Code of Practice on Disinformation – Report of Vimeo for the period 16/12/2022 to 16/01/2023

Table of Content

Executive summary

Executive summary (max. 2 pages)

Guidelines for filling out the report

Baseline reports are detailing how Signatories have implemented their Commitments under the Code and provide the Qualitative Reporting Elements (QREs) and Service Level Indicators (SLIs), as they stand one month after the implementation. The baseline report should also include a comparison between the measures in place under the previous Code to the measures taken to implement the new Code. The measures taken to implement the new Code should be outlined per commitment in the dedicated field of the reporting template.

Reporting period

The reporting period to be covered in the baseline reports is from 16 December 2022 to 16 January 2023 for all Signatories. (The implementation period of the Code from 16 June 2022 to 16 December 2022 is followed by a one-month reporting period from 16 December 2022 to 16 January 2023.) Signatories shall submit baseline reports outlining policy updates and actions taken to implement the Code during the implementation period. Data, e.g. on the number of actions taken under a specific policy, should be reported on from the end of the implementation period (16 December 2022) until the cut-off date of 16 January 2023. In case specific data is not available for the first reporting period (from 16 December 2022 to 16 January 2023), please provide the monthly average based on the previous quarter, clearly outlining the methodology used in the relevant field. The submission date for baseline reports is January 31, 2023.

Adjusting the reporting template

Non-VLOPs can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Non-VLOPs 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. 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 table directly, in written form.

Reporting SLIs and data

Reporting on Service Level Indicators requires quantitative information to be reported in the reporting template. We ask you to report data in the format provided by the reporting template, not on external links.

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. Please also indicate inconsistencies or gaps regarding methodology in the field dedicated to methodology.

Attachments

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

Uploading data to the Transparency Centre

After the submission of the baseline reports and the launch of the Transparency Centre website, all data from the reporting template must be uploaded to the Transparency Centre within maximum 7 days, allowing easy data access and filtering. 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, filer and download data as needed in a user-friendly way and format.

IV. Integrity of Services	
Commitment 14	
In order to limit impermissible manipulative behaviours and practices across their services, Relevant Signatories commit to put in place or further bolster policies to address both misinformation and disinformation across their services, and to agree on a cross-service understanding of manipulative behaviours, actors and practices not permitted on their services. Such behaviours and practices, which should periodically be reviewed in light with the latest evidence on the conducts and TTPs employed by malicious actors, such as the AMITT Disinformation Tactics, Techniques and Procedures Framework, include: The following TTPs pertain to the creation of assets for the purpose of a disinformation campaign, and to ways to make these assets seem credible: ● 1. Creation of inauthentic accounts or botnets (which may include automated, partially automated, or non-automated accounts) ● 2. Use of fake / inauthentic reactions (e.g. likes, up votes, comments) ● 3. Use of fake followers or subscribers ● 4. Creation of inauthentic pages, groups, chat groups, fora, or domains ● 5. Account hijacking or impersonation The following TTPs pertain to the dissemination of content created in the context of a disinformation campaign, which may or may not include some forms of targeting or attempting to silence opposing views. Relevant TTPs include: ● 6. Deliberately targeting vulnerable recipients (e.g. via personalized advertising, location spoofing or obfuscation) ● 7. Deploy deceptive manipulated media (e.g. "deep fakes", "cheap fakes"...) ● 8. Use "hack and leak" operation (which may or may not include doctored content) ● 9. Inauthentic coordination of content creation or amplification, including attempts to deceive/manipulate platforms algorithms (e.g. keyword stuffing or inauthentic posting/reposting designed to mislead people about popularity of content, including by influencers) ● 10. Use of deceptive practices to deceive/manipulate platform algorithms, such as to create, amplify or hijack hashtags, data voids, filter bubbles, or echo chambers ● 11. Non-transparent compensated messages or promotions by influencers ● 12. Coordinated mass reporting of non-violative opposing content or accounts	
Measure 14.1	Vimeo is not a social media platform that enables or encourages user engagement in the way social media platforms do. Therefore, we do not commit to the following as they are not relevant to our services: SLI 14.2.2 SLI 14.2.3 SLI 14.2.4
QRE 14.1.1 [insert wording if adapted]	Vimeo has clear policies on disinformation. Section 5 of our Terms of Service lists the types of content that users may not submit to our platform. This list includes content that: ● Contains false or misleading claims about (1) vaccination safety, or (2) health-related information that has a serious potential to cause individual or public harm; ● Contains false or misleading information about voting or seeks to obstruct voting;

