

Nurturing the Integrity of Political Communication in the Digital Era

An Open Government Perspective

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Open
Government
Partnership



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A menu for open policy action

The integrity and health of our systems for public discourse and political communication are under threat from many angles in our digital era. From misinformation, distrust, and hate speech to rising polarization, populism, and attacks on democratic discourse, all eyes are on big tech and social media as both the main troublemaker and potential troubleshooter.

A focus on big tech when developing a policy response to these problems is important. Yet it overshadows a broader message for policymakers: new research insights conclusively confirm that many more actors and dynamics are responsible for the current global malaise in political communication. An “ecosystem” approach can help to scope this broader space for policy action. And an open government lens can offer inspiration, practical tools, and a useful support system for drawing up a list of priority policy actions for these stakeholders.

Political candidates, political parties, and political elites are the most important drivers—good and bad—of the norms and standards that characterize our political discourse and online campaigning practices. Respect for truth, civility, inclusiveness, and trust stand and fall with their own conduct.

Suggested open government actions: open digital campaigns and a digital integrity pact

- ✓ Expand transparency for political campaigning and finance fully into the online realm to cover new funding, spending, and campaigning tactics—digital campaigning is still a black box.
- ✓ Implement a collective code of conduct for online campaigning—from the responsible use of big data to the treatment of deep-fakes and leaked information. New tactics abound and new effective norms are missing, yet many useful templates are already available.

Conventional “news media and journalism” continue to be the biggest and potentially most trusted producers and editors of political news, narratives, and emotive frames that circulate online and offline.

Suggested open government actions: open ownership and independence/public accountability by design

- ✓ Mandate public disclosure of beneficial ownership and financing arrangements for all large media outlets as a necessary step for building trust and protecting against capture and market concentration. The growing momentum for open ownership points the way.
- ✓ Strengthen independence of public media from political interference (e.g., by improving merit-based recruitment and multi-stakeholder oversight). Trusted public media can be one of the most effective engines for a healthy political discourse, but political meddling is a persistent risk everywhere.



Social media and big tech platforms put the entire political communication system on steroids. Their algorithms selectively amplify political information, segment audiences, and offer unique tools for political organizing and advertising all architected to maximize user engagement.

Suggested open government actions: decisional transparency; know your political customer; and a monitoring, reporting, and verification (MRV) system on impact

- ✓ Mandate decisional transparency—full disclosure of the processes and rules for both human and algorithmic decisions on how content is (de)prioritized. Dominant platforms will always have a major gatekeeping role, and the public needs to understand in much more detail how this power is exercised.
- ✓ Encourage platforms to apply existing identity validation systems for online advertisers to all issues and political advertisers—such a know-your-political-customer system can greatly contribute and complement existing, yet often insufficient disclosure arrangements.
- ✓ Build an impact MRV system to track with effective indicators and tiered data access for regulators, researchers, and the public—an essential input to track rapidly evolving platform impacts on the political sphere and have an informed discourse on adapting policies accordingly.

Citizens are not simply passive news consumers or unwitting influencing targets, but they contribute actively by annotating, recirculating, and organizing around political information. More political knowledge and media literacy are potent antidotes to a sense of disempowerment and manipulation.

Suggested open government actions: a big education push for media and democratic literacy

- ✓ Expand media and political literacy education and training for all age cohorts.
- ✓ Track and periodically report on outcomes around a set of jointly agreed indicators.

Governments coordinate and safeguard the coherence of many different policies that shape the governance of political communication systems and the public trust in politics and electoral integrity.

Suggested open government actions: open ad archives, mini-publics, open elections, and support for public interest journalism

- ✓ Convene a universal political ad repository—campaigns are multichannel and multiplatform, and only a unified repository enables a comprehensive picture and informed critical debate about political campaigns and their messaging.
- ✓ Expand the use of mini-publics in policy-making—such deliberative mechanisms have a great potential to help temper polarization, enhance trust, and provide reasoned citizen input on contentious policy questions.
- ✓ Boost the trust in the integrity of elections through transparency and proactive communication—from authoritative information help desks for journalists to crowd-sourced quick counts, much can be done in all types of countries to counter misinformation about elections as some of the most corrosive threat vectors to the public trust in democracy.
- ✓ Step up support to public interest journalism—old business models are evaporating more quickly than new ones emerge. Direct support, administered in nonpartisan ways, is required for conventional media outlets, innovative start-ups, and local news production.



Political consultants and service providers innovate and mainstream new technologies and tactics for campaigning and influencing and evolve acceptable industry practice along the way.

Suggested open government actions: an open integrity initiative against professional digital malpractice

- ✓ Adapt existing codes of conduct to cover new digital practices and transparently report on implementation and enforcement. Professional integrity systems are only beginning to grapple with new digital opportunities and are in general need of more teeth in enforcement.



Executive summary

Propelled by a string of dramatic recent events—from online incitement of genocide in Myanmar to an acutely polarized and lie-infested election in the US that culminated in the storm on the Capitol—the question of how social media can be tamed so that it will not bring down our democracies has taken center stage and animated a great amount of research and policy initiatives. We sort through this rapidly expanding evidence and idea space to explore the question, “Can open government approaches make positive contributions?”

The answer is a resounding yes. But the pathways for engagement and impact that we identify are perhaps a bit different from and more diverse than what a more cursory look at the current evidence and policy debate might suggest. In a nutshell, a digital-only or even just a digital-first approach is often not the most urgent priority. Many more drivers shape the integrity of political communication. More entry points for promising improvements are available, but some of these might lie further outside the policy makers’ comfort zone than bashing social media. And the diversity of political information ecosystems defies reliance on a set of generalized good practice interventions.

Taking a step back

When it comes to the health of democracy, the perceived role of the internet and social media has shifted from hero to villain in internet time. High hopes for inclusion and empowerment have given way to deep fears about extreme polarization, hate, and disinformation on digital steroids.

The most productive way to evaluate these claims and to derive balanced and properly prioritized policy responses is to take a broader ecosystem perspective. Acute digital dysfunctions are best examined on a bigger map of what integrity in political communication should look like, who plays a role in nurturing or undermining it, and what dynamics and strains are at play and need to be grappled with.

Where to?

Serving as the main policy compass and flourishing in political communication is a comprehensive positive vision of integrity that is rooted in human rights and entails:

- a political communication space that is inclusive and accessible, offers a diversity of viewpoints, protects freedom of expression, and promotes formation of opinion and collective organization;
- a political discourse that is characterized by civility, respect, and a shared commitment to facts, truthfulness, and reciprocity, serviced by an independent, professional, plural news and media sector;
- political campaigns that are open and transparent while operating from a level playing field; and
- the respect and promotion of individual autonomy, political equality, democratic participation, the legitimacy of the electoral process, public trust in and accountability of the government, and a reasonable level of epistemic and social cohesion through its overall workings and outcomes.



What is going on and wrong?

Political communication around the world is not in good shape. Contests about policy ideas are escalating into more profound contests about democratic norms, political identities, and even facts and how to establish them. Misinformation floods the scene; entrenched polarization fractures common ground, incites, inflames, and opens the door to toxic populism. Authoritarian attacks on civic space in many places and crumbling business models for independent media everywhere add further strains. Nowhere are these troubling dynamics and their sheer scope and scale more clearly on display than in online spaces for political communication. It is thus not surprising that the rise of social media and its distinctive functionalities and operational logics are often viewed as being at the heart of these problems. Recent evidence deepens our understanding of this situation but also paints a more complicated picture of the problems landscape. For example:

- **Online not first:** Many of the negative dynamics in political communication predate the rise of social media pointing at broader and more structural drivers around growing inequalities, social sorting, changes in political elites, and media environments.
- **Fact-checking poverty:** A new form of the digital divide has emerged around online political communication problems. Because of lax regulations, developing countries have become experimental staging grounds for some of the more sinister digital campaigning and disinformation tactics that later make their way into the Global North. At the same time, pricing strategies that provide free online access to some social media but not the broader internet and that hide high-quality information behind paywalls expose poorer segments of the population to misinformation while making fact-checking all but unaffordable.
- **A division of labor in misinformation:** Different platforms pose different challenges to the integrity of political communication and speak to different age groups. A narrow focus on and general approach to the most visible platforms is not sufficient.
- **Putting three priority concerns into perspective:** Microtargeting issues in political advertising may be less detrimental and more solvable, information echo chambers less pronounced but more difficult to mitigate, and foreign online interference less important than domestic issues.
- **The call from inside the house:** Political elites and their own conduct—both online and offline—play a much more central role for the (lack of) integrity of political communication than often assumed.



How is the response landscape shaping up?

Responses to the deteriorating health of political communication are evolving rapidly, and several new developments and insights provide important context for exploring possible contributions of an open government approach.

- **Principles go practice:** The burgeoning policy debate in this area has shifted from agreeing on general principles (largely done to the extent possible) to churning out an increasing vast number of practical policy recommendations. The main challenge is now to identify the most practical ones and forge the coalitions required to put them into practice.
- **New but not without precedence:** Despite the uniqueness of online platforms, there is no need to start completely from scratch. Policy precedence in a variety of fields—from communication to competition and from infrastructure to consumer protection—provides an installed base of institutions and interventions to build on, adapt, or at least draw inspiration from.
- **Growing space between the rock and the hard stone:** The blunt extremes of internet shutdowns by governments or information takedowns by platforms are giving way to a much more nuanced and diverse toolbox of interventions built around the (de)prioritization of content, graded sanctions, due process, differentiated transparency, and auditable performance.
- **Reluctant change agents:** Some conventional routes to more accountability are more difficult to pursue in this area. Major platforms are controlled by their owners with limited influence for institutional shareholders that often drive change for more corporate responsibility. Likewise, politicians are reluctant to put formal constraints on their own conduct. Neither is an unsurmountable obstacle, but both need to be kept in mind when charting avenues for reform.
- **A race—but not of the tortoise-and-hare type:** Anecdotes abound that document the many ingenious ways with which sinister political communicators outwit sophisticated controls. Yet this whack-a-mole situation is not without hope as thresholds for engaging with extreme content rise for the broad mainstream.
- **The fallacy of symmetry:** The prevalence of misinformation and inflammatory speech is unlikely to be distributed evenly across the political spectrum in any given country context. This means any efforts to raise the level of civility and respect for truth in the political discourse—no matter if administered through technological or editorial means—are likely to unevenly affect different political groups. This is not a failure of impartiality as clear standards and proper due diligence can offer equal and fair treatment on the content regulation side, but it cannot and should not guarantee equal outcomes. Nor is it a license to do nothing as the status quo and the operational logic of platforms and their desire to maximize engagement tend to favor the uncivil, untruthful factions in the discourse.



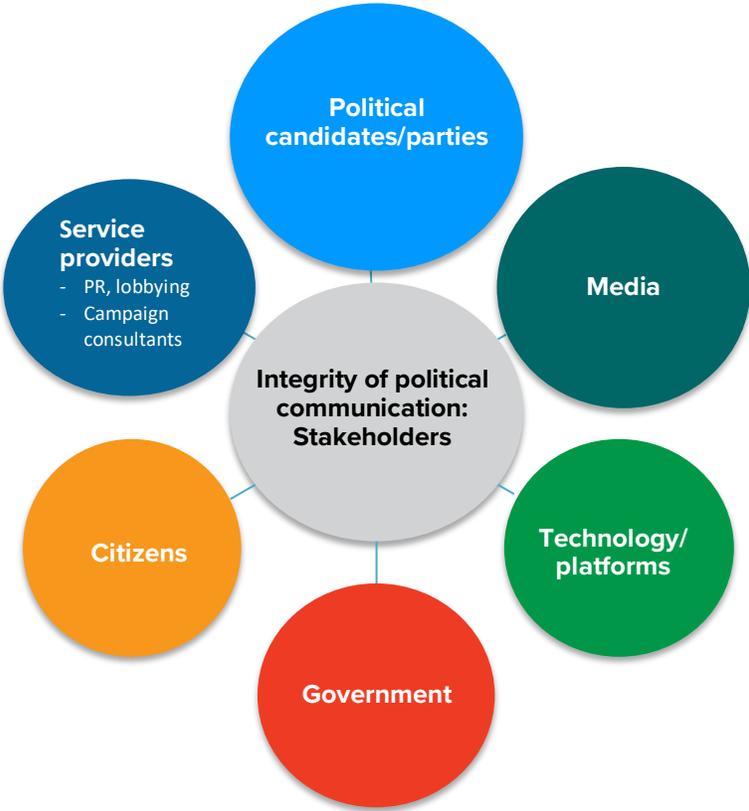
An ecosystem perspective: Who is involved?

While most of the focus in the policy debate is on platforms and regulators, at least six groups of stakeholders directly shape the integrity and flourishing of political communication conceived in such a way (see Figure I).

- As mentioned above, most central are **politicians and parties** that are instrumental in shaping the norms and standards of the discourse, drive polarization, seed populism, and sadly often act as super-spreaders of political misinformation. The trust in government and democracy they manage to instill or squander ripples out into (mis)trust for the media, science, and other institutions, which in turn interacts with the readiness of people to embrace fake news and polarized political identities.
- Next, the **conventional news media** can boost or tamper these impulses and incentives, give credit, and put into mass circulation, or help dismiss and contextualize misinformation. Contrary to received wisdom, this group continues to be the main and most important investor in and producer of news and political information, while facing the collapse of traditional business models.
- **Social media** puts the entire system on steroids. Its business model to maximize engagement skews towards promoting inflammatory extremes. Platforms cut out editorial gatekeeping of conventional media, supply tools to make mobilization but also propaganda much more effective and accessible. Social media platforms boost salience of specific contributions and elevate them to virality, and they can help diversify or segment news diets.
- **Governments** have the primary responsibility to provide a regulatory framework for social media and tech platforms. The multipurpose character of social media platforms means that governments can draw on a considerable number of existing sectoral policies from consumer protection and competition to media and infrastructure policies. With regard to political speech, governments are meant to be the main guarantors of electoral integrity—free and fair elections—and at a minimum, exercise indirect oversight over public media.
- **Citizens** are often treated as rather passive consumers of news or unwitting targets of influencing strategies. Yet, there is no automatic transmission mechanism from fake news to false beliefs. Media literacy and meaningful opportunities for political engagement can nurture a sense of political efficacy among the citizenry, the absence of which provides fertile ground for many of the pathologies in political communication as currently experienced.
- **Professional service providers** put everything to work. They craft the messages and connect campaigns to technologies, big data, and psychological insights. These service providers influence all parts of the political communications integrity systems through their professional values, sense of responsibility, and norms encoded in daily practice—or a neglect thereof.



Figure I. The political communication ecosystem: Main stakeholders



An open government agenda for a thriving sphere of political communication: 13 suggestions

An open government approach offers many promising action options for all six of these stakeholders to help strengthen the integrity in political communication. Different countries will have different priorities and different capabilities to follow through, yet most suggestions apply in different variations in most places.

Politicians and parties: open influencing and a digital integrity pact

1. Bring campaigning transparency to the digital sphere

Online political campaigning is growing rapidly across the world yet remains largely a black box. Two-thirds of countries in Europe for example still do not require candidates and parties to report their spending on online platforms at a meaningful level of granularity, and in 28 European countries, political parties are not forthcoming with sufficient information on their social media campaigning activities. Campaign finance and transparency rules require a digital overhaul but are slow to catch up, so parties and candidates can (and some already do) take action by themselves and disclose more details on their digital campaigning, including detailed breakdowns for online advertising, big data use, and promotion qua online influencers.

2. Update conduct norms for a digital era

A growing toolbox of sinister tactics for online campaigning—from sharing deep-fakes to weaponizing hacked data—meets campaigning codes of conduct from a pre-digital era. Updating these guardrails is imperative and can build on a growing number of pioneering initiatives, from responsible online campaigning pledges in São Paulo or the US elections to guidelines by electoral commissions in New Zealand or India.

News media and journalism: an open media ownership movement

3. Commit to open ownership, open funding

Knowing who owns and funds a specific media outlet is not sufficient to guard against interference by special interests, but it is an essential data input for media watchdogs and regulators when assessing the adequacy of governance structures or identifying potential conflicts of interest and concentration risks. Ownership and sponsorship structures remain too often woefully opaque and even hidden behind nested shell companies in money-laundering style. For the 13 OGP membership countries for which the NGO Reporters Without Borders (RSF) assessed media independence, the group found high-to-medium risks of interference or could not get public access to relevant ownership data. An analysis of 30 European countries only rated four countries as good performers with regard to the transparency of media ownership and placed three European OGP member countries in the lowest category. Open media ownership could therefore be a particularly strategic sectoral focus for the growing open ownership initiative and provide opportunities to link up with a robust movement for media independence.



4. Design public media for independence and accountability

High-quality, independent public media can be an extremely powerful antidote to the many ailments that affect the health of political communication. Fine-tuning governance arrangements for the right level of independence and public accountability is as difficult as it is important and urgent. Governments in many countries could take important steps to depoliticize the recruitment and promotion systems. Even in countries that place great emphasis on their independent public media, there is ample room for improving governance structures, for example by making governing boards more diverse and transparent (Germany) or introducing an interest disclosure scheme for senior executives (UK).

Platforms: decisional transparency, MRV, and know your political customer

Social media and other tech platforms are at the center of the debate about the health of political communication and thus inundated with demands for reform. Policy responses on the part of platforms are being adapted continuously. Open government principles feature prominently in many individual suggestions, and at least three more encompassing open government action areas can be identified that hold particular promise.

5. Foster decisional transparency

Irrespective of whether they are tasked with heavily policing their platforms or not, the dominant social media entities will continue to play important gatekeeping roles for political communication, and the public needs to be able to see, understand, monitor debate, and suggest changes to the way platforms take content-related decisions. Such decisional transparency must cover both positive content decisions (the criteria that guide algorithms in boosting the visibility of particular types of content) and negative content decisions (the criteria and processes used for sanctioning content and users that violate standards).

6. Establish an MRV system for impact metrics

Content governance is in an experimental phase, and platforms selectively report on the efficacy of specific measures, in which a much more trusted, independent tracking of efficacy and impact is urgently needed. Taking a sheet from established blueprints for tracking information in sensitive policy domain platforms could be required to establish MRV systems that combine targeted audits and standardized reporting regimes to produce trusted big picture accounts of both their democracy footprint and the performance of their governance systems.

7. Establish a know-your-customer architecture for political campaigns

Essential transparency for political funding and campaign support is being eroded through the inflow of dark money, undisclosed third-party advertising, etc., both online and offline. Big technology platforms already operate identity verification systems for advertising and payment services that can be expanded to help validate and publicly report on the identity of sponsors of political online advertising. Such political know-your-customer mechanisms could thereby make an important contribution to the overall transparency of political campaigning.



Governments: open elections, mini-publics, and more

Governments already have an important part to play in helping other groups in the political communication ecosystem deliver on their open government to-dos. But governments can contribute even more on their own account.

8. Convene effective ad archives and fair access

Contemporary political campaigns are multichannel and mix online and offline elements fluidly. Provisions for transparent, fair campaigning need to follow suit. Future archives of political ads need to be one-stop shops for all ads by all players in all media. In addition, electoral management bodies are best suited to help standardize reporting and convene the establishment of consolidated archives that counter current trends of fragmented, platform-idiosyncratic efforts separate from archiving and access requirements in conventional media.

9. Expand mini-publics in decision-making

Experimenting with and offering more deliberative mechanisms through which people of all walks of life can contribute to policy-making are regarded as a particularly promising route for re-civilizing democratic discourse and rebuilding public trust. Many governments are already experimenting with some aspects of this, and these efforts are also increasingly reflected in many OGP commitments. This expansion prepares the ground for mutual learning, continuous improvements, and a concerted scaling up of such deliberative initiatives that can grow into an integral part of the participation dimension in open government.

10. Encourage open electoral integrity

Elections and their outcomes are hotspots of political misinformation, and concerted assaults on the legitimacy of outcomes threaten to critically undermine public trust in the working of democracy. From crowd-sourced quick counts in Indonesia to help desks for journalists in Sweden, many actions are possible for countries at all levels of political sophistication to boost the transparency of and trust in electoral processes and outcomes.

