

# upgrade democracy

Research Series: Reinhard Mohn Prize

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## Effectively countering disinformation

Perspectives from every continent

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Cathleen Berger, Charlotte Freihse, Otto Meyer zu Schwabedissen



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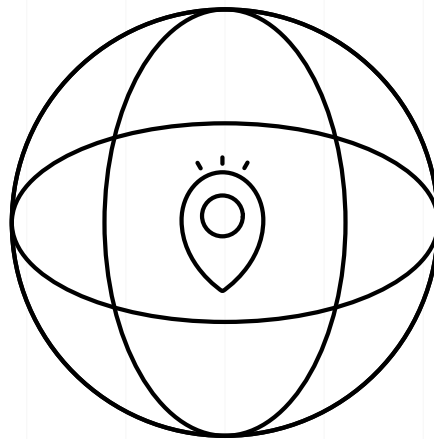
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# Effectively countering disinformation

Perspectives from every continent

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This report is part of an international research series on  
“Strengthening Democracy, Countering Disinformation.”

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# 1 Global perspectives on countering disinformation: Why they matter and what we can learn

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Democracies across the world are under greater pressure than ever before: According to the latest Bertelsmann Transformation Index (BTI), the quality of democratic processes is declining in many countries: Of the 137 countries surveyed, elections were less free and fair in 25 countries, freedom of assembly and association less respected in 32 countries, and freedom of expression and the press more restricted in 39 countries ([BTI 2024](#)).

Contributing to these trends is widespread disinformation, which can undermine trust in institutions and degrade the quality of public discourse. The phenomenon of disinformation – malign actors, the issues they exploit, and the spaces they occupy – may appear idiosyncratic to each nation state. A closer look reveals a globalised picture: Disinformation campaigns target discourses across national borders, often disseminated on global social media platforms, and are coordinated by domestic and foreign actors, intent on weakening democracy. Countermeasures must therefore be coordinated and integrated as well. But countering disinformation can also serve as a pretext for authoritarian governments to crack down on freedom of speech, and even democracies must be vigilant to act in a rights-respecting manner.

While disinformation is not a new phenomenon, the rise of online platforms has given it unprecedented reach and amplification. Nowadays, much of public discourse is happening online, placing significant power in the hands of a few private actors who own the social media platforms where people read, discuss, engage, and form their opinions. The design features, policies, and algorithms they deploy to curate people's online experiences are increasingly being scrutinised for their potential impact – and rightly so. There is evidence that platforms adopt different strategies in different markets, often using sections of the global majority as guinea pigs for new features (see [2.1](#) of this report). Moreover, the dynamics that unfold on these platforms can and are being exploited by disinformation actors, whose targeted campaigns do not stop at national borders.

This interconnected nature of digital disinformation necessarily affects the way we observe and analyse political developments, including elections, as we can no longer focus on a single national context or an isolated phenomenon. All stakeholders – governments, researchers, civil society organisations, journalists, and corporate players – are aware of the need for multifaceted and concerted efforts to counter disinformation. However, it is unclear to what extent, in which shape and in what form this awareness is translated into action. This is why we need a better understanding of the various strategies and initiatives that have been put in place by different actors around the world. Without a more systematic, global overview, we are

limited to anecdotes of success, but lack appropriate insight into the effectiveness and impact of counter-disinformation measures.

In 2024, elections will be held in more countries than ever before, with roughly half of the world's population heading to the polls. Elections present critical moments that malign actors can exploit to manipulate public discourse and interfere with electoral processes. The 2021 Capitol Riots in Washington D.C., following the 2020 presidential election, and the 2023 attacks in Brazil following the Lula v. Bolsonaro elections, serve as compelling evidence of the urgent need to take these risks very seriously.

Aware of the global nature of the disinformation threat, our team at Upgrade Democracy undertook international research, meeting with experts, academics, activists, and policymakers to learn from them. We wanted to understand how disinformation is discussed in different parts of the world, to what extent topics and/or actors might differ, and what it would take to develop common countermeasures and long-term strategies. In short, our international research looked at what is observable, what is comparable, and where we have room for concerted action. Our international research includes desk research and expert interviews, resulting in a global landscape mapping of initiatives and approaches to countering disinformation ([Upgrade Democracy 2024](#)). In addition, we partnered with regional research partners to host a series of five expert workshops that took place in Nairobi, Kenya; Bangkok, Thailand; Buenos Aires, Argentina; Washington D.C. , USA; and Brussels, Belgium, which brought together over 100 experts from different disciplines and stakeholder groups.

These face-to-face meetings are complemented by a series of five reports written by teams from the Asociación por los Derechos Civiles (ADC, Argentina), the Bertelsmann Foundation North America (BFNA, United States), the Collaboration on International ICT Policy for East and Southern Africa (CIPESA, Uganda), the Digital Asia Hub (Hong Kong), and the Global Public Policy institute (GPPI, Germany). An additional report provides a global overview of government responses to countering disinformation.

Together, these six reports and the insights we gained from interviews and background talks with experts and practitioners, underpin this comparative analysis. In our comparative report, we share noteworthy observations from all regions and provide illustrative examples to point to larger patterns, trends, and considerations that require further attention and research. Put simply, our analysis breaks down the broader picture and highlights specific case studies and examples to make concepts more concrete.

The purpose of this report is to identify patterns of disinformation and to highlight trends that may serve as role models in different regions. The report is structured around four overarching themes, illustrated by a total of 14 observations. First, we explore similarities and differences in the information ecosystem to get a sense of the context and dynamics in which disinformation spreads – and needs to be countered. Second, we compare which topics are targeted where, and who is responsible for spreading disinformation, to understand whether countermeasures need to be deeply embedded in local context, or whether commonalities and overlap, particularly with regard to malign actors, lend themselves to concerted, international efforts. Third, we highlight efforts and initiatives that are countering disinformation – the protagonists – to illustrate successes and current challenges. Fourth, we compare the role of governments in

different political contexts and assess the impact of tech trends in the field, as experienced in different regions.

The final part of the report identifies and summarises key considerations for each of the four overarching themes. All of them require more attention and broader (international) engagement to foster an ecosystem of successful counter-disinformation protagonists.



Covers of this 7-part report series

## 2 Lessons learned from five regions

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Structured along four overarching themes, the following summarises the most significant insights and observations from six research reports (five regional, one global overview of government responses to disinformation) and our international engagements – and puts them into perspective: what are the commonalities, what are the differences? For instance, you will find data on the use of social media, the most prominent topics exploited in disinformation campaigns, and observations on the role of traditional media. In addition, we point to trends that strike us as illustrative beyond their specific case, such as developments around ‘disinformation for hire’, ‘zero-rating’, or the influence of AI-generated content in elections.

In total, we have captured 14 observations, which we have grouped under four overarching themes:

1. Commonalities and differences in the information ecosystem;
2. Sector topics and actors spreading disinformation;
3. Protagonists countering disinformation; and
4. The role of governments and tech trends in this field.

## 2.1 The information ecosystem: Commonalities and differences

The state and health of information ecosystems is largely indicative of how and to what extent disinformation spreads and manipulates. Information ecosystems describe a complex network of information flows, sources and digital platforms that shape and influence how information is created, distributed, consumed, and shared.

There are four elements whose dynamics influence information ecosystems in all regions: First, there is a worrying trend of shrinking space and overburdening of civil society. Second, media consumption and decision-making are affected by eroding trust and other pressures. Third, we find that information ecosystems in all regions differ significantly in terms of patterns of use and the social media available. Fourth, the intersection of digital divides with the spread of disinformation underscores the urgent need for inclusive strategies to counter disinformation. Taken together, these observations underscore the multifaceted nature of the information landscape and the challenges it poses for effectively countering disinformation.