	- Contains (1) claims that a real-world tragedy did not occur; (2) false claims that a violent crime or catastrophe has occurred; or (3) false or misleading information (including fake news, deepfakes, propaganda, or unproven or debunked conspiracy theories) that creates a serious risk of material harm to a person, group, or the general public; or - Violates any applicable law. Section 5 of our Terms of Service (as above) was updated in September 2022. This update included revised – more specific – language around disinformation. Corresponding changes were made to our Acceptable Use Community Guidelines to offer more guidance to users. The types of conducts and TTPs employed by malicious actors we see on our platform are: - Impersonation - Malicious deep fakes This is addressed in our Acceptable Use Policy, Section 5 of our Terms of Service, which prohibits - content that infringes any third party's copyrights or other rights, including impersonations; and (as listed above) content that contains false or misleading information (including fake news, deepfakes, propaganda, or unproven or debunked conspiracy theories) that creates a serious risk of material harm to a person, group, or the general publicincluding deep fakes Further, as per Section 5.3, in using our services, user may not, among others: - Act in a deceptive manner or impersonate any person or organization; - Distribute "spam" in any form or use misleading metadata; - Access another's account except as permitted herein; - Use or export any of our Services in violation of any U.S. law; - Engage in any unlawful activity; - Embed our video player on or provide links to sites that contain content prohibited by Section 5.2; or - Cause or encourage others to do any of the above In our Acceptable Use Community Guidelines, which explain in detail how we interpret and eforce our Terms of Service, we explain that Section 5.3 (above) sets rules that bar users from (among other things) harassing other users, interfering with our technical measures, spamming, or engaging in inauthentic behavior. "Spamming" includes mass distribution of the same or similar content, content containing links intended to sell the user some dubious item, and the use of bots, scripts, or other automated tools for any purpose. "Inauthentic behavior" includes creating fake accounts, liking or commenting on your own content using another account, and purchasing likes or comments from third-parties.
QRE 14.1.2 [insert wording if adapted]	- We enable users to flag content that may violate our content restrictions. - We review content that is flagged by our users, third parties, and certain software-based systems. - We use third-party vendors to scan the web for content that may violate some of our content restrictions, including misinformation and disinformation, as per our Terms of Service.
Measure 14.2	As described above, we are meeting this commitment. See our Terms of Service (Section 5) and Acceptable Use Community Guidelines.
QRE 14.2.1 [insert wording if adapted]	As explained above
SLI 14.2.1 – SLI 14.2.4	

TTP OR ACTION 1	For the covered period, we did not see any bot/ATO attacks related to the spread of misinformation on our platform. No data available for actions taken for misinformation specifically in the EU, or in each individual Member State.										
[replicate for number of TTPs or actions reported]	SLI 14.2.1		SLI 14.2.2				SLI 14.2.3			SLI 14.2.4		
	Nr of instances of identified TTP	Nr of actions taken by type	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Data												

IV. Integrity of Services

Commitment 16
Relevant Signatories commit to operate channels of exchange between their relevant teams in order to proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation and with due consideration for security and human rights risks. [change wording if adapted]

Measure 16.1	[insert wording if adapted]		
QRE 16.1.1 [insert wording if adapted]	No action here yet. There hasn't been anything relevant to share.		
SLI 16.1.1 – Numbers of actions as a result of information sharing [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]		
	Nr of actions taken (total)	Type of detected content	Other relevant metrics
Data			
Measure 16.2	Same as above (given that we are not a social media platform, our ability to identify this type of behaviour is very limited)		
QRE 16.2.1 [insert wording if adapted]	Same as above		

V. Empowering Users

Commitment 17
In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups. [change wording if adapted]

Measure 17.1	Where appropriate given the nature of our services, we will support media literacy and critical thinking activities.
QRE 17.1.1 [as above]	None for the covered period.

