UN Special Rapporteur on Freedom of Opinion and Expression: Report on Disinformation Consultation

Global Partners Digital submission

February 2021

About Global Partners Digital

Global Partners Digital (GPD) is a social purpose company dedicated to fostering a digital environment underpinned by human rights.

Introduction

We welcome the opportunity to respond to the UN Special Rapporteur's call for input to inform the development of the annual thematic report to be presented to the Human Rights Council at its 47th session in June 2021. We are particularly pleased that the Special Rapporteur's report will focus on the issue of disinformation and freedom of opinion and expression.

Global Partners Digital has worked on disinformation from a human rights perspective over the past few years. We therefore recognise there is a need to further examine the phenomenon and scrutinise trends in the adoption of laws, policies and practices by states and platforms. In this contribution, we respond to the questions posed in the call for submissions where we hope that, as a result of our experience and ongoing work on the issues raised, we are able to provide useful insight and perspectives. Please see our response to question 6 for a list of recommendations for states and companies. We have also provided additional resources in the Annex of this document should these materials prove helpful in developing the report.

Consultation Questions

1. **What do you believe are the key challenges raised by disinformation? What measures would you recommend to address them?**

<u>Key Challenges</u>

The challenges posed by disinformation have become more pronounced and difficult to address since the *Joint Declaration on Freedom of Expression and "Fake News", Disinformation and Propaganda* was issued in 2017. In this submission, we evaluate these key challenges based on the specific human rights impacts of disinformation and responses to the phenomenon by state and platforms. We acknowledge that disinformation may pose broad societal challenges, but believe that this approach and rights-based assessment will prove most constructive.

In recent years, and especially since the outbreak of the COVID-19 pandemic, states and platforms have struggled with the negative impacts that disinformation has on a range of human rights. While the spread of disinformation may impact a number of rights, it has had a clear impact on the right to free and fair elections, the right to health, the right to non-discrimination,

and in some cases the right to life. Short-sighted responses by states and platforms have proven equally problematic and have themselves posed serious risks to individuals' right to freedom of expression and privacy.

The spread of disinformation has had a discernable impact on democratic processes, and directly on the right to free and fair elections as guaranteed under Article 25 of the International Covenant on Civil and Political Rights (ICCPR). As noted in the UN Human Rights Committee (HRC) General Comment No. 25, "Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind".[1] For an election to be free and fair, voters need to have accurate information about the parties, candidates and other factors when they vote. Incorrect information may influence the way that individuals vote, and there are numerous reports which highlight how the results of elections may be influenced by disinformation.[2] While public discourse is often focused on elections, disinformation and coordinated inauthentic behaviour has the potential to undermine democratic processes more broadly by amplifying anti-democratic narratives or in driving polarisation.[3] States and companies are now forced to respond to different categories of users, such as public figures, when they are accused of disseminating disinformation that results in real world harms.

Even before the outbreak of COVID-19, disinformation posed a risk to individuals' right to health as provided for under Article 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR). Inaccurate information about health care and disease prevention, such as false information on risks associated with vaccines, may deter people from taking healthcare decisions that protect their health and put others at risk. For example, disinformation greatly complicated the response to the ebola virus in West Africa and the DRC.[4] Today, disinformation about COVID-19 has proven rampant online and complicated global efforts to tackle the pandemic.[5]

---

[1] UN Human Rights Committee (HRC), *CCPR General Comment No. 25: Article 25 (Participation in Public Affairs and the Right to Vote), The Right to Participate in Public Affairs, Voting Rights and the Right of Equal Access to Public Service*, 12 July 1996, CCPR/C/21/Rev.1/Add.7

[2] *See,* Ian Vandewalker, "Digital Disinformation and Vote Suppression", Brennan Center for Justice (September 2020), available at: Digital Disinformation and Vote Suppression; and David Kaye, "Freedom of Expression and Elections in the Digital Age" Research Paper 2019, available at: https://www.ohchr.org/Documents/Issues/Opinion/ElectionsReportDigitalAge.pdf

[3] Samantha Bradshaw, Hannah Bailey and Philip N.Howard, "Industrialized Disinformation: 2020 Global Inventory of Organised Social Media Manipulation", University of Oxford: The Project on Computational Propaganda (January 2021), available at: https://comprop.oii.ox.ac.uk/wp-content/uploads/sites/127/2021/01/CyberTroop-Report20-FINALv.3.pdf