11. Support public interest media—old and new

Given the news media's paramount role in a thriving political communication sphere and the dire financial situation that most news media outlets face, governments can support the sector in important ways. Governments can draw inspiration from a wide range of support measures and related financing options that countries have used in this area. The challenge is not a finessing of technological innovation capabilities but a robust infrastructure that supports established players and new journalism models alike and that also guards against political capture.



Citizens: open education-for-democracy push

12. Push for an open education for democracy

Political knowledge, media literacy, and digital skills are not a silver bullet but are empirically confirmed to offer important protections against political misinformation. Yet, such skills are unevenly distributed, often along existing socioeconomic disparities. Media and digital literacy are insufficiently integrated into education and training curricula and hardly tracked in systematic ways. An open education for democracy offensive could link up existing efforts and help establish clear criteria and transparent mechanisms for tracking and comparing skills outcomes and progress across countries.

Professional service providers

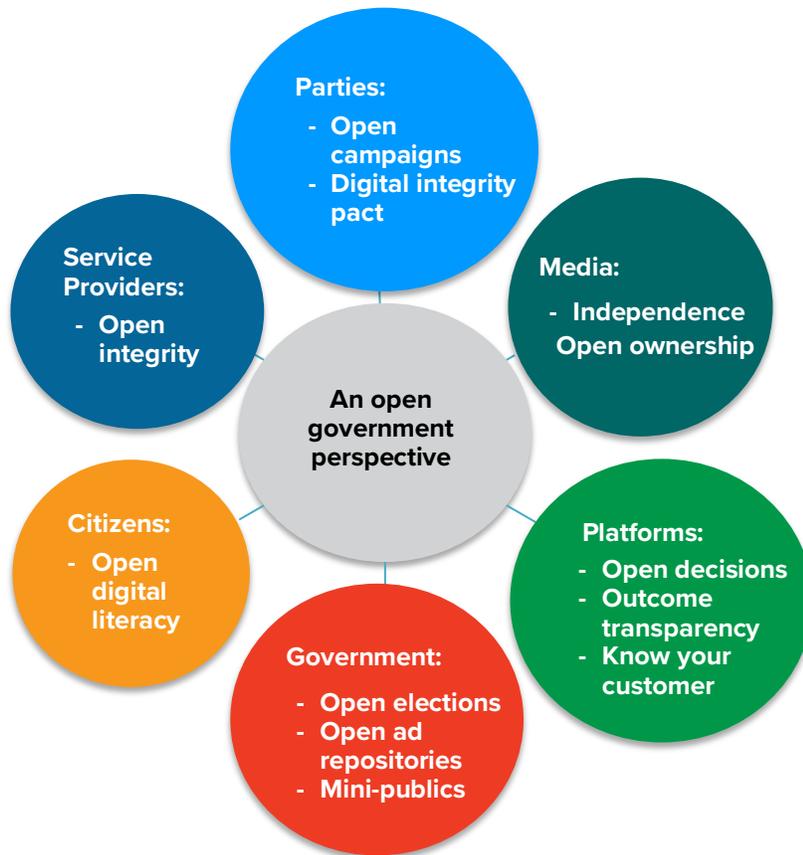
13. Root out professional malpractice in the digital era

A booming political service industry devises and energetically promotes new, often digitally and big data-enabled tactics of political campaigning and influencing all around the world. Setting clear, effective standards for responsible conduct, for example with regard to fact-checking and data handling and sanctioning violations, are thus priority to-dos for this sprawling industry. Existing professional value systems that already categorically reject the use of manipulative approaches and misinformation provide a good point to start from. An open government approach rooted in the idea of transparent integrity systems analogous to corporate anti-corruption systems could make a significant contribution to these efforts.



From technology fixes to sensible priorities

Figure II. How an open government approach can contribute to improving the integrity of political communication



All of these action items for different stakeholder groups in the political communication ecosystem clearly highlight one message: the dynamics to consider for a healthy political communication sphere go well beyond the challenges associated with the rise of social media and big tech. The picture is more complicated, but at the same time more conducive to taking action. Many more levers for improving the situation are at hand than a narrow focus on all things online and the governance of social media platforms might suggest. And depending on country context, a different order of priorities might be better suited to dealing with the issues at hand.

Governments intent on effectively improving the health of political communication and addressing some of the deeper symptoms of eroding public trust, escalating polarization might want to complement a focus on tech governance with some more mundane, yet urgent good housekeeping chores: raise your own standards of political morality and communication, bring more granular transparency to campaigning and elections, shore up the independence of public media, and support pluralistic media systems (see Figure II).



The good news: many of these to-dos are more familiar and can be acted upon more directly by governments and political elites than new experimental regulatory regimes for big tech. Without paying attention to these bread-and-butter issues in their own backyard, policy makers that pretend to be deeply concerned about the health of political communication yet only focus on the governance of big, often foreign-owned tech might even look somewhat hypocritical. Examples include a government that obsesses with online misinformation but dismantles the independence of its public media system, a party that worries about the online erosion of political trust but fails to bring sufficient transparency to its own campaigning, and a politician who complains about toxic online debating cultures but is unapologetic about her own forwarding of dubious factual claims. This hypocrisy not only compounds the imminent health crisis in political communication, but on a more fundamental level, it also risks further fanning the flames of cynicism about politics and political elites that are part of the root cause of the rot.



I. Introduction

When it comes to the health of democracy and political communication, the perceived role of social media and digital technologies has shifted from hero to villain in record time. High hopes for tech-supported democratic renewal hatched only two decades ago are now overshadowed by acute concerns about big tech and big platforms having degraded into a political wrecking ball that threatens to lay waste to the political fundamentals of our societies by fueling hate speech, lies, polarization, and populism.

Common to both the hero and villain story is a fixation on how the major digital platforms of our time are the dominant characters that drive the plot. This is not a surprise, considering that the largest social network touches more people than the largest world religion, that fake news items flooding elections across the world are counted in the millions, and that the blitz-scaling of specific digital tools tracks closely with a flurry of democratic awakenings at first and democratic degradations more recently.

It is therefore not surprising either that, until recently, most of the attention in the policy world on how to amplify the good and remedy the bad that tech brings to the political sphere has been focused on the platforms and technologies themselves. Depending on ideological inclinations, the focus has been on how platforms can re-*architect* themselves or be better regulated from the outside to fix a set of problems closely tied to political life.

During the last couple of years, however, this story has become much more nuanced and complicated but also, in some places, more imaginative and hopeful. Major political events in 2019 and 2020 have surfaced new trends and dynamics. A huge wave of new research has significantly expanded our understanding of the issues at hand, reaffirming some assumptions while confounding others, producing new ones, and—perhaps most importantly—tracing the linkages to broader political, economic, and social dynamics that need to be considered when thinking about policy responses. In parallel, the policy world has shifted into the highest gear. Numerous expert committees, think tanks, advocates, and legislators have produced an enormous amount of policy ideas that gradually work their way into draft bills and action templates.

Against this backdrop, this scoping paper seeks to accomplish the following:

- harvest the latest research and policy thinking on the role of digital technology in politics and democracy to tease out new angles and nuances to received wisdoms;
- present these insights not in relation to a set of discrete online problems such as digital misinformation but in a broader context of how to promote the integrity and flourishing of political communication;
- filter for interesting ideas that speak most prominently to and could be most productively advanced by governments and other stakeholders through an open government lens; and
- cluster and place these ideas in an ecosystem of different, interlinked actors that are jointly responsible for nurturing integrity of political communication.



To make this extensive body of ideas manageable and relevant to policymakers, the focus is on the **integrity of political communication**, rather than misinformation, hate speech, etc. more broadly. The idea is not to assemble an exhaustive overview of all relevant developments and recommendations but to be selective and summarize:

- a set of key trends and insights that go beyond the received wisdom and help get a grasp of an unwieldy policy landscape; and
- some of the most interesting, and perhaps overlooked, recommendations that resonate with and could be advanced from an open government vantage point.

Towards integrity of political communication: A direction of travel rather than specific destination

For the purpose of this synthesis, political communication is used as a loose umbrella concept to refer to information and communication activities that have a political purpose and contribute to political life in a community, including forming, articulating, and exchanging political views; mobilizing, organizing, and campaigning; and producing and circulating political news and journalism that informs this conversation. A positive vision of integrity and flourishing in political communication is then centered on a set of attributes and quality indicators rooted in human rights and established democratic principles that include:

- a political communication space that is inclusive and accessible, offers a diversity of viewpoints, protects freedom of expression, and promotes formation of opinion and collective organization;¹
- a political discourse that is characterized by civility, respect, and a shared commitment to facts, truthfulness, and reciprocity, serviced by an independent, professional, plural news and media sector;
- political campaigns that are open and transparent while operating from a level playing field;² and
- the respect and promotion of individual autonomy, political equality, democratic participation, the legitimacy of the electoral process, public trust in and accountability of the government, and a reasonable level of epistemic and social cohesion through its overall working and outcomes.

Many of these attributes are open to interpretation, and the list is by no means exhaustive or sufficiently polished to withstand stringent normative scrutiny. Taken together, this loose bundle of essential and desirable qualities provides a pragmatic reference point against which current development of political communication in the digital era can be assessed and policy solutions envisioned and prioritized.

¹ See for example, Fishman, R. M. (2016). Rethinking dimensions of democracy for empirical analysis: Authenticity, quality, depth, and consolidation. *Annual Review of Political Science*, 19, 289-309.

² See for example, the UK Information Commissioner's Office. (2018). Democracy Disrupted? Personal Information and Political Influence.



A broader set of problems

Worrisome broader dynamics affect the fundamental health and integrity of political communication around the world. Autocratization is on the rise. For the first time since 2001, more than half of all countries are classified as autocracies in 2020, and a so-called third wave of autocratization is affecting all world regions, including some rich G20 countries.³ Around the world, the quality of democratic deliberation is the dimension of democracy that has declined the most during the last decade.⁴ Political populism that thrives on inflammatory political rhetoric is likewise gaining currency. An assessment of 36 mature democracies found the vote share of populist parties steadily rising from a mere 3% in the 1970s to around 20% in 2018.⁵ Political movements with strong authoritarian-populist tendencies have made it into government in no less than 11 European countries.⁶ Polarization—political and social—is found to deepen in many countries across the world.⁷ The last 5 to 10 years saw overall declines in freedom of expression,⁸ freedom of the media,⁹ and freedom of civil society.¹⁰

³ V-Dem. (2020). Autocratization Surges—Resistance Grows. Democracy Report 2020.

⁴ V-Dem. (2020). Autocratization Surges—Resistance Grows. Democracy Report 2020.

⁵ Meyer, T. M., & Wagner, M. (2020). The rise of populism in modern democracies. In Rohrschneider, R., & Thomassen, J. (Eds.), *The Oxford Handbook of Political Representation in Liberal Democracies*.

⁶ Claassen, C. (2020). Does public support help democracy survive? *American Journal of Political Science*, 64(1), 118-134.

⁷ Carothers, T., & O'Donohue, A. (Eds.). (2019). *Democracies Divided: The Global Challenge of Political Polarization*. Brookings Institution Press.

⁸ World Freedom of Expression Rankings for 2019/20,

<https://www.article19.org/gxr2020/#:~:text=Around%20the%20world%20freedom%20of,score%20less%20than%2020%2F100.>

⁹ 2020 World Press Freedom Index: “Entering a Decisive Decade for Journalism, Exacerbated by Coronavirus,”

<https://rsf.org/en/2020-world-press-freedom-index-entering-decisive-decade-journalism-exacerbated-coronavirus>

¹⁰ Freedom in the World 2020: A Leaderless Struggle for Democracy, <https://freedomhouse.org/report/freedom-world/2020/leaderless-struggle-democracy> and State of Civil Society Report 2020. The State of Democratic Freedoms, https://www.civicus.org/documents/reports-and-publications/SOCS/2020/SOCS2020_Democracy_en.pdf



II. Setting the scene part 1: Features of the problem landscape

Before zooming in on specific digital issues in political communication, it is worthwhile recapping relevant observations about the broader state of affairs and general dynamics that shape the options for policy responses.

Digital darkness

The above empirics make for a depressive reading, and the mood further drops when wading through the astounding stats and anecdotes that describe the scale, venality, and virality of the political mudslinging and misinformation that are making the rounds online. Here are just some examples from a rapidly evolving empirical landscape:

- Government-forced internet shutdowns and slowdowns, many of them politically motivated to stifle democratic discourse, are on the rise in many regions affecting 29 countries in 2020.¹¹
- Political parties or government agencies in 70 countries were found to have engaged in manipulative and disruptive online behavior in 2019.¹²
- The online circulation of significant amounts of political disinformation are by now regularly affecting elections and political life all around the world, including Cambodia,¹³ Brazil,¹⁴ Taiwan,¹⁵ and Tunisia.¹⁶
- One-third of more than 275,000 tweets shared in a ten-day period about the 2018 Swedish national elections originated on so-called junk news sites.¹⁷
- A quarter of the most influential Twitter accounts during the 2017 elections in Kenya were believed to be bots (automated accounts).¹⁸
- On Facebook in the US, the liking and sharing of articles from news outlets that regularly publish falsehoods have tripled between 2016 and 2020.¹⁹
- According to the most authoritative analysis of the recent US elections, the main repeat spreaders of false narratives about election fraud that culminated in the storming of the US Capitol were a small bend of verified social media accounts by partisan media outlets, social media influencers, and political figures, including President Trump and his family.²⁰

¹¹ Shattered Dreams and Lost Opportunities, <https://www.accessnow.org/keepiton-2020-report>

¹² Bradshaw, S., & Howard, P. N. (2019). The Global Disinformation Order: 2019 Global Inventory of Organised Social Media Manipulation. Working Paper 2019.3. Oxford, UK: Project on Computational Propaganda. comprop.oii.ox.ac.uk. 23 pp.

¹³ The Asian Network for Free Elections. 2018 Cambodia National Assembly Elections, <https://anfrel.org/wp-content/uploads/2018/06/FINAL-REPORT-2018-CAMBODIA-PEAM.pdf>

¹⁴ Evangelista, R., & Bruno, F. (2019). WhatsApp and political instability in Brazil: targeted messages and political radicalisation. *Internet Policy Review*, 8(4), 1-23.

¹⁵ The 2020 Taiwanese General Election: Success for Democracy Despite Emerging Challenges, https://anfrel.org/wp-content/uploads/2020/03/Taiwan-Report-2020-FINAL_ol.pdf

¹⁶ Elswah, M., & Howard, P. N. The Challenges of Monitoring Social Media in the Arab World: The Case of the 2019 Tunisian Elections. Data Memo 2020.1. Oxford, UK: Project on Computational Propaganda

¹⁷ Innovations for Successful Societies(2020).Sweden Defends Its Elections Against Disinformation, 2016–2018, https://successfultsocieties.princeton.edu/sites/successfultsocieties/files/GL_Swedena_Election_FINAL12_23_20_V1_0.pdf

¹⁸ Portland. (2018). How Africa Tweets 2018 Report, <https://portlandcommunications.com/publications/how-africa-tweets-2018/>

¹⁹ According to new research from the German Marshall Fund Digital in <https://www.nytimes.com/2020/10/12/technology/on-facebook-misinformation-is-more-popular-now-than-in-2016.htm>

²⁰ The Long Fuse: Misinformation and the 2020 Election, <https://stacks.stanford.edu/file/druid:tr171zs0069/EIP-Final-Report.pdf>



- Political hate speech online is increasingly linked to incidences of political violence from places such as India,²¹ Sri Lanka,²² and Germany,²³ even rising to levels of crimes against humanity and genocide such as in Myanmar.²⁴

Too easy of a conclusion

All these trends negatively affect the integrity of political communication. And they seem to have reached dramatic proportions and have grown into prominent public concerns at about the same time that the ailments and aberrations of political communication in the social media sphere have come into sharp relief. The following two conclusions have become quite compelling:

1. the negative side effects of social media are the main causes for many of these broader problems in political communication; and
2. as a consequence, the main site for fixing the issues and the main actors for doing so will have to be found in the world of social media.

Mounting evidence suggests that both of these conclusions, however, are incomplete at best and misleading at worst.

Degenerations in political communications are deeply intertwined with certain resonating dynamics in the digital environment. However, the causality runs both ways and broader economic, political, and social dynamics may shape the integrity and quality of political communication, as well as the interplay between “conventional” and online political communication in more significant ways than any inherent social media dynamics.

The erosion of trust in political institutions and the news media may have accelerated in the era of social media, but it predates the arrival of Facebook et al. This mistrust can be traced to the polarization of conventional media and political actors, which in turn is linked to forces of economic and social dislocation, rising inequality, and the ensuing opportunities to exploit these dynamics for political gain.²⁵

These tangled up dynamics are important to keep in mind and need to be examined in detail for each specific context when thinking about appropriate policy responses.

²¹ Dixit, P, & Mac, R. (2018, September 9). How WhatsApp destroyed a village. *BuzzFeedNews*.

²² Taub, A., & Fisher, M. (2018, April 21). Where countries are tinderboxes and Facebook is a match. *New York Times*.

²³ Müller, K., & Schwarz, C. (2018). Fanning the flames of hate: Social media and hate crime. *Journal of the European Economic Association*.

²⁴ Mozur, P. (2018, October 9). A genocide incited on Facebook, with posts from Myanmar’s military. *The New York Times*.

²⁵ See for example, Stewart, A. J., McCarty, N., & Bryson, J. J. (2020). Polarization under rising inequality and economic decline. *Science Advances*, 6(50); Benkler, Y., Faris, R., & Roberts, H. (2018). *Network propaganda: Manipulation, disinformation, and radicalization in American politics*. Oxford University Press; Margalit, Y. (2019). Economic insecurity and the causes of populism, reconsidered. *Journal of Economic Perspectives*, 33(4), 152-170.



A virus goes viral

COVID-19 has accelerated the rise of online political communication. Lockdowns for more than half of the world's populations and restrictions on travel and social gatherings in more than 150 countries as of December 2020²⁶ have pushed political campaigning and political communication further online. At least 101 countries and territories have held national or subnational elections in this period.²⁷ A growing resolve by platforms to crack down on COVID-related misinformation has led to the experimentation and deployment of mechanisms to curb the virality of this “infodemic” and direct users to verified information, practices that also gained more currency and traction with regard to election-related disinformation. At the same time, many countries have experienced a significant rise of public trust in governments and science, as well as a marked uptick in the consumption of conventional media sources during the early days of the pandemic.²⁸ It is not clear, however, how enduring these trends are as there are already indications that some of these dynamics are going into reverse.

A different type of digital divide: Reckless experiments and fact-checking poverty

“Fact-checking is too expensive for the average Brazilian” (L. Belli, Internet Governance Expert Brazil, 2018).²⁹

Countries in the Global South face a challenging situation when it comes to the integrity of political communication. A first intuition might be that lower access to advanced internet infrastructures and less money for political campaigning might provide protection against some of the most sophisticated information campaigns. Yet, the opposite seems to be the case. High penetration rates for social media and less regulatory oversight have combined to make Africa in particular a test bed for some of the most dubious strategies, such as psychological profiling and microtargeted campaigns or coordinated inauthentic campaigns (some even penetrated by northern governments that champion the fight against political misinformation).³⁰

Zero-rated mobile subscriptions from Latin America, Africa, and Southeast Asia allow low-income users to access some social media platforms for free, but not browse to other, expensive parts of the internet if they want to verify any dubious messages that they have received.³¹ This unaffordability of individual fact-checks in combination with patchy enforcement of political campaigning regulation, low trust in official information, low-state capacity and limited platform attention to curb hate speech and misinformation, and a backdrop in some places of volatile socioeconomic configurations set the stage for many instances of online political communication that is rife with misinformation, reckless online campaigning tactics, and often violent consequences.

