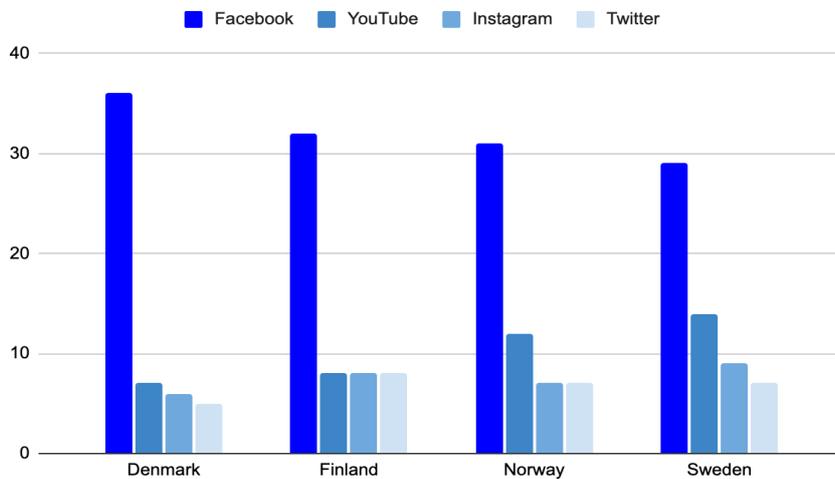
Furthermore, these platforms are relatively significant news sources, although the prominence of Facebook is clear, ranging from 36% in Denmark to 29% in Sweden (Figure 5). News is also shared on these platforms: 16% of people in Denmark, 21% in Sweden, 23% in Norway and, remarkably, 28% in Finland share news on social media, messaging apps and email.<sup>60</sup>

<sup>58</sup> PTS (n.d.) *Mobile subscriptions per capita 2020*. <https://statistik.pts.se/nordic-baltic-telecom-market/graphs/1-mobile-services/1-1-subscriptions/>

<sup>59</sup> Newman N. et al. (2021). *Digital News Report*, Country Data. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/country-and-market-data>; % of surveyed people nationally.

<sup>60</sup> Newman N. et al. (2021). *Digital News Report*, Country Data. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/country-and-market-data>; % of surveyed people nationally.

**Figure 5. Most used social media platforms as news sources in NORDIS countries in 2021 (%)<sup>61</sup>**



Such prominence of social media in people's everyday lives, even when if the platforms are not decidedly used as news sources, exposes audiences to potential harms, even if the tradition of the media welfare state is strong. Some studies suggest that Finns encounter disinformation significantly less often than Americans, Brits or Spaniards and also points to high awareness of online disinformation, social media filter bubbles and the like.<sup>62</sup> Another survey on Norwegian news audiences highlights that 45% are concerned about false information in online news. The coronavirus leads as a topic of false or misleading content, followed by climate change/environment and politics. Facebook is seen as a key source for disinformation, and the most notable creators of false information are thought to be activists.<sup>63</sup>

In addition, a survey in ten European countries, including Sweden, indicates that generally, disinformation is found around a variety of topics and is sourced from politicians, corporations and foreign actors. This study, as well as one on Finnish audiences, finds warning signs in too much scepticism, which can lead to general distrust in all news. The Finnish study, in particular, pointed to audiences' mutual distrust and doubts of others' media literacy skills to navigate the online environment.<sup>64</sup> Some researchers are also concerned about people's tendency to overestimate their ability to detect false information and other fake content online.<sup>65</sup> Yet other challenges of literacy include the need to

<sup>61</sup> Newman N. et al. (2021). *Digital News Report*, Country Data. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/country-and-market-data>; % of surveyed people nationally.

<sup>62</sup> Horowitz, M. et al. (2021). The multidimensionality of trust: Assessing Finnish audiences' views on the trustworthiness of digital news. *Global Perspectives* 2(1). <https://doi.org/10.1525/gp.2021.19054>

<sup>63</sup> Newman N. et al. (2021). *Digital News Report*, Country Data. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/country-and-market-data>

<sup>64</sup> Hameleers, M., Brosius, A., & de Vreese, C. H. (2021). Where's the fake news at? European news consumers' perceptions of misinformation across information sources and topics. *Harvard Kennedy School (HKS) Misinformation Review*. <https://doi.org/10.37016/mr-2020-70>; Horowitz, M. et al. 2021.

<sup>65</sup> Kalsnes, B. et al. (2021). Scandinavian political journalism in a time of fake news and disinformation. In *Power, communication, and politics in the Nordic countries* (pp. 283-304). Nordicom. <https://doi.org/10.48335/9789188855299-14>

increase engagement with underserved language groups and other communities, and to widen the understanding of the media and information needs of adults and older people, from practical digital skills to their ability to detect disinformation.<sup>66</sup>

The Digital News Report 2021 indicates further challenges to the Nordic media welfare systems. While the countries have been digital-forward, global platforms are gaining prominence alongside domestic media. Some markets like Finland were hit hard by Covid-19. The public broadcasters in Denmark and Finland have been faced with challenges: the former with significant budget cuts during the previous government that still impact its services and reach, the latter with complaints by the commercial sector to the EU about market distortion, resulting in a proposal to limit broadcasters' ability to publish online news.<sup>67</sup> Over recent years, the report has also noted the birth of alternative, often populist news sources that correspond to the rise, and currently notable presence, of populist politics in the NORDIS countries.<sup>68</sup>

The most comprehensive comparative account of policy and regulatory media environments to date, the Media Pluralism Monitor of the European University Institute,<sup>69</sup> assesses risk scores for protection of the freedom of the media environment, diversity of the market, political independence and social inclusiveness—all key aspects of a digital media welfare state and a resilient media and communications system. Each area includes five sub-themes: protection of freedom of expression or independence of the media authority, news media ownership, independence of public service media, media literacy and protection against illegal speech. The risks related to these themes are assessed by an extensive research design pointing to specific descriptive indicators and sources, as well as expert assessments.