### Shrinking space for civil society

*“In this connection, while civil society organisations are keen to play a constructive role in the Code of Practice on Disinformation processes and to monitor corporate compliance, resource constraints make it difficult for them to keep up, for example, with the necessary preparations for meetings and to contribute to reports.” (Hoxtell 2024, 18)*

Our international research highlights the significant positive impact of civil society organisations, including but not limited to fact-checking, increasing media literacy, and fostering trust within communities. Given their familiarity with local cultures and languages, these organisations serve as crucial multipliers and possess the essential knowledge and expertise needed to design effective countermeasures. However, we observe that in many contexts, civil society is facing increasing challenges: Either their expertise remains under-utilised, or their space for manoeuvre is infringed upon, either through direct suppression of their voices or legal intimidation, or through increasingly scarce resources for growing responsibilities. This is not an isolated trend. In Europe and the US, too, civil society spaces are shrinking (see [Council of Europe 2018](#); [European Parliament 2022](#)).

This means that especially, but not exclusively, in countries or regions where governments are either unwilling or unable to stabilise the information ecosystem and counter disinformation, the involvement of civil society organisations cannot be overemphasised. Illustrative and powerful examples come from **Thailand**, where civil society organisations are crowdsourcing input for constitutional reform; **Brazil**, where civil society is working hard to contain false narratives spread by Bolsonaro supporters; or **Ethiopia**, where non-profits are drawing attention to the situation in Tigray ([Berger 2023](#); [Ferreira et al. 2024, 24f.](#); [Nanfuka et al. 2024, 11f.](#)).

However, it is not only governments that occasionally try to limit the influence of civil society organisations through strategic litigation. Companies do, too. The situation in the **United States** is particularly worrying: According to one report, independent researchers and advocates are facing coordinated attacks on their research and data access plans, threatening both their effectiveness and safety ([Jackson et al. 2023](#)). X's recent lawsuit against the **Center for**



**Countering Digital Hate** serves as an alarming example of the risks faced by organisations and individuals working on the front line of this issue.

Additional pressures arise when the space for civil society is shrinking, while at the same time the demand and scope for their engagement is growing, making working conditions unsustainable. These growing responsibilities may take the form of new and expanding formats of participation, consultation, or input, e. g. around platform governance or risk assessments (Iglesias Keller et al. 2024, 24f.), or because state protection fails. In several **African** countries, for example, civil society actors are playing an essential role, and structures are developing that require a high level of commitment, e. g. to ensure a strong focus on the local level as well as linguistic diversity (Nanfuka et al. 2024, 10f.).

### The importance of trustworthy and reliable media

*“As ad revenue shifted toward digital media and newsrooms continued to shrink as a result of wide-spread cost-cutting, local media outlets have been a major casualty of this information revolution.” (Rao 2024, 5).*

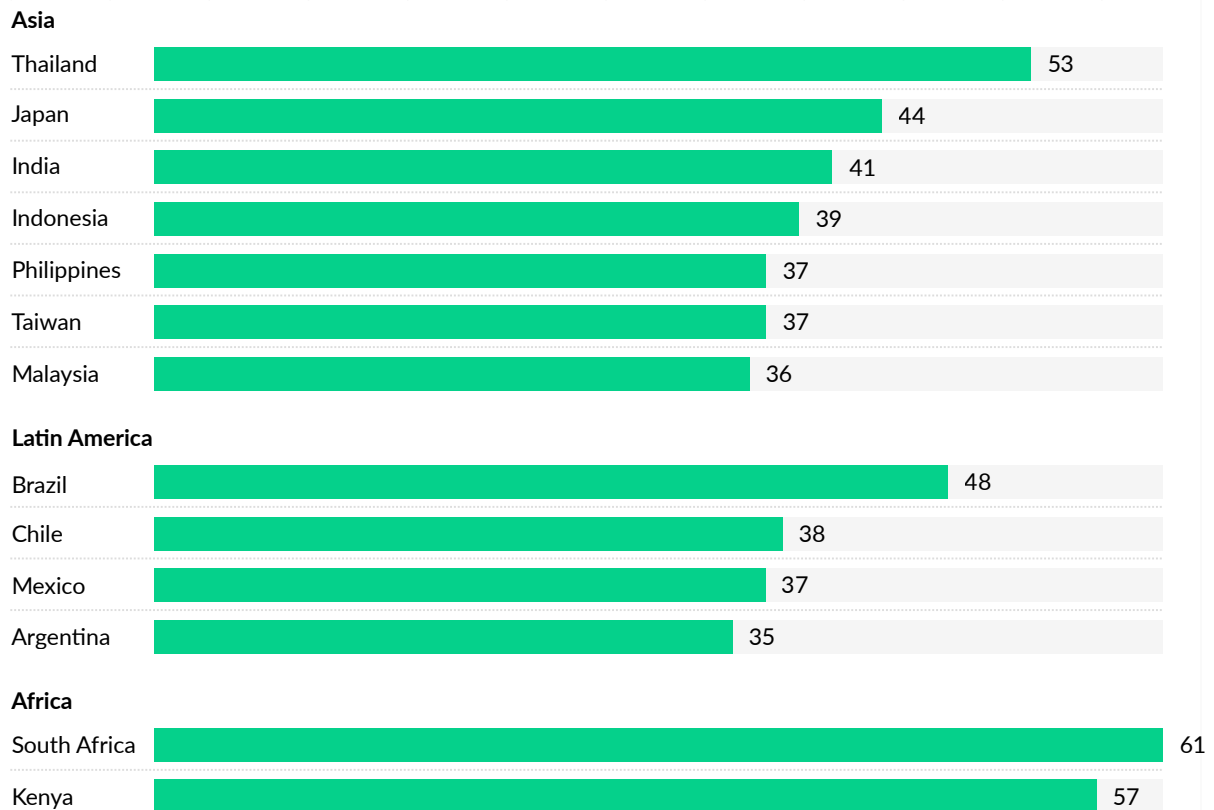
Another variable that adds to the importance of civil society is that a vibrant and trusted media system is crucial in all regions, but similarly under pressure. In settings where trust in established journalism is declining, people often turn to lower quality sources of information, with social media often serving as a popular substitute. However, social media platforms generally lack rigorous verification and editorial oversight (Shah et al. 2024, 21), increasing the likelihood of exposure to disinformation.

In contrast, traditional news outlets often act as the main defence against disinformation. Their resources and ability to fact-check, provide perspective, and conduct investigations enable them to debunk false claims and provide reliable information. **Kenya's** 2022 elections are a case in point, where the country's popular radio, TV, and print outlets ran *“real-time myth-busting articles and (...) fact-checking segments on primetime news”* (Nanfuka et al. 2024, 12). For these efforts to be fully effective, citizen engagement and trust are essential.

Ultimately, the spread of disinformation itself undermines trust in the media, creating a vicious cycle. Recently, there has been an increase in the spread of disinformation through impersonated news outlets that mimic credible and established outlets, such as in the ‘Doppelgänger’ campaign exposed by **Germany** and **France** (Leloup et al. 2024). This leads to a general sense of uncertainty about the trustworthiness of information and, for many, a withdrawal from news sources altogether.

**Figure 1: Trust in the news**

Percent of population, who generally trust the news in selected counties



Source: Reuters Institute (2022)

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In order for media outlets to effectively fulfil their role as the fourth pillar, they must not only enjoy trust, but also be reliable and accurate in their reporting. This is undermined by a number of structural factors: First, the resource constraints faced by many media outlets reduce the quality of reporting, as seen in all the regions we analysed (Rao 2024; Nanfuka et al. 2024; Ferreyra et al. 2024; Shah et al. 2024). Media markets in many countries are becoming increasingly competitive, and advertising revenues have shifted from news outlets to large online platforms. The resulting financial pressures are particularly affecting local outlets in the **United States** (Rao 2024, 9). In contrast to national journalism (e. g. CNN), these publications are seen as a trustworthy source because they are ‘tangible’. In some cases, economic hardship may even lead journalists to actively spread disinformation. For example, in the Democratic Republic of **Congo**, some journalists engage in a practice called ‘coupage’, whereby a subject covered by news outlets pays for the desired coverage (Nanfuka et al. 2024, 11).