²⁶ Lockdowns Compared: Tracking Governments' Coronavirus Responses, <https://ig.ft.com/coronavirus-lockdowns/>

²⁷ Global Overview of COVID-19: Impact on Elections, <https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections>

²⁸ Executive Summary and Key Findings of the 2020 Report, <https://www.digitalnewsreport.org/survey/2020/overview-key-findings-2020/>

²⁹ WhatsApp Skewed Brazilian Election, Proving Social Media's Danger to Democracy, <https://theconversation.com/whatsapp-skewed-brazilian-election-proving-social-medias-danger-to-democracy-106476>

³⁰ See for example, Removing Coordinated Inauthentic Behavior From France and Russia, <https://about.fb.com/news/2020/12/removing-coordinated-inauthentic-behavior-france-russia/>

³¹ Interview with media expert for Africa, Nov. 2020.



A horizontal and vertical division of labor on misinformation

Expert observers are tracing intertwined dynamics that drive the production and spread of disinformation. A horizontal “division of labor” or set of differentiated complementarities can be discerned at the platform level: Facebook is for conspiracy-curious older generations. Sometimes likened to a slightly tired bingo hall, it is a gathering place for baby boomers to swap recipes, gossip, and get introduced to some first strands of misinformation by friends and acquaintances. WhatsApp and other group messaging tools serve a similar purpose across generations, particularly where internet and data affordability are issues. YouTube is the hangout for the young to kill time, a private broadcast channel that serves up progressively more extreme political fare through its attention-maximizing engagement algorithms—the onramp to polarization and fundamentalist views. Twitter is where populist influencers seed and amplify misinformation, and the more private chats on WhatsApp and Telegram are meeting places for the converted and committed to organize, flesh out, and further boost the visibility of misinformation and inflammatory political narratives. Waiting in the wings and ready to take over are many lesser-known, smaller platforms and services that provide alternative outlets. A vertical division of labor describes the dynamic interplay between elites (politicians, influencers, partisan media, and government-sponsored outlets) and grass-roots users in seeding suspicion and false facts, jointly assembling them into larger narratives, mutually validating their legitimacy and eventually amplifying and further exacerbating them aided by the virality engines of the networks.

Peak dirt? The glass half-full reminder

Not all is going badly and getting worse in political communication. Sliding averages and egregious cases tend to drown out several more hopeful developments. Following a period of disenchantment, voter turnout is nearing record highs in several countries,³² party competition is growing in more than 20 parliamentary democracies,³³ and pro-democracy mass movements have ushered in substantial steps towards more democratization in 22 countries over the last decade.³⁴

By some measures, we might even be inching towards peak dirt—or at least have arrived at a temporary flattening of the infodemic curve in online political communication. Less junk news was found to be making the rounds on Twitter and Facebook in the US during the time of the State of the Union Address in 2018 as compared to the general elections two years earlier,³⁵ during the 2019 elections to the European Parliament as compared to national election campaigns in earlier years,³⁶ and during the 2019 UK general elections as compared to the UK elections two years earlier.³⁷ So not everything spirals downward, and it is important to not lose sight of the enormous upsides of social media in political communication. While urgent, concerted action is clearly necessary, a moral panic with the risk of overreaction and excessive censorship is not warranted.

³² Voter Turnout Trends Around the World, <https://www.idea.int/sites/default/files/publications/voter-turnout-trends-around-the-world.pdf>

³³ Katz, R. S. (2020). The model of party government. In Rohrschneider, R., & Thomassen, J. (Eds). *The Oxford Handbook of Political Representation in Liberal Democracies*.

³⁴ V-Dem. (2020). Autocratization Surges—Resistance Grows. Democracy Report 2020.

³⁵ Bradshaw, S., Howard, P. N., Kollanyi, B., & Neudert, L. M. (2020). Sourcing and automation of political news and information over social media in the United States, 2016-2018. *Political Communication*, 37(2), 173-193.

³⁶ N. Marchal, B. Kollanyi, P. N. Howard, and L.-M. Neudert, Junk News During the 2019 EU Parliamentary Elections: Lessons from a Seven Language Study of Twitter and Facebook, University of Oxford, Data Memo 2019.

³⁷ Marchal, N., Kollanyi, B., Neudert, L. M., Au, H., & Howard, P. N. (2020). Junk News & Information Sharing During the 2019 UK General Election. *arXiv preprint arXiv:2002.12069*.



Political misinformation: The call comes from inside the house

A popular, terrifying twist in the plot of horror movies is when it turns out that the threatening call by a mysterious attacker was in fact placed from inside the house. A similar situation has ensued with regard to political disinformation. Influenced by high-profile cases, the main threat potential was for quite some time associated with foreign interference and targeted foreign propaganda to cause confusion and mistrust in the democratic process. By 2019, it had become abundantly clear, however, that the major sources and amplifiers of online political misinformation were found to be domestic players. From around the globe (e.g., Kenya, Sweden,³⁸ Brazil, India, the US), highly connected partisan influencers, party-organized online volunteer networks, and populist heads of states with tens of millions of followers actively scouted for fringe rumors compatible with their political messaging. These groups relentlessly broadcast their messages in interviews and online postings until their virality ensured pickup and further propagation through mainstream media.

The difference between domestic and foreign misinformation matters greatly for policy remedies. While it turned out to be relatively easy to build political support and clear legislative or self-regulatory responses for protecting against foreign interference that usually does not enjoy freedom of speech privileges, the situation is much more complex and contested with regard to home-grown propaganda. Efforts to curb home-grown disinformation were up against strong free speech protections, the added public interest in an unvarnished view on the thinking of political candidates, and the vocal suspicion of biased censorship that censured political actors and their ardent supporters will instantly seek to impress upon the public.

Three shifting stories about misinformation

Early discussions about the governance of political online communication put a strong focus on three issues that might be less central to the future of online political integrity than initially thought.

- **Microtargeting—less evil, more solvable:**³⁹ The ability to target voters with unprecedented precision, opacity, and ubiquity through big data-driven advertising drives on social media has raised strong concerns about political manipulation. However, its negative impact might be smaller than often feared,⁴⁰ while the upside of offering affordable opportunities for lesser-known candidates to run competitive campaigns might be greater than anticipated. In the US, for example, online political advertising is found to be more ideological, but at the same time, it is also being used by a broader group of candidates and less negative in tone than conventional political advertising.⁴¹

³⁸ Fake News Takes Its Toll on Sweden's Elections, <https://www.bloomberg.com/opinion/articles/2018-11-15/>.

³⁹ The following section is also based on an interview with an academic expert on digital campaigning, Dec 2020.

⁴⁰ Microtargeted marketing is understood to be effective in contexts with low consumer awareness, low brand recognition, and repeat purchasing opportunities, none of which applies to citizen choices in elections [Karpf, D. (2019). On Digital Disinformation and Democratic Myths. *Social Science Research Council MediaWell*]. Similarly, bold claims about the power of data-driven political persuasion by the infamous microtargeting service provider Cambridge Analytica, turned out to be overblown marketing gimmicks rather than empirically verifiable, as egregiously unethical as these practices in themselves may have been. (https://ico.org.uk/media/action-weve-taken/2618383/20201002_ico-o-ed-l-rtl-0181-to-julian-knight-mp.pdf).

⁴¹ Fowler, E. F., Franz, M. M., Martin, G. J., Peskowitz, Z., & Ridout, T. N. (2020). [Political advertising online and offline](#). *American Political Science Review*, 1-20.



In addition, a set of rather clear remedies building on legal precedence and existing efforts are at hand to address the negative side effects. Transparent, fully searchable ad archives can help allay transparency and accountability concerns. The fine-tuning and application of privacy data protection rules can help outlaw targeting practices that are considered too manipulative. Additional measures to create a level playing field for online political advertising (e.g., through some access and pricing mandates) can further help to preserve the democracy-enhancing potential.

- **Online echo chambers—confirmation bias about confirmation bias:** Political polarization is a serious problem. Online echo chambers constructed by recommender systems that please our innate confirmation bias and serve up news and networks that align with our views have long been marked out as principal drivers. Yet segregation predates social media,⁴² and the empirical evidence for filter bubbles remains rather inconclusive. There are some indications that distributed discovery of news as afforded by social media is still enriching rather than narrowing down the media diets of the median voter, although not of the polarized fringe.⁴³ What's more, purported remedies such as a more communicative contact with people who think differently are found insufficient at best and counterproductive at worst.⁴⁴
- **Foreign misinformation—consensually ostracized, but there are bigger issues:** Few other issues in political integrity make for better headline news than the interference of foreign powers in national elections. Few are met with stronger condemnation across the political spectrum. Few are easier to legislate against without infringing upon constitutional rights of speech and campaigning. Yet, it is precisely these factors that have given this issue—as important as it is—a disproportionate amount of attention. Disinformation from the inside is a much bigger and more complex problem. High-profile action against foreign interference must not distract from this more urgent agenda.

⁴² Benkler, Y. (2019). Cautionary notes on disinformation and the origins of distrust. *MediaWell (Social Science Research Council)*.

⁴³ For empirical work that challenges the existence of consequential filter bubbles, see for example, Brenes Peralta, C., Wojcieszak, M., Lelkes, Y., & de Vreese, C. (2017). Selective exposure to balanced content and evidence type: The case of issue and non-issue publics about climate change and health care. *Journalism & Mass Communication Quarterly*, 94(3), 833-861; Nielsen, R. K., & Fletcher, R. (2020). Democratic creative destruction? The effect of a changing media landscape on democracy. *Social Media and Democracy: The State of the Field, Prospects for Reform*, 139.

⁴⁴ Busby, E. (2021). *Should You Stay Away from Strangers?: Experiments on the Political Consequences of Intergroup Contact*. Cambridge University Press.



III. Setting the scene part 2: The state of response

From a convergence on principles to a cornucopia of practical ideas

About a year ago, a scoping exercise on digital governance more broadly described that growing awareness of digital governance challenges had given rise to a large body of broadly convergent normative principles that would in a next step inform the development of practical, domain specific policy proposals. A year later, a huge number of think tanks, expert committees and commissions have produced hundreds of practical ideas on anything from redesigning micro-nudges for user engagement and online choice architectures to macro-level proposals for new regulatory authorities.

The task is now about identifying the most relevant and urgent ones and building the right coalitions across sectors and across countries to test, evaluate, and, if successful, roll out the most promising efforts on a broader scale.

No rocket science or new wheels required

Apart from a batch of novel strategies to redesign software architectures for more high-quality information diets, it is striking to see that most proposals under discussion build on a plethora of tried and tested norms, institutions, and practical approaches. These linkages are at times purely inspirational (e.g., treating social media profiles analogous to cultural artefacts and the duties of care and self-determination that arise from them). In other instances, suggestions are derived from established regulatory doctrines (e.g. fair access to campaigning time on TV), long-standing principles of conduct (e.g. codes for journalists, PR professionals, or parties prohibit disinformation), legal precedence (e.g. the banning of subliminal audiovisual advertising), or more directly extending existing rights and regulations to the online sphere (e.g. itemizing online campaign expenditures, applying data privacy standards to the handling of online campaign profiling). Some seek to emulate existing institutional designs that balance independence with accountability (e.g., regulated self-governance in the media sector), while others seek to directly expand the remit of existing institutions to take on some of these digital tasks. In short, despite the novelty of social media and runaway innovation in online political campaigning, there is no need to attempt the seemingly impossible and start from scratch. A creative harnessing of existing ideas, templates, and governance structures—that draws on all relevant sectors and policy domains rather than narrowly confined to the tech sector—goes a long way to advance the integrity of political communication.



It really, really depends

The conversation about what is appropriate platform governance is often bogged down by the same problem that has afflicted the conversation on media governance for decades. Ideas that look good in one context can look bad in another. Platform self-regulation might be preferable and offer better prospects for a healthy democratic discourse when governments are low capability, autocratic, or at the other end of the spectrum, hamstrung by very strict freedom of expression rights (e.g., US). A stronger role for public oversight might be preferable when governments are democratic, public media is reasonably independent, and the bigger risks to political communication do not come from state censorship but from viral online disinformation and hate speech. Without specifying the context, irreconcilable disagreement and a deadlocked discussion on remedies quickly ensue.

The way forward is not to default to an anything-goes status quo or insist on a maximalist position of either private or public dominance, but to outline general principles of conduct and remit that apply to both sides, assess the relative strength and weaknesses for a given context, and assign the right mix of responsibilities and complementary actions proportional to these relative strengths and realistic capabilities with a view to further improving this mix when capabilities and commitments evolve. “It depends” does not mean a normative relativism and divergence in fundamental values and principles across countries for integrity in political communication, but reflects a differentiation in the most promising paths on how to achieve these shared values.

For example, relying on Facebook for content moderation might be preferable in Vietnam, but once its government can credibly commit to a well-designed, transparent process for alerting a platform to hate speech based on human rights principles, this option might be preferable to full platform self-regulation.

Policy templates and declarative initiatives are available to bind both governments (the Manila principles⁴⁵) and platforms (the Santa Clara Principles⁴⁶) to proper standards of due process, transparency, and accountability for their interventions. Pushing both Manila and Santa Clara as reference points for public and private content governance can help unlock the debate at a high conceptual level and move towards locally appropriate policy agendas.

⁴⁵ Manila Principles on Intermediary Liability, <https://manilaprinciples.org/>

⁴⁶The Santa Clara Principles on Transparency and Accountability in Content Moderation, <https://santaclaraprinciples.org/>



Much more than takedowns and shutdowns

What aids this process of tailoring roles and responsibilities is that the toolbox available for countering political disinformation or hate speech has also expanded greatly beyond the schematic binaries of takedown or tolerate-all.

A vast array of measures is available to finely calibrate the response to problematic content, contextualizing such pieces with warning labels or referrals, responding with authoritative counter-information, adding limits on sharing, de-monetizing through withdrawal of ad placements, and suspending or even deleting accounts used by repeat offenders. This differentiated toolset also provides opportunities for governments to engage with tech platforms in a much more nuanced discussion on how to curb hate speech and misinformation. Such conversations have their own pitfalls and require ample transparency and a commitment to fundamental human rights principles on both sides. But where they do not happen yet, governments may feel that blanket internet shutdowns are their only option for curbing viral hate.

From big tech to fringe tech: Emergent full-stack content governance

Although the dominant social networks and big tech platforms are at the center of the discussion on content governance, there is a growing number of instances in which other essential service providers have begun to take action against hate speech and misinformation based on a violation of their terms of services.⁴⁷ This ranges from the dominant app stores for Apple and Android phones⁴⁸ all the way to major web hosting,⁴⁹ online security,⁵⁰ and payment service providers⁵¹ that have begun to drop fringe social media networks that fail to effectively police hate speech, including political hate speech. Such full-stack governance can help reach into the darker corners of the internet and cut off essential services for hands-off fringe sites that provide refuge for political hate speech and is being increasingly pushed out of mainstream networks.⁵² At the same time, it is important that these services exercise their gatekeeping function in line with the same principles and procedures for protecting freedom of expression that are being developed for the dominant networks.

⁴⁷ Gillespie, T., Aufderheide, P., et al. (2020). Expanding the debate about content moderation: Scholarly research agendas for the coming policy debates. *Internet Policy Review*, 9(4).

⁴⁸ Amazon, Apple and Google Cut Off Parler, and App That Drew Trump Supporters, <https://www.nytimes.com/2021/01/09/technology/apple-google-parler.html?referrer=masthead>

⁴⁹ Amazon Will Suspend Hosting For Pro-Trump Social network Parler, <https://www.buzzfeednews.com/article/johnpaczkowski/amazon-parler-aws>

⁵⁰ Why We Terminated Daily Stormer. <https://blog.cloudflare.com/why-we-terminated-daily-stormer/>

⁵¹ Tipalti on Twitter. <https://twitter.com/tipalti/status/1347671936265031686?s=21>

⁵² See the prominent case of Parler at Why Conservatives' Favorite Twitter Alternative Has Disappeared From the Internet, <https://www.vox.com/2021/1/10/22223250/parler-amazon-web-services-apple-google-play-ban>



From end-of-pipeline cleaning up of the bad to up-front boosting of the good

The bulk of the current efforts focus on negative protections, i.e., labelling, introducing friction for, or deleting harmful content. Relatively little attention, however, is being paid to the other side of the coin: how to boost the visibility and virality of high-quality information and news. The power of the recommender systems deployed by the platforms is enormous. Internal Facebook research estimated in 2018 that close to two-thirds of people joining extremist groups were introduced to those groups via the recommendation system.⁵³ YouTube, the most important online information source for younger cohorts, estimates that 70% of videos consumed are served up by its recommendation engine.⁵⁴

Somewhat outside the public limelight, platforms have experimented with tweaking their algorithms to give more visibility to high-quality news sources, but they are shying away from expanding such efforts and making them permanent, as they fear economic fallout via lower engagement metrics and a political backlash from the ones losing attention share.⁵⁵ This is unfortunate. The future of platforms might well be that they abandon the misguided stance of do-as-little-as-possible libertarianism that leads an engagement-maximizing algorithm to prioritize highly sensational clickbait. Instead, they will begin to compete at least partially on the quality of the news and information feeds that they are able to deliver. The “must-carry” rule requires cable broadcasters to carry local public interest stations. Analogous to this regulation is the idea to demand that platforms implement a “must-be-found” or “due prominence” principle for public interest journalism in their websites.⁵⁶

Going even further is a vision proposed by some influential observers⁵⁷ that is gradually working its way into policy proposals:⁵⁸ platforms should offer users explicit and transparent choices for different types of news feeds with information quality as one important variable to choose from.

⁵³ Facebook Executives Shut Down Efforts to Make the Site Less Divisive, <https://www.wsj.com/articles/facebook-knows-it-encourages-division-top-executives-nixed-solutions-11590507499>

⁵⁴ YouTube’s AI Is the Puppet Master Over Most of What You Watch, <https://www.cnet.com/news/youtube-ces-2018-neal-mohan/>

⁵⁵ Facebook Reverses Postelection Algorithm Changes That Boosted News From Authoritative Sources, <https://www.nytimes.com/2020/12/16/technology/facebook-reverses-postelection-algorithm-changes-that-boosted-news-from-authoritative-sources.html>; Facebook Struggles to Balance Civility and Growth, <https://www.nytimes.com/2020/11/24/technology/facebook-election-misinformation.html>

⁵⁶ Steenfadt, O., E. Mazzoli, & S. Luca. (2020). Ensuring The Visibility and Sustainability of Reliable, Accurate Information in the Online Sphere Through Voluntary Standards—A Co-Regulatory Approach (Accessed on 2 October 2020). It defines two main safeguards as formulated below.

⁵⁷ See for example, the section on feed transparency tools in Stigler Committee on Digital Platforms Final Report, <https://research.chicagobooth.edu/-/media/research/stigler/pdfs/digital-platforms---committee-report---stigler-center.pdf>

⁵⁸ The new draft EU Digital Services Act includes a provision on the transparency of and choices for recommender systems for large platforms.



Nutrition labels for a healthy information diet: Building a quality scoring system for online news

All efforts to boost high-quality news and online content rely on the availability of adequate scoring methodologies and their widespread integration into content-selection algorithms. Initiatives to put in place the pieces for such a system are well underway, both internal and external to the big platforms. The multi-stakeholder Journalism Trust Initiative, for example, has developed a standard and certification procedure for ethical, trustworthy journalism in Europe.⁵⁹ The similarly named Trust Project US has devised a set of nine trust indicators that are being considered by search providers to assess the quality of their search outputs.⁶⁰ News Guard's team of editors use these principles to classify thousands of news sources, and News Guard offers a tool that automatically displays these ratings alongside online search results.⁶¹ The Global Disinformation Index prepares detailed disinformation risk assessments for media outlets in different countries.⁶² Facebook devised an internal news ecosystem quality and trialed it into the context of the COVID pandemic and US elections.⁶³ A sprawling industry of fact-checking services that platforms rely on for some of their content moderation can also contribute to keep such classification systems up-to-date and also expand them into broader online reputation systems that build track records of social media influencers and other power posters and their proclivity of forwarding misinformation.

Once fully operational, such machine-readable quality classifications can not only help to surface high-quality news but also inform the eligibility for public support and help direct investments into quality news. Moreover, they can enable advertisers to ensure that their ads only run alongside high-quality content and thus help demonetize junk and fake news.