SLI 17.1.1 – actions enforcing policies above [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]			
	Total count of the tool's impressions	Interactions/ engagement with the tool	Other relevant metrics	Other relevant metrics
Data				
Measure 17.2	None for the covered period.			
QRE 17.2.1 [as above]	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 17.2.1 – actions enforcing policies above [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]			
	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of participants	Nr of interactions with online assets	Nr of participants (etc)
Data				
Measure 17.3	None for the covered period.			
QRE 17.3.1 [as above]	Outline relevant actions [suggested character limit: 2000 characters]			

V. Empowering Users
Commitment 23
Relevant Signatories commit to provide users with the functionality to flag harmful false and/or misleading information that violates Signatories policies or terms of service. [change wording if adapted]

Measure 23.1	[insert wording if adapted]

QRE 23.1.1 [insert wording if adapted]	Users that encounter behaviour or content that violates our Terms of Service, including that which contains misinformation and disinformation, may report it by either flagging it (where provided) or contacting us.
	Our Reporting Abuse article explains in detail how to report abuse and violations for content that is available to the public on Vimeo.com.
	To report content:
	    1. Navigate to the video page in question.
	    2. Click the Flag in the bottom right corner of the player section (on the black background).
	To report an account:
	    1. Navigate to their profile page
	    2. Click the Flag icon in the bottom left corner of the page.
	
	To report a spammer, users can click the flag icon at the bottom left corner of their profile page.
	
	If users receive unwanted attention in the form of messages or shared videos containing misinformation or disinformation, they can:
	● Send that user a message asking them to refrain from contacting you on Vimeo
	● Block them
	● Contact us for help

Measure 23.2	[insert wording if adapted]
QRE 23.2.1 [insert wording if adapted]	The number of reports/flags a piece of content receives is not relevant to whether it will be reviewed for violations to our Terms of Service. All videos that are reported/flagged (whether it is one or 500 times) will be reviewed. We have seen targeted flagging as a coordinated social activity. The way we deal with it is the same as with any other report/flag: the content in question would be reviewed for violations to our ToS before removing. Videos with a higher number of flags may be reviewed first, but the process is the same for all to make sure we make the right decision.

V. Empowering Users
Commitment 24
Relevant Signatories commit to inform users whose content or accounts has been subject to enforcement actions (content/accounts labelled, demoted or otherwise enforced on) taken on the basis of violation of policies relevant to this section (as outlined in Measure 18.2), and provide them with the possibility to appeal against the enforcement action at issue and to handle complaints in a timely, diligent, transparent, and objective manner and to reverse the action without undue delay where the complaint is deemed to be founded. [change wording if adapted]

Measure 24.1	See below
QRE 24.1.1 [insert wording if adapted]	Users whose content is removed or account terminated receive an email from our T&S team explaining the reasons for our decision and stating the specific type of content restriction they violated. We do this for all types of content except for CSAM, terrorist content, fraud, spam, sextortion and illegal content.

SLI 24.1.1 – **enforcement actions** [change wording if adapted]	Same as above. No data available on the specific metrics for misinformation takedowns and appeals.				
	Nr of enforcement actions		Nr of actions appealed	Metrics on results of appeals	Metrics on the duration and effectiveness of the appeal process
Data					

VI. Empowering the research community
Commitment 27
Relevant Signatories commit to provide vetted researchers with access to data necessary to undertake research on Disinformation by developing, funding, and cooperating with an independent, third-party body that can vet researchers and research proposals. [change wording if adapted]