The in-depth analysis of the Media Pluralism Monitor, resulting in risk scores, points to some challenges in Denmark, Finland and Sweden.<sup>70</sup> For all three countries, ownership concentration demonstrates a significant risk in terms of the diversity of the market due to the lack of limitations to the concentration of ownership. In terms of social inclusiveness, Denmark lacks a direct policy on media literacy, and actions to protect minorities against hate speech online are not working as desired. A section of the study on Finland points out the growing risk of disinformation and highlights the urgent need to gather systematic data on online media's audiences, revenues, ownership, employees or political affiliations, which is now non-existent. Another worrying trend is the growing harassment of journalists that, in worst cases, may result in self-censorship.<sup>71</sup>

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<sup>66</sup> See, e.g., Rivinen, S. et al. (2021). Older people need media education that transcends mere digital support.

[https://acadsci.fi/sofi/wp-content/uploads/Phenomenon\\_Map\\_Impacts\\_of\\_digital\\_media\\_Summary\\_report\\_Sofi\\_2021.pdf](https://acadsci.fi/sofi/wp-content/uploads/Phenomenon_Map_Impacts_of_digital_media_Summary_report_Sofi_2021.pdf)

<sup>67</sup> Newman N. et al. (2021). *Digital News Report*, Country Data. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/country-and-market-data>

<sup>68</sup> E.g., *Timbro Authoritarian Populism Index*. <https://populismindex.com/report/>

<sup>69</sup> European University Institute (n.d.). *Media Pluralism Monitor*. <https://cmpf.eui.eu/media-pluralism-monitor/>

<sup>70</sup> Norway is not included in the analysis.

<sup>71</sup> See also, Hiltunen, I. (2021). External interference in a hybrid media environment. *Journalism Practice*.

<https://doi.org/10.1080/17512786.2021.1905539>



## Challenges of Information Disorder: Nordic Expert Assessments

In order to go beyond statistical indicators and to better understand the policy context of information disorder in Nordic countries, NORDIS Activity 3 entails a baseline study of expert stakeholder views on information disorder in Denmark, Finland, Norway and Sweden. Nordic experts' views were gathered in a total of 32 interviews<sup>72</sup> and in an exploratory policy roundtable co-organised by NORDIS. The secondary objective of the interviews was to raise awareness of EDMO's work: wider reach of EDMO was noted as an urgent need in the recent evaluation of the EU's activities against disinformation.<sup>73</sup>

The focus of the interviews was on perceived sectoral challenges and the needs of different sectors to counter disinformation by policymakers, media literacy experts and journalism experts, including a focus on independent fact-checkers and highlighting the views of legacy media as well.<sup>74</sup>

An overarching, key finding is that given the ubiquity of platformisation and its related harms (ranging from national security risks to disruption to the business models of national media outlets to digital competence divides among different groups and potential negative psychological impacts of the social media environment), the approaches to combat information disorder are, for the most part, sectorally divided.

It should be noted, however, that Nordic policy coordination is taking place around issues related to information disorder. For instance, the Nordic Council of Ministers convened in 2018 to create a set of policy recommendations to counter disinformation.<sup>75</sup> The Council also worked on understanding the role of Covid-19 disinformation and its impact on journalism,<sup>76</sup> and it is currently (2022) examining more broadly the role of platformisation in Nordic societies.<sup>77</sup> Regarding digital literacy, the Council has recently (December 2021) discussed the digital skills of migrants.<sup>78</sup>

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<sup>72</sup> 32 original interviews (12 for NORDIS, others conducted in 2021 for the Media for Democracy Monitor project, <https://www.norden.org/en/publication/media-democracy-monitor-2021>; and for the project Communication Rights in the Era of Digital Disruption, <https://cordi.blog/>), two analyses of interviews (the Media for Democracy Monitor), one policy roundtable on platformisation policies and digital literacy (October 2021; co-organized with NORDIS). The interviews included representatives of journalistic legacy media in Denmark, Sweden and Norway, media policy and media literacy experts in all NORDIS countries, as well as all the NORDIS fact-checkers.

<sup>73</sup> European Court of Auditors (2021). *Disinformation affecting the EU: Tackled but not tamed. Special report No 09, 2021*, Publications Office, 2021, <https://data.europa.eu/doi/10.2865/337863>

<sup>74</sup> These assessments are based on a NORDIS scientific paper by J. Grönvall (in progress, 2022).

<sup>75</sup> Nordic Council of Ministers (2018). *Fighting Fakes—The Nordic Way*. <https://www.norden.org/en/publication/fighting-fakes-nordic-way>

<sup>76</sup> Ohlsson J. et al. (2021). *Covid-19 och de nordiska nyhetsmedierna*. Nordicom. <http://norden.diva-portal.org/smash/get/diva2:1543808/FULLTEXT01.pdf>

<sup>77</sup> Nordic Council of Ministers (2021). *New initiative: What effect do the technology giants have on the democratic conversation in the Nordic Region?* <https://www.norden.org/en/news/new-initiative-what-effect-do-technology-giants-have-democratic-conversation-nordic-region>

<sup>78</sup> Nordic Council of Ministers (2021). *Migrants must be given more digital skills*.



Indeed, information and media literacy seems to bring together the greatest number of actors nationally in the NORDIS countries. This is not surprising as fostering media literacy is seen as one of the central features of the Nordic media welfare state.<sup>79</sup> In terms of independent fact-checking, given that it is a relatively new field, the organisational configurations, the scope of activities and practices of national collaborations with legacy media and interaction with policymakers of different fields vary greatly by country in the NORDIS countries. The Norwegian Faktisk.no represents the most elaborate and sustainable model in terms of activities and its funding model, connected to direct collaborations with main legacy media outlets.<sup>80</sup> (Some research suggests that such diverse approaches to multi-sectoral collaborations are typical elsewhere in Europe as well.)<sup>81</sup> In addition, a study addressing Scandinavian fact-checking organisations notes that approaches tend to differ: some fact-checkers control the truthfulness of selected claims in news items, some fact-check claims are on social media and some fact-check claims come from policymakers. The latter is the most prevalent and also the one that most explicitly connects the emergence of fact-checkers with the institutions of politics.<sup>82</sup>

The following summary of the challenges highlighted by the stakeholders reflects the diverse fields and responsibilities in combating disinformation and information disorder.