Overt partisan bias also undermines the quality of media outlets. Public broadcasters in **Latin America** are often subject to editorial interference and capture by undemocratic governments (Ferreyra et al. 2024, 35). Likewise, the political independence of private media outlets is not always guaranteed. In the Democratic Republic of **Congo**, some private media companies are owned by active politicians and work to consolidate the power of these players (Nanfuka et al. 2024, 7). Finally, governments can reinforce media partisanship through the allocation of advertising expenditure. In some regions, parties in power reward outlets that take a favourable view of the government. Such alliances weaken the quality of reporting (Ferreyra et al. 2024, 35).

Competition from digital platforms, along with covert and overt political repression are some of the key challenges media outlets face around the world. At the same time, journalists are urgently needed to ensure accountability and an evidence-based public discourse in a fast-paced information environment. Quality reporting suffers from these constraints, further eroding trust in the media and contributing to the shift towards digital news feeds rife with disinformation.

### Social media is global, but experiences vary

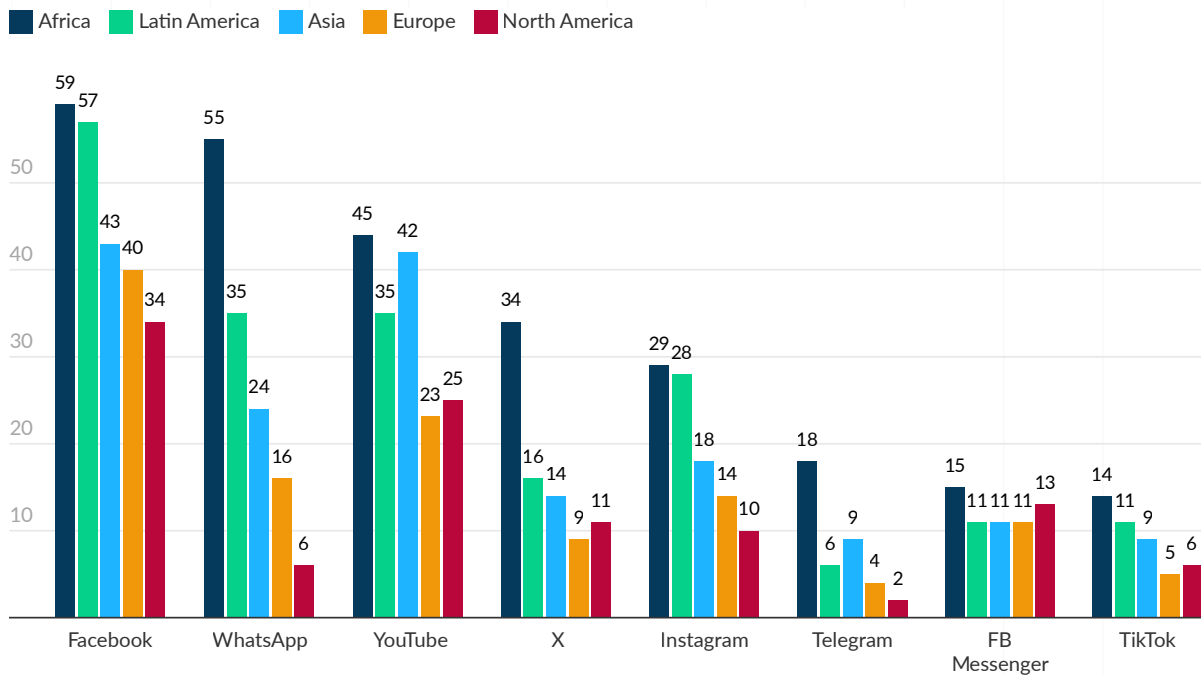
*“Across the DR Congo, Ethiopia, Kenya and South Africa, the disinformation ecosystem bears as many similarities as it does differences. This is despite varying levels of internet access, democratic credentials and digital rights-related practices.” (Nanfuka et al. 2024, 8)*

As trust in traditional media erodes, online platforms are increasingly filling the gap. In other words: Online platforms are essential for public discourse and communication worldwide, but the use and availability of specific platforms varies from region to region. This leads to a differentiation of information environments between countries and regions, where a platform may be central in one area but hardly used in another.

In **Latin America, Africa, and Asia**, many of the very large online platforms have larger user numbers than in **North America and Europe**, making social media services an integral part of public discourse and communication in Asian, African, and Latin American countries. For example, 55 percent of Africans use WhatsApp, compared to just 6 percent in North America. Similarly, 42 percent of the population in Asia watch YouTube videos on a weekly basis, compared to only 23 percent of Europeans. A similar pattern can be seen in the use of X: 34 percent in Africa use it as a means of communication, but only 9 percent in Europe (see Figure 2). The popularity of social media is partly due to low trust in traditional media in these regions, as individuals shift their news consumption from traditional media to social media feeds (Ferreyra et al. 2024, 10f.; Nanfuka et al. 2024, 8). This gives social media platforms an important role in many political systems. In other cases, messaging services such as LINE, are used primarily in one region (e. g. **Asia**, Shah et al. 2024, 56). Similarly, Threads seemed to be much more relevant in **Brazil** and other Latin American countries than in other countries, whereas the idea of the Fediverse is more prevalent in **Europe**.

The influence of certain social media on public discourse is further reinforced by so-called zero-rating contracts in many Latin American and African countries. With these contracts, telecommunications companies offer unlimited free use of major social media services as part of limited mobile data plans. Often, these large online platforms pay telecommunication companies to include their services in zero-rating contracts, giving an advantage to large companies with the resources to pursue such strategies. For example, in 14 **Latin American** countries, telecommunication companies offer plans with free access to WhatsApp or Facebook. Experts are ambivalent about zero-rated services: While they offer cheap connectivity to those who would otherwise have no internet at all, they also further concentrate power over communication and public discourse in the hands of few global companies (Ferreyra et al. 2024, 11).

**Figure 2: Global use of various social media**  
Percent of population, survey data from 2022



Source: Reuters Institute

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This also speaks to the fact that most of the world’s social media users live in **Asia**, **Latin America**, and **Africa**, yet these regions are often underserved by platform and government policies. For most social media companies, advertising and other revenues are still concentrated in **North America** and **Europe**, leading to the neglect of other markets. For instance, platform companies are found to be non-compliant with local regulations (e. g. in **Kenya**, [Nanfuka et al. 2024, 24](#)) and attempts at regulation are sometimes met with threats to leave the market altogether. Most recently, the owner of X, Elon Musk, announced that he would not comply with a court order in **Brazil** to remove far-right accounts, and declared his intention to leave the market entirely ([Hern and Phillips 2024](#)). While the company subsequently reversed course, such threats illustrate the challenges that authorities outside North America and Europe face in properly regulating and enforcing accountability on social media platforms. The lack of regulation is reflected in the platform companies’ strategic use of these markets as testing grounds for new policies and practices. There are also other issues that make social media platforms less safe to use outside of Europe and North America: The lack of sufficient content moderation tailored to linguistic and cultural needs, especially for indigenous communities, is just one key concern for many users worldwide ([Nanfuka et al. 2024, 24](#)).

