

Code of Practice on  
Disinformation – Report of  
Pagella Politica and  
Facta.news (TFCF srl) for the  
period 16 January 2023 to 16  
January 2024

## Table of Content

<b>Executive summary</b>	<b>4</b>
<b>Guidelines for filling out the report</b>	<b>5</b>
<b>II. Scrutiny of Ad Placements</b>	<b>1</b>
Commitment 1	1
Commitment 2	4
Commitment 3	5
<b>III. Political Advertising</b>	<b>5</b>
Commitment 4	5
Commitment 5	6
Commitment 6	6
Commitment 7	7
Commitment 8	8
Commitment 9	8
Commitment 10	8
Commitment 11	9
Commitment 12	9
Commitment 13	10
<b>IV. Integrity of Services</b>	<b>10</b>
Commitment 14	10
Commitment 15	12
Commitment 16	12
<b>V. Empowering Users</b>	<b>13</b>
Commitment 17	13
Commitment 18	13
Commitment 19	14
Commitment 20	15
Commitment 21	15
Commitment 22	16
Commitment 23	17
Commitment 24	17
Commitment 25	18
<b>VI. Empowering the research community</b>	<b>19</b>
Commitment 26	19
Commitment 27	19
Commitment 28	20

Commitment 29	20
<b>VII. Empowering the fact-checking community</b>	<b>21</b>
Commitment 30	21
Commitment 31	22
Commitment 32	23
Commitment 33	23
<b>VIII. Transparency Centre</b>	<b>24</b>
Commitment 34	24
Commitment 35	24
Commitment 36	25
<b>IX. Permanent Task-Force</b>	<b>25</b>
Commitment 37	25
<b>X. Monitoring of Code</b>	<b>26</b>
Commitment 38	26
Commitment 39	26
Commitment 40	26
Commitment 41	27
Commitment 42	27
Commitment 43	28
Commitment 44	28
<b>Reporting on the service's response during a period of crisis</b>	<b>29</b>
[Name of crisis]	30
<b>Reporting on the service's response during an election</b>	<b>34</b>
European Elections	35

## Executive summary

Executive summary (max. 2 pages)

Pagella Politica and Facta.news (PP/F) are two fact-checking and debunking projects operated by the Italian company TFCF, active in various projects in the research, monitoring and contrast of disinformation at the national and European level, as well as media and information literacy.

In light of their nature and activities, PP/F have chosen the following commitments:  
33-34-35-36-37-38-39-40-42-43.

PP/F ethical, transparency and independence standards are certified annually by IFCN Code of principles external evaluators. PP/ F are also members of the EFCSN consortium and governance body, as well as official and verified signatories of its Code of Standards.

Pagella Politica and Facta participate in the crisis management sub-group actively. They share knowledge about the state of disinformation at Italian level, and also at the European level, thanks to PP/F position of coordinators of the fact-checking network within EDMO.

PP/F have internal staff dedicated to the CoP, who participate in TaskForce subgroups, and ensure internal compliance with the commitments.

## Guidelines for filling out the report

Reports are detailing how signatories have implemented their Commitments under the Code and signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each signatory.

### Reporting period

The reporting period to be covered in the reports is **12 months (edit reporting period)** for signatories who are not offering very large online platform services. Signatories shall submit reports outlining policy updates and actions taken to implement the Commitments and Measures they signed up to under the Code. All data and policy updates should be reported for 12 months period from the submission of last reports.

### Adjusting the reporting template

Signatories who are not offering very large online platform services can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Relevant signatories will report only on commitments and measures they subscribed to and provide Member State-level data only if feasible.

### Reporting per Service

When filling in a report for several services, use colour codes to clearly distinguish between services. At the beginning of the report, clarify what colour is used for which service.

