

UN Research on a Code of Conduct on Information Integrity – IFLA Response

4 January 2024

The UN is proposing a Code of Conduct on Information Integrity for Member States, and is seeking input on principles for the code. IFLA and the Freedom of Access to Information and Freedom of Expression Advisory Committee (FAIFE) have prepared a response, focusing on raising the profile of libraries' role in fighting misinformation and disinformation through user empowerment. The consultation also offers an opportunity to advance other IFLA goals, such as those related to open access, open science, and protection of privacy.

IFLA's responses are set out below, and relate to the proposals already included in the UN Secretary-General's [Policy Brief on Information Integrity](#). The texts from the Brief are given, in italics, ahead of the IFLA responses.

For further information, see our initial [response to the Policy Brief](#), as well as the [note](#) from our side-event at the UN in July on libraries as pillars of information integrity.

If you want to respond to the same consultation, you can do so at [this link](#).

Commitment to Information Integrity

All stakeholders should refrain from using, supporting or amplifying disinformation and hate speech for any purpose, including to pursue political, military or other strategic goals, incite violence, undermine democratic processes or target civilian populations, vulnerable groups, communities or individuals;

We welcome the call to refrain from using, supporting or amplifying dissemination of disinformation and hate speech, but underline that this should not lead to restrictions on legitimate free speech. We note that this is a point underlined by the UNESCO Guidelines on Regulation of Digital Platforms, and suggest taking language from there.

We also believe that this principle should be accompanied by a positive message, stressing the importance of building respect for quality information, as well as curiosity and critical thinking about information, as a complement to more supply-led/top-down approaches.

Respect for Human Rights

Member States should:

Ensure that responses to mis- and disinformation and hate speech are consistent with international law, including international human rights law, and are not misused to block any legitimate expression of views or opinion,

including through blanket Internet shutdowns or bans on platforms or media outlets;

Undertake regulatory measures to protect the fundamental rights of users of digital platforms, including enforcement mechanisms, with full transparency as to the requirements placed on technology companies

All stakeholders should comply with the Guiding Principles on Business and Human Rights;

We also welcome this point, but note the need also to affirm the right of access to information of all types as a key right that needs to be taken into account.

In addition to references to Internet shutdowns and bans on platforms, we also need to avoid manipulation of internet access and bandwidth in the context of violations of net neutrality. This includes zero-rating and efforts to impose costs on providers of information, given the harm that these will do to less wealthy sources, such as libraries.

Support for Independent Media

Member States should guarantee a free, viable, independent and plural media landscape with strong protections for journalists and independent media, and support the establishment, funding and training of independent fact-checking organizations in local languages;

News media should ensure accurate and ethical independent reporting supported by quality training and adequate working conditions in line with international labour

We welcome these steps, but also highlight the value of supporting local media, and promoting citizen journalism. We encourage efforts to realise the potential of partnerships with community information institutions such as libraries.

Increased Transparency

Digital platforms should:

Ensure meaningful transparency regarding algorithms, data, content moderation and advertising;

Publish and publicize accessible policies on mis- and disinformation and hate speech, and report on the prevalence of coordinated disinformation on their services and the efficacy of policies to counter such operations;

News media should ensure meaningful transparency of funding sources and advertising policies, and clearly distinguish editorial content from paid advertising, including when publishing to digital platforms;

We welcome this point, but add that it is important to have transparency about all measures designed to counter mis-/disinformation and hate speech, not just those aimed at coordinated disinformation. It is important for people to be able to inform themselves about all of the factors which affect what they see online.

User Empowerment

Member States should ensure public access to accurate, transparent, and credibly sourced government information, particularly information that serves the public interest, including all aspects of the Sustainable Development Goals;

Digital platforms should ensure transparent user empowerment and protection, giving people greater choice over the content that they see and how their data is used. They should enable users to prove identity and authenticity free of monetary or privacy tradeoffs and establish transparent user complaint and reporting processes supported by independent, well publicized and accessible complaint review mechanisms;

All stakeholders should invest in robust digital literacy drives to empower users of all ages to better understand how digital platforms work, how their personal data might be used, and to identify and respond to mis- and disinformation and hate speech. Particular attention should be given to ensuring that young people, adolescents and children are fully aware of their rights in online spaces

We strongly agree about the importance of access to government information, but we should not limit ourselves to this. Citizens need access to reliable, accurate and verifiable information for making the decisions that affect their day to day lives, including health and financial information, from whichever source can provide this. We should take what information is useful for people as the starting point, rather than any particular source.

In particular, it is essential to highlight the role of open access and open science in supporting a healthy information environment by ensuring access to research, as well as the literacy and community infrastructures to engage with it.

While welcoming the goal of the point about proving identity without privacy or monetary trade-offs, we are concerned that this may be impossible, and lead to potential negative outcomes

We strongly welcome the assertion of the importance of building digital literacy, and would only note that this should be delivered, as far as possible, at the community level, and that libraries in particular be empowered to offer this support by providing adequate funding to build on their existing efforts.

Strengthen Research and Data Access

Member States should invest in and support independent research on the prevalence and impact of mis- and disinformation and hate speech across countries and languages, particularly in underserved contexts and in languages other than English, allowing civil society and academia to operate freely and safely;

Digital platforms should:

Allow researchers and academics access to data, while respecting user privacy. Researchers should be enabled to gather examples and qualitative data on individuals and groups targeted by mis- and disinformation and hate speech to

better understand the scope and nature of harms, while respecting data