[4] David P. Fidler, "Disinformation and Disease: Social Media and the Ebola Epidemic in the Democratic Republic of the Congo" Council on Foreign Relations (August 2019), available at: https://www.cfr.org/blog/disinformation-and-disease-social-media-and-ebola-epidemic-democratic-republic-congo

[5] *See,* Joint statement by WHO, UN, UNICEF, UNDP, UNESCO, UNAIDS, ITU, UN Global Pulse, and IFRC, "Managing the COVID-19 infodemic: Promoting healthy behaviours and mitigating the harm from misinformation and disinformation", (September 2020), available at: Managing the COVID-19 infodemic: Promoting healthy behaviours and mitigating the harm from misinformation and disinformation ; and Kouzy R, Abi Jaoude J, Kraitem A, et al. "Coronavirus Goes Viral: Quantifying the COVID-19 Misinformation Epidemic on Twitter", Cureus 12(3), (March 2020).

Disinformation may pose risks to individuals right to non-discrimination as guaranteed under Articles 2(1) and 26 of the ICCPR. This is because disinformation has been shown to target particular groups in society—such as certain ethnic groups—and is designed to incite violence, discrimination or hostility. We have seen that disinformation involving hate speech has particularly harmful effects on marginalised groups, which may result in physical harm or even loss of life[6] and potentially constitute violations under Articles 6 and 9 of the ICCPR.

The proliferation of disinformation online poses a number of threats to human rights, but so, too, do laws and policies that are designed to tackle this phenomenon. States have increasingly responded to the spread of disinformation and misinformation online through content based restrictions and regulation, which in some cases has imposed stricter moderation by platforms. These laws and policies, which come in a variety of forms, pose a threat to individuals' right to freedom of expression as guaranteed under Article 19 of the ICCPR. The majority of these laws are overly broad in scope, pursue aims which are not considered legitimate by international human rights standards and carry disproportionate penalties. It is notable that few state responses align with relevant standards despite the existence of a clear framework for states to follow under international human rights law.

Responses by platforms have proven inadequate and pose risks to human rights as well. Companies continue to use automated processes for content moderation, whether required by law or not, and this is likely to increase the scale of erroneous removals of content. It has been widely observed that AI is at a very nascent stage when it comes to analysing speech, and can only accurately identify a very small number of categories of speech which don't require an assessment of context or other nuances[7] - unlike disinformation. These issues are compounded by a lack of sufficient transparency by platforms on decisions surrounding content moderation, political advertising and use of recommender systems.

Please see questions 2 and 3 below for more information on state and company responses.

Measures to address key challenges

While we have seen a variety of troubling measures adopted by states and companies to address disinformation, there are potential measures to tackle the spread of disinformation and its associated harms in a more rights respecting manner. In 2020, the Forum on Information and Democracy established the Working Group on Infodemics to devise a framework to combat disinformation.[8] The final output of this working group identified a number of recommendations to address disinformation and we believe that many of these measures would be helpful in addressing key challenges identified above.

There is a need to move past content based restrictions on disinformation which pose risks to freedom of expression. If states are to pursue regulatory measures to tackle the spread of disinformation, they should begin by imposing transparency requirements on platforms with regard to their advertising, targeting practices and algorithmic decisionmaking. However, states

---

[6] Paul Mozur, "A Genocide Incited on Facebook, With Posts From Myanmar's Military" NY Times (October 2018), available at: A Genocide Incited on Facebook, With Posts From Myanmar's Military (Published 2018); and UNHRC, Report of the independent international fact-finding mission on Myanmar, (September 2018) A/HRC/39/64.

[7] *See,* Cambridge Consultants, "Use of AI in Online Content Moderation: 2019 Report Produced on Behalf of OfCom", available at: Use of AI in online content moderation – Cambridge Consultants

[8] Forum on Information & Democracy, Working Group on Infodemics, available at: https://informationdemocracy.org/working-groups/concrete-solutions-against-the-infodemic/

should not require platforms to make determination on the legality of content (even harmful content) under national law. If these platforms do adopt terms of services pertaining to disinformation, then regulation should require platforms to ensure that their terms are clear to users, and that they have mechanisms in place, such as appeals mechanisms, to ensure that those terms of service are enforced as fairly and consistently as possible.