## Policymakers

The EU proposal for the Digital Services Act package will bring about some regulation of platforms. However, on a global scale, the Nordic countries are small actors, even when working together.<sup>83</sup>

The unsurprising challenge brought up in policy conversations is the challenge of small nations addressing the harms of global platforms. Given the strong ethos of freedom of expression in Nordic countries, there is a fear of over-regulation in terms of content. Another challenge is the aforementioned multi-sectoral policy and regulatory approaches that are often addressed as siloed issues and tasks. As an example, in an interview with Finnish policymakers in the Ministry of Transport and Communication, the Digital Services Act package was discussed in terms of the distinct, separate requirements it poses to numerous ministries, ranging from the Ministry of Finance to the Ministry of Education and

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<https://www.norden.org/en/news/migrants-must-be-given-more-digital-skills>

<sup>79</sup> Forsman, M. (2020). Media literacy and the emerging media citizen in the Nordic media welfare state. *Nordic Journal of Media Studies*, 2, 59-70. <https://www.doi.org/10.2478/njms-2020-0006>

<sup>80</sup> See, e.g., Faktabaari (n.d.). *Why Faktisk.no? Views from commercial media*. <https://faktabaari.fi/avoinyhtk/why-faktisk-no/>

<sup>81</sup> Horowitz, M. et al. (2021). A Framework for Assessing the Role of Public Service Media Organizations in Countering Disinformation. *Digital Journalism*, 1-23 <https://doi.org/10.1080/21670811.2021.1987948>

<sup>82</sup> Kalsnes, B. et al. (2021). Scandinavian political journalism in a time of fake news and disinformation. In *Power, communication, and politics in the Nordic countries* (pp. 283-304). Nordicom. <https://doi.org/10.48335/9789188855299-14>

<sup>83</sup> CORDI (2021). *Platformisation and Finland policy roundtable*, 29 October 2021, memorandum (in Finnish): <https://www2.helsinki.fi/en/conferences/media-platformisation-and-small-nations/materials>



Culture.<sup>84</sup> There is also relatively little multi-sector discussion on, or collaborations regarding, the role of strategic communications, even though it has been a part of the EU Action plan against disinformation.<sup>85</sup> The Nordic countries, too, have stressed the need to tackle cyber threats as a value-based, collaborative effort.<sup>86</sup>

At the same time, the concentration of communication and media platforms and outlets, both at the national and global levels, and the threats to national business models of journalism are prominent. If national news organisations do not thrive, who can provide trusted content for national and local audiences? Two different approaches can be seen: on one hand, the collaboration of commercial and public service outlets in Norway in their involvement with Faktisk.no, and on the other hand, the proposed change in the act on public service broadcasting in Finland that would restrict its online news operations and thus lessen competition for commercial companies.<sup>87</sup> Yet, while the public support and funding to public service media in all NORDIS countries still remains in a relatively high level, Finland differs from Denmark, Norway and Sweden in that it has no permanent subsidy system for other journalistic media. In one interview, this was seen as a notable gap in support for a robust national media system in Finland.<sup>88</sup>

However, one fundamental challenge for policymaking, and one of the key challenges NORDIS seeks to remedy, is understanding the nature and extent of information disorder and disinformation, in the Nordics and in each NORDIS country, for effective policies:

It is so difficult to investigate through surveys because people do not know if they have encountered (disinformation) or not. They are possibly what they have seen recognized as disinformation. On the other hand, (...) social media is the main source of news and information among children and young people today. Even if you have a high level of confidence in established news media it is through social media that you get the information anyway and you also get a lot of information via influencers.<sup>89</sup>

Is this in fact the problem of the older population? Where are the big problems really? There are different problems depending on the age group.<sup>90</sup>

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<sup>84</sup> Interview with two policy experts at the Ministry of Transport and Communications Finland, 8 December, 2021.

<sup>85</sup> In general, it seems that different member states see the importance and emphasis of the roles of Strat Comm activities vis-a-vis awareness-raising and literacy activities differently, as reported in the report Disinformation affecting the EU. See, e.g., European Court of Auditors (2021). *Disinformation affecting the EU: Tackled but not tamed. Special report No 09, 2021*, Publications Office, 2021, <https://data.europa.eu/doi/10.2865/337863>

<sup>86</sup> Nordic Council of Ministers (2020). *Nordic Council demands stronger co-operation to tackle cyber threats*. <https://www.norden.org/en/nyhet/nordic-council-demands-stronger-co-operation-tackle-cyber-threats>; also Bjarnason, B. (2020). *Nordic Foreign and Security Policy*.

[https://www.regjeringen.no/globalassets/departementene/ud/vedlegg/europapolitikk/norden/nordicreport\\_2020.pdf](https://www.regjeringen.no/globalassets/departementene/ud/vedlegg/europapolitikk/norden/nordicreport_2020.pdf)

<sup>87</sup> Account in Finnish, e.g., <https://cordi.blog/asiantuntijalausunto-yle-laista-12-3-2021/>

<sup>88</sup> Interview with a representative of the Union of Journalists in Finland, 31 January 2022.

<sup>89</sup> Interview with a Swedish Policy Expert, 8 December, 2021.

<sup>90</sup> Interview with a policy expert at the Nordic Council of Ministers, 10 December, 2021.