⁵⁹ Journalism Trust Initiative, <https://ftp.cencenelec.eu/EN/News/WS/2019/JTI/CWA17493.pdf>

⁶⁰ We Help Over Half a Billion People Easily Assess the Integrity of News Worldwide. And We're Growing Fast, <https://thetrustproject.org/>

⁶¹ We Help You Decide Which News Sources to Trust—With Ratings From Humans, Not Algorithms, <https://www.newsguardtech.com/how-it-works/>

⁶² Global Disinformation Index, <https://disinformationindex.org/research/>

⁶³ Facebook Reverses Postelection Algorithm Changes That Boosted News From Authoritative Sources, <https://www.nytimes.com/2020/12/16/technology/facebook-reverses-postelection-algorithm-changes-that-boosted-news-from-authoritative-sources.html>



Three very difficult routes to more accountability

Three conventional pathways to more accountability and integrity are difficult to travel on in the arena of online political communication. These routes apply to the governance of corporate actors, parties, and the media.

Pressure by institutional investors and independently minded boards is an increasingly popular route towards responsible corporate behavior. Yet, this strategy is not available in the platform world. Most emerging actors are privately owned by a small band of venture capital firms and many of the dominant publicly listed companies including Facebook and Google have dual-class share structures that keep these companies under tight control by their funders with no effective role for institutional investors to steer company strategy and responsibility.⁶⁴ On the one hand, this structure makes investor pressure an unlikely route towards responsible conduct; on the other hand, it offers (at least in theory) more discretion to this small band of platform founders to opt for responsible conduct, even if it may hurt the bottom line.

Not quite impossible, but very difficult to achieve, will be the required update of rules and regulations for online political campaigning. It is the very politicians and parties whose online actions need to be made more transparent and better guided by conduct standards that will have to design and vote in these required changes. Ample experience suggests that the appetite for this type of self-constraint is limited and requires considerable external pressure. And this is the case for the sizeable number of countries in which governments are reluctant to excessively regulate political parties because of their special status in democratic political systems as recognized by law or political norms.⁶⁵

A similar problem also affects the task of supporting the independence of the media, another of the important building blocks for the integrity in political communication. The temptation for governments and political actors to influence both public and private media for partisan ends is strong. Where this political instrumentalization has gained roots, the political will is limited to reform and voluntarily giving up political leverage available in many countries—for example via opaque funding or appointment mechanisms. Where the media is rather free, it can brush off legitimate concerns about its responsibility and conduct as an assault on its independence and by invoking the specter of capture.

None of these concerns suggest that change is not possible, but the existing interest and incentive structures that apply to big tech corporations, to political parties, and to the news media need to be kept in mind when thinking about how to work towards a healthy democratic discourse in the digital era.

⁶⁴ More Tech Companies Are Selling Stock That Keeps Their Founders in Power, <https://www.vox.com/2019/4/11/18302102/ipo-voting-multi-dual-stock-lyft-pinterest>

⁶⁵ See for example, Van Biezen, I. (2012). Constitutionalizing party democracy: The constitutive codification of political parties in post-war Europe. *British Journal of Political Science*, 187-212, and interview with representative from a European country government, Jan. 2021.



When the drugs do not work anymore—but are still important

Cutting down on misinformation, similar to curbing corruption, is not a one-off push but a continuous effort to stem the flow. Just as with corruption, misinformation tends to find ways to blunt or route around measures introduced to control it. Initiatives to label contested content fall short when readers get accustomed to or annoyed by them⁶⁶ or even when readers begin to wrongly assume that the absence of labels signifies the accuracy of content.⁶⁷ Sharing images or screenshots of messages, rather than text-based messages, has evolved into a widespread practice to evade content restrictions, for example in India.⁶⁸ Similarly, livestreaming disinformation is much harder to police than postings. In addition, robopets (autodialed text messages) with disinformation campaigns in minority languages have emerged as popular ways of spreading propaganda despite the scrutiny of automatic or manual content filtering efforts. And where evading regulations becomes too cumbersome, alternative networks and service providers are likely to offer refuge.

Although this arms race and whack-a-mole situation can plausibly be expected to continue, it is not without impact as it increases the friction for engagement and achieves a certain quarantining effect. It pushes more extreme elements and conversations out of the mainstream and thus reduces possible contagion, diffusion, and public validation effects that are important for further recruitments into and broader legitimacy of extreme positions or uncivil norms.

⁶⁶ Saltz, E., Leibowicz, C., & Wardle, C. (2020). Encounters with Visual Misinformation and Labels Across Platforms: An Interview and Diary Study to Inform Ecosystem Approaches to Misinformation Interventions. *arXiv preprint arXiv:2011.12758*.

⁶⁷ Pennycook, G., Bear, A., Collins, E. T., & Rand, D. G. (2020). The implied truth effect: Attaching warnings to a subset of fake news headlines increases perceived accuracy of headlines without warnings. *Management Science*, 66(11), 4944-4957.

⁶⁸ The Weaponization of Web Archives: Data Craft and COVID-19 Publics, <https://misinforeview.hks.harvard.edu/article/the-weaponization-of-web-archives-data-craft-and-covid-19-publics/>



The fallacy of symmetry and hands-off neutrality

There is a persistent idea that any kind of content-related rules—mandated or self-imposed—for any kind of gatekeepers in political communication, from conventional news media to social media platforms, should be neutral in the sense that they affect all viewpoints across the political spectrum equally. Yet, this is an increasingly untenable position. It confuses neutrality in treatment, the appropriate ambition with equality in outcomes. There is no evidence to suggest that hate speech, ideological extremism, highly inflammatory populist rhetoric, or a disregard for evidence and facts are in any real-world political community equally distributed across political ideologies and parties, across government and opposition actors, or across any other significant segmentation of a political landscape. In the US, for example, increasing ideological polarization characterizes political elites in both major parties, yet it is evaluated as much more extreme on one side.⁶⁹ Such a dynamic of asymmetric ideological polarization has also been observed for the US media system.⁷⁰ Similarly, the distribution of populist rhetoric is highly uneven across political parties and skews heavily towards one end of the social-values spectrum as a comparative country assessment shows.⁷¹ At constituency level, trust in science⁷² and mainstream media⁷³ is also much lower for people who support parties on one side of the ideological spectrum and who can thus plausibly be expected to favor and share more junk news items. And the readiness to embrace authoritarian values is similarly skewed.⁷⁴

Faced with such a distinctive concentration of political falsehoods and inflammatory commentary, optimizing for equal reach and visibility of political views is not an option for platform governance as it essentially rewards and elevates the uncivil.

Equally important is that taking a hands-off approach has the same pernicious effect. For social media, the main criterion for giving content visibility is its contribution to maximizing virality and user engagement (and therefore advertising income). Without any countervailing measures, these criteria have been found to be prone to manipulation through coordinated inauthentic behavior.

⁶⁹ Hacker, J., & Pierson, P. (2015). Confronting Asymmetric Polarization. In N. Persily (Ed.), *Solutions to Political Polarization in America* (pp. 59-70). Cambridge: Cambridge University Press; Lelkes, Y., & Sniderman, P. M. (2016). The ideological asymmetry of the American party system. *British Journal of Political Science*, 46(4), 825-844.

⁷⁰ Benkler, Y., Faris, R., & Roberts, H. (2018). *Network propaganda: Manipulation, disinformation, and radicalization in American politics*. Oxford University Press.

⁷¹ Norris, P. (2020). Measuring Populism Worldwide., Faculty Research working Paper, RWP20-002, HKS

⁷² Science and Scientists held in High Esteem across Global Publics, <https://www.pewresearch.org/science/2020/09/29/science-and-scientists-held-in-high-esteem-across-global-publics/>

⁷³ Schulze, H. (2020). Who uses right-wing alternative online media? An exploration of audience characteristics. *Politics and Governance*, 8(3), 6-18.

⁷⁴ Malka, A., Lelkes, Y., Bakker, B. N., & Spivack, E. (2020). Who Is Open to Authoritarian Governance Within Western Democracies? *Perspectives on Politics*, 1-20.



More importantly, the criteria intrinsically favor more inflammatory, ideological fare as such items elicit more engagement. The emerging pathway for sensible governance of political discourse online is therefore a clear, transparent commitment to values of democracy, news quality, and political civility. This commitment requires an active enforcement of these values in how content is prioritized and can be shared, not just warning labels on the most egregious pieces. Such a commitment to democratic values, quality of discourse, and the rejection of a false sense of neutrality may be a hard sell in a polarized political environment. Yet neither the debate nor its implications are new. A similar problem of avoiding a “false balance” between empirically sound vs. flimsy political statements has long been discussed in the realm of conventional media.⁷⁵ There is a rich fundament of professional values in science, the media, and even public relations to build on and help develop a principled stance. Freedom of speech does not imply freedom of reach, and it is the latter that the social media platforms shape and need to take responsibility for.

From special privileges to special responsibilities for public figures

Until recently, content policies of platforms tended to treat political leaders and high-level government officials more leniently as their statements and views were regarded as special public interest and thus worthwhile hosting, even if they at times clearly violated applicable terms of service.⁷⁶ The legal backdrop for such actions varies significantly across countries. In some countries, the laws accord a privileged position and thus advanced speech protection to political parties and politicians, while at the same time showing less tolerance for irresponsible speech by government officials as they are considered to have particular fiduciary duties vis-à-vis the public. Likewise, countries and their legal doctrines differ with regard to what extent they oblige private platforms to take action one way or the other or prevent them from doing so. Current practice, however, is far from settled anywhere and leaves much discretion to the platforms. And here in the platform world, the notion of special exemptions from strict rule enforcement for well-known political speakers appears to be gradually shifting. There is increasing public support for the opposite reasoning: that the very influence these people wield and the troubling potential they command to trigger harmful behavior with incisive speech should mean that they are held to higher, rather than lesser standards,⁷⁷ and presidents of the US and Brazil have already begun to feel the heat.⁷⁸

⁷⁵ Boykoff, M. T., & Boykoff, J. M. (2004). Balance as bias: Global warming and the US prestige press. *Global environmental change*, 14(2), 125-136.

⁷⁶ For India, see for example Facebook’s Hate Speech Rules Collide With Indian Politics, <https://www.wsj.com/articles/facebook-hate-speech-india-politics-muslim-hindu-modi-zuckerberg-11597423346>; for the US, see Why Facebook Can’t Fix Itself, <https://www.newyorker.com/magazine/2020/10/19/why-facebook-cant-fix-itself>; for platform policies, see Defining Public Interest on Twitter, https://blog.twitter.com/en_us/topics/company/2019/publicinterest.html and Facebook, Elections, and Political Speech, <https://about.fb.com/news/2019/09/elections-and-political-speech/>

⁷⁷ Trump Is Banned. Who Is Next? <https://www.theatlantic.com/ideas/archive/2021/01/trump-is-banned-who-is-next/617622/>

⁷⁸ Twitter Blocks Bolsonaro Posts as He Visits Market to Campaign Against Isolation, <https://www.smh.com.au/world/south-america/twitter-blocks-bolsonaro-posts-as-he-visits-market-to-campaign-against-isolation-20200330-p54f90.html>



It's the ecosystem

The search for good policy responses to improve political communication should start with scrapping a digital-first attitude and the artificial distinction between online and offline. More productive is an ecosystem approach that examines political communication at the intersection of politics, media, communication, and technology. This approach brings into focus a much broader set of problem dynamics, important stakeholders, and policy levers.

- **Politicians and political parties:** The conduct of political leaders, candidates, and parties is the main determinant of the integrity of political communication, both online and offline. An authoritative evidence review of the drivers of political trust discusses a wide range of contributing factors, including the rise of social media but eventually concludes that “the most promising explanation for change in trust is politics itself.”⁷⁹ People are found to become less divided when they observe politicians treating their opponents with respect,⁸⁰ using moderate rhetoric,⁸¹ and eschewing attack ads.⁸² In the US, polarization by political elites drives the partisan polarization of citizens, whose actual policy preferences remain astoundingly similar.⁸³ Political leaders role model and significantly influence public respect for opponents’ views; regard for democratic norms; trust in other institutions such as the media;⁸⁴ and, at its most fundamental, a commitment to facts, truthfulness, and non-violent political action.⁸⁵ Similarly, political parties and leaders are more often shaping the values of their supporters than being shaped by them.⁸⁶ And in historical perspective, it is political elites that are found to be principal drivers in the downfall of democracies.⁸⁷

⁷⁹ Citrin, J., & Stoker, L. (2018). Political trust in a cynical age. *Annual Review of Political Science*, 21, 49-70.

⁸⁰ Finkel, E. J., Bail, C. A., Cikara, M., Ditto, P. H., Iyengar, S., Klar, S., ... & Skitka, L. J. (2020). Political sectarianism in America. *Science*, 370(6516), 533-536.

⁸¹ Lelkes, Y. (2019). Policy over party: Comparing the effects of candidate ideology and party on affective polarization. *Political Science Research and Methods*, 1-8.

⁸² Iyengar, S., Sood, G., & Lelkes, Y. (2012). Affect, not ideology: A social identity perspective on polarization: Erratum. *Public Opinion Quarterly*, 76(4), 819.

⁸³ Finkel, E. J., Bail, C. A., Cikara, M., Ditto, P. H., Iyengar, S., Klar, S., ... & Skitka, L. J. (2020). Political sectarianism in America. *Science*, 370(6516), 533-536.

⁸⁴ What We Think We Know and What We Want to Know: Perspectives on Trust in News in a Changing World, <https://reutersinstitute.politics.ox.ac.uk/what-we-think-we-know-and-what-we-want-know-perspectives-trust-news-changing-world>

⁸⁵ Karpf, D. (2019). On Digital Disinformation and Democratic Myths. *Social Science Research Council MediaWell*.

⁸⁶ Achen, C. H., & Bartels, L. M. (2017). *Democracy for Realists: Why Elections Do Not Produce Responsive Government*. Oxfordshire: Princeton University Press.

⁸⁷ Bermeo, N. G. (2003). *Ordinary People in Extraordinary Times: The Citizenry and the Breakdown of Democracy*. Princeton University Press.



- **The established news media:** Despite shrinking resources and all eyes on big platforms and radical online media outlets, the conventional news media are found to play a persistent, crucial role in shaping the quality and integrity of political communication. Often called the fourth estate, conventional TV, radio, and print news media sources still provide the major fora for political candidates to present themselves and discuss their ideas with the broader public, ideally offering a plurality of perspective on issues of the day and acting as watchdog to help strengthen public accountability to governments and political representatives.⁸⁸ The conventional news media is by far the largest producer of news and investor in news production and continues to command the largest audience shares. Depending on the standards that conventional news media outlets apply, they are found to act as a major bulwark against or essential enablers of misinformation, populism, and polarization taking root in the public discourse.⁸⁹ The existence of high-quality, public media in some European countries is closely associated with higher levels of political knowledge and trust.⁹⁰ A widespread sense that the mainstream media is captured by political interests is found to drive the sharing of fake news across a number of African countries.⁹¹ In the US, the erosion of trust in institutions and the rise of polarized, partisan discourse are closely associated with the arrival of partisan cable news and talk radio and significantly predate the arrival of social media.
- **Social media platforms:** As the main focus of attention in the current policy debate on political communication, the role and responsibility of platforms has been well established and perhaps even assumed a somewhat outsized importance. As mentioned earlier, the evidence suggests that social media is not the main driver of the most positive and negative dynamics in relation to the integrity of political communication, yet it interacts with other parts of the ecosystem in consequential ways. Social media offers new logics of political engagement and news dissemination (e.g., algorithmically administered prospects for visibility and virality) and greatly expands the efficacy of existing ones (e.g., organizing, outreach, microtargeting). This digital communication world is not a neutral suite of tools, however. Big tech has the documented potential to restructure incentives in favor of more sensationalist, partisan, and inflammatory voices and framings or more sinister political persuasion techniques. The information feeds these outlets curate and the sharing mechanisms they offer can aid the segmentation or diversification of media diets. They have proven to afford the intensity, immediacy, and scale to deeply root and escalate hate speech to concerted violence or emotional reactions to crisis events into impactful solidaristic responses. Some of the current architectural configurations and business models for these platforms appear to skew towards negative outcomes at the moment, but there is nothing inevitable about that.

⁸⁸ Iyengar, Shanto. 2016. *Media Politics: A Citizen's Guide*. 3rd edition. New York: W. W. Norton & Company.

⁸⁹ See for example, Lelkes, Y. (2020). National and cross-national perspectives on political media bias. In Suhay, E., Grofman, B., & Trechsel, A. H. (Eds.). (2020). *The Oxford Handbook of Electoral Persuasion*. Oxford University Press; Lelkes, Y. (2016). Winners, losers, and the press: The relationship between political parallelism and the legitimacy gap. *Political Communication*, 33(4), 523-543; Levendusky, M. S. (2013). Why do partisan media polarize viewers? *American Journal of Political Science*, 57(3), 611-623.

⁹⁰ Fraile, M., & Iyengar, S. (2014). Not all news sources are equally informative: A cross-national analysis of political knowledge in Europe. *The International Journal of Press/Politics*, 19(3), 275-294.

⁹¹ Mare, A., Mabweazara, H. M., & Moyo, D. (2019). "Fake news" and cyber-propaganda in sub-Saharan Africa: Recentering the research agenda. *African Journalism Studies*, 40; Wasserman, H., Madrid-Morales, D., Ndlovu, K., Tully, M., Umejei, E., & Uzeugbunam, C. E. (2019). Audience motivations for sharing dis- and misinformation: A comparative study in five sub-saharan African countries.

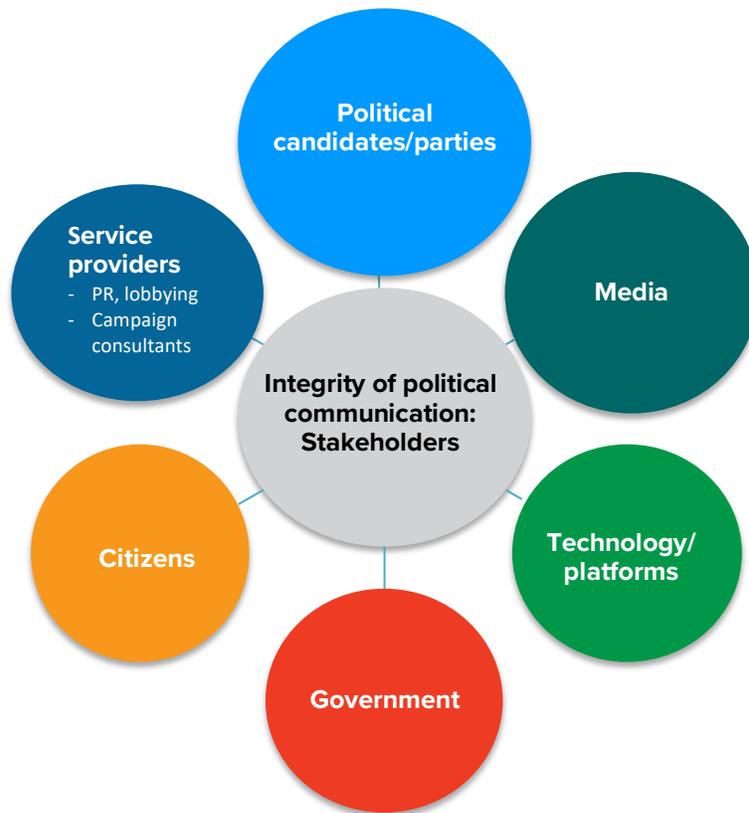


- **Governments:** Governments have the primary responsibility to provide policies and a regulatory framework for social media and tech platforms. The hybrid, multipurpose character of social media platforms means that they can draw on and need to ensure compatibility with a considerable number of existing sectoral policies from consumer protection and competition to media and infrastructure policies. With regard to political speech, governments are meant to be the main guarantors of electoral integrity—free and fair elections, as well as a clear separation between governmental resources and action from campaigning activities. They also exercise, at a minimum, indirect oversight over public media, and they can organize their decision-making processes in ways that give citizens more or less trust and voice in the political process.
- **Citizens:** Although enabling citizens to freely, competently form and express their opinions and political choices is a central objective and benchmark for good political communication, citizens are often treated as rather passive consumers of news or unwitting targets of influencing strategies. Yet, there is no automatic transmission mechanism from fake news to false beliefs, from inflammatory rhetoric to sectarian identities and actions. Restoring the essential public trust in institutions and facts will require not only improving the conduct of political elites and media systems, but also actively providing media literacy, meaningful political engagement opportunities, and a sense of political efficacy among the citizenry—the absence of which provides fertile ground for many of the pathologies in political communication as currently experienced.
- **Political service providers:** Political consultants, lobbyists, campaign advisors, public relations professionals, and technology practitioners form the professional service architecture that makes political communication happen. These professionals are not simply implementing fully formed political communication strategies. They actively shape these strategies by innovating and experimenting in methods, crafting the messages, and designing the most efficacious tactics, connecting campaigners with the most cutting-edge technology tools and big data applications—and all along exercising, conveying, and exemplifying in their own conduct their professional judgement of what is effective, acceptable, and advisable. As such, these service professionals can make significant contributions to setting the standards for dealing with misinformation and practicing responsible microtargeting, as well as to cutting down on incivility, misrepresentation, and inflammatory rhetoric in political speech.