This should not simply be left to platforms, but also evaluated and assessed by an independent entity or regulator which would look at all systems in place dealing with content-based harm. This would provide increased transparency around the entire system - including the setting of terms of service, enforcement system design, moderator training, and efficacy of moderation and safeguards. Without adequate information from platforms, policymakers and researchers will be unable to properly assess compliance with international human rights standards, or be able to craft effective solutions or appropriate limitations on systems designed for automated amplification and audience targeting.

In addition, states should consider regulation which requires platforms to enable users to understand what types of algorithmic recommender systems are in place, including specific data points used, and let users have a say in whether these systems are applied, and if so, what specific data points may be used. States also need to develop and effectively enforce data protection legislation which tackles the issues of micro-targeting and surveillance of users. Policymakers should examine existing frameworks, such as the EU's GDPR or the Council of Europe's Convention 108, as useful models.

Outside of these proposed regulatory approaches, companies themselves need to make changes to align their content moderation and other relevant processes with the international human rights standards. While the UN Guiding Principles on Business and Human Rights (UNGPs) make clear that companies have a responsibility to respect human rights and avoid infringing upon the human rights of others, this has not translated into rights respecting policies by platforms. Platforms should be guided by the principles of legality, legitimacy, and necessity and proportionality when faced with potential limitations on freedom of expression as they relate to disinformation. Companies should at a minimum, and without government mandate, make clear their terms of service, notify users of decisions made on content, and provide effective appeals mechanisms and options to seek redress.

Beyond these measures, larger companies with adequate resources must significantly expand fact-checking initiatives to cover local languages, prioritise at-risk countries, and hire experts to oversee content moderation decisions. Companies should also develop stronger relationships with civil society, engage with human rights groups, and share knowledge with other platforms. It is further advisable, and noted below in our response to question 3, that companies should work to limit the virality of harmful content, even on private channels, without undermining encryption and the right to privacy.

Please see our response to question 6 for specific recommendations for states and companies.

2. **(a) What legislative, administrative, policy, regulatory or other measures have Governments taken to counter disinformation online and offline?**

   (b) What has been the impact of such measures on i) disinformation; ii) freedom of opinion and expression; and iii) other human rights?

   (c) What measures have been taken to address any negative impact on human rights?

Over the last decade there has been a trend of governments across the globe resorting to strict criminal restrictions on disinformation and other kinds of "false" or "misleading" information. While many of these laws are strongly linked to criminal and penal codes that were introduced in past decades, the last few years have seen many governments introducing new legislative restrictions, often under the guise of tackling cybercrime, as well as disinformation-specific legislation.[9] More recently, COVID-19 has prompted some governments to pass emergency measures which criminalise disinformation as it relates to the pandemic.[10] States continue to pursue new ways of tackling disinformation, including through traceability requirements, which would undermine both the right to freedom of expression and privacy.[11]

The combined effects of these laws, both old and new, is a further curtailing of freedom of expression. GPD, alongside other civil society organisations, has developed an interactive map which seeks to support human rights defenders by tracking and analysing all laws, policies and other government actions on disinformation across Sub-Saharan Africa.[12] We have found that laws in this region, and throughout the rest of the world, are often broad in their scope, meaning that they can be interpreted as prohibiting a wide range of speech. They pursue aims which would not be considered legitimate under Article 19(3) of the ICCPR and they often carry penalties which can be disproportionate and result in a chilling effect on freedom of expression. They are being applied in ways which silence legitimate forms of speech, with consequences for other associated rights, such as freedom of association and assembly.

This trend is evident in a number of regions, including Southeast Asia and the Middle East. Dozens have been arrested in the Philippines for allegedly spreading 'fake news' in 2020, which is criminalised under Article 154 of the Revised Penal Code and, until its expiration in June 2020, COVID-19 emergency legislation.[13] These arrests were referenced by UN High Commissioner for Human Rights Michelle Bachelet in June 2020, who noted that one arrest stemmed from an individual who made comments online about the prevalence of infection in one locality.[14] In Egypt, the dissemination of false news is criminalised in the Egyptian Penal Code, Law No. 175 of 2018 on Anti-Cybercrime and Law No. 180 of 2018 Regulating the Press and Media.[15] These laws contain broadly worded offences and disproportionate penalties which enable the government to clamp down on critical voices and dissent. The Committee to Protect Journalists has collected