The need to understand the online practices of and the impacts of disinformation on two distinct groups is evident in many interviews. On one hand, the worry of policymakers, literacy experts and journalism professionals is about young people as news audiences. Several European studies indicate that, while generally media literate and critical toward commercial imperatives of social media platforms, young people rely greatly on peer recommendations and do not always extend critical thinking in their own news consumption habits.<sup>91</sup> On the other hand, there is a growing worry about older age groups and digital divides, especially amongst media literacy experts and policymakers working in that sector, not only in terms of technical competencies but in terms of capabilities to distinguish disinformation from trustworthy news.

## Media Literacy Experts

There is a risk that in the many discussions I have been involved in and seen in various campaigns and others, that media literacy is perhaps seen as a bit of an easy solution (...) (It is) difficult to promote media literacy comprehensively; it requires a lot of resources and effort and long-term development. Often in these discussions, it is easily given as a quick fix: quickly now media literacy to everyone. But it doesn't work like that. (...) (I)t is all about the development of media culture and our society.<sup>92</sup>

Experts in media literacy emphatically expressed their concern about literacy being offered as the catch-all solution to disinformation. While critical literacy has in the international press been described as the key reason for the ability of the Nordic countries to counter the many harms of information disorder,<sup>93</sup> the interviewees stressed the complex nature of the problem. There are resources as well as multiple layers of policies, best practices, and international and national collaborations between stakeholders. Still, curiously, fact-checkers were not specifically highlighted as key resources and partners. This may be a result of two factors. The tradition of critical media literacy may be prevalent, and the urgent need for a better understanding of the online, digital information environment, including disinformation, is not clearly articulated by all actors. The other factor may be a result of a turn from previous processes of bottom-up engagement in media literacy to a policy-driven, top-down process of media literacy.<sup>94</sup> It has become a standard part of policy toolkits and is articulated in the interviews as broad policies, rather than concrete activities.

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<sup>91</sup> Horowitz, M. et al. (2021). The multidimensionality of trust: Assessing Finnish audiences' views on the trustworthiness of digital news. *Global Perspectives*, 2(1). <https://doi.org/10.1525/gp.2021.19054>; Russman, U. & Hess, A. (2020). News consumption and trust in online and social media: An in-depth qualitative study of young adults in Austria. *International Journal of Communication*, 14(2020), 3184-3201. <https://ijoc.org/index.php/ijoc/article/view/13774>

<sup>92</sup> Interview with a Finnish media literacy expert, 4 November, 2021.

<sup>93</sup> See, e.g., CNN (2019). *Finland is winning the war on fake news. What it's learned may be crucial to Western democracy.* <https://edition.cnn.com/interactive/2019/05/europe/finland-fake-news-intl/>

<sup>94</sup> Forsman, M. (2020). Media literacy and the emerging media citizen in the Nordic media welfare state. *Nordic Journal of Media Studies*, 2, 59-70. <https://www.doi.org/10.2478/njms-2020-0006>

Yet another challenge is the rapidly changing digital landscape, including new platforms and other communication technologies, and related new types of harm. In addition, literacy needs to entail more than the ability to critically assess content. Information disorder also calls for knowledge about digital ecosystems, including data-driven economy and functions of algorithms. Relatedly, concepts such as media literacy or even media and information literacy have multiple, sometimes contested meanings. In NORDIS, this need for an extended understanding of literacy is addressed with the term ‘digital information literacy’.<sup>95</sup>

## Journalistic Views: Legacy Media and Independent Fact-checkers

The interviews illustrate that the role of independent fact-checkers is far from cemented as a part of the Nordic digital media welfare state—even given the highly collaborative and successful Norwegian model of Faktisk.no, the vast activities and legacy media roots of the Danish Tjekdet, the multidisciplinary activities of the Finnish Faktabaari with an array of stakeholders in Finland and abroad and the Kjällkritiksbyråns educational events and collaborations with the Swedish public broadcasters UR and others.

The interviews with legacy media representatives and fact-checkers suggest that in some cases, there still exists a conceptual gap between what fact-checking means for different stakeholders.<sup>96</sup> Some journalism experts pointed out the necessity of recognizing and supporting fact-checkers as an independent and integral part of the national media system. At the same time, while all interviewed journalists recognized the challenges of operating on third-party platforms, possibly amidst disinformation, the approach to fact-checking in general was sometimes seen as redundant. This ambivalence has been documented in earlier research: on the one hand, fact-checking is considered a useful tool for improving quality in reporting, but on the other hand, there are reservations against relying on a single source, a fact-checker, to assess factuality.<sup>97</sup>

In contrast, interviews with the fact-checkers pointed to aspects of the distinct, unique nature of their work and the distinct challenges that go with it. The challenges include, unsurprisingly, detecting and selecting content for verification and conducting verification processes, the former of which could be better tackled with technology tools, the latter less so. Even with the innovation of new tools, problems can emerge that pertain to the platforms as counterparts:

You know, Facebook might block you. If you develop a new tool that could help us on Facebook, they will 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 can't get API access.<sup>98</sup>

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<sup>95</sup> See, e.g., <https://faktabaari.fi/edu/digital-information-literacy-skills-needed-to-tackle-online-disinformation/>

<sup>96</sup> See also this section in the brief: Key Terms: Welfare State, Disorder, Fact-checking and Literacy.

<sup>97</sup> Brandtzaeg, P. B. et al. (2018). How journalists and social media users perceive online fact-checking and verification services. *Journalism Practice*, 12(9), 1109-1129. <https://doi.org/10.1080/17512786.2017.1363657>

<sup>98</sup> Interview with a representative of Tjekdet, 2 November, 2021.



All in all, fact-checkers have an ambivalent relationship with platforms: platforms can be necessary, even good partners for fact-checkers, but they have acted upon the EU Code of Conduct only in a limited way. Neither are they effectively held accountable for their actions and their role in actively tackling disinformation.<sup>99</sup> A recent (January 2022) open letter from fact-checkers to YouTube,<sup>100</sup> co-signed by, among others, Faktisk.no, points to how the platform's policies are in part ineffective against rampant, harmful disinformation, and it lists measures to remedy the situation, including more transparency and collaboration with independent fact-checkers.