### Reporting in text form

Reporting in the form of written text is required for several parts of the report. Most of them are accompanied by a target character limit. Please stick to the target character limit as much as possible. We encourage you to use bullet points and short sentences. When providing information to the QRE, please make sure that your answer covers all the elements of the associated commitment and measure. Links should only be used to provide examples or to illustrate the point. They should not be used to replace explanations or to provide data in the forms. All relevant explanations and data must be included in the report directly, in written form.

### Reporting SLIs and data

Reporting on SLIs requires quantitative information to be reported on in this harmonised reporting template.

- Where relevant and feasible, SLIs should be reported on per Member State.
- If no data is available on Member State level, SLIs might, instead, be exceptionally reported on per language. (NB that signatories agreed to revisit this issue after the first reporting, to ensure harmonised and meaningful reporting.)
- Please report data in the format provided by the harmonised reporting template, not through external links. Please use the Member State/language template provided in the harmonised reporting template. Where the table asks for "Other relevant metrics", please name the metric that you would like to report on in addition to the ones already provided. You may include more than the number of additional fields provided where necessary; in that case, please adjust the table as needed.
- Please contextualize all data as much as possible, i.e. include baseline quantitative information that will help contextualize the SLIs (e.g. number of pieces of content labelled out of what volume of content).
- If there are no relevant metrics to report on, please leave the respective columns blank.

### Reporting on TTPs

If subscribed to Commitment 14, Integrity of Services, we ask you to report on each identified TTP individually. The number of identified TTPs may vary per service. Where more than one TTP are reported under the same action, clarify the reasoning in the methodology. Where input is not provided, keep the placeholder for the relevant TTP and explain reasons and planned remedial action. Additionally, as with all other SLIs, data can be provided per Member State for each individual TTP.

### Missing Data

In case that at the time of reporting there is no data available yet, the data is insufficient, or the methodology is lacking, please outline in the dedicated field (i.e. in the field about further implementation measures planned) how this will be addressed over the upcoming six months, being as specific as possible.

Signatories are encouraged to provide insights about the data/numbers they provide by inserting possible explanations in the boxes of the template "*Methodology of data measurement & insights on data provided*". This should aim to explain the why of what is being reported, for instance – *Are there trends or curiosities that could*

require or use contextual explanation? What may be driving the change or the difference in the number? Please also indicate inconsistencies or gaps regarding methodology in the dedicated box.

## Attachments

We ask you not to enclose any additional attachments to the harmonised reporting template.

## Crisis and elections reporting template

Relevant signatories are asked to provide proportionate and appropriate information and data during a period of crisis and during an election. Reporting is a part of a special chapter at the end of the harmonised reporting template and should follow the guidelines:

- The reporting of signatories' actions should be as specific to the particular crisis or election reported on as possible. To this extent, the rows on "Specific Action[s]" should be filled in with actions that are either put in place specifically for a particular event (for example a media literacy campaign on disinformation related to the Ukraine war, an information panel for the European elections), or to explain in more detail how an action that forms part of the service's general approach to implementing the Code is implemented in the specific context of the crisis or election reported on (for example, what types of narratives in a particular election/crisis would fall into scope of a particular policy of the service, what forms of advertising are ineligible).
- Signatories who are not offering very large online platform services and who follow the invitation to report on their specific actions for a particular election or crisis may adapt the reporting template as follows:
  - They may remove the "Policies and Terms and Conditions" section of the template, or use it to report on any important changes in their internal rules applicable to a particular election or crisis (for example, a change in editorial guidelines for fact-checkers specific to the particular election or crisis)
  - They may remove any Chapter Section of the Reporting Template (Scrutiny of Ads Placement, Political Advertising, Integrity of Services etc.) that is not relevant to their activities
- The harmonised reporting template should be filled in by adding additional rows for each item reported on. This means that rather than combined/bulk reporting such as "Depending on severity of violation, we demote or remove content based on policies X, Y, Z", there should be individual rows stating for example "Under Policy X, content is demoted or removed based on severity", "Under Policy Y, content [...]" etc.
- The rows should be colour-coded to indicate which service is being reported on, using the same colour code as for the overall harmonised reporting template.