The evidence base clearly demonstrates the significance of all these stakeholders, summarized below, for the integrity of political communication.

Figure 1: Main stakeholders: Integrity of online political communication



A simple hierarchy of sorts

As this short overview has illustrated, there are many more actors beyond the platforms and their regulators that directly impact the integrity of political communication. These elements are interlinked in multiple ways and reinforce or provide checks on each other. Yet a rough hierarchy can also be discerned.

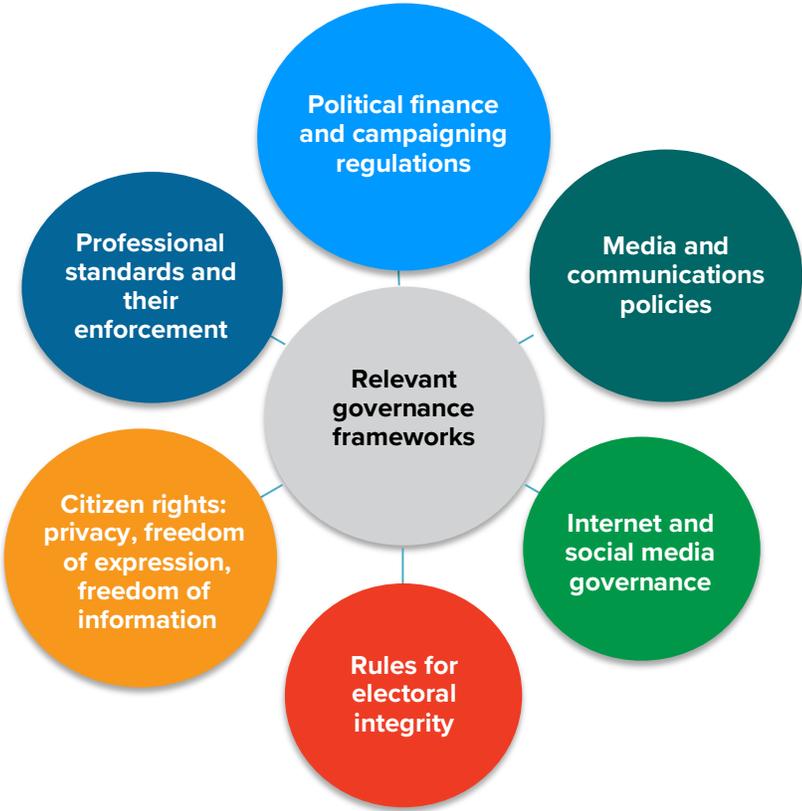
Most central are politicians and parties that are instrumental in shaping the norms and standards of the discourse, drive polarization, seed populism, and spread disinformation. The trust in government and democracy they manage to instill or squander ripples out into (mis)trust for the media,⁹² science, and other institutions, which in turn interacts with the readiness of people to embrace fake news and polarized political identities. Next, the news media can boost or tamper these impulses and incentives, give credit, and put into mass circulation, or the media can help dismiss and contextualize misinformation. Social media puts the entire system on steroids. Its business model to maximize engagement skews towards the inflammatory and extreme and thus often amplifies negative impulses and consequences. It cuts out editorial gatekeeping and supplies tools to make persuasion, mobilization, and propaganda much more effective and accessible. It turns salience into virality and can diversify or segment news diets. Professional service providers put everything to work. They craft the messages, connecting campaigns to technologies, big data, and psychological insights. And they offer political actors the arm's length outsourcing of dubious and aggressive tactics and thus a comforting level of plausible deniability and reputation control if a backlash sets in. These service providers can influence all parts of the political integrity systems through their professional values, sense of responsibility, and norms encoded in daily practice.

And this diversity of stakeholders brings with it a number of already existing governance and policy frameworks that can potentially be mobilized for the health and integrity of political communication in the digital era (see Figure 2).

⁹² Hanitzsch, T., Van Dalen, A., & Steindl, N. (2018). Caught in the nexus: A comparative and longitudinal analysis of public trust in the press. *The International Journal of Press/Politics*, 23(1), 3-23.



Figure 2: Central policy levers



IV. An open government boost for the pieces of the puzzle

The following sections provide more specific context for each element of this ecosystem and present central recommendations and inspiration on how an open government approach can help these parts function better in the service of the integrity of political communication.

A. Politicians and parties: Setting the standards for integrity

“Politicians may not be the largest sharers of disinformation, but they might be some of the most influential.”⁹³

“The most promising explanation for change in trust is politics itself.”⁹⁴

Evidence suggests that many politicians across the world not only fail to live up to their paramount role in safeguarding the integrity of political communication but play an increasingly pernicious role in dismantling it instead. Politicians and parties in 61 countries were found to have used borderline methods of computational propaganda in their campaigns—from paying online influencers for personal endorsements to commanding volunteer cyber troops to spread misinformation about opponents.⁹⁵ In recent public opinion surveys across 40 countries, “domestic politicians” was the most frequently named source of misinformation. In France, the UK, and the US, for example, roughly 40% of respondents perceived their own government, politicians, and parties to be the main source of misinformation, far ahead of other sources.⁹⁶ Experts concur that political parties and candidates in countries as different as Austria, Italia, Slovenia, Indonesia, Kenya, and Thailand use social media to spread misleading viewpoints and disinformation “about half of the time” and “often” in countries such as Brazil, Colombia, Ethiopia, Egypt, and the Philippines, while this practice is tracked to be on the rise in many other countries, both in the Global North and South.⁹⁷ The latter also resonates with evidence from expert interviews that suggest that politicians today make more misleading claims than in the recent past.⁹⁸ An analysis of political ads placed by the contending parties during the 2019 UK elections found a significant number of them contained misleading information.⁹⁹

⁹³ Mele, N., Lazer, D., Baum, M., Grinberg, N., Friedland, L., Joseph, K., ... & Mattsson, C. (2017). Combating fake news: An agenda for research and action. *Retrieved on October, 17, 2018.*

⁹⁴ Citrin, J., & Stoker, L. (2018). Political trust in a cynical age. *Annual Review of Political Science, 21*, 49-70

⁹⁵ Industrialized Disinformation: 2020 Global Inventory of Organized Social Media Manipulation, <https://comprop.oii.ox.ac.uk/wp-content/uploads/sites/127/2021/01/CyberTroop-Report-2020-v.2.pdf>

⁹⁶ Reuters Institute Digital News Report 2020.

⁹⁷ Author calculations, based on Mechkova, Valeriya, Daniel Pemstein, Brigitte Seim, Steven Wilson. 2020. *Digital Society Project Dataset v2.*

⁹⁸ Skjeseth, H. T. (2017). "All the president's lies: Media coverage of lies in the US and France." Reuters Institute for the Study of Journalism, University of Oxford.

⁹⁹ Thousands of Misleading Conservative Ads Side-Step Scrutiny Thanks to Facebook Policy, <https://firstdraftnews.org/latest/thousands-of-misleading-conservative-ads-side-step-scrutiny-thanks-to-facebook-policy/>



Political misinformation typically does not go viral through distributed social sharing. It requires a group of political influencers with large followings to give it the essential boost in popularity to trigger the algorithmic promotion and mass media coverage that helps to fully establish its salience.¹⁰⁰ A meticulous analysis of the genesis and spread of one of the most prominent false narratives about mail-in ballot fraud during the US 2020 presidential election shows how this was a concerted campaign orchestrated both online and offline by the incumbent president with a combined social media following of more than 100 million users alone, key allies in his party, and a number of affiliated partisan media.¹⁰¹

Once a critical mass of misinformation circulates in the political realm, and lying politicians are not held to account and ostracized by their peers, systemic contagion is likely. At an individual psychological level, repeat misinformation sticks, even when considered fake.¹⁰² Cumulative and complementary fake postings thicken into evidence collages that firmly establish compelling, manipulated narratives,¹⁰³ create permission structures for partisan followers to increase the level of inflammatory, unsubstantiated remarks. When political actors realize that they can lie with impunity, they can start building alternative truth regimes in highly polarized settings¹⁰⁴ and blatantly invoke alternative facts as an “ontological counter-measure to accountability.”¹⁰⁵ If such behavior reaches critical mass, the “load-bearing norms” for civil political behavior are being eviscerated.¹⁰⁶ Political lies then drive a fundamental epistemic fragmentation that fractures the fundamentals of all collective social action, the consensus that facts matter and can be established and tested through agreed-upon methods.

¹⁰⁰ Tucker, J. A., Guess, A., Barbera, P., Vaccari, C., Siegel, A., Sanovich, S., Stukal, D., & Nyhan, B. (2018, March 19). Social media, political polarization, and political disinformation: A review of the scientific literature. SSRN. <https://ssrn.com/abstract=3144139>

¹⁰¹ Mail-In Voter Fraud: Anatomy of a Disinformation Campaign, <https://cyber.harvard.edu/publication/2020/Mail-in-Voter-Fraud-Disinformation-2020> and The Long Fuse: Misinformation and the 2020 Election, <https://stacks.stanford.edu/file/druid:tr171zs0069/EIP-Final-Report.pdf>

¹⁰² The phenomenon was identified by a team of psychologists led by Lynn Hasher in 1977; see Whitney Phillips, *The toxins we carry*, *Columbia Journalism Review*, Fall 2019.

¹⁰³ Krafft, P. M., & Donovan, J. (2020). Disinformation by design: The use of evidence collages and platform filtering in a media manipulation campaign. *Political Communication*, 37(2), 194-214

¹⁰⁴ McVittie, C., & McKinlay, A. (2019). ‘Alternative facts are not facts’: Gaffe-announcements, the Trump administration and the media. *Discourse & Society*, 30, 172–187; Karpf, D. (2019). On Digital Disinformation and Democratic Myths. Social Science Research Council MediaWell.

¹⁰⁵ Lewandowsky. (2020). Wilful construction of ignorance: A tale of two ontologies. In R. Hertwig and C. Engel, editors, *Deliberate Ignorance: Choosing Not to Know*, pages 101–117, MIT Press.

¹⁰⁶ Karpf, D. (2020). How digital disinformation turned dangerous. In Bennett, W. L., & Livingston, S. (Eds.). (2020). *The Disinformation Age: Politics, Technology, and Disruptive Communication in the United States*. Cambridge University Press.



An open government response: Open campaigns and a pact for integrity

An open government approach offers many promising pathways to help political parties and candidates play a more active role in raising the integrity of political communication in the digital era. These efforts might take the form of mandatory legal provisions or self-regulations depending on the legal standing of parties in each country-context.

Outside regulation of political candidates and parties has limited reach when constitutional provisions prioritize self-regulation, and political communication could easily migrate into hard-to-police private chat spaces. This places great importance on the individual and collective responsibility of political actors and on self-regulatory efforts, complemented where possible by related legal provisions. No one needs to start from scratch or take a plunge into the unknown. The main issues are well understood, and a plethora of tools and templates are readily available to aid anyone ready to take action.

1. Open digital campaigning

Online political campaigning is growing rapidly across the world, eyed by the public with suspicion, yet remains largely a black box.¹⁰⁷ Existing rules for transparency in political funding and campaigning fail to adequately cover online activities. Two-thirds of countries in Europe do not require candidates and parties to report their spending on online platforms at a meaningful level of granularity. In 28 countries, parties are not forthcoming with sufficient information on their social media campaigning activities, prompting an EU media watchdog to classify this as one of the most problematic issues in campaigning governance.¹⁰⁸ The situation is similar in New Zealand,¹⁰⁹ and in the US the mandatory disclosure of electioneering information does not fully cover online communications.¹¹⁰

Parties and political candidates that want to help open this black box as a first step towards more public trust in the integrity of political campaigning online can take steps that include:

- granular reporting on expenditures for digital campaigns¹¹¹
- a detailed disclosure of citizen data handling and privacy protection practices¹¹²
- a repository of all campaign ads across all media with descriptions of targeting practices
- a description of digital campaign efforts (e.g., promotional work with influencers, coordinated social media campaigns)¹¹³

¹⁰⁷ This section has greatly benefitted from interviews with two experts on social media use of parties, Dec 2020.

¹⁰⁸ Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola de Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute.

¹⁰⁹ Online Political Campaigning in New Zealand, <https://www.transparency.org.nz/wp-content/uploads/2020/10/Online-Political-Advertising-TINZ-publication.pdf>

¹¹⁰ Stigler Committee on Digital Platforms Final Report, <https://research.chicagobooth.edu/-/media/research/stigler/pdfs/digital-platforms---committee-report---stigler-center.pdf>

¹¹¹ See for example, Report: Digital Campaigning—Increasing Transparency for Voters, <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/changing-electoral-law/transparent-digital-campaigning/report-digital-campaigning-increasing-transparency-voters>

¹¹² See detailed recommendations at Privacy International (2020): Challenging Data Exploitation in Political Campaigning.

¹¹³ See for example, recommendations at Stigler Committee on Digital Platforms Final Report, <https://research.chicagobooth.edu/-/media/research/stigler/pdfs/digital-platforms---committee-report---stigler-center.pdf>



Some of these steps can be achieved by updating, expanding, and properly enforcing existing rules on campaign disclosure or privacy protection. Yet, given the related slowness of rulemaking in a runaway digital world, the likely persistence of loopholes and the fragmented, impact-diluting nature of many filing practices, there is an even greater potential for political parties and candidates to take action individually or collectively. A party or candidate that wants to credibly commit to openness and integrity could easily provide full transparency on its digital campaigning footprint in a consolidated report. Many businesses do publish good sustainability approaches that deliver a full account of the social and environmental footprint and approach that the enterprise practices. Parties and candidates could take inspiration and publish democratic sustainability or political integrity reports, thereby sending a credible signal about their commitment to integrity to voters, inspiring peers to follow suit, and in the longer-term raising the overall transparency standard of online political communications.

Example: Online marketing transparency

During the 2017 national election campaign in Germany, the Green Party offered on its website a picture gallery of the paid online ads it had placed. Although detailed information on targeting criteria etc. was missing, this was a first for Germany.¹¹⁴

2. Towards a common integrity pact for online campaigning

The toolbox for online political disinformation strategies is expanding and diversifying rapidly. It ranges from spreading unverified claims and deep-fakes (manipulated images and video) to weaponizing hacked data and coordinated inauthentic behavior (the use of automated accounts or many volunteers to push messaging). This growing range of dubious options calls for clear guardrails on what counts as good and bad behavior in digital campaigns, and there is growing momentum to update the norms and expectations for conduct in this area. A civil society coalition in Ireland, for example, successfully prodded political parties to sign the Fair Play Pledge for open, honest online campaigning.¹¹⁵ The main candidates for the mayoral election in São Paulo committed to campaign without resorting to misinformation,¹¹⁶ and in the US, some candidates for political office offered strong commitments for digital political integrity (see example below).

¹¹⁴ Online-Marketing Transparent, <https://web.archive.org/web/20170714151654/https://www.gruene.de/ueber-uns/2017/online-marketing-transparent.html>

¹¹⁵ Interview with NGO representative, Ireland.

¹¹⁶ Interview, political integrity expert, Brazil.



These efforts are so far piecemeal, however. They lack the strong backing of an ethical infrastructure to monitor and sanction egregious violations. And they do not yet command the critical mass to raise overall standards. Again, this does not require starting from scratch. Efforts in this area can build on existing initiatives. Extant codes of conducts for parties, for example, enshrine principles of truthful (e.g., Tunisia) and civil (e.g., Ghana) campaigning.¹¹⁷ Electoral commissions in New Zealand, Bhutan, and India have issued guidelines for social media use in campaigns.¹¹⁸ A concerted push for clear guardrails and codes of conduct for integrity in online political campaigning is not only required to update existing standards of behavior. It is also essential to protect against the erosion of existing norms through the impact of some egregious and influential violators, the cavalier complicity of their supporters, and the reluctant embrace of similar tactics by their political opponents in order to not fall behind.

Example: Online campaigning integrity pledge¹¹⁹

During the 2020 US presidential election primaries, Elizabeth Warren, one of the contenders, issued the following pledge to online integrity:

My promise to fight disinformation as a candidate

To truly stem the spread of damaging false information, tech companies and the federal government need to take a more serious, comprehensive approach. But I'm committed to doing everything I can do to combat disinformation, and that means tackling it on the campaign trail.

It's not enough to make vague statements condemning fraudulent attacks on opponents or efforts to suppress the vote—while also reaping the benefits of those attacks on democracy. Campaigns need to make clear that disinformation has no place in our campaigns, and that we will disavow supporters who embrace it and act quickly to stop its spread.

That's why I'm pledging to fight disinformation aimed at my campaign, my opponents, and voters:

- My campaign will not knowingly use or spread false or manipulated information, including false or manipulated news reports or doctored images, audio, and videos on social media.
- My campaign will not knowingly promote content from fraudulent online accounts.
- My campaign will not knowingly allow campaign staff or surrogates to spread false or manipulated information on social media.

I'm sending a clear message to anyone associated with the Warren campaign: I will not tolerate the use of false information or false accounts to attack my opponents, promote my campaign, or undermine our elections. And I urge my fellow candidates to do the same.

¹¹⁷ Dialogues on Voluntary Codes of Conduct for Political Parties in Elections, <https://www.idea.int/sites/default/files/publications/dialogues-on-voluntary-codes-of-conduct-for-political-parties-in-elections.pdf>

¹¹⁸ Guidelines for the Development of a Social Media Code of Conduct for Elections, <https://www.idea.int/publications/catalogue/guidelines-development-social-media-code-conduct-elections>

¹¹⁹ Fighting Digital Disinformation, <https://elizabethwarren.com/plans/fighting-digital-disinformation>



B. News media and journalism: Editing and framing the conversation in a trusted, transparent manner

“We told [the news media] that [no] government agency was monitoring the web to identify and debunk political manipulation around the election. It was up to them. They were our best defenses” (Swedish government official, 2020).¹²⁰

Despite its persistent paramount relevance for political integrity, the news media faces a number of unprecedented challenges in the digital era.

- **The advertising-based business model is all but collapsing—opening the door to new dependencies:** The virtual environment has brought many more news providers into direct competition with each other and with reams of other online content, while the bulk of advertising revenues are bagged by the new digital information intermediaries that provide much more granular, expansive, and traceable ad placement options. Revenues for European newspapers have declined by an astounding €2.5m on average every day between 2015 and 2019,¹²¹ and newsrooms in the US have shed almost half their staff between 2008 and 2017,¹²² leaving behind local news deserts, entire regions that have not trusted, independent local news outlets.¹²³ Financial distress (re)opens the door to more political instrumentalization. Some news outlets are snapped up by ideologically motivated owners,¹²⁴ and networks are systematically reconfigured as marketing channels for particular political viewpoints.¹²⁵
- **New and old autocrats seek to (re)capture the media:** (Re)asserting control of the media is a centerpiece of autocratic playbooks unfolding in a significant number of countries. The strategy is typically three-pronged and relies on taking direct political control of the management of public media, facilitates the transfer of high-profile private media outlets to cronies in the business sector, and puts the remaining independent media outlets on a tight leash through repressive measures and curtailed media freedoms.