At the same time, in line with both the Nordic ethos of the media welfare society as well as with the proposed European Media Freedom Act, national independent and sustainable journalistic actors should be part of the EU's efforts to promote democratic participation, fight disinformation and support media freedom and pluralism.<sup>101</sup> Transparent collaboration with different partners that does not compromise independence is seen as a key principle in the context of NORDIS partners. Yet another platform challenge is the issue of transparency and privacy. Closed platforms, albeit not significant yet in the NORDIS countries as news and disinformation sources, will most likely become so:

One challenge we have is the active spreaders of misinformation are migrating to closed platforms. Telegram, Whatsapp, it's a phenomenon not that big in Norway yet, but it will grow in the coming years. (...) It will be harder to trace the origins of misinformation. When the Facebook ecosystem shut down, the major platforms then are Twitter, which is quite small in Norway, Snapchat, Telegram, Signal, messaging apps of various kinds, and TikTok which has a really different user base. It's difficult to compare them.<sup>102</sup>

Finally, the question is also about an effective reach of checked claims as well as other activities that the checks can inform and support. For scaling operations, more information is needed about the state of the art of disinformation in terms of content and influencers but also about more general user behaviour in online environments. The lack of support for such systematic research at a national and Nordic level emerges as a risk to society, but, as expressed in the interviews, it also dampens the effectiveness of policy decisions, media literacy projects and fact-checking activities.

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<sup>99</sup> European Court of Auditors (2021). *Disinformation affecting the EU: Tackled but not tamed. Special report No 09, 2021*, Publications Office, 2021, <https://data.europa.eu/doi/10.2865/337863>

<sup>100</sup> Poynter (2022). *An open letter to YouTube's CEO from the world's fact-checkers*. <https://www.poynter.org/fact-checking/2022/an-open-letter-to-youtubes-ceo-from-the-worlds-fact-checkers/>

<sup>101</sup> European Commission (2022). *European Media Freedom Act: Commission launches public consultation*. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_22\\_85](https://ec.europa.eu/commission/presscorner/detail/en/ip_22_85)

<sup>102</sup> Interview with a representative of Faktisk.no, 6 October, 2021.



## Proposed Framework: Operationalising A Rights-based Approach

A healthy democracy relies on citizen engagement and an active civil society, not only at election time, but all the time. Engaged, informed and empowered citizens are the best guarantee for the resilience of our democracies. Across the (European democracy) action plan, there is a strong emphasis on empowering citizens and civil society to counter the threats.<sup>103</sup>

Communication rights are not only about legally binding rights but also about societal norms that stipulate citizens' rights to truthful communication. Hence, it was seen that disinformation should be tackled both with legal measures as well as with self-governance (by stakeholders).<sup>104</sup>

### Global Platforms, National Systems – European Solutions?

The Nordic expert interviews reveal highly siloed views and approaches to the challenges of disinformation. This is not surprising. Even in these contexts that entail the ideals of the digital media welfare state, the harmful phenomenon of information disorder has complex connections to both specific political trends and issues, as well as to the platform economy that thrives on data and targeting of audiences.

Furthermore, despite the rapidly growing, international and increasingly comparative body of research on disinformation, there is no consensus on what countermeasures are the most effective against disinformation campaigns.<sup>105</sup> To be sure, since March 2020, the role of fact-checking organisations has become increasingly important due to the widespread prevalence of misinformation about the coronavirus.<sup>106</sup> In addition, recent research suggests that improving digital literacy protects those vulnerable to disinformation but does not prevent sharing.<sup>107</sup> Still, some research indicates that promoting trust in reliable sources may be more effective than highlighting false information.<sup>108</sup> In terms of policymaking, some regulatory attempts have proven counterproductive in curbing

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<sup>103</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European democracy action plan, COM/2020/790 final, p. 3: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423>

<sup>104</sup> CORDI (2021). *Platformisation and Finland policy roundtable*, 29 October 2021, memorandum (in Finnish): <https://www2.helsinki.fi/en/conferences/media-platformisation-and-small-nations/materials>

<sup>105</sup> Courchesne, L. et al. (2021). Review of social science research on the impact of countermeasures against influence operations. *Harvard Kennedy School (HKS) Misinformation Review*. <https://doi.org/10.37016/mr-2020-79>

<sup>106</sup> Siwakoti, S. et al. (2021). Localized misinformation in a global pandemic: Report on COVID-19 narratives around the world. Empirical Study of Conflict Project, *Princeton University*, 1–68. <https://esoc.princeton.edu/publications/localized-misinformation-global-pandemic-report-covid-19-narratives-around-world>

<sup>107</sup> Sirlin, N. et al. (2021). Digital literacy is associated with more discerning accuracy judgments but not sharing intentions. *Harvard Kennedy School (HKS) Misinformation Review*. <https://doi.org/10.37016/mr-2020-83>

<sup>108</sup> Acerbi, A., Altay, S., & Mercier, H. (2022). Research note: Fighting misinformation or fighting for information?. *Harvard Kennedy School (HKS) Misinformation Review*. <https://doi.org/10.37016/mr-2020-8>



freedom of expression and privacy,<sup>109</sup> and therefore the context of information disorder calls for the creation of shared values between stakeholders.<sup>110</sup>

The analyses of statistics and various indices<sup>111</sup> do verify that in structural terms, the NORDIS countries are somewhat alike and notably robust compared to most countries in Europe. The analyses also highlight the structural variety within European media systems. The contextual structural assessments and the NORDIS interviews resonate with the assessment of the EU-led actions against disinformation.<sup>112</sup> On one hand, the EU needs to set requirements and establish better monitoring of the performance of global platforms. Even regional cooperation, such as NORDIS, may not suffice in suggesting and crafting effective platform-related policies. On the other hand, the phenomenon of information disorder is complex and requires careful consideration and coordination of different stakeholders, as well as specific national policies that support the respective national media and communication systems. The challenges of information disorder may be global, but they take localised forms. What various structural and market indicators cannot reveal are the principles, or possibilities, of a normative, shared, value-based framework that could guide multi-front, multi-stakeholder coordination and monitoring.