In general, social media use varies, information flows can be locked into specific (zero-rated) services, and content moderation and policies are enforced to varying degrees – all of which affect the composition of not one global, but multiple information ecosystems.

## Digital divides intersect with the spread of disinformation

*“The gender digital divide in Pakistan is one of the sharpest in the world: a large number of women do not have easy access to a mobile phone for social, economic, religious, and cultural reasons.”*

(Shah et al. 2024, 38)

Internet access is not as widespread in most **Latin American, African, and Asian countries** (70 – 90 percent) as in many **Western European** countries (90 – 100 percent), but it is similar to that in **Central and Eastern European** countries. In much of **Latin America**, for example, there are significant digital divides between rural and urban areas, which hamper efforts to hold political actors to account, especially when traditional media are not trusted (Ferreyra et al. 2024, 9).

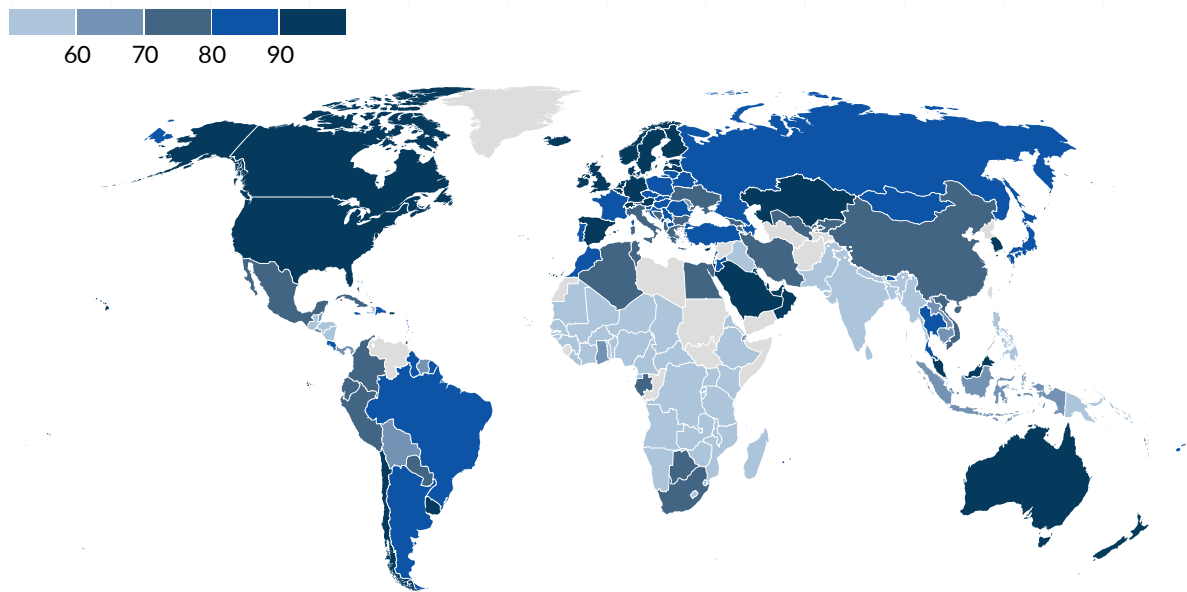
Many people in **Latin American** cities, particularly those from the middle and upper classes, are well connected and information spreads rapidly. In this urban environment, the proliferation of deceptive narratives and fabricated content poses a significant threat (ibid., 10). People rely heavily on online platforms for information consumption and are particularly vulnerable to disinformation campaigns that exploit digital vulnerabilities.

In contrast, rural populations often face infrastructural challenges, such as limited access to reliable internet connectivity, digital devices, and technological resources. The digital divide, exacerbated by socio-economic disparities and geographical remoteness, renders these communities particularly susceptible to the spread of disinformation (ibid., 10f). In such contexts, where traditional communication channels may still prevail, strategies should aim to bridge this gap by ensuring access to accurate and reliable information. Initiatives aimed at improving communication infrastructure, enhancing the quality and independence of public media (often the only media outlet for these communities), and diversifying sources of information can empower rural populations to better identify and counter the effects of disinformation (ibid., 10ff).

Another digital divide is evident in several countries in the **Asia-Pacific** region. In **Pakistan**, for example, internet penetration is 53.8 percent, yet access is uneven, particularly in regions such as Balochistan. Many Pakistanis see social media as a trustworthy source of news and consider it to be fairer than traditional media. There is also a notable digital gender gap for women in Pakistan, who often lack access to mobile phones for a variety of reasons. Conversely, in **India**, the gender gap is more pronounced in terms of educational attainment, with 71 percent of women lacking primary education compared to 36 percent in the G20 countries (Shah et al. 2024, 39f).

### Figure 3: Global internet penetration rates

Share of population which has accessed the internet in the past three months



Source: The World Bank (2021)

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## 2.2 Topics and malign actors

In tracing the topics exploited for disinformation and the actors who spread it, several notable observations emerge. First, there is a distinction between foreign and domestic sources in the dissemination of disinformation, each with their own agendas and tactics. In addition, the prevalence of disinformation for hire highlights the commercialisation of disinformation as a tool of manipulation. Moreover, elections often serve as a catalyst for disinformation campaigns and the subsequent implementation of countermeasures aimed at preserving the integrity of democratic processes and institutions.

### Who spreads disinformation: Foreign v. domestic sources

*“The strategy of the government’s disinformation campaigns is to work 365 days and in a 360-degree fashion. This is done so that the narrative around every single event can be micromanaged.”* (Shah et al. 2024, 41)

**European** and **North American** policymakers tend to see governments as natural allies for countering disinformation. But in many countries in **Asia**, **Africa**, and **Latin America**, established political parties are themselves involved in spreading disinformation. They do so as opposition parties during election campaigns, but also when they are in government. For example, **India’s** government recently made headlines for floating disinformation aimed at boosting public perception of Prime Minister Modi’s performance as a staunch defender of Indian interests in the Ukraine crisis (Shah et al. 2024, 41). Such abuses of executive power further weaken the role of state institutions as a source of reliable information.

However, it is not only domestic players spreading disinformation, but also foreign malign actors seeking to advance their geopolitical influence. In **Latin America**, Russia seeks to contain American influence and weaken pro-NATO forces in society (Ferreyra et al. 2024, 13). Similar geopolitical ambitions motivate Russia’s disinformation campaigns in **Europe**, where the Kremlin increased its disinformation efforts during the invasion of Ukraine in 2014 and 2022. The pervasiveness of Russia’s campaigns prompted many initiatives by European policymakers to counter the spread of false information online (Hoxtell 2024, 5). Other governments also engage in disinformation campaigns abroad: China’s overt territorial ambitions regarding **Taiwan** are also manifested in the spread of disinformation in the country, especially during local elections. Taiwan’s local political spheres are particularly fertile ground for malign actors to exploit, as the ecosystem of trustworthy information sources is comparatively weak (Shah et al. 2024, 13).

Malign actors sometimes seek wins in specific policy areas (e. g., reducing immigration), while in other cases their intention is to sow division and uncertainty among the general public. In both cases, their campaigns are based on polarising and emotionally charged issues. Often, intense anger or fear leads social media users to share disinformation with little regard for factual accuracy. In **Japan**, for example, parts of society are strongly opposed to increased immigration and ethnic diversity, making these issues contentious to discuss in public (ibid., 47). As such, disinformation targeting immigration is virulent – with malign actors aware of the opportunity to exploit this neuralgic issue and some citizens eager to share inflammatory content. Similarly, in **Sri Lanka** there was widespread reluctance to be vaccinated against

COVID-19, with around 20 percent unwilling to be vaccinated for non-medical reasons (Swarnamali et al. 2023). This reluctance may be due to sensitive personal concerns, such as religious beliefs or mistrust of public health authorities. During the pandemic, the then Sri Lankan Minister of Health Pavithra Wanniarachchi exploited and strengthened these sentiments by promoting ineffective ‘magic’ solutions to COVID-19 using religious appeals (Shah et al. 2024, 34).