---

[9] For example, Section 16 of the Tanzania Cybercrimes Act, 2015, available at: https://rsf.org/sites/default/files/the_cyber_crime_act_2015.pdf; and Singapore 'The Protection from Online Falsehoods and Manipulation Act 2019', available at: Protection from Online Falsehoods and Manipulation Act 2019 - Singapore Statutes Online

[10] For example, Eswatini Regulation 29 of the Coronavirus (COVID-19) Regulations, 2020, available at: http://www.gov.sz/images/CORONA/The-Coronavirus-COVID-19-Regulations-2020.pdf

[11] Center for Democracy & Technology, "Traceability Under Brazil's Proposed Fake News Law Would Undermine Users' Privacy and Freedom of Expression" (June 2020), available at: https://cdt.org/insights/traceability-under-brazils-proposed-fake-news-law-would-undermine-users-privacy-and-freedom-of-expression/

[12] Disinformation Tracker, available at: https://www.disinformationtracker.org

[13] CNN Philippines Staff, "32 arrested over 'fake' COVID-19 news", CNN Philippines (April 2020), available at: https://www.cnnphilippines.com/news/2020/4/6/arrests-over-coronavirus-fake-news.html

[14] OHCHR, Asia: Bachelet alarmed by clampdown on freedom of expression during COVID-19, (June 2020), available at: Asia: Bachelet alarmed by clampdown on freedom of expression during COVID-19

[15] Library of Congress, Initiatives to Counter Fake News: Egypt, available at: https://www.loc.gov/law/help/fake-news/egypt.php

data on over 20 journalists in Egypt who have been imprisoned on fake news charges in recent years.[16]

Newer forms of regulation, as recently presented in the UK government's full response to its Online Harms White Paper,[17] do not seek to criminalise the dissemination of disinformation. Instead, the UK proposal would tackle disinformation online by introducing a duty of care, requiring certain companies to address disinformation (as well as other content) that poses a reasonable foreseeable risk of significant physical or psychological harm to individuals. High reach and high risk platforms would be required to set out clear policies on harmful forms of disinformation, which need to be enforced consistently. The regulatory framework would require transparency reporting requirements. There are some positive elements to the proposal, but the lack of clarity on which forms of disinformation fall within scope, is concerning. While the proposed legislation would give users the right to challenge decisions, this is a relatively weak safeguard that places the burden on users, rather than platforms, to ensure that freedom of expression is protected.

The EU's proposed Digital Services Act,[18] which aims to update the EU's legal framework for intermediary liability, would also address disinformation through new obligations on providers. All service providers will have to provide clear terms of service detailing "information on any policies, procedures, measures and tools used for the purpose of content moderation, including algorithmic decision-making and human review". Very large platforms would be required to conduct annual reviews of "significant systemic risks stemming from the functioning and use made of their service" which includes the "intentional manipulation of their service" which causes (or could cause) "negative effects upon public health, children, civil discourse, electoral processes and public security". Disinformation would therefore be tackled through more proportionate and effective mitigation measures and undergo independent auditing. This proposal is set to complement and strengthen existing self-regulatory efforts at the EU level, such as the Code of Practice On Disinformation, which has been signed up to by platforms including Facebook, Google, and Twitter to address disinformation on their services.[19]

Other states have proposed more targeted forms of legislation to address the spread of disinformation, including those which require platforms to provide transparency on algorithmic recommender systems, and give users control on when they are used and how. While this approach is reflected in the EU DSA proposal, Germany's proposed law (Medienstaatsvertrag),[20] if approved, would impose binding obligations on platforms to disclose the selection criteria used to determine the sorting and presentation of content. Social media platforms would need to disclose the way that criteria are weighed, the functioning of the algorithm, and provide users with an opportunity to both understand and modify based on their individual preferences. The effectiveness of this proposal is difficult to ascertain, but the emphasis on transparency and

---

[16] Committee to Protect Journalists, Data - 22 Journalists Imprisoned in Egypt 2020 / Charges includes False News, available at: https://cpj.org/data/

[17] Online Harms White Paper: Full Government Response to the Consultation (December 2020), available at: Online Harms White Paper: Full government response to the consultation

[18] Proposal for a Regulation of the European Parliament and of the Council on a Single Market For Digital Services (Digital Services Act) and amending Directive 2000/31/EC (December 2020) available at: https://ec.europa.eu/digital-single-market/en/news/proposal-regulation-european-parliament-and-council-single-market-digital-services-digital

[19] Code of Practice on Disinformation, available at: https://ec.europa.eu/digital-single-market/en/code-practice-disinformation

[20] Medienstaatsvertrag, Rundfunkkommission Der Lander, available at: https://www.rlp.de/fileadmin/rlp-stk/pdf-Dateien/Medienpolitik/04_MStV_Online_2018_Fristverlaengerung.pdf

empowering end-users to make decisions is preferable to the criminalisation of false or misleading information seen elsewhere.