## The Rights-based Turn

Against the backdrop of the global-local challenges of information disorder, it is no wonder that policy conversations have in recent years focussed on citizens' rights, especially their communication rights, in the digital environment. Either as a legal approach or as a moral discursive strategy, the rights-based approach is typically presented in a general sense as a counterforce that protects individuals against illegitimate forms of power, including both state and corporate domination. The notion of communication rights can refer not only to existing, legally binding norms but also more broadly to normative principles against which real-world developments are assessed. Yet, so far, there is no global consensus on what kinds of institutions are needed to uphold and enforce communication rights in the non-territorial, regulation-averse and rapidly changing media environment. Besides the actions of states, the realisation of communication rights is now increasingly affected by the actions of global platforms and other multinational corporations, activists and users.<sup>113</sup>

From EU citizens' perspective, a rights-based approach seems important. A recent Eurobarometer survey of the European Commission found that more than eight in ten respondents think that it would be useful for the European Commission to define and

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<sup>109</sup> e.g., Hoboken, J.V., & Ó Fathaigh, R. (2021). Regulating disinformation in Europe: Implications for speech and privacy. *6 UC Irvine Journal of International, Transnational, and Comparative Law*, 9. <https://scholarship.law.uci.edu/ucijil/vol6/iss1/3>

<sup>110</sup> Bowers, J., & Zittrain, J. (2020). Answering impossible questions: Content governance in an age of disinformation. *Harvard Kennedy School (HKS) Misinformation Review*. <https://doi.org/10.37016/mr-2020-005>

<sup>111</sup> See also this section of the brief: The NORDIS Context of Information Disorder.

<sup>112</sup> European Court of Auditors (2021). *Disinformation affecting the EU: Tackled but not tamed. Special report No 09, 2021*, Publications Office, 2021, <https://data.europa.eu/doi/10.2865/337863>

<sup>113</sup> Ala-Fossi, M. et al. (2019). Operationalising communication rights: The case of a 'digital welfare state'. *Internet Policy Review*, 8(1). <https://policyreview.info/articles/analysis/operationalising-communication-rights-case-digital-welfare-state>



promote **a common European vision on digital rights and principles**.<sup>114</sup> A need to emphasise a rights-based approach—one that can be founded on established human rights principles and be applied in different contexts—can be seen in the recent policy initiatives of the EU. As Figure 7 illustrates, they can be seen as a collection of policy tools that together address information disorder with a holistic approach:

1. The European Democracy Action Plan (2020): Democratic values and principles as a baseline for policy approaches and related activities, including the essential role of citizen rights and participation, and entailing the work against disinformation as one of its key pillars.<sup>115</sup>
2. The Code of Practice (2018) and subsequent Guidance to strengthen the Code of Practice (2021): Highlights both users' rights and the need to empower them, as well as the need for support to promote the reach of fact-checking.<sup>116</sup>
3. The Digital Services Act package (in progress): Shared platform policies and related practices against disinformation, steered by the need to ensure user rights.<sup>117</sup>
4. The European Media Freedom Act (in progress): Support for free and sustainable national media systems, in alignment with the EU's efforts to promote democratic participation, fight disinformation and support media freedom and pluralism as set out in the Democracy Action Plan. It also complements the Digital Services Act package (as well as offers more protection for journalists).<sup>118</sup>
5. The European Declaration on Digital Rights and Principles (in progress): A citizen-centric approach to digitalisation, the first in the world of its kind, that highlights inclusion, participation, empowerment to choose, safety and sustainability in the digital environment.<sup>119</sup>

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<sup>114</sup> European Commission (2021). *Eurobarometer: Europeans show support for digital principles*. [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_21\\_6462](https://ec.europa.eu/commission/presscorner/detail/en/IP_21_6462)

<sup>115</sup> European Commission (2020). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions*. On the European democracy action plan. COM/2020/790 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423>; see also, European Democracy Action Plan: making EU democracies stronger. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_2250](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2250)

<sup>116</sup> European Commission (2021). *Guidance to strengthen the Code of Practice on Disinformation*. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2585](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2585)

<sup>117</sup> European Commission (n.d.). *The Digital Services Act Package*. <https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package>

<sup>118</sup> European Commission (2022). *European Media Freedom Act: Commission launches public consultation*. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_22\\_85](https://ec.europa.eu/commission/presscorner/detail/en/ip_22_85)

<sup>119</sup> European Commission (2022). *European Declaration on Digital Rights and Principles for the Digital Decade*. <https://ec.europa.eu/newsroom/dae/redirection/document/82703>



**Figure 7. Recent EU policy initiatives contributing to measures against information disorder**



## Nordic Digital Media Welfare State and Operationalisable Rights

A rights-based approach that understands rights in terms of equality, inclusion and shared epistemic commons of knowledge is both a European tradition and a specific feature of the Nordic welfare states.<sup>120</sup> While the European policy framework offers strong support for the rights-based approach to disinformation, as well as concrete guidelines for some practices, the overview of information disorder in NORDIS countries can offer an example of a more comprehensive framework for operationalising rights in national contexts and assessing potential stakeholders' roles.

A framework of communication rights, developed with the case study of Finland,<sup>121</sup> positions four core rights, based on international human rights principles, at the centre of a democratic, sustainable digital media environment. In this framework, rights are seen as central to citizens' capabilities to foster their well-being in a digital media welfare state, whether in the four NORDIS countries or elsewhere, including diminishing the harms of information disorder and disinformation:

1. Access: citizens' equal access to technology and other means of access to information, orientation, entertainment and other content serving their rights.