Beyond a general interest in gaining power, actors may also use disinformation to garner support for specific policies. The **Indonesian** government’s vilification of climate activists is an example of this: Fearing that its extractive policies would be hampered, the government resorted to spreading falsehoods about pro-climate groups, with false portrayals of climate science, and misrepresentation of the economic impact of fossil fuel development in order to sway public opinion in its favour (ibid., 30).

In summary, disinformation is spread by both foreign and domestic malign actors. While their means and rationales may differ, they typically tap into charged issues and seek to create a sense of mistrust in society or alter specific policy outcomes.

### Disinformation for hire

“‘Keyboard warriors’ – influencers for hire (bloggers, communication specialists, journalists, vloggers and digital experts [are] being paid to help craft and spread narratives...” (Nanfuka et al. 2024, 18).

When thinking about disinformation actors, a common image is of armies of bots responding to posts, or politicians spreading falsehoods on their personal accounts, or – as outlined above, foreign agents trying to manipulate public discourse. But this is not the full picture.

The disinformation industry is becoming increasingly professional, with sophisticated agencies and consultancies designing and running campaigns. Their clients include politicians, political parties, and strategists who benefit from the ability to operate anonymously and avoid legal consequences. Agencies often employ young and economically vulnerable workers, boosting recruitment efforts during economic downturns.

For instance, in **Thailand**, a significant proportion of young, well-educated digital natives are employed by companies in the disinformation business (Shah et al. 2024, 23). In **Latin American** politics, a notorious figure in the industry is the Argentinian Fernando Cerimedo, who has a history of working for far-right actors. During a **Chilean** referendum on a constitutional process, one of his agencies was allegedly behind the fabrication of polls designed to sway public opinion in favour of maintaining the current constitution (Ferreyra et al. 2024, 12). Similarly commercialised and professionalised offerings can be found in **Kenya**, where journalists, bloggers and other experts are paid to spread disinformation (Nanfuka et al. 2024, 18).

This commercialisation of disinformation is further evidenced by more advanced methods of dissemination: In **Indonesia**, for example, disinformation is often transported through videos, and influencers with large followings offer these services to clients (Shah et al. 2024, 55).



A team of investigative journalists recently provided a detailed account of the specific means used by disinformation agencies for influence operations: For instance, an **Israeli** agency called 'Team Jorge' creates bots with profiles on multiple platforms to enhance their authenticity. These accounts then spread disinformation according to the wishes of their clients. The group of journalists has found evidence of the firm's work in many countries around the world, including **France**, **South Africa**, and the **United States**; its founders even claimed to have influenced 33 presidential-level campaigns as of February 2023 (Burke et al. 2023).

These worrying trends suggest a rapidly developing and professionalising disinformation industry, which is likely to exacerbate the corrosive effect of false information on public discourse.

### Elections often trigger disinformation campaigns and countermeasures

*"Disinformation is increasingly being spread by state and non-state actors, affecting a broad range of human rights, undermining responses to public policies and amplifying tensions in times of emergency, elections or armed conflict."* (Nanfuka et al. 2024, 4)

Elections are often the focal point around which domestic and foreign actors orchestrate their disinformation campaigns based on controversial issues. For this reason, elections are not just another subject or occasion; rather they trigger both disinformation campaigns and countermeasures. Elections are a cornerstone of democratic societies, allowing citizens to influence the composition of their government through active participation and choice – and the proliferation of disinformation poses a significant risk to both public opinion and the integrity of democratic processes (Hoxtell 2024, 6). As outlined in the 'Misinformed Choice' framework (Shah et al. 2024), democratic elections require voters to be able to make well-informed decisions; any form of manipulation undermines this process, thereby compromising the election itself. Two notable cases illustrate this concern: The presidential elections in the **United States**, and the 2022 **Brazilian** presidential election. These cases highlight the potential for disinformation campaigns, whether orchestrated by foreign actors or disseminated by domestic entities. Such campaigns can escalate beyond the digital sphere and incite offline political violence, as seen in events such as the Capitol Riots in the US, the attacks on the Brazilian Congress, or the 2017 **Kenyan** elections, which also turned violent.

Narratives around electoral fraud are also present in **Africa** and were particularly pronounced in **South Africa** (Nanfuka et al. 2024, 17ff). In this region, female political candidates faced a disproportionate amount of gendered attacks and misogyny questioning their qualifications (African Feminism 2023). Similarly, in **Latin America**, elections are a prominent focus alongside political discourse (Ferreyra et al. 2024, 16ff). Importantly, however, these narratives often emerge long before election cycles begin, a fact which must also be reflected in countermeasures.

In response to various elections, platforms are taking a number of actions, although there is a lack of transparency, and the impact needs to be assessed. Notably, platforms are taking more proactive steps in **Europe**, but less so in other regions. An empirical study conducted ahead of **India's** national elections in 2024 sheds light on this issue (Access Now 2024). The study tested YouTube's enforcement of its own political advertising policy in different languages, namely in English, Hindi, and Telugu, three of India's most spoken languages. Every single one of their 48 submissions violated YouTube's advertising and election misinformation policies, but they all passed and had to be withdrawn by the team (Sinha 2024).

In **South Africa**, TikTok, Google, Meta and X partnered with the Electoral Commission of South Africa (IEC) and Media Monitoring Africa (MMA) to counter disinformation in the run-up to local government elections ([Nanfuka et al. 2024, 11](#)). A collaborative effort between the public and private sectors to address election threats has also been observed in **Kenya**, exemplified by the partnership between Meta (Facebook, Instagram) and the Media Council of Kenya ([Freihse et al. 2023](#)). This promising alliance, however, did not translate into sustained collaboration. Instead, the behaviour and (lack of) actions by Meta and other social platforms can be characterised as ‘fig leaf activities’: A lack of financial incentives, resulting in a rather passive, barely visible presence on the continent (*ibid.*). Similar challenges are faced in different **Latin American** countries, where the need to engage expert moderators, especially during electoral periods, has been highlighted to mitigate the detrimental impact of disinformation on democratic processes ([Ferreira et al. 2024, 25](#)).

While some progress has been made in improving election security, particularly in the **European** market, challenges remain in terms of transparency and impact assessment of platform measures. Overall, election cycles also trigger many countermeasures – but these struggle to have a long-term impact and often require extended cooperation between stakeholders.

## 2.3 Protagonists: Who fights back and how?

While disinformation is spread by malign actors, we refer to those who fight back and use a variety of countermeasures as protagonists. Comparing protagonists from different regions reveals several interesting observations. First, collaborative approaches are widely endorsed as effective strategies in different contexts, highlighting the importance of integrated efforts to counter disinformation. Second, the importance of fact-checking on digital platforms emerges as a crucial but challenging measure in countering disinformation. Third, ensuring access to data for researchers is globally recognised as essential to enable comprehensive analyses and informed responses to disinformation across domains and borders.

### Collaborative approaches are championed everywhere

*“If the actors involved in the dissemination of disinformation narratives act in a coordinated manner, a successful effort to counter their attempts requires at least a similar coordination.”*  
([Ferreyra et al. 2024, 37](#))

This sentiment that collaboration and coordination are the key to countering malign interference is shared everywhere. And the rationale is simple. Civil society organisations have important and increasingly diverse roles to play: fact-checking, media literacy training, education programmes, monitoring, digital rights impact assessments, advocacy and policy work, rapid and crisis response functions, and more. Unsurprisingly, in all of our engagements, experts emphasised: Civil society organisations cannot win the fight against disinformation on their own. To promote a healthy information ecosystem for all, cross-stakeholder collaboration is needed: to share expertise, to scale up countermeasures, to respond faster.