Reporting should be brief and to the point, with a suggested character limit entry of 2000 characters.

## Uploading data to the Transparency Centre

The reports should be submitted to the Commission in the form of the pdf via e-mail to the address CNECT COP TASK FORCE [CNECT-COP-TASK-FORCE@ec.europa.eu](mailto:CNECT-COP-TASK-FORCE@ec.europa.eu) within the agreed deadline. Signatories will upload all data from the harmonised reporting template to the Transparency Centre, allowing easy data access and filtering within the agreed deadline. It is the responsibility of the signatories to ensure that the uploading takes place and is executed on time. Signatories are also responsible to ensure that the Transparency Centre is operational and functional by the time of the reports' submission that the data from the reports are uploaded and made accessible in the Transparency Centre within the above deadline, and that users are able to read, search, filter and download data as needed in a user-friendly way and format.

## VII. Empowering the fact-checking community

### Commitment 33

Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.  
[change wording if adapted]

Measure 33.1	[insert wording if adapted]
<b>QRE 33.1.1</b> [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters] Both Pagella Politica and Facta (PP/Facta) are active members of the IFCN network and verified signatories of its Code of Principles:</p> <ul style="list-style-type: none"> <li>● PP has been a verified member since 2017, compliance with IFCN principles is reviewed and assessed annually, last assessment has been in September 2023, next one in September 2024.</li> <li>● Facta was born in 2020 and has been a verified member since 2021, last assessment was in November 2023 and next one is going to be in November 2024.</li> </ul> <p>PP/Facta are also among the founding members of the European Fact-Checking Standards Network (EFCSN), both are verified signatories of its Code of Standards and their Deputy Director is a member of its Governance Body. After having updated their internal methodologies, norms and procedures:</p> <ul style="list-style-type: none"> <li>● PP has been verified as compliant with the Code in April 2023</li> <li>● Facta has been verified as compliant with the Code in September 2023</li> </ul> <p>Pagella Politica and Facta already abide by ethical, transparency and independence rules as certified annually by IFCN Code of principles external evaluators and lastly by EFCSN Code of Standard assessors.</p>
<b>SLI 33.1.1 - number of European fact-checkers that are IFCN-certified</b> [change wording if adapted]	<p>Methodology of data measurement [suggested character limit: 500 characters]</p> <p>The complete list of verified signatories of the IFCN Code of Principles is publicly available here: <a href="https://ifcncodeofprinciples.poynter.org/signatories">https://ifcncodeofprinciples.poynter.org/signatories</a>. As of March 11th, 2024, signatories from EU member States + Council of Europe + Kosovo are as follows:</p> <ul style="list-style-type: none"> <li>● Verified active signatories: 50</li> </ul>

	<ul style="list-style-type: none"> <li>● Under renewal: 27</li> <li>● Expired: 8</li> </ul> <p>For EFCSN, the list of verified members is publicly available here: <a href="https://efcsn.com/list-of-verified-members/">https://efcsn.com/list-of-verified-members/</a>.</p> <ul style="list-style-type: none"> <li>● As of March 2024, the number of verified members is 38, while 14 organizations are under review</li> </ul>	
	Nr of fact-checkers IFCN-certified	Nr of members of CPI
<b>Data</b>	50	38

<b>VIII. Transparency Centre</b>	
<b>Commitment 34</b>	
To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website. [change wording if adapted]	
Measure 34.1	[insert wording if adapted]
Measure 34.2	[insert wording if adapted]
Measure 34.3	[insert wording if adapted]
Measure 34.4	[insert wording if adapted]
Measure 34.5	[insert wording if adapted]

<b>VIII. Transparency Centre</b>	
<b>Commitment 35</b>	
Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable. [change wording if adapted]	
Measure 35.1	[insert wording if adapted]
Measure 35.2	[insert wording if adapted]
Measure 35.3	[insert wording if adapted]