<sup>120</sup> Nieminen, H. (2019). Inequality, social trust and the media: Towards citizens' communication and information rights In *Digital media inequalities: Policies against divides, distrust and discrimination* (pp. 43-66). Nordicom. <http://norden.diva-portal.org/smash/get/diva2:1535715/FULLTEXT01.pdf>

<sup>121</sup> Ala-Fossi, M. et al. (2019). Operationalising communication rights: The case of a 'digital welfare state'. *Internet Policy Review*, 8(1). <https://policyreview.info/articles/analysis/operationalising-communication-rights-case-digital-welfare-state>

2. Availability: equal availability of various types of content (information, orientation, entertainment or other) for citizens; availability of truthful journalistic content.
3. Privacy: protection of every citizen's private life from unwanted publicity. This also includes the protection of personal data, against microtargeting and other information disorders.
4. Dialogical rights: the existence of public spaces that allow citizens to publicly share information, experiences, views and opinions on common matters.

These rights can manifest in several dimensions:

1. Regulation and policy, such as acts on public broadcasting, information society policies securing internet access to citizens and personal privacy legislation.
2. Activities by the public sector, for instance with e-governance and designated literacy activities.
3. Activities by public and commercial media outlets and platforms, as well as civil society actors, to provide opportunities for access and availability to content and services in a manner that protects privacy and enhances mediated interaction between citizens.
4. Citizen-users' activities also highlight how their capacities are realised: how they use media and platforms, for interpersonal connections and other activities of the private sphere and as participants in societal and political debates and decision-making.<sup>122</sup>

These rights are basic and norms of the traditional ideal of the Nordic media welfare state. The overview of the context of the Nordic digital media welfare state, based on the secondary data and interviews, gives an outlook of the state of communication rights and their challenges in the NORDIS countries in the era of information disorder:

**Access:** In European and global comparisons, NORDIS countries exemplify access to communication tools as measured by internet access and mobile phone subscriptions. More access also means more activities on apps and platforms. This can be seen in relatively high rates of use of global platforms, the significant role of Facebook as a news source and the predicted rise of closed messaging apps for news and disinformation.

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<sup>122</sup> Ala-Fossi, M. et al. (2019). Operationalising communication rights: the case of a 'digital welfare state'. *Internet Policy Review*, 8(1). <https://policyreview.info/articles/analysis/operationalising-communication-rights-case-digital-welfare-state>



**Availability:** While the pandemic has shaken the Nordic media markets, they are still robust. The risk to the availability of diverse national and local content is seen in the potential of (further) concentration of the news sector, as well as in the challenges to public service media by political and commercial actors. The fewer trusted national sources as alternatives that are available, the fewer choices of truthful, vetted information for citizens are available. In addition, the size, operations and focus of national fact-checkers vary by country, resulting in different availability of fact-checked claims.

**Privacy:** All NORDIS countries regulate privacy in the field of data protection, e-transactions, consumer protection and cybercrime.<sup>123</sup> Still, as in any country, the more data on users, the more targeted and tailored disinformation is possible – and data from the NORDIS countries verifies that global commercial social media sites are very popular there. Another, specific, emerging challenge is related to the online harassment of, and false information about, representatives of knowledge institutions, notably journalists, sometimes targeting them as private citizens and exposing their personal information. That, in turn, may have a chilling effect on the availability of content.

**Dialogicality:** Amidst stakeholders, the challenge is a siloed, non-dialogical approach; the complexities of information disorder require much more coordination. There are fears that literacy is offered as a catch-all solution to disinformation. To be sure, the efforts in NORDIS countries on literacy have paid off in that awareness of disinformation, in general, is strong. People also see the key role of literacy in understanding disinformation. At the same time, research indicates a growing distrust in others as content consumers, while people may overestimate their own capacity to detect disinformation. Societal and institutional trust begins with interpersonal trust, so this development may be detrimental to dialogicality at all levels.

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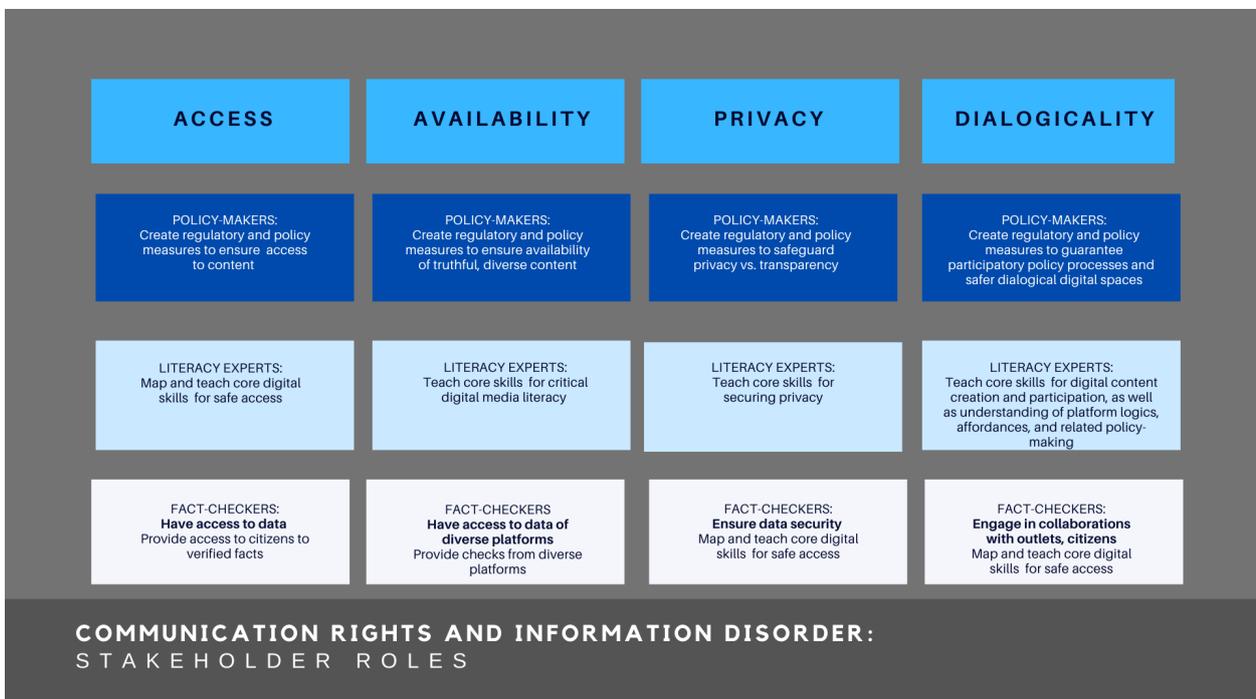
<sup>123</sup> UNCTAD (n.d.). *Data Protection and Privacy Legislation Worldwide*.  
<https://unctad.org/page/data-protection-and-privacy-legislation-worldwide>