Fortunately, exemplary collaborative approaches exist, and new ones are emerging all the time. In **Latin America**, **Chequeado** stands out as a leading protagonist with innovative and powerful initiatives to bring together experts and stakeholders. **Reverso** is one of their flagship alliances. It brings together more than 100 media and technology companies to mitigate disinformation, one of their test cases being the Argentine elections of 2021 and 2023 ([Ferreyra et al. 2024, 27](#)). Similarly, **DataLEADS** from India is running several media literacy and journalism training camps in close collaboration with different stakeholders, including the pan-Asian initiative **First Check** ([Shah et al. 2024, 44](#)). In the **EU**, protagonists such as the **EU Disinfo-Lab** provide resources to engage and nurture a network of counter-disinformation players, and in the **US**, alliances such as the **Global Coalition for Tech Justice** are expanding their outreach and awareness-raising efforts around potential election interference the world over.

Examples such as these help to draw attention beyond their specific context and serve to inspire and shape new alliances. Yet, sustaining such collaborative efforts and ensuring that concrete actions follow the intentions discussed requires a lot of work ([Ferreyra et al. 2024, 31](#)). Moreover, collaborations between civil society and tech platforms can sometimes lead to unwanted, and even harmful, exposure, as witnessed by **Aos Fatos** in Brazil, who became victims of harassment after their data was leaked (*ibid.*, 24), or **Soch Fact Check** in Pakistan, whose partnership with Meta came under pressure from the Pakistani government ([Shah et al. 2024, 40](#)).

Regardless, calls abound for additional, even stronger strategic alliances between government, civil society, academia, and the private sector in all parts of the world. In **Africa**, for instance, successful examples of collaboration are somewhat scarcer, partly because the field of counter-disinformation work is still comparatively nascent. Many of the local or national protagonists tend to either rely or depend on larger, more resourceful pan-African or international players who have more capacity and/or more sophisticated methods to adapt to new challenges. However, where collaborative efforts are pursued, for instance with **Real411** in South Africa or the National Coalition on Freedom of Expression and Content Moderation (**FECOMO**) in Kenya, there is a sense of empowerment and impact. Overall, calls for interdisciplinary cooperation as well as mechanisms for broader public deliberation are widespread ([Nanfuka et al. 2024, 28](#)).

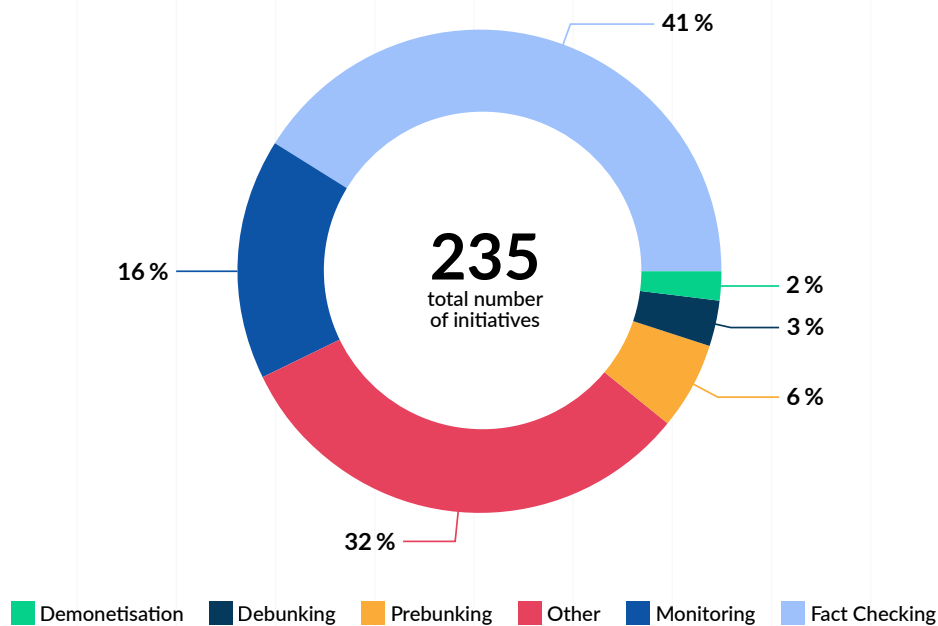
On a positive note, many of the **government initiatives** we analysed also actively recognise the need for multi-stakeholder involvement ([Iglesias Keller et al. 2024](#)). In practice, however, more safeguards and support are needed to ensure that participation and input requirements for non-state actors do not lead to exploitative relationships.

### The role of fact-checking on digital platforms

*“On some days, we are fact-checking doctored and AI-generated images of public rallies that overstate the crowd size, on others we are verifying images and videos claiming a sectarian conflict has erupted in the north.”* ([Shah et al. 2024, 39](#))

The one countermeasure that can be found in every corner of the world is fact-checking. In fact, we identified 95 out of 235 initiatives that use fact-checking as their primary measure, with several more engaging in fact-checking in addition to other efforts ([Upgrade Democracy 2024](#)). Building on long-standing journalistic practices and a variety of knowledge-sharing networks, such as the **International Fact-Checking Network (IFCN)**, the **African Fact-Checking Alliance**, the **European Fact-Checking Standards Network (EFCSN)**, **First Check**, or **LatAm Chequea**, fact-checking is a well-tested, foundational activity that attracts the most resources, yet still remains underfunded (see e.g. [Nanfuka et al. 2024, 27](#)).

**Figure 4: Distribution of counter-disinformation methods**  
Percent of 235 initiatives mapped



Source: Upgrade Democracy 2024

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Traditionally, fact-checking was simply a standard practice for each media outlet and their own content. Social media platforms don't have that kind of editorial oversight, so more protagonists, beyond trained journalists, had to get involved to keep up with the sheer volume of content that needed verification.

The good news is that fact-checking initiatives are widespread – and comparatively well connected. There is a level of mutual learning and continuous training of (future) fact-checkers that far exceeds other countermeasures. For instance, more than 60 universities in **Latin America** teach fact-checking in their curricula, drawing on the knowledge of **LatAm Chequea** (Ferreyra et al. 2024, 29). In **India**, nearly 900 universities are engaged in media literacy programmes developed by **DataLEADS** (Shah et al. 2024, 44), and the South African-based **Africa Check** has trained almost 5,000 journalists to adopt best practices for verification across Africa (Upgrade Democracy 2024).

The sobering news is that most of these initiatives, outside of traditional journalistic vetting processes, are struggling to keep up with the ever-increasing speed and volume of content that is now primarily shared on social platforms. Content moderation, design, and governance aspects of social media platforms are critical levers in managing the flow and credibility of information online. These are generally defined by the platforms themselves, but regulatory efforts are beginning to challenge this premise (see Iglesias Keller et al. 2024). The outsized power of social media platforms over public discourse is recognised in the **EU's Digital Services Act**, based upon which the EU Commission recently published their guidelines for mitigating systemic risks on very large online platforms (European Commission 2024). These

guidelines not only call for independent fact-checking, but also emphasise that independently verified content must be appropriately labelled.

On a promising note, we are seeing an expansion of content agreements between independent fact-checkers and large online platforms, e.g. through Meta's trusted partner programme. While this is crucial and increasingly available in all parts of the world, trusted partners often face difficulties in their interactions with Meta representatives, as illustrated by **Soch Fact Check** in Pakistan ([Shah et al. 2024, 40](#)), **Contextual** in Argentina ([Ferreyra et al. 2024, 21](#)), or the experiences of fact-checkers from **Kenya**, **Tanzania**, or the **DR Congo**, who can't seem to reach the right person to even join Meta's trusted partner programme. Add to this the fact that some platforms, such as YouTube, still do not adequately support independent fact-checking agreements, and the challenge of verifying online content remains disproportionately high. We have also started to see examples of malign actors masquerading as fact-checkers to spread disinformation, e.g. in the **US** where examples include 'CheckYourFact', suggesting that we need more transparency around funding.