¹²⁰ Innovations for Successful Societies(2020).Sweden Defends Its Elections Against Disinformation, 2016–2018, https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/GL_Swedena_Election_FINAL12_23_20_V1_0.pdf

¹²¹ What Can Be Done? Digital media Policy Options for Europe (and Beyond), <https://reutersinstitute.politics.ox.ac.uk/what-can-be-done-digital-media-policy-options-europe-and-beyond#intro>

¹²² Grieco, E. (2020). U.S. newspapers have shed half of their newsroom employees since 2008. Pew Research Center. <https://www.pewresearch.org/fact-tank/2018/07/30/newsroom-employment-dropped-nearly-a-quarter-in-less-than-10-years-with-greatest-decline-at-newspapers/>

¹²³ Stigler Committee on Digital Platforms Final Report, <https://research.chicagobooth.edu/-/media/research/stigler/pdfs/digital-platforms---committee-report---stigler-center.pdf>

¹²⁴ How the Las Vegas Review Journal Unmasked Its Owners, <https://www.newyorker.com/business/currency/how-the-las-vegas-review-journal-unmasked-its-owners>

¹²⁵ Bengani, P. (2020). As election looms, a network of mysterious ‘pink slime’ local news outlets nearly triples in size. *Columbia Journalism Review*; As Local News Dies, a Pay-for-Play Network Rises in Its Place, <https://www.nytimes.com/2020/10/18/technology/timpone-local-news-metric-media.html>



- **The misperception of a battle lost to all things digital hampers policy attention and action for the legacy media:** Two frequently misinterpreted statistics fuel a misleading notion that the conventional news media is being eviscerated by new digital competition and thus on a natural, inevitable path of decline that makes any effort to support it through policy action and investments a waste of time and money.
 - Rapidly growing shares of citizens get their news through social media. Yet these platforms are not themselves news producers but simply link through to other news content with conventional news outlets in many countries pulling in the biggest audience share.¹²⁶
 - News items by alternative, often highly partisan fringe news outlets, consistently top rankings of news items by how often they are shared and commented on. These engagement numbers, however, are typically driven by a segment of highly active power users and, except for some highly viral stories, pale in comparison to the numbers of conventional news consumers that do not comment on or share individual stories.
 - The conventional news media is by far the biggest producer of and investor in news and investigative reporting. In the UK, for example, for-profit media companies—primarily newspapers—account for almost 80% of investment in news production. In the US, arguably the most developed digital news marketplace, online media, and information services still only account for a meagre 10% of employed reporters.¹²⁷ Even in a more dynamic and differentiated news landscape, the legacy media is the elephant in the room when it comes to media influence on the integrity of political communication.

In sum, dynamics related to creeping autocratization and rapid digitalization combine to pose considerable challenges to the news media and journalism at the very time when independent, high-quality journalism and news outlets are arguably more important than ever.

¹²⁶ Nielsen, R. K., & Fletcher, R. (2020). Democratic creative destruction? The effect of a changing media landscape on democracy. *Social Media and Democracy: The State of the Field, Prospects for Reform*, 139.

¹²⁷ Nielsen, R. K., & Fletcher, R. (2020). Democratic creative destruction? The effect of a changing media landscape on democracy. *Social Media and Democracy: The State of the Field, Prospects for Reform*, 139.



An open government response: Open ownership, independence by design

Depending on country context and configuration of the news media landscape, many open government strategies can be envisioned to help the news media live up to its pivotal role in the integrity system for political communication.

1. Open ownership and open funding—shoring up trust in and integrity of private media

Knowing who owns and funds a specific media outlet is not sufficient to guard against interference by special interests but is an essential data input for media watchdogs and regulators when assessing the adequacy of governance structures, identifying potential conflicts of interests or influencing risks, monitoring potential biases in news coverage, and tracking the plurality/concentration of the overall media market that is so important for a pluralistic sphere of political communication. Despite some highly visible media barons in the public limelight, ownership and funding relations remain woefully opaque, at times deliberately obscured through the types of complex, nested ownership arrangements known from the world of money laundering.

For the 13 OGP membership countries for which the NGO Reporters Without Borders (RSF) assessed the risks of concentration, opacity, and political control in the media sector, the group found high-to-medium risks or could not get public access to relevant data.¹²⁸ An analysis of 30 European countries rated only four countries as good performers with regard to the transparency of media ownership and placed three European OGP member countries in the lowest category.¹²⁹ This is particularly troubling considering the same analysis found that editors and journalists in 24 out of these 30 countries are insufficiently protected from interference by owners and political actors.¹³⁰ The emergence of new native online media outlets and cross-country ownership structures add further complexity and urgency to strengthening transparency in this area.

¹²⁸ Author cross-check. The related OGP member countries are Albania, Argentina, Brazil, Colombia, Ghana, Mexico, Mongolia, Morocco, Peru, Philippines, Serbia, Sri Lanka, Ukraine.

¹²⁹ Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola de Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: Application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute. The three OGP countries in the lowest category are Latvia, Czech Republic, and Slovakia.

¹³⁰ Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola de Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute. The three OGP countries in the lowest category are Latvia, Czech Republic, and Slovakia.



Opening media ownership: Promising examples¹³¹

In Germany, political parties are required to disclose their involvement in media outlets, commercial broadcasters must report their owners and any changes to shareholder structures as part of their licensing arrangements, and online media must disclose this information in its imprint.

In France, media companies are required to publicly disclose their three largest owners, and they must alert the authorities when individual ownership or control passes a 10% threshold.

This example suggests that open media ownership could be a particularly strategic sectoral focus for the growing open ownership movement. Such a focus would also offer the opportunity to link the open ownership, anti-money laundering expertise in the OGP network more closely to ongoing and expanding efforts by media advocates to improve the ownership transparency situation in the sector.¹³² What's more, open ownership initiatives can be expanded to cover important transparency dimensions of news production, which is associated with higher public trust in and engagement with news media (e.g. reference to authors' biographies, disclosure of managers and senior editorial staff, links to referenced documents, and tracking of story corrections).¹³³

¹³¹ Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola de Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute.

¹³² This includes RSF's Media Ownership Monitor (https://rsf.org/en/rsf_search?key=media%20ownership%20monitor) and the commitments to step up ownership analysis in the context of the EU's new Democracy Action Plan in which this activity area emerged as a strong focus in the related public consultation (see https://ec.europa.eu/info/sites/info/files/edap_communication.pdf).

¹³³ Curry, A. L., & Stroud, N. J. (2019). The effects of journalistic transparency on credibility assessments and engagement intentions. *Journalism*. <https://doi.org/10.1177/1464884919850387>



2. Generating public value with public media—independence and accountability

High-quality, independent public media can be an extremely powerful antidote to the many ailments that affect the health of political communication.¹³⁴ Yet, getting the governance for public media right to avert political capture and to finely balance independence, with high-quality, high principles and broader public accountability is a formidable task. There is ample and urgent room for improvement in most countries, and for even the best performers, it presents continuous work in progress given the rapidly evolving digital media landscape. On the upside, a few countries have put in place some interesting governance arrangements for their public media that are built around elements of regulated self-regulation and a strong role for multi-stakeholder organs. These arrangements appear well-adaptable to new challenges and dovetail nicely with open government principles and innovations. And they can serve as templates and inspiration for platform governance. An action agenda for strengthening public media for political integrity will vary significantly from country to country, but open government-inspired actions include the following:

- Establishing a clear remit and role for public media to be an active player online. In Germany, for example, the public media was until recently not allowed to establish a substantive online presence that would compete with private outlets, a concern that seems to be not supported by the evidence.¹³⁵ As a group of industry observers put it: “*The absence of the effective digital provision of public-service news is an existential threat to the ability of public-service media to deliver on their mission and to the legitimacy of the enterprise as a whole.*”¹³⁶
- Making appointment and promotion systems for public media organizations and media regulators transparent and removing them from direct political control. More than half of all European countries, for example, are regarded as having insufficient safeguards in place in this area, making these shortcomings the main entry point for undue political influence.¹³⁷
- Strengthening and expanding the multi-stakeholder elements in the governance of public sector media. Involving a diversity of societal interests and perspectives in effective oversight and decision-making committees for public sector media is one ingredient to achieving a plurality of perspectives in programming and lowers the risk of undue partisan influence. In Germany, for example, the share of party-appointed representatives in the public media oversight board is limited to one-third.¹³⁸
- Implementing tailored tweaks to public media governance. Even where public media is well established, important improvements are possible and ongoing reforms by some countries can provide inspiration for others. The UK, for example, plans to introduce a public register of outside corporate work for senior BBC journalists in 2021. Germany has begun to livestream key meetings of its public media oversight board in 2020.¹³⁹

¹³⁴ Aalberg, T., & Curran, J. (Eds.). (2012). *How media inform democracy: A comparative approach* (Vol. 1). Routledge; Pickard, V. (2020). The public media option. In: Bennett, W. L., & Livingston, S. (Eds.). (2020). *The Disinformation Age: Politics, Technology, and Disruptive Communication in the United States*. Cambridge University Press.

¹³⁵ Fletcher, R., & Nielsen, R. K. (2017). Paying for online news: A comparative analysis of six countries. *Digital Journalism*, 5(9), 1173-1191.

¹³⁶ Nielsen, R. K., Gorwa, R., & de Cock Buning, M. (2019). What Can Be Done? Digital Media Policy Options for Strengthening European Democracy.

¹³⁷ Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola de Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute.

¹³⁸ Leitsätze (Guiding Principles). https://www.bundesverfassungsgericht.de/e/fs20140325_1bv000111.html

¹³⁹ [Podcast interview](#) with Leonhard Dobusch, Dec 11, 2020.



Depoliticized public media management in Sweden that balances accountability with independence:

Appointment and dismissal procedures for senior management of public media entities are clearly laid out in law. Board members are appointed by a foundation whose decision makers are appointed by the government on recommendation of the political parties represented in parliament. Terms for board members are staggered in ways that avoid that incoming governments can change the entire composition of the board.¹⁴⁰

C. Platforms: Transparency on decisions and impact

With all eyes on the big social media platforms and their role in the health and ailments of the democratic discourse, it is hardly surprising that they have been inundated by practical demands and suggestions from all sides. Recommendations at the micro-level include designing tweaks to introduce frictions and slow the viral spread of misinformation and establishing sophisticated content filtering systems. Macro-level structural suggestions include establishing new oversight bodies and breaking up certain services. New practices continue to be developed and examined at these levels. It is impossible and not helpful to aim at providing a comprehensive snapshot of this humongous, rapidly evolving idea space. Instead, the following briefly summarizes three more features and trends in the evolution of platform governance that help identify and design the most productive role for an open government approach in this area.

The less-than-10% effort

The first trend is the overwhelming bulk of efforts and investments that big social media players make in the health of the political discourse on their platforms and are focused on the US and a small band of mostly high-income countries. With on average more than 70 elections and referenda annually around the world¹⁴¹ and more than 25 elections due in 2021 in Africa alone,¹⁴² this essentially means that online political campaigning in the overwhelming majority of countries—often in contexts where populations are more diverse and election guardrails are less solidified—unfold in an anything-goes manner.

¹⁴⁰ Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola de Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute. The three OGP countries in the lowest category are Latvia, Czech Republic and Slovakia.

¹⁴¹ 2021 National Electoral Calendar, https://en.wikipedia.org/wiki/2021_national_electoral_calendar

¹⁴² 2021 African Election Calendar, <https://www.eisa.org/calendar2021.php>



A high-speed roller coaster into uncharted territories

The second trend is the platform policies that are evolving at breakneck speed. Facebook went from allowing holocaust denial in its network to indefinitely shutting down the account of the democratically elected president of the US within a time span of less than three months. It instituted a myriad of rule changes in content moderation and political advertising along the way. It introduced a flurry of design tweaks to its platform to curb the virality of debunked stories or encourage more reasoned debate. And it also engaged in intensive governance institution building by setting up a high-level review panel and vesting it with rather sophisticated decision-making procedure and powers.

Other major platforms in the public limelight have reacted in similar ways. Some might dismiss this incessant stream of new efforts and announcements as ad-hoc PR plays to stave off criticism during a string of escalating crises, particularly during and after the US elections. A more positive take is to consider these activities as well-intentioned efforts to react and adjust policies quickly when circumstances demand it. However, common to both the positive and negative take on the situation is the recognition that it is difficult to figure out the right path that balances all trade-offs in acceptable manners, that much of what works and what does not is unknown, and that most interventions have an experimental character and advance the learning and public understanding with regard to this important challenge.

Social media and governance: A journey from rights to public health to legitimacy¹⁴³

And third, early discussions in social media and internet governance more broadly revolved around principles of recognizing and realizing individual rights. With the downsides of social media and the limits of individual rights enforcement in a networked, big-platform world coming into sharp relief,¹⁴⁴ the emphasis has shifted to a public health perspective and how to promote the integrity and flourishing of a community and the health of its political discourse. An individualistic approach has morphed into a more collective endeavor. A narrow focus on the right to speak is expanded into a broader regard of nurturing political speech as a prerequisite for self-governance. There are early signs that this focus on public health is more and more embracing a pragmatic approach that puts a strong emphasis on “legitimacy”: we are living in a world where policy-making is in eternal catch-up mode, perhaps even strictly constrained by private speech rights, and where available, judicial and public enforcement resources are limited and hard to quickly scale up. This means platforms will have to play a significant role in content governance in the near- and medium-term future even if the democratic ideal would call for these rules being made by the legislative and their protection of rights being overseen by the judiciary. How to achieve an adequate level of public legitimacy for any kind of online governance of political speech, irrespective of whether they are made and enforced by the platforms or by the state therefore becomes a critical question. Building this type of legitimacy relies on two central pillars: trust that the rule-making and rule-enforcement process is fair and inclusive (process legitimacy) and confidence that it delivers effective, fair outcomes (outcome legitimacy). Each of these requirements to build legitimacy inspires an open government action item outlined below.

¹⁴³ This and the subsequent sections have greatly benefitted from an interview with a legal expert on platforms and human rights, Germany.

¹⁴⁴ On the latter see for example Cohen, J. E. (2017). Law for the platform economy. *UCDL Rev.*, 51, 133.



An open government response—differentiated openness for decisions, outcomes, and political campaigners—everywhere

Many demands and emerging policies for more platform transparency advocate for a differentiated approach along two dimensions: (1) by size—the most expansive disclosure requirements apply to very large platforms only, thus addressing concerns about the anti-competitive and burdensome nature of strict rules on new entrants or smaller players; (2) by business-criticality—the more critical to business operations and competitive positioning specific disclosure requirements are, the more they will be restricted from full public access and made available to accredited academics or competent regulatory authorities only, thus addressing a reluctance to give away valuable business secrets. While such a differentiated approach diverges from the ideal of full public transparency and may open new loopholes, it nevertheless helps advance the debate and forge a pragmatic consensus for action as it effectively allays two major obstacles to the transparency agenda for platforms. Embracing this principle of differentiated transparency, an open government approach looks particularly promising in three main areas, all of which should be pursued in global context not just in relation to a small band of large markets.

1. Decisional transparency

As noted earlier, whether we like it or not, social media platforms will continue to play a critical gatekeeping and regulatory role in political communication. To earn the trust and legitimacy that this role requires and to allow for meaningful public accountability and oversight requires what the UN Rapporteur for human rights has called full “decisional transparency”: the public needs to be able to see, understand, monitor, debate, and suggest changes to the way platforms make content-related decisions. Decisional transparency has two components: the first refers to the positive promotion of content. It is about the recommendation systems that determine what people see in their news feeds; in their personalized rankings of search results; and in their recommendations for new like-minded people to reach out to, groups to join, influencers to follow, or videos to watch. Opening up these complex algorithms and machine-learning systems at a deep technical level is not too helpful. Yet transparency of criteria and relative weighting shape the optimization and personalization efforts. An intelligible menu of user choices to dial up weightings for news quality, diversity, etc., and (de)activating specific personalization dimensions would go far towards reestablishing a meaningful level of transparency for and some choice over the information that our gadgets are feeding us.

The second component of decisional transparency refers to the negative protection from misinformation and harmful content. It is about how decisions are taken from which type of content and accounts to contextualize, deprioritize, block, reinstate, or “forget.” This covers full disclosure of the rules being applied; the human and computational resources deployed; and the decision-making, notice, and complaints procedures in place. Facebook, for example, has established an expert-led oversight board to adjudicate difficult content decisions and thus help evolve the canon of rules it relies upon for content moderation. Google has set up an expert advisory council to help it decide on difficult cases when implementing the European right-to-be-forgotten rules.



The verdict is still out on how independent and effective such new bodies can be. But the transparency for the institutional setup and the people involved, as well as for the procedures for deliberation and decision-making, is encouraging and helps to advance the learning around desirable design features and weaknesses.¹⁴⁵ Some of the tech companies' community guidelines and annual transparency reports have also begun to shine more light on selective aspects of these decision-making processes and the scale and scope of content moderation efforts. And a number of assessment exercises and good practice principles provide comprehensive guidance for the level of disclosure that can be mandated for this type of decisional transparency.¹⁴⁶ These templates and efforts suggest the main task is to identify a comprehensive set of good practices and ensure they are implemented across more platforms.

2. Output, outcome, impact transparency: An MRV system for the digital sphere

The need to establish the legitimacy of outcomes and the experimental character of many interventions makes it imperative to collect, track, and disclose granular performance data on how well specific interventions work, how well the overall systems for content governance perform, and how the scale and nature of problems evolve. This includes comprehensive, periodic reporting on the rates of false negatives and false positives in negative content decisions, the impact of specific types of interventions being tested and deployed on a broader scale, the prevalence and virality of specific types of misinformation, and the performance metrics of complaints systems. Again, there are many detailed recommendations and templates that can guide and help standardize these efforts.¹⁴⁷

Public disclosure of key performance metrics should be complemented by nondiscriminatory access to more granular data for independent, authenticated researchers to enable them to run their own analyses, validate company-provided metrics, spot new issues, and track broader impacts.¹⁴⁸ In addition, a periodic in-depth human rights audit carried out by independent researchers would produce a holistic picture of political impact footprints to inform structural evolution of governance and performance tracking systems.¹⁴⁹

Instituting such a three-tiered regime for outcome and impact transparency can take cues from established MRV systems that are applied in many sectors from arms control to climate change

¹⁴⁵ Klonick, K. (2020). The Facebook Oversight Board: Creating an independent institution to adjudicate online free expression. *Yale LJ*, 129, 2418.

¹⁴⁶ See for example, the 2018 Santa Clara Principles on transparency and accountability in content moderation (<https://santaclaraprinciples.org/>) or the Ranking Digital Rights Corporate Accountability Index Initiative (<https://rankingdigitalrights.org/2020-indicators/>).

¹⁴⁷ See for example, Promoting Fairness, Accountability, and Transparency Around Automated Content Moderation Practices, <https://www.newamerica.org/oti/reports/everything-moderation-analysis-how-internet-platforms-are-using-artificial-intelligence-moderate-user-generated-content/promoting-fairness-accountability-and-transparency-around-automated-content-moderation-practices/>.

¹⁴⁸ Some collaborative projects, such as Social Science One (<https://socialscience.one/our-facebook-partnership>) are underway but tend to face difficulties (<https://socialscience.one/blog/public-statement-european-advisory-committee-social-science-one>).

¹⁴⁹ Facebook has subjected itself to such an audit in 2020, but follow-up is unclear. <https://about.fb.com/wp-content/uploads/2020/07/Civil-Rights-Audit-Final-Report.pdf>



mitigation where self-reporting, independent analysis, and focused audits are combined to produce reliable performance information.