## Take-aways: Rights-based Approach for Policy, Literacy, Fact-checking and Research

This first NORDIS policy brief has aimed at constructing an empirical overview for the entire project, and a normative, rights-based framework for further actions in Activity 3 (Policy and Media Literacy). As Figure 8 indicates, these rights can also be applied as a baseline for creating a robust, resilient media and communication environment for citizens, with specific roles by different stakeholders, regardless of specific structural considerations.

**Figure 8. Communication rights and information disorder: Stakeholder roles**



### Policy

While the EU policy framework offers a united front vis-a-vis the platforms, communication rights as realised at a national level are at the centre of the independence and sustainability of free and democratic media systems and related national policies. The benchmarks of the four rights offer a way to examine the regulatory measures as well as the activities of the public sector from a citizen-centric perspective. More broadly, the framework could also inform the shared values between stakeholders that have been

called for<sup>124</sup> and provide specific themes for the key performance indicators that are required for the Code of Practice, e.g., in terms of access to and availability of transparent data of their activities and timely and transparent dialogue in terms of user activity such as flagging and the like.<sup>125</sup>

## Literacy

The role and type of media literacy activities varies by country, and even the concept of media and information literacy is in flux and differently understood by different actors in the context of information disorder. There are also calls for collaboration in these activities that, to an extent, address similar challenges in many countries. The framework of four rights could offer a basic, common scheme for digital information literacy, one that would cover central challenges and capabilities related to each right and aid in creating systematic processes of evaluation of literacy activities.

## Fact-checking

Both the EU policy initiatives and the expert interviews carve out a special, independent role for fact-checkers as watchdogs and innovators in digital information literacy. Their actions can be measured in terms of the four rights: can their activities be easily and inclusively accessed by different groups? Do they address a wide variety of sources and issues? Do they adhere to regulations and good conduct in terms of privacy? Do they engage with multiple stakeholders as well as initiate and increase awareness-raising and dialogues about information disorder?

At the same time, fact-checkers are given a major role in EU-wide policies in the fight against disinformation. Due to their independent status as the node between platforms, policymakers, legacy media, literacy actors and citizens, fact-checkers can be seen as having responsibilities and as special rights-holders, an integral part of sustainable and free media systems, similar to other public service and accountability watchdogs such as media councils and journalism associations.

## Research

It is not a novel takeaway that there is an urgent need to understand information disorder better, in four NORDIS countries, the entire Nordic region, and in Europe. We need contextualised, localised research to create contextualised solutions. As argued in a recent study on the Scandinavian context of false news and journalism,<sup>126</sup> the following aspects require more research:

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<sup>124</sup> Bowers, J., & Zittrain, J. (2020). Answering impossible questions: Content governance in an age of disinformation. *Harvard Kennedy School (HKS) Misinformation Review*. <https://doi.org/10.37016/mr-2020-005>

<sup>125</sup> European Commission (2021). *Guidance to strengthen the Code of Practice on Disinformation*. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2585](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2585)

<sup>126</sup> Kalsnes, B. et al. (2021). Scandinavian political journalism in a time of fake news and disinformation. In *Power, communication, and politics in the Nordic countries* (pp. 283-304). Nordicom. <https://doi.org/10.48335/9789188855299-14>



1. The scale of disinformation in the Nordic region.
2. The different types of disinformation and propaganda in the Nordic countries.
3. Peoples' abilities to distinguish, facts, opinions and fakes.
4. New methods for digital source criticism and digital information literacy in general.

Within NORDIS, the aim is also to provide comparative outlooks on NORDIS countries and, with fact-checkers, trace possible connections and flows of disinformation across borders. These are important empirical endeavours that can build understanding of information disorders in between fact-checkers, literacy and research professionals with concrete case studies.

The framework of four rights can help map the system, structure and nation-specific contexts in a manner that can directly feed the normative ideals of the digital media welfare state, and those ideals are shared in recent EU policy initiatives. The framework also gives methodological flexibility that does not set absolute standards or foci but can be assessed according to the rapidly changing communication environment and new emerging phenomena. In sum, the four rights can be used as normative benchmarks when considering the impact of particular phenomena, or even literacy practices. In Activity 3, we will utilise the framework to assess the role of public service media as an organisation countering information disorder, as well as a structuring tool for a university course on critical disinformation studies.

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The recent Eurobarometer on digital rights and principles<sup>127</sup> reveals that Danes, Finns and Swedes are the most optimistic in the EU about their digital future. Their biggest concerns surround cybercrime, as well as questions of inequality that digitalisation may bring about. That speaks further to the ongoing ethos of the media welfare states in the digital era. With NORDIS, we can analyse and distil the best practices, not only regarding direct interventions against false information online but also regarding detecting and documenting best practices for national information environments.

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<sup>127</sup> EU (2021). *Eurobarometer: Digital rights and principles*. <https://europa.eu/eurobarometer/surveys/detail/2270>; see also European Commission (2021). *Eurobarometer: Europeans show support for digital principles*. [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_21\\_6462](https://ec.europa.eu/commission/presscorner/detail/en/IP_21_6462)