Fortunately, there is also a great deal of innovation and experimentation happening in the field. For example, organisations such as **Cofacts**, **MyGoPen**, and the **Taiwan Factcheck Center** have built automated fact-checking tools to help track and tag disinformation online ([Shah et al. 2024, 46](#)). Similarly, **Aos Fatos** and **Chequeado** are experimenting with machine learning and automation to provide chatbots ([Ferreyra et al. 2024, 24, 28](#)). Other protagonists are building browser extensions to provide text- or video overlays of fact-checked information (e.g. **Captain Fact** or **Claim Buster**, cf. [Upgrade Democracy 2024](#)). The **Foundation for Media Alternatives (FMA)**, **Watchdog Sri Lanka** and others have gotten creative, amplifying their fact-checks and reaching new audiences through comics, podcasts, or short videos. They all note that the reach of audio-visual content is much greater than text alone (e.g. [Shah et al. 2024, 28, 34](#)).

Overall, the importance of fact-checking is widely accepted, including the need to expand access for independent fact-checkers to verify and label content on social media platforms. That said, the innovation potential that we encounter everywhere continues to be challenged when platforms refuse to engage appropriately in markets that may not be as financially lucrative for them.

### Required everywhere: Data access for researchers

An important aspect of effectively countering disinformation campaigns is generating evidence-based knowledge about the phenomenon. It is therefore crucial to monitor, analyse, and understand the dynamics of digital disinformation. To achieve this, independent researchers need access to data on social media platforms to study the behaviour and dynamics of disinformation campaigns and instigators. Article 40 of the Digital Services Act (DSA) requires online platforms to provide researchers with such access to data. This provision allows European researchers to obtain crucial data for studying issues such as disinformation, hate speech, and harmful content on digital platforms. However, it is important to note that this access is limited to researchers within the **European Union**, potentially excluding researchers from other regions who may also wish to study global online phenomena ([Berger and Freihse 2023](#)).

Evidence from other regions confirms that platforms are interpreting the DSA too narrowly, and the need for similar legislative initiatives is becoming increasingly apparent. This is illustrated by examples from **Thailand, Brazil, Mexico, and Kenya**, where researchers face significant hurdles in complying with data access requests from their European counterparts ([Freihse et al. 2023](#)). In the absence of regulated data access, civil society organisations outside Europe often resort to social media listening tools developed for (paid) marketing purposes. This poses challenges in terms of limited ability to filter and analyse data over time. It is also clear that some platforms are more accessible than others. Moreover, attitudes towards monitoring closed messaging services vary, as exemplified by some entities monitoring closed WhatsApp chats without disclosing the content, thus navigating legal grey areas ([Ferreyra et al. 2024, 21f.](#)).

## 2.4 The role of governments and tech trends

Governments play ambiguous roles when it comes to (countering) disinformation, just as emerging technological developments present ambiguous challenges. First, depending on the country, governments can be instigators or sources of disinformation, or they can be allies in striking a delicate balance. Second, regulatory initiatives and platform policies (often initiated in Europe) are central to shaping the digital landscape and are often adopted by countries outside the European Union. Third, the use of artificial intelligence during elections is becoming increasingly complex, affecting various aspects such as existing (legislative) transparency efforts, campaign strategies, and voter engagement. And fourth, internet shutdowns highlight the urgent need for rights-respecting approaches to safeguarding digital spaces and preserving democratic integrity.

### Instigator, arbitrator, or defender: Governments play different roles

*“The creation of strategic alliances between government agencies, civil society organizations, academic institutions, and the private sector may help these protagonists to distribute tasks, share best practices, and co-create cutting-edge solutions.” (Ferreyra et al. 2024, 38)*

The role of governments is contested around the world. While in **Latin America**, the importance of strategic alliances with governments is repeatedly stressed (ibid. 38), albeit with caution and growing reluctance in **Brazil** and **Argentina**, experiences in various countries in **Asia** show that not all governments have their citizens’ best interest at heart, as in **India**, **Pakistan**, or **Thailand** (Shah et al. 2024). **Taiwan** stands out as a notable example in Asia, where the government is praised for its relentless vigilance in fending off Chinese interference and piloting citizen participation efforts (ibid. 45). One distinction stems from the sliding scale of autocratic and democratic systems, another from the stability and support of the ruling party and/or coalition.

Different contexts also lead to different interpretations: Where governments are instigators, propaganda is rampant; where governments feel threatened by foreign interference, they revert to prioritising security and rely on their intelligence services; and where social cohesion is strong, governmental entities clearly distinguish between censoring foreign voices and protecting freedom of speech for their own citizens.

Generally, democratic governments are regularly called upon to support the fight against disinformation, but they, too must strike a delicate balance as they can easily be perceived as arbiter of truth, especially if they themselves engage in content moderation, monitoring, or fact-checking activities (Iglesias Keller et al. 2024, 25). Their role is multifaceted and requires a range of safeguards to ensure that government responses to disinformation are embedded in oversight, consultation, and integrated approaches (ibid., 26). Regulation alone is rarely, if ever, the appropriate response.

### Copy and paste of regulatory initiatives and platform policies

The Digital Services Act (DSA) is *“one of the most far-reaching legislative attempts to enforce a legal framework for the governance of social media platforms. Its implementation and enforcement will be put to the test in 2024.” (Iglesias Keller et al. 2024, 7)*



Experience has shown that European regulation can influence legislation in other parts of the world, as was the case (partly intended) with the EU's General Data Protection Regulation (GDPR), as well as Germany's DSA predecessor, the Network Enforcement Act (NetzDG), which influenced legislation in Russia, Venezuela, Kenya, and the Philippines, among others (Berger 2017). Too often, these 'copy and paste' cases focus on the obligations, the sanctions, and restrictions and can therefore be used to stifle dissent – but fall short in their adoption and implementation of safeguards, redress mechanisms, and other checks and balances.

The DSA is also already having spillover effects, for example in **Thailand**, **Brazil**, and the **US**, where parts of the DSA influenced legislative measures but were implemented without the necessary transparency and accountability frameworks (see Berger 2023; Ferreyra et al. 2024, 15). In order to strike the necessary balance, consultation with civil society and academia is crucial to the effective implementation of the DSA. However, in countries where governments spread disinformation, civil society faces attacks, threats, and increasing repression, forcing many into exile. In such environments, oversight and advisory bodies are unlikely to exist and/or function as they should. Indeed, research confirms that disinformation regulation can be weaponised and is in fact often used to silence critics (Mahapatra et al. 2024).

In short, governments are all too often ambivalent actors, and democratic players need to pay very close attention to the (un)intended consequences of their efforts.

Social media platforms, too, engage in copy and paste behaviour when it comes to their content moderation and governance policies. As a result of increased regulatory pressure on the largest social platforms, they have adopted policies on how to ensure electoral integrity, how to handle political advertising, and how to moderate content around disinformation. However, the resources since 2016 shows that **North America** and **Europe** receive the most attention, including more nuanced and context-aware approaches. Conversely, countries from the global majority feature far less frequently and, to make matters worse, platform policies are copied almost verbatim from one country to the next highlighting the lack of local context or input, for example in **Kenya**, **Ethiopia**, and **Nigeria** (Madung et al. 2024).

In this sense, while platforms may not actively suppress dissent by enforcing their policies, their role is equally ambivalent in markets they deem less relevant to their business models.