Please see our response to question 6 for specific recommendations for states.

3. **(a) What policies, procedures or other measure have digital tech companies introduced to address the problem of disinformation?**

(b) To what extent do you find these measures to be fair, transparent and effective in protecting human rights, particularly freedom of opinion and expression?

(c) What procedures exist to address grievances and provide remedies for users, monitor the action of the companies, and how effective are they?

Social media platforms and other tech companies have introduced a number of policies and procedures to address disinformation on their services. Major platforms like Facebook, Twitter or Youtube take different approaches to the issue, but the most common measures include: (1) enforcing platform policies according to terms of service or community standards; (2) fact checking content and down ranking or directing users to authoritative sources - particularly around COVID-19 or democratic processes; (3) inserting friction to limit the virality of false or misleading content, for example by limiting the number of times content may be shared or labeling pieces of content; and (4) allowing users to report disinformation on their services.

The extent to which these measures have been fair, transparent and effective in tackling disinformation while upholding freedom of expression is difficult to ascertain. We have insufficient data from online platforms to arrive at conclusions, but recent studies suggest that measures taken by platforms have been inadequate. For example, the Reuters Institute for the Study of Journalism recently found that 59% of posts on Twitter which were rated as false by fact-checkers remained up without warnings, whereas on Facebook 24% of false-rated content in a particular sample remained up without warning labels.[21] Reports further indicate that Facebook has recently enabled advertisers to target users based on undetermined data points and potentially dangerous characteristics, including "interest in pseudoscience".[22] The "interest in pseudoscience" group was reported to include 78 million people, but nonetheless represents a form of micro-targeting, as opposed to regular targeting, as it enables the group to receive a tailored message based on one or several specific characteristics. This demonstrates that measures to address disinformation need to extend beyond just content moderation and take account of the business practices more broadly.

Moreover, some companies are not entirely clear in how their terms of service relate to content moderation of disinformation. Companies have made substantial changes to their content moderation policies since the outbreak of COVID-19, and these have not been relayed to users or presented in transparency reports to the public. And even when they are, the increasing reliance on automated tools for content moderation has undoubtedly led to permissible content removed from platforms with often inadequate or non-existent grievance mechanisms. Some platforms are now working to establish procedures and structures to address grievances, provide remedies and monitor the action of companies. The Facebook Oversight Board is a

---

[21] Scott Brennen et al., "Types, Sources, and Claims of COVID-19 Misinformation", available at: https://reutersinstitute.politics.ox.ac.uk/types-sources-and-claims-covid-19-misinformation
[22] Aaron Sankin, "Want to Find a Misinformed Public? Facebook's Already Done It." *The Markup* (May 7, 2020), available at: Want to Find a Misinformed Public? Facebook's Already Done It – The Markup

notable effort worth mentioning, but the effectiveness and impact of this initiative is yet to be determined.

Please see our response to question 6 for specific recommendations for companies.

4. **Please share information on measures that you believe have been especially effective to protect the right to freedom of opinion and expression while addressing disinformation on social media platforms.**

We believe there are other entities better suited to comment on the effectiveness of measures.

5. **Please share information on measures to address disinformation that you believe have aggravated or led to human rights violations, in particular the right to freedom of opinion and expression.**

Please see our responses to questions 1 - 3 for more information on measures to address disinformation which have aggravated or led to human rights violations.

6. **Please share any suggestions or recommendation you may have for the Special Rapporteur on how to protect and promote the right to freedom of opinion and expression while addressing disinformation.**

Recommendations for states:

Recommendation: States should avoid content based restrictions on disinformation, particularly through criminal laws, which should only be used in the most severe circumstances where there is an intention to cause some clear, objective public harm.