Measure 35.4	[insert wording if adapted]
Measure 35.5	[insert wording if adapted]
Measure 35.6	[insert wording if adapted]

<b>VIII. Transparency Centre</b>	
<b>Commitment 36</b>	
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]	
Measure 36.1	[insert wording if adapted]
Measure 36.2	[insert wording if adapted]
Measure 36.3	[insert wording if adapted]
<b>QRE 36.1.1 (for the Commitments 34-36)</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]  Pagella Politica and Facta are not members of the subgroup in charge of the development of the Transparency Centre but we think that this is an initiative of paramount importance also for our work and will keep an eye on its development. Pagella Politica and Facta will upload the information in their reports on the Transparency Centre, as they did for the baseline report.
<b>QRE 36.1.2 (for the Commitments 34-36)</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
<b>SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage</b> [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters] Our company would like to provide following data:
<b>Data</b>	

<b>IX. Permanent Task-Force</b>	
<b>Commitment 37</b>	
Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus. [change wording if adapted]	

Measure 37.1	[insert wording if adapted]
Measure 37.2	[insert wording if adapted]
Measure 37.3	[insert wording if adapted]
Measure 37.4	[insert wording if adapted]
Measure 37.5	[insert wording if adapted]
Measure 37.6	[insert wording if adapted]
<b>QRE 37.6.1</b> [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]</p> <p>The Deputy Director of Pagella Politica and Facta co-chair the working group on elections, assuring the coordination with EDMO efforts. In the past 12 months the incoming EU elections have been one of the main topics of discussion, but also national elections particularly relevant, such as the Slovak ones in September 2023. Recently the WG is discussing a rapid response mechanism in the context of elections. DSA-related discussions have also obvious repercussions on the internal discussions of the WE.</p> <p>Pagella Politica and Facta participated also in the crisis management sub-group by sharing knowledge about the state of disinformation with the other participants, in particular on the main current crises (pandemic, war in Ukraine, Israel/Hamas conflict). We have shared the information in our possession on the situation at Italian level, and also at the European level, thanks to PP/F position of coordinators of the fact-checking network within EDMO. That role allows us to access information from all over Europe, which we then materially aggregate, analyse and translate in the monthly EDMO briefs. PP/F also provided insights - potentially useful for platforms - on the single most worrying cases of disinformation detected and on some recurring phenomena (e.g. the frequent use, by disinformation, of videos and images old and taken up in another context to spread false news about current events; IA-generated content etc.). PP/F have also made suggestions of how platforms can better collaborate with f-cs on crisis management.</p>

<b>X. Monitoring of Code</b>	
<b>Commitment 38</b>	
The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code. [change wording if adapted]	
Measure 38.1	[insert wording if adapted]
<b>QRE 38.1.1</b> [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]</p> <p>Pagella Politica and Facta have a number of internal staff dedicated to following the CoP and related</p>

	developments, participating in TaskForce subgroups and working groups, and ensuring internal compliance with the commitments.
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<b>X. Monitoring of Code</b>
<b>Commitment 39</b>
Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code’s signature) the baseline reports as set out in the Preamble. [change wording if adapted]

<b>X. Monitoring of Code</b>	
<b>Commitment 40</b>	
Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code’s Commitments and Measures by each Signatory, service and at Member State level. [change wording if adapted]	
Measure 40.1	[insert wording if adapted]
Measure 40.2	[insert wording if adapted]
Measure 40.3	[insert wording if adapted]
Measure 40.4	[insert wording if adapted]
Measure 40.5	[insert wording if adapted]
Measure 40.6	[insert wording if adapted]

<b>X. Monitoring of Code</b>
<b>Commitment 41</b>

Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO. [change wording if adapted]

Measure 41.1	[insert wording if adapted]
Measure 41.2	[insert wording if adapted]
Measure 41.3	[insert wording if adapted]

### X. Monitoring of Code

#### Commitment 42

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]

### X. Monitoring of Code

#### Commitment 43

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]

### X. Monitoring of Code

#### Commitment 44

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]