### Artificial Intelligence plays an increasing and intricate role in elections

One of many examples *“is the last general elections in Argentina, where the use of generative Artificial Intelligence (Gen AI) tools to create various kinds of online content (videos, animated images, etc.) was evident in the campaigns of the main presidential candidates.”* (Ferreyra et al. 2024, 30)

There is no report on (countering) disinformation that does not mention the impact of Artificial Intelligence (AI).

In **Africa**, there are concerns about a lack of capabilities to respond appropriately: *“Given that most protagonists in the region lack the technical expertise to identify sophisticated disinformation such as that generated using AI, it is feared that a lot of election-related disinformation could go unnoticed and unchallenged during 2024, especially in electoral contexts where digital literacy rates are low, and content regulation and moderation is ineffective.”* (Nanfuka et al. 2024, 25)

Conversely, in the **United States**, natural language processing tools are presented as part of the solution that offers hope in the dire state of a polarised information environment ([Rao 2024, 18](#)).

Then again, in **Indonesia, Pakistan, and India**, all of which held elections in 2024, AI-generated voice content rang alarm bells. For instance, the AI translation tool, Bhashini, provides easy translation from English to other Indian languages – and while it can be used to reach a wider electorate, voice-fakes have also been detected ([Sinha 2024](#)). On YouTube too, researchers continue to find misleading and AI-generated video content about the Indian elections, too ([Rest of the World 2024](#)). Similarly, a number of audio fakes appeared on TikTok and Instagram during the Indonesian election campaign (*ibid.*). Interestingly, in Indonesia, this content is not misleading per se, but is sometimes used primarily for entertainment or to portray candidates as likeable ([Duffy 2024](#)).

The use of AI-generated content by the campaign teams of political candidates appears to be a growing trend, which was clearly evident during the 2023 general elections in **Argentina** ([Ferreya et al. 2024, 30](#)). The challenge here was not so much that the AI-generated content was misleading or manipulative – in fact, most of it was either labelled or clearly identifiable, e. g. because candidates were depicted on movie posters. The challenge, which could become a larger pattern, is the potential for AI-generated meme content to spread organically as users share it for entertainment. If this happens, campaign content could bypass existing oversight mechanisms because it will no longer be published through established political advertising channels. This is one of the reasons why calls for clearly visible labels for synthetic content on digital platforms are widespread and important.

### Disrupting the flow of information: Internet shutdowns

*“Almost all of the countries reviewed impose draconian internet shutdowns, erase and censor information, and practice an unaccountable state control of digital infrastructure which belies their democratic potentials and discourages people from engaging with modes of information making.”* ([Shah et al. 2024, 24](#))

Another trend that is particularly worrying, is internet shutdowns. These are deliberately imposed by governments to disrupt online communication during critical periods such as protests and elections. Shutdowns prevent access to social media and messaging apps, thus hindering the flow of information. While governments justify shutdowns for various reasons, they often impede freedom of expression and the right to information – and can even provide cover for human rights abuses on the ground. Although there are no binding sanctions for shutdowns, international condemnation is growing. Civil society plays a crucial role in advocating against shutdowns, using a variety of strategies to raise awareness and put pressure on governments.

Governments in **Africa** and **Asia** have been known to shut down the internet, usually during times of crisis or elections. They often cite the need to protect against disinformation or the threat of violence caused by hate speech. In regions with a vibrant online discourse but weak media systems, internet shutdowns are also used to protect governments from accountability. In African countries, for example, the states’ public justifications have been disputed, as *“network disruptions (...) have also occurred at times where no threats seemed imminent, including*

*peaceful demonstrations and national exams*” (Gagliardone et al. 2022). The **Indian** government is also frequently involved in such activities, with 84 shutdowns in 2022, accounting for nearly 60 percent of global shutdowns (Shah et al. 2024, 43).

These actions are a reminder that supposed protection from online harms can be censorship in disguise. Concentration of power over online discourse – in government agencies or private platforms – can make the internet less safe for users. Awareness raising by civil society organisations, safety and redress mechanism to ensure human rights online and offline are crucial. It is also important that democratic states and the international community continue to condemn internet shutdowns as a disproportionate mechanism to allegedly curb disinformation.

### 3 Four considerations for the counter-disinformation community to explore further

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As this analysis shows, there are striking similarities in the challenges of disinformation across regions. While the 14 observations in this report offer only a glimpse of the rich research reports that underpin our analysis, they can be useful in guiding further research and counter-disinformation strategies. We categorise these observations into four parts, namely the structure of the information ecosystem; sector topics and malign actors; protagonists championing counter-measures; and the role of governments and technological developments.

Disinformation campaigns must be seen as part of the global anti-democratic backlash, an attempt to disrupt evidence-based public discourse and sow distrust in democracy. Similarly, the regulation of digital platforms is a global effort: Initiatives are agreed in international multi-stakeholder settings, resulting in standards that often extend beyond a single market. Finally, counter-disinformation protagonists can adapt their strategies according to lessons learned from other regions. Countering disinformation is therefore a global task, in which governments, civil society organisations, and private actors must work together. In particular, the European Union, which prides itself on acting in a values-based manner, should ensure that its regulatory efforts, counter-disinformation and pro-democracy initiatives take into account the global nature of disinformation, including in international formats.

The following four considerations focus on each of our four themes and point to the most critical elements that the counter-disinformation community should pay close attention to and explore further.

1. To shape **information ecosystems** locally, nationally and globally, a vibrant and well-versed civil society is critical. To empower civil society organisations as actors in public discourse requires a comprehensive and multi-faceted approach. However, one key element that can only improve the situation in all parts of the world is sustainable funding. Civil society organisations are fundamental to the resilience of our democracies; their tasks and activities are growing; the spaces in which they operate are too often shrinking. **Greater support for the online and offline work of civil society organisations is therefore needed to increase their resilience.**
2. Disinformation campaigns exploit **topics** that are controversial and/or evoke emotional responses. The **actors** who disseminate disinformation may be domestic or foreign, but in either case they tend to fill informational vacuums or moments of hesitation with content that sows doubt. Reliable, fact-checked information is often playing catch-up, especially on social platforms, and **media systems need to be more resilient, notably with regard to quality journalism and media pluralism.** The current erosion of trust is exacerbated by AI-generated content, which further increases the speed and volume of content available.

Critically, AI-generated political content is beginning to bypass existing electoral oversight mechanisms (see Argentina, Indonesia, India). Policymakers and platform providers need to **step up their efforts to ensure that independently fact-checked sources are available at scale, that content is labelled more prominently on platforms, and that election content is treated with the highest standards of care.**

3. The spread of disinformation does not stop at borders, and **protagonists** everywhere are challenged with conflicting dynamics. As much as they understand that collaborative approaches and cross-border research are critical to developing adequate countermeasures, the reality confronts them with different regulatory frameworks, a maze of platform policies, and many context-specific, local challenges. No single protagonist can solve all of these. But many improvements are possible, including in how platforms interpret existing transparency, data access, and accountability requirements. To name just one, it is critically important that (European) policymakers **continue to hold platforms to account and work towards enabling data access for international researchers.**
4. The **role of governments** in (countering) disinformation is ambiguous, as are the impacts of **technological developments**. European regulatory efforts are innovative and often closely followed in other parts of the world. To mitigate a potential Counter-Brussels effect, where less democratic regimes choose to copy only the sanctions and obligations but not the safeguards and redress mechanisms, European policymakers and platform providers should **intensify efforts to provide safe spaces, boost civil society input, and amplify marginalised and/or suppressed voices, and expand redress mechanisms in other parts of the world.** This includes requiring platforms to employ **sufficient staff and local content moderators to adequately represent a given user base.**

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