Recommendation: States should not require platforms to make determinations on the legality of content, including disinformation, under national law. It should be up to platforms to decide what terms of service and content moderation policies they apply to content, including disinformation. However, it may be appropriate for States to require those online platforms which do develop such terms of service and content moderation policies on disinformation to ensure that those terms of service are clearly understood, and establish appeal mechanisms to ensure they are enforced fairly and consistently. Assessments of whether this is the case should involve an independent entity such as a regulator.

Recommendation: States should require certain platforms to publish transparency reports or relevant information on their advertising, targeting practices, and algorithmic decision making, particularly as they relate to democratic processes and public health crises. However, the scope of platforms to be included must be proportionate. Platforms should only be included where there is clear evidence of harm being caused or facilitated by their services.

Recommendation: States need to develop and effectively enforce data protection legislation which tackles the issues of micro-targeting and surveillance of users. Policymakers should examine existing frameworks, such as the EU's GDPR, as useful models for potential legislation.

Recommendation: States should consider legislation that requires platforms to allow users to understand what types of controls or algorithms are in place, including the data points used to make recommendations. This should be provided in an accessible format to inform users.

Recommendation: States should consider legislation that requires platforms to let users have a say in whether algorithmic recommender systems are applied, and have the option to turn them off, or instead only have them base recommendations on specific data points agreed to by the user.

Recommendation: States should consider measures that require companies to allow their users to report disinformation, even on private or encrypted channels. They should also encourage companies to conduct further research on limiting the virality of disinformation on their services in a rights respecting manner.

Recommendation: States should not require platforms to undertake proactive monitoring or filtering of content. Maintaining a prohibition on general monitoring is critical to protecting individuals' right to privacy and the filtering of content poses unique risks to freedom of expression. If these are required, there is a risk of creating a situation where all content may need to be potentially approved before it is published.

Recommendations for companies:

Recommendation: The international human rights framework should guide the development of all corporate policies. Companies should acknowledge their responsibilities under the UNGPs and develop content moderation policies which align with the principles of legality, legitimacy, and necessity and proportionality. Content moderation policies are more likely to be proportionate when they prioritise deamplification and friction, as opposed to removal.

Recommendation: Companies should develop terms of service and ensure that these are clearly understood to users, with established appeal mechanisms to ensure they are enforced fairly and consistently. This should involve the translation of such terms into local languages.

Recommendation: Companies should conduct periodic assessment of their content moderation policies and appeals mechanisms to ensure they do not pose risks to individuals human rights, particularly to freedom of expression and the right to an effective remedy.

Recommendation: Companies should ensure they have (or are able to access) the relevant language skills and cultural and contextual understanding to apply their terms of service, including on disinformation, to all users, fairly and consistently, irrespective of geography or other factors.

Recommendation: Whereas terms of service should apply to all users and be applied in a consistent and transparent manner, companies should consider their approaches to public figures. Content moderation decisions for public figures should be clearly provided for,

> evaluated with regard to international human rights standards, and ultimately not infringe upon individuals right to access information.

> **Recommendation**: Companies should continue to support fact-checking initiatives and establish dedicated structures and local expertise in countries where they operate. Human oversight of content moderation is imperative in all countries, but especially in areas where there is a clear risk that disinformation may result in real world harm.

> **Recommendation**: Companies should adopt measures that limit the virality of false or misleading content shared on messaging apps, and research further options to quell the spread of such content without undermining privacy or freedom of expression.

Additional Resources

- **Disinformation Tracker** (https://www.disinformationtracker.org): This tracker maps laws, policies and government actions taken in the Sub-Saharan African region on disinformation, providing links to the laws and other sources, and analysing them from a human rights perspective (using Article 19 as the basis).

- **A Human Rights-Based Approach to Disinformation** (https://www.gp-digital.org/a-human-rights-based-approach-to-disinformation): This blogpost sets our human rights-based approach to disinformation, with a summary of the main ways that disinformation can harm human rights, but also how disinformation laws and policies can themselves risk freedom of expression. It also contains a set of guiding questions to help analyse whether laws and policies are consistent with Article 19.

- **GPD Booklet on Disinformation and Human Rights** (https://www.gp-digital.org/wp-content/uploads/2019/09/DISINFORMATION-EXPORT_final.pdf): This booklet summarises the blogpost.

- **GPD Submission to the Forum on Information & Democracy Working Group on Infodemics** (https://www.gp-digital.org/wp-content/uploads/2020/10/Forum-ID-Contribution_final.pdf): This is our submission to the FID's Working Group, which was referenced several times in the final report.