Measure 27.1	[insert wording if adapted]
QRE 27.1.1 [insert wording if adapted]	We have not been approached for this
Measure 27.2	[insert wording if adapted]
QRE 27.2.1 [insert wording if adapted]	We have not been approached for this
Measure 27.3	[insert wording if adapted]
QRE 27.3.1 [insert wording if adapted]	We have not been approached for this
SLI 27.3.1 – research projects vetted by the independent third-party body [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]
	Nr of research projects for which they provided access to data
Data	
Measure 27.4	[insert wording if adapted]
QRE 27.4.1 [insert wording if adapted]	We have not been approached for this

VI. Empowering the research community
Commitment 28
Relevant Signatories commit to support good faith research into Disinformation that involves their services. [change wording if adapted]

Measure 28.1	Vimeo's T&S will cooperate with the research community as much as possible, in the understanding that our resources are limited. Our moderators deal with all types of content that is uploaded to the platform – they're not a team that is dedicated exclusively to deal with misinformation and disinformation.
QRE 28.1.1 [insert wording if adapted]	We have not been approached for these purposes.
Measure 28.2	[insert wording if adapted]

QRE 28.2.1 [insert wording if adapted]	We have not been approached for these purposes,
Measure 28.3	[insert wording if adapted]
QRE 28.3.1 [insert wording if adapted]	We have not been approached for these purposes.
Measure 28.4	[insert wording if adapted]
QRE 28.4.1 [insert wording if adapted]	We have not been approached for these purposes.

VIII. Transparency Centre
Commitment 34
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	We have taken part in the working groups during this period.
Measure 34.2	TBD
Measure 34.3	TBD
Measure 34.4	TBD
Measure 34.5	TBD

VIII. Transparency Centre
Commitment 35
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	As detailed in Commitment 14 above
Measure 35.2	TBD
Measure 35.3	N/A for the period
Measure 35.4	N/A for the period
Measure 35.5	Work in progress
Measure 35.6	Work in progress

VIII. Transparency Centre
Commitment 36

	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	N/A for the period
Measure 36.2	N/A for the period
Measure 36.3	[N/A for the period
QRE 36.1.1 (for the Commitments 34–36) [insert wording if adapted]	N/A for the period
QRE 36.1.2 (for the Commitments 34–36) [insert wording if adapted]	N/A for the period
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 [change wording if adapted]	N/A for the period
	Our company would like to provide following data: N/A for the period
Data	

IX. Permanent Task–Force
Commitment 37
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	We have been part of the working group
Measure 37.2	Ongoing work
Measure 37.3	Ongoing work
Measure 37.4	Ongoing work
Measure 37.5	Ongoing work
Measure 37.6	Ongoing work
QRE 37.6.1 [insert wording if adapted]	Ongoing work

X. Monitoring of Code
Commitment 38
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]
QRE 38.1.1 [insert wording if adapted]	Vimeo's T&S team is integrated by 13 moderators who deal with misinformation and disinformation on our platform. In addition, we engage a third-party vendor to help identify videos hosted by Vimeo with specific types of misinformation and disinformation (e.g., COVID-related) that may be found on different sites. Our moderators deal with all types of content that is uploaded to the platform – they're not a team that is dedicated exclusively to deal with misinformation and disinformation.

X. Monitoring of Code

Commitment 39

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]

X. Monitoring of Code

Commitment 40

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	N/A to Vimeo
Measure 40.2	Ongoing work
Measure 40.3	Ongoing work
Measure 40.4	Met commitment
Measure 40.5	Ongoing work
Measure 40.6	N/A for period

X. Monitoring of Code

Commitment 41

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	Met commitment
Measure 41.2	Met commitment
Measure 41.3	Ongoing work

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
Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure, as agreed in the Task-force. [change wording if adapted]

X. Monitoring of Code
Commitment 44
Relevant Signatories that are providers of Very Large Online Platforms commit, seeking alignment with the DSA, to be audited at their own expense, for their compliance with the commitments undertaken pursuant to this Code. Audits should be performed by organisations, independent from, and without conflict of interest with, the provider of the Very Large Online Platform concerned. Such organisations shall have proven expertise in the area of disinformation, appropriate technical competence and capabilities and have proven objectivity and professional ethics, based in particular on adherence to auditing standards and guidelines. [change wording if adapted]