3. Know-your-customer architectures for political campaigning

All major social media platforms run some sort of user identity authentication and verification systems. Such systems are increasingly important in the sphere of political communication, when fake accounts are generated for coordinated inauthentic behavior, or political campaigns are driven by third-party groups that exploit loopholes in campaign finance rules to keep the origin of money flows into politics hidden. As tokenistic and easy to outwit, some of these authentication systems currently build up into a system of differentiated authentication and identity disclosure requirements tied to specific user rights and user status on the platform. This can range from a protected zone for anonymous postings and small-scale sharing to some authentication requirements for influencers with large groups of followers to strict identity verification and disclosure of the identity of the ultimate sponsor for political advertisers. Such a system of political campaigning transparency can build on existing platform verification systems, which already require advertisers to share more information about themselves than ordinary users. And it has at least two additional advantages: (1) it ties the verifiable disclosure of identities to specific revocable user privileges and incentivizes compliance, and (2) it produces a critical piece of the political campaigning transparency puzzle that can help follow the money, disclose covert support channels, etc. These benefits are particularly pronounced when individual political user authentication systems are sufficiently harmonized with other transparency registers such as political ad archives.¹⁵⁰ Similar models of know-your-customer authentication systems are common in the anti-money laundering world. For example, the beneficial ownership determination of real estate is the responsibility of title insurance agents, and the responsibility of vetting financial clients falls to banks' compliance departments with collective initiatives underway to economize on verification costs through standardized reporting and pooling of information.¹⁵¹

¹⁵⁰ See the section on Governments for more on political ad archives.

¹⁵¹ See for example Mrazauskaite, R., & Stephenson, M. C. (2020). A proposal for a global database of politically exposed persons. *Stan. J. Int'l L.*, 56, 153; Lidstone, H. K. (2019). Beneficial Ownership Legislation and Geographic Targeting Orders. Available at SSRN 2923842.



D. Governments: Boosting fairness and trust in the electoral process

Many of the open government recommendations presented here for other stakeholder groups in the political communication ecosystem already entail a role for governments to mandate specific disclosure regimes (platforms), provide regulatory guardrails for the self-regulation of the media or some political service providers, or to roll out open media literacy projects. Yet there are also open government avenues for engagement that are the direct responsibility of or are best placed at government.

An open government response: Trust in a fair contest and the democratic process

The most fundamental way that a government can contribute to the trust in the institutions of democracy and the fairness of a political system in the long run is probably by performing well, inclusively, and fairly, and by nurturing a free, open environment for media and civil society. Besides these general performance parameters, however, a number of targeted, distinctively open government-related activities can be discerned to safeguard and nurture the integrity of political communication.

1. Political ad archives and fair access to marketing

Data-driven, microtargeting by digital political campaigns has captured most of the early imaginations on how the new digital tools can be weaponized for sinister psychological manipulation and for covert political tactics that further fracture our shared public sphere. In response, the views of policy makers and experts converge around the necessity of establishing publicly accessible repositories for political online ads, and the larger platforms that run major political advertising operations have begun to establish such repositories. These efforts, however, are just at the beginning, and significant shortcomings remain to be addressed.

Platforms use different reporting standards. Their repositories have large reporting gaps, provide insufficient and variable data access, and offer limited search and retrieval functionality. These private repositories are in scale, scope, and permanence fully at the discretion of the platforms. Most importantly, they are not interlinked and not interoperable with other radio or broadcasting advertising repositories and are unable to assemble a sufficiently comprehensive public record and capture the realities of contemporary multichannel political advertising campaigns.



The government has an important role to set clear and detailed standards for a federated, interoperable system of repositories or preferably mandate an independent electoral management body to directly host such a one-stop consolidated repository. Experts have put forward many detailed recommendations as to the design features of such a repository. Some of the most noteworthy items include:

- Scope: Related reporting requirements must also cover ads placed by third parties and issue advertising, both of which are on the rise and stand in the way of campaigning transparency.
- Full interoperability: Machine-readability, open application interfaces to read out data and most importantly the use of unique identifiers for advertisers and sufficiently harmonized reporting standards are needed to deliver a full, timely account of advertising conduct.
- Targeting and reach: Repositories need comprehensive information on targeting criteria used, location placement, and reach of the ads.
- Timeliness and permanence: Repositories need to record political advertising continuously and not just in short election periods as political messaging increasingly stretches beyond election spurts. Information needs to be provided in close to real time so that campaigners can be held to account for their messaging while it matters most—during the campaign. And the filings need to be archived and available long after the elections to enable comparative research later on and an authoritative archival record to draw on for ex-post accountability.
- Clear and effective ad labelling system: Political ads, including third-party and issue ads, need to be clearly labelled with full information on sponsors and click-through to more information on targeting, etc.

Government must further set a reasonable minimum for equitable online advertising access (e.g., in the form of must-carry for a specific number of ads with specific reach at an affordable price-point). There is sound precedence for such a requirement. Right now, almost two-thirds of all countries around the world mandate free or subsidized access to mass media channels for political parties and candidates.¹⁵² No analogous must-carry rules apply to the social media advertising space that offers highly unequal advertising conditions. As online advertising prices are algorithmically decided on spot markets, they are highly diverse and individualized. Unfortunately, they typically offer a premium for ads that closely align in tone and messaging with the affinities of the targeted audience (which in conventional marketing, promises higher click-through to the ad and thus higher revenue for the advertising platform). One empirical study found that advertising online to a voter segment that is ideologically distant ended up being 30% more expensive than advertising to one's own, ideologically aligned base.¹⁵³ These are unfortunate features of online political advertising as they can lead to unfair advertising conditions and systematically encourage outreach to the already converted (and thus encourage filter bubbles), making some fair access rules akin to conventional media desirable.

¹⁵² International Idea Political Finance Database, accessed Dec 2020.

¹⁵³ Ali, M., Sapiezynski, P., Korolova, A., Mislove, A., & Rieke, A. (2019). Ad Delivery Algorithms: The Hidden Arbiters of Political Messaging. *arXiv preprint arXiv:1912.04255*



2. Building mini-publics into decision-making processes

Experimenting with and offering more deliberative mechanisms through which people of all walks of life can contribute to policy-making are regarded as a promising route for reinvigorating and re-civilizing democratic discourse and franchise.

So-called mini-publics vary widely in format and ambition and go under names such as citizens' juries, consensus conferences, planning cells, and citizen assemblies. But they share a central idea of convening a representative, semi-randomly selected group of citizens for an in-depth deliberation of a specific policy challenge, often aided by expert inputs and facilitators with the ambition to produce a consensual view on the preferred policy response that is then taken into account by policy makers.¹⁵⁴ In many countries, experts and policy practitioners across the political spectrum profess considerable enthusiasm for such mini-publics¹⁵⁵ as they promise to generate a more civil, inclusive political discourse that accommodates a wide range of opinions, delivers useful guidance to policy makers, and raises the legitimacy and trust in the policy solutions that are being devised. Empirical evidence broadly confirms these claims, and mini-publics are increasingly recognized as an antidote to misinformation and polarized, toxic political discourse.¹⁵⁶

Mini-publics could also play an important role in platform governance itself and take on the role of assessing the truthfulness or misleading character of political ads or the harmfulness of specific types of online postings.¹⁵⁷ Adding a common-sense public deliberation to expert adjudication in complex, grey-zone decisions has a strong precedence in the judicial system and its use of juries.

Expanding the use of deliberative elements is fully aligned with open government principles.¹⁵⁸ It can build on the work of an OGP practice group in this area¹⁵⁹ and on the experience of several OGP countries that have recently included related activities in their national action plans (e.g. UK in NAP 4 to trial innovative deliberative models in local decision-making, Australia in NAP 2 building civil service capacity to carry out deliberative initiatives, and São Paulo in NAP 2 to enhance deliberative mechanisms around budgeting¹⁶⁰).

¹⁵⁴ Farrell, D. M., & Stone, P. Sortition and Mini-Publics. In *The Oxford Handbook of Political Representation in Liberal Democracies*.

¹⁵⁵ For an overview of existing initiatives see Peña-López, I. (2020). Innovative citizen participation and new democratic institutions: Catching the deliberative wave. OECD.

¹⁵⁶ Curato, N., Dryzek, J. S., Ercan, S. A., Hendriks, C. M., & Niemeyer, S. (2017). Twelve key findings in deliberative democracy research. *Daedalus*, 146(3), 28-38; McKay, S., & Tenove, C. (2020). Disinformation as a threat to deliberative democracy. *Political Research Quarterly*; Himmelroos, S. (2017). Discourse quality in deliberative citizen forums-A comparison of four deliberative mini-publics. *Journal of Public Deliberation*, 13(1); Gastil, J. (2018). The lessons and limitations of experiments in democratic deliberation. *Annual Review of Law and Social Science*, 14, 271-291.

¹⁵⁷ Zittrain, J. (2019). A jury of random people can do wonders for Facebook. *The Atlantic*.
<https://perma.cc/S57Y-WTB2>

¹⁵⁸ See for example sections 8 and 9 of the 2017 OECD Recommendations on Open Government (<https://www.oecd.org/gov/Recommendation-Open-Government-Approved-Council-141217.pdf>).

¹⁵⁹ OGP Practice Group on Dialogue and Deliberation, <https://www.opengovpartnership.org/ogp-practice-group-on-dialogue-and-deliberation/>

¹⁶⁰ See OGP Commitments Database.



3. Opening electoral integrity

“The election was robust because it was manual, decentralized, and transparent” (Swedish election official).¹⁶¹

A lot of online political misinformation is not only directed to political campaigns and candidates, but quite shrewdly is also targeted at the election process directly—for example, by spreading false information about voting modalities to demobilize the supporters of opponents or by ex-post or even ex-ante calling into question the legitimacy of the voting process and its results. The government and the election management authorities in particular therefore have an important role to play in at least three respects:

- to fully live up to the role as the authoritative source of voter information and effectively distribute this information to all voting groups including through the active use of social media;
- to proactively and reactively counter voting-related misinformation and enable tech platforms, the media, etc. to play this role as well (e.g. by providing verified candidate lists to platforms that can use them to help authenticate political advertisers and target misinformation monitoring activities¹⁶² or by establishing an election information help desk for the media that can be consulted by journalists who seek to fact-check dubious information as Sweden has done to stave off misinformation during its recent national elections);¹⁶³ and
- to support the monitoring of voting and the vote count and to enable crowd-sourced quick counts¹⁶⁴ as have been conducted in Indonesia¹⁶⁵ to facilitate a distributed independent verification of results and an expedited publishing of vote counts before rumors about stolen elections and massive irregularities can take hold.

4. Supporting a public interest media sphere

Given the difficult financial situation of many important news media outlets and the dire state of local news media that serve as important watchdogs to hold local governments to account and provide a public conversation square for communities, public support for news media has become more important than ever. What’s more, there is a growing ecosystem of new online journalism start-ups that are vital for the plurality and quality of news in the digital era and deserve support for their work. This includes investigative journalism collectives (e.g., CORRECTIV in Germany or ProPublica in the US), new online-first quality media outlets (e.g., Malaysiakini in Malaysia), and a new crop of media watchdogs and fact-checking organizations. Public media support can even be justified from a small government perspective that seeks to limit government interventions to correcting market aberrations: in economic theory, high-quality news and investigative journalism is commonly recognized as a merit good, meaning it produces socially desirable outcomes that exceed its prospects to turn a profit, which constitutes a substantive market failure to justify public support.¹⁶⁶

¹⁶¹ Quoted in Innovations for Successful Societies(2020).Sweden Defends Its Elections Against Disinformation, 2016–2018, https://successfultsocieties.princeton.edu/sites/successfultsocieties/files/GL_Swedena_Election_FINAL12_23_20_V1_0.pdf

¹⁶² Interview with international election expert Dec 2020.

¹⁶³ Sweden Defends Its Elections Against Disinformation, 2016–2018, https://successfultsocieties.princeton.edu/sites/successfultsocieties/files/GL_Swedena_Election_FINAL12_23_20_V1_0.pdf

¹⁶⁴ Interview with expert on media and elections in Southeast Asia, Australia.

¹⁶⁵ Open Election Data + Mass Interaction = Indonesian Public as Watchdog, <https://theconversation.com/open-election-data-mass-interaction-indonesian-public-as-watchdog-29450>; The Future of Elections and Technology, <http://aceproject.org/ace-en/topics/et/etj>

¹⁶⁶ Clement, M., Lepthien, A., Schulz, P., Loosen, W. (2018): [Alternative Models of Financing Investigative Journalism. Commissioned](#) by the Greens/EFA Group in the European Parliament.



In addition, a main concern that support for public interest media crowds out private media ventures is not supported by the empirical evidence.¹⁶⁷ There are many useful suggestions and existing practices to draw inspiration from:¹⁶⁸

- public-interest media that can be granted a type of charitable status that makes them eligible for foundation support, which is not the case in many countries
- public service media providing license-free content and staff secondments to support local media production (e.g., the BBC Local Democracy Reporting Service)¹⁶⁹
- value-added tax exemptions, general direct subsidies, and access to an innovation fund for private news providers that meet certain criteria (Denmark)
- operation and distribution subsidy for quality media (Sweden) and subsidized circulation in remote local markets (Norway)
- free one-year newspaper subscription for teenagers at their 18th birthday (France in 2009)
- a media voucher system (suggestion by US expert commission)¹⁷⁰
- open government and open government data initiatives that make life easier for journalists and help them lower their production costs (e.g., for data-heavy investigative reporting)¹⁷¹

For all funding and subsidy schemes, it is important to devise eligibility criteria and disbursement mechanisms that are fully transparent, offer incentives to produce high-quality news and media outlet transparency, and protect the independence of news outlets from government capture.¹⁷²

¹⁶⁷ Fletcher, R., & Nielsen, R. K. 2017. Paying for online news, *Digital Journalism*, 5(9): 1173-1191.

¹⁶⁸ See for example, Pickard, V. (2020). The public media option. In Bennett, W. L., & Livingston, S. (Eds.). (2020). *The Disinformation Age: Politics, Technology, and Disruptive Communication in the United States*. Cambridge University Press; or Stigler Committee on Digital Platforms Final Report, <https://research.chicagobooth.edu/-/media/research/stigler/pdfs/digital-platforms---committee-report---stigler-center.pdf>

¹⁶⁹ What Can Be Done? Digital media Policy Options for Europe (and Beyond), <https://reutersinstitute.politics.ox.ac.uk/what-can-be-done-digital-media-policy-options-europe-and-beyond>

¹⁷⁰ Stigler Committee on Digital Platforms Final Report, <https://research.chicagobooth.edu/-/media/research/stigler/pdfs/digital-platforms---committee-report---stigler-center.pdf>

¹⁷¹ What Can Be Done? Digital media Policy Options for Europe (and Beyond), <https://reutersinstitute.politics.ox.ac.uk/what-can-be-done-digital-media-policy-options-europe-and-beyond>

¹⁷² EU MPM 2020.



E. Citizens: Digital skills and media literacy for active participation

“Engaged, informed and empowered citizens are the best guarantee for the resilience of our democracies” (EU Democracy Action Plan, 2020).¹⁷³

Early efforts to enhance the integrity of political communication online have primarily focused on the main platforms and on curbing the supply side of the infodemic. During the last couple of years, partly inspired by mixed results for platform initiatives to label dubious information pieces¹⁷⁴ or step up exposure to contrarian viewpoints, attention has increasingly shifted towards a complementary strategy on the “demand side.” This has generated momentum for efforts to reduce the vulnerability of citizens to fake news, to raise trust in key political institutions, and to boost their capabilities to engage competently in the political discourse.

The starting point is more hopeful than the current political infodemic may suggest. Survey data from 40 countries show that a majority of citizens prefer their news sources to be balanced, rather than to reflect their own viewpoints.¹⁷⁵ Another survey across 140 countries indicates that even most citizens who deeply distrust their governments are still trustful of science and have not resigned themselves to alternative truth regimes.¹⁷⁶ Empirical evidence confirms the positive impact of higher levels of political literacy. Having better political and civic knowledge is associated with less support for far-right populism, more support for democratic values, more political engagement, and less discontent.¹⁷⁷

Similarly, a number of micro-level studies in social psychology indicate that a range of individual educational interventions—nurturing intellectual humility,¹⁷⁸ boosting cognitive skills,¹⁷⁹ attitudinal inoculation (measured exposure to and critical evaluation of misinformation),¹⁸⁰ pre-bunking common myths,¹⁸¹ and promoting epistemic vigilance¹⁸²—have a significant potential to reduce the vulnerability to political misinformation and radicalization.

¹⁷³ Communication From the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, https://ec.europa.eu/info/sites/info/files/edap_communication.pdf

¹⁷⁴ Tucker, J. A., Guess, A., Barbera, P., Vaccari, C., Siegel, A., Sanovich, S., Stukal, D., & Nyhan, B. (2018, March 19). [Social media, political polarization, and political disinformation: A review of the scientific literature](#). SSRN.

¹⁷⁵ Executive Summary and Key Findings of the 2020 Report, <https://www.digitalnewsreport.org/survey/2020/overview-key-findings-2020/>

¹⁷⁶ Percent of People With Different levels of Trust in Government and in Science, https://cms.wellcome.org/sites/default/files/styles/gallery_full_hi/public/infographics-trust_ecosystem.png?itok=tRU4TiMs

¹⁷⁷ For a summary of evidence, see Varieties of Democracy, https://www.v-dem.net/media/filer_public/f3/f0/f3f09467-bcf7-4f8a-9ad9-e83171673705/v-dem_resourceguide_20-05-28_final-better.pdf

¹⁷⁸ Fernbach, P. M., Rogers, T., Fox, C. R., & Sloman, S. A. (2013). Political extremism is supported by an illusion of understanding. *Psychological Science*, 24(6), 939-946.

¹⁷⁹ R. Hertwig and T. Grüne-Yanoff. (2017). Nudging and boosting: Steering or empowering good decisions. *Perspectives on Psychological Science*, 12, 973-986.

¹⁸⁰ Cook, J., Lewandowsky, S., & Ecker, U. K. (2017). Neutralizing misinformation through inoculation: Exposing misleading argumentation techniques reduces their influence. *PloS One*, 12(5), e0175799.

¹⁸¹ Blastland, M., Freeman, A. L., van der Linden, S., Marteau, T. M., & Spiegelhalter, D. (2020). Five rules for evidence communication. <https://www.nature.com/articles/d41586-020-03189-1>

¹⁸² Sperber, D., Clément, F., Heintz, C., Mascaro, O., Mercier, H., Origg, G., & Wilson, D. (2010). Epistemic vigilance. *Mind & Language*, 25(4), 359-393.



Related education efforts and outcomes, however, are rather nascent. In the US, for example, political knowledge is found to be on the decline—the share of people who can name all three branches of government has dropped by a third to as low as 25% between 2011 and 2016. Across Europe, more than 40% of young people believe that critical thinking, media, and democracy are not sufficiently taught in school. An expert assessment of 30 European countries found that although media literacy policies are, in principle, available in a majority of countries, they are not part of the compulsory curriculum, and only a handful of countries provide actual teacher training for them.¹⁸³

The momentum is growing, however, for an education offensive in this area. Demands for such initiatives have, for example, been prominently made by the OSCE,¹⁸⁴ in the context of UK responses to misinformation¹⁸⁵ or as a centerpiece of the recent EU Democracy Action Plan that also refers to binding requirements for EU member states to promote the development of media literacy skills.¹⁸⁶ Early practical efforts include the UN’s first global “nudging” campaign for “pledge to pause” before forwarding dubious information or inflammatory posts.¹⁸⁷ At country level, examples come from Sweden,¹⁸⁸ which decided in 2017 to amend elementary and high school curricula with lessons on how to spot fake news, and Finland, which provided related modules for adult education since 2014.¹⁸⁹

¹⁸³ EU MPM 2020.

¹⁸⁴ Organization for Security and Cooperation in Europe (OSCE). (30 April 2020). Joint Declaration on Freedom of Expression and Elections in the Digital Age. Para. 1(c)(i).

¹⁸⁵ Dommett, K. & Power, S. (2020). Democracy in the Dark: Digital Campaigning in the 2019 General Election and Beyond. <https://www.electoral-reform.org.uk/wp-content/uploads/2020/09/Democracy-in-the-Dark-FINAL.pdf>

¹⁸⁶ Communication From the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, https://ec.europa.eu/info/sites/info/files/edap_communication.pdf

¹⁸⁷ UN Urges People to #PledgetoPause Before Sharing Information Online, <https://news.un.org/en/story/2020/10/1075742>

¹⁸⁸ Sweden Defends Its Elections Against Disinformation, 2016–2018, https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/GL_Swedena_Election_FINAL12_23_20_V1_0.pdf

¹⁸⁹ Finland is Winning the War on Fake News. What It’s Learned May Be Crucial to Western Democracy, <https://edition.cnn.com/interactive/2019/05/europe/finland-fake-news-intl/>



An open government response: Open education for democracy

Output and outcome indicators on how to measure political and civic knowledge as well as media and digital literacies are partly well established, partly under development.

Conceptual discussions and partial applications of measurements of political knowledge,¹⁹⁰ media literacy,¹⁹¹ and digital competencies¹⁹² feature in a robust body of academic and policy work. Researchers are also working towards a cross-country index on the resilience to online disinformation.¹⁹³

In addition, a small band of initiatives have begun to roll out cross-country comparisons.¹⁹⁴ The most comprehensive effort under development is probably the suggested inclusion of assessment questions on digital skills and the ability to handle facts and misinformation into the 2024/25 round of the world's largest educational assessment exercise across more than 80 countries, the OECD Programme for International Student Assessment initiative (PISA).¹⁹⁵ This planned expansion of PISA also reflects the recognition that media literacy, disinformation vulnerability, and resilience to misinformation deserve their own focus as they are not closely associated with general educational attainments such as competencies in literacy or science.¹⁹⁶

¹⁹⁰ Wegscheider, C., & Stark, T. (2020). What drives citizens' evaluation of democratic performance? The interaction of citizens' democratic knowledge and institutional level of democracy. *Zeitschrift für Vergleichende Politikwissenschaft*, 1-30; Turgeon, M., & Lloyd, R. (2017). Measuring Political Knowledge in Cross-National Contexts: Enhancing Comparability between Different Political Information Structures.

¹⁹¹ Maksl, A., Ashley, S., & Craft, S. (2015). Measuring news media literacy. *Journal of Media Literacy Education*, 6(3), 29-45.

¹⁹² Chetty, K., Qigui, L., Gcora, N., Josie, J., Wenwei, L., & Fang, C. (2018). Bridging the digital divide: measuring digital literacy. *Economics: The Open-Access, Open-Assessment E-Journal*, 12(2018-23), 1-20. ; for Europe, see also DigComp 2.0: The Digital Competence Framework for Citizens, https://publications.jrc.ec.europa.eu/repository/bitstream/JRC101254/jrc101254_digcomp%202.0%20the%20digital%20competence%20framework%20for%20citizens.%20update%20phase%201.pdf

¹⁹³ Humprecht, E., Esser, F., & Van Aelst, P. (2020). Resilience to online disinformation: A framework for cross-national comparative research. *The International Journal of Press/Politics*, 25(3), 493-516.

¹⁹⁴ For an EU wide-assessment see Brogi, E., Carlini, R. M., Nenadic, I., Parcu, P. L., & Viola d Azevedo Cunha, M. (2020). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania & Turkey: policy report*. European University Institute; for a civil society example, see also OSF's New Media Literacy Index: Lessenski, M. 2018. *Resilience to 'Post-Truth' and its Predictors in the New Media Literacy Index*. Sofia, Bulgaria: Open Society Institute. http://osi.bg/downloads/File/2018/MediaLiteracyIndex2018_publishENG.pdf

¹⁹⁵ OECD (2019). PISA 20121 ICT Framework Lorenceau, A., Marec, C., & Mostafa, T. (2019). Upgrading the ICT questionnaire items in PISA 2021; OECD (2020). PISA 2024 Strategic Vision and Direction for Science March 2020

¹⁹⁶ Surveys of the anti-Covid lockdown movement in Germany, for example, suggest that many of its supporters who also tend to subscribe to conspiracy theories have an advanced degree.



An open government approach could strategically build on and effectively complement these efforts that are so far dispersed, focus on individual aspects, and do not provide a common floor of transparency on efficacy and achievements. An **open education for digital democratic** initiative could, for example, convene a group of countries for related commitments in this area. This initiative could include setting out transparent ambitions, milestones, resource outlays, and report cards for the content and implementation of related educational initiatives on digital democratic capabilities. As a complementary or self-standing pillar of such an initiative, participating countries could also focus on the outcome side of the equation. They could select a set of key outcome targets and indicators and establish related monitoring and public reporting systems as part of their OGP national action plan commitments. This could help identify specific shortfalls and aid the prioritization of policies and the tailoring of related education initiatives in both child and adult education. It would also encourage cross-country learning and enhance public accountability around educational outcomes in this area that is so critical to the long-term integrity of political communication and the health of the democratic discourse. Finally, such an initiative could also build on existing open education activities in the OGP context on open education policy and curricula development (e.g., Spain)¹⁹⁷ and ties in with thematic work on open education elsewhere (e.g., UNESCO).¹⁹⁸

¹⁹⁷ Education, <https://www.opengovpartnership.org/policy-area/education/>

¹⁹⁸ Huss, O., & Keudel, O. (2020). Open Government in Education: Clarifying Concepts and Mapping Initiatives.



F. Professional service providers: Advancing responsible conduct

“For a long time our perception of propaganda and disinformation was that they come from governments . . . rather than considering the fact that they are part of a commercial enterprise. . . . What we’ve realised is that many of the firms that build online disinformation are based in democratic countries as well” (S. Woolley, propaganda researcher).¹⁹⁹

The increasing professionalization of political parties and political campaigning,²⁰⁰ the growing amounts of money being poured into elections,²⁰¹ and the advent of new technologies and big data are three trends that have combined to precipitate the rise of a professional political service industry. These political consultants include lobbying and public relations professionals, data scientists, and online communication experts, former journalists, politicians, and political operatives. As mentioned earlier, they do not simply execute predefined campaigning strategies but serve as “promotional intermediaries” to actively advise and help craft political brands and positioning, media image, messages, storylines, talking points, tone, targeting, and methods of connecting with the broader public. Stiff competition for lucrative assignments provides incentives to overpromise²⁰² and develop new markets abroad.²⁰³ As one campaign worker from Australia noted, various international companies “came through pitching and a lot of people had an app that would win us the election,” while a colleague in the UK remarked that they “frequently have people trying to sell [them] social listening tools. . . . [O]ne of the world’s leading IT companies tried to sell us something which was going to totally transform the way we understand the public.”²⁰⁴ The widespread, yet questionable practices of big tech companies to second staff right inside political campaigns to help them deploy cutting-edge tech tools further show that such service providers are instrumental in shaping campaigning practices and norms.²⁰⁵ A series of scandals around political service providers (e.g. the case of Cambridge Analytica and its abuse of personal data for attempts at political manipulation) exemplify how some in the industry push aggressively into regulatory grey zones, where rules have not caught up with new technology and practices, or enforcement is insufficient. A global analysis of related practices came to the conclusion that a “disinformation-for-hire” industry is booming and that third party contractors had targeted at least 48 different countries in 2020 to manipulate political communications through coordinated inauthentic behavior and misinformation.²⁰⁶

¹⁹⁹ Boom in Private Companies Offering Disinformation-for-Hire, <https://www.ft.com/content/cb6b3342-a320-486e-b54c-a49ad32f2166>, quoting <https://demtech.oii.ox.ac.uk/wp-content/uploads/sites/127/2021/01/CyberTroop-Report-2020-v.2.pdf>

²⁰⁰ Dommett, K., Kefford, G., & Power, S. (2020). The digital ecosystem: The new politics of party organization in parliamentary democracies. *Party Politics*.

²⁰¹ With more than USD13 billion, the 2020 election cycle turned out to be the most expensive campaigning period in history. Spending on all things digital was estimated to accelerate and reach USD3 billion (<https://www.vox.com/recode/2019/12/10/20996869/facebook-political-ads-targeting-alex-stamos-interview-open-sourced>).

²⁰² Baldwin-Philippi, J. (2019). Data campaigning: Between empirics and assumptions. *Internet Policy Review*, 8(4), 1-18.

²⁰³ Bennett, C. J., & Lyon, D. (2019). Data-driven elections: Implications and challenges for democratic societies. *Internet Policy Review*, 8(4).

²⁰⁴ Dommett, K., Kefford, G., & Power, S. (2020). The digital ecosystem: The new politics of party organization in parliamentary democracies. *Party Politics*.

²⁰⁵ Kreiss, D., & McGregor, S. C. (2018). Technology firms shape political communication: The work of Microsoft, Facebook, Twitter, and Google with campaigns during the 2016 US presidential cycle. *Political Communication*, 35(2), 155-177.

²⁰⁶ Industrialized Disinformation: 2020 Global Inventory of Organized Social Media Manipulation, <https://demtech.oii.ox.ac.uk/wp-content/uploads/sites/127/2021/01/CyberTroop-Report-2020-v.2.pdf>



An open government response: Open integrity to root out professional malpractice

Setting clear, effective standards for responsible conduct and weeding out the bad players is an urgent task for this sprawling industry. An open government approach rooted in the idea of open integrity could make a significant contribution to these efforts. It can draw on a vast existing repertoire of existing reference points for responsible conduct and help establish a viable, open enforcement infrastructure. Such an approach would consist of a number of building blocks, including:

1. Establish clear standards and an industry model code of conduct or responsible political service provision in the digital era. Political service providers have diverse educational and professional profiles, but all of the professions involved have set out professional values, responsible behavior standards, and codes of ethics that converge substantively on a set of principles that can be readily adapted for the online political communication environment. Professional standards for journalists,²⁰⁷ public relations specialists,²⁰⁸ lobbyists,²⁰⁹ and computer scientists,²¹⁰ stress a fiduciary duty not only to clients, but also to the public at large. The professionals commit to promoting truthful communication and a fair and flourishing marketplace of ideas while eschewing inflammatory speech and the distortion of facts. Computer professionals commit to promoting a responsible development and use of technology. Professional values between conventional and online-focused practitioners might still somewhat diverge. Online journalists, for example, are found to more frequently justify the use of unverified information,²¹¹ yet the responsibility standards for the two spheres are increasingly merging, and specific guidelines are increasingly being adapted for the digital age. The Institute for Public Relations, for example, has issued practical guidelines for handling disinformation.²¹² Academics in the US have convened professional political consultants to workshop principles for conduct in the digital environment.²¹³ The European Commission has set up a code of practice on disinformation for the broader tech and advertising industries.²¹⁴

²⁰⁷ For an overview, see Accountable Journalism, <https://accountablejournalism.org/ethics-codes/international>

²⁰⁸ See Bowen, S. A. (2007). *Ethics and public relations*. Gainesville, FL: Institute for Public Relations.

²⁰⁹ For an overview of lobbying codes of conducts around the world see French High Authority For Transparency In Public Life. (2020). https://www.hatvp.fr/english_news/comparative-study-of-lobbying-regulation-mechanisms/; for a general discussion see, Năstase, A. (2020). An ethics for the lobbying profession? The role of private associations in defining and codifying behavioural standards for lobbyists in the EU. *Interest Groups & Advocacy*, 9(4), 495-519.

²¹⁰ See for example, ACM Code of Ethics and Professional Conduct, <https://www.acm.org/code-of-ethics>, but also a plethora of specific ethical principles for the use of algorithms, artificial intelligence, responsible private protection, etc. some of which are listed here <https://algorithmwatch.org/en/ai-ethics-guidelines-global-inventory/>.

²¹¹ Henkel, I., Thurman, N., Möller, J., & Trilling, D. (2020). Do online, offline, and multiplatform journalists differ in their professional principles and practices? Findings from a multinational study. *Journalism Studies*, 1-21.

²¹² Voiovich J. (2020). Combatting information manipulation and deception. In Harris P., Bitonti A., Fleisher C., Skorkjær Binderkrantz A. (Eds.), *The Palgrave Encyclopedia of Interest Groups, Lobbying and Public Affairs*. Palgrave Macmillan, Cham. https://doi.org/10.1007/978-3-030-13895-0_91-1

²¹³ Baldwin-Philippi, J., Bode, L., Kriess, D., & Sheingate, A. (2020). Digital political ethics: Aligning principles with practice. *Center for Information, Technology and Public Life*, 18.

²¹⁴ EU Code of Practice on Disinformation, https://ec.europa.eu/newsroom/dae/document.cfm?doc_id=54454



2. Support the establishment of viable professional enforcement infrastructures.

Based on the principle of regulated self-regulation, this building block entails setting clear performance and reporting criteria for the professional bodies and mechanisms tasked with enforcing professional conduct standards, analogous to best practices on anti-corruption compliance systems and related reporting and accountability features.

3. Political service supply chain transparency and responsibility.

To further incentivize responsible conduct, more disclosure on the client-side can be useful. This transparency includes more granular, mandatory reporting requirements for political parties, candidates, and outside campaign groups on the third-party services and consultants they work with and the requirement to only contract with suppliers that adhere to and publish a code of conduct that complies with ethical industry standards.²¹⁵

Turning this ambition for open integrity for political consultants into practice dovetails productively with the deep expertise and experience within the OGP community on raising standards and transparency of lobbying and anti-corruption compliance. And there are direct synergies: enrollment in lobbying registries can be tied to the adoption of a sound code of conduct or to the establishment of an effective integrity system.

Enforcing truthful political advertising standards: New Zealand²¹⁶

The Advertising Standards Authority in New Zealand is an industry-funded voluntary organization that, according to expert assessments, enjoys cross-partisan credibility and a high-level of compliance with its verdicts. The body hears complaints about violations of its industry code of practice for truthful advertising and uses a fast-track process for handling election-related complaints, including online political ads within three to four days. Because of an increasingly polarized political environment and the switch from periodic to continuous political campaigning, further improvements with regard to resources, turnaround time, and enforcement power might be warranted to help the body retain its efficacy and public standing.

²¹⁵ Voiovich J. (2020). Combatting information manipulation and deception. In Harris P., Bitonti A., Fleisher C., & Skorkjær Binderkrantz, A. (Eds), *The Palgrave Encyclopedia of Interest Groups, Lobbying and Public Affairs*. Palgrave Macmillan.

²¹⁶ Online Political Campaigning in New Zealand, <https://www.transparency.org.nz/wp-content/uploads/2020/10/Online-Political-Advertising-TINZ-publication.pdf>



Figure 3: An open government agenda for the health of political communication

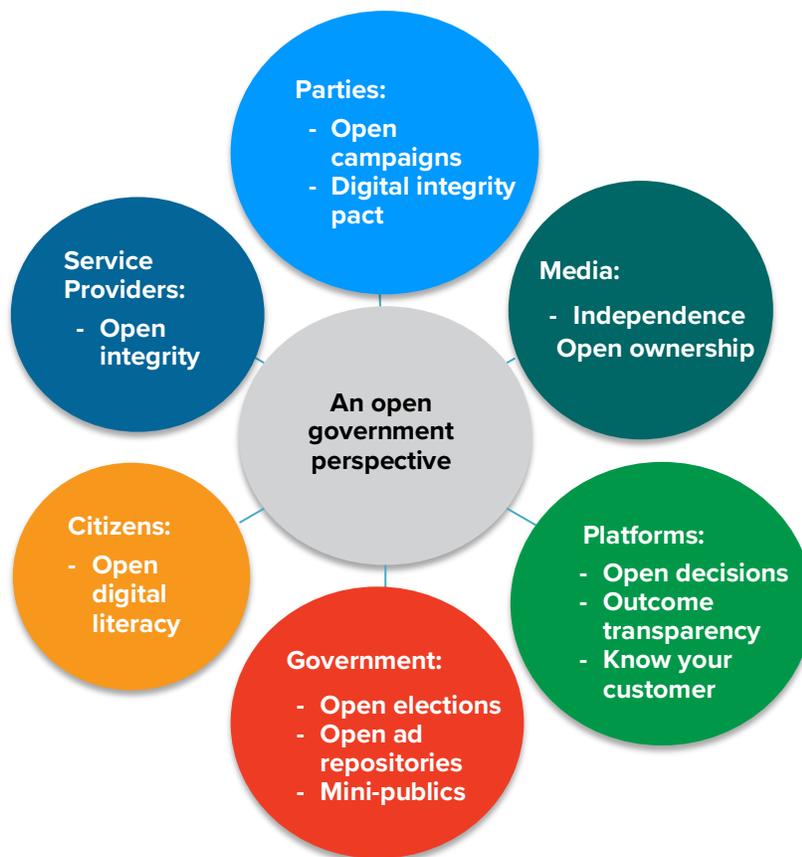


Figure 3 above summarizes some of the main suggestions on how an open government approach can contribute to improving the integrity of political communication.



V. Endnote and outlook

Protecting and nurturing the integrity and health of political communication is not just a central contemporary challenge in an era of polarization, populism, and demagoguery. It is also an enduring imperative for continuously evolving democratic and just forms of governance into the future. The rise of social media, big platforms, and all things digital provide great opportunities for plotting this path, yet also present a number of unprecedented problems that require urgent attention. Many practical measures are being proposed, many policy drafts are on the table, and many initiatives have been launched. Moving beyond the focus on tech platforms on the one hand and government on the other is essential when prioritizing action. An ecosystem perspective that maps the roles of and dynamics between a broader group of different stakeholders shows that a broader focus is both necessary and productive when thinking about the options available for how to nurture the integrity of political communication in the digital era. Much of this is in the beta phase of experimentation. Yet a growing body of empirical evidence has helped to deprioritize some issues that might turn out to be less prevalent and consequential than initially thought. And it directs attention to both new issues on the horizon and old ones that merit to be urgently revisited.

The best that specific stakeholders can do or should be incentivized to do is often not what is the most discussed or obsessed about. Governments might want to pay less attention to micromanaging the regulation of hate speech and think about ways to shore up the independence, financial clout, and online presence of their public media systems and independent, local journalism that continue to be vital for the integrity of political communication, if they are truly empowered to play their role. Political parties and candidates can examine themselves and how they work on their own campaigns and set examples for transparency, civility, and truthfulness. They can think twice before they make unfairly disparaging remarks about their opponents, media watchdogs, or science for short-term political gains, but with longer-term corrosive impact on overall public trust in the system.

A vast array of positive policy ideas is being put forward. Directly related initiatives in the making include the proposed EU Digital Services Act²¹⁷ and European Democracy Action Plan²¹⁸ or parts of the US Platform Accountability and Consumer Transparency Act²¹⁹ and 2021 For the People Act,²²⁰ suggesting that policy momentum is turning into directed action.

²¹⁷ The Digital Services Act Package, <https://ec.europa.eu/digital-single-market/en/digital-services-act-package>

²¹⁸ European Democracy Action Plan: Making EU Democracies Stronger, https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2250

²¹⁹ PACT Act, <https://www.congress.gov/bill/116th-congress/senate-bill/4066/all-info>

²²⁰ For the People Act, <https://www.congress.gov/bill/117th-congress/house-bill/1/text>



The next step is to build effective coalitions to move forward, develop differentiated approaches that do not overburden start-ups, and recognize the experimental nature of the worthy proposals that require an adaptive approach for fine-tuning governance systems as they evolve in the future. A central challenge is to avoid two sorts of capture: (1) that governance mechanisms are abused by political actors to stifle internet freedoms that are so vital in the context of authoritarian regimes and (2) that governance mechanisms are watered down by industry lobbying in pursuit of staving off any qualifications to their highly lucrative business models.

An open government approach can be highly inspirational for envisioning a set of responses to key priorities on the integrity of political communication agenda and to guard against these two types of capture. And it offers access to a growing stock of learning and experience as well as a community and organizational infrastructure to jointly discuss, devise, and implement specific actions.

Finally, it is also important to keep in mind that an open government approach is not only about helping craft a set of direct, practical responses to the problem at hand.

The overall spirit of open government is a commitment to fair, inclusive, accountable, and empowering governance that guides the direction of travel for the more than 4,000 commitments that national and local government entities have so far undertaken under the remit of the OGP.²²¹ Pursuit of these principles of open government is not only holding power to account but also crowding in political morality. Open government is a project that responds to deeper structural inequities of feeling powerless and disenfranchised—the very sentiments that are increasingly recognized to underpin the nascent rage, distrust, and enamourment with conspiracy and populism that put the health of political communication at risk.

²²¹ [OGP Commitments Database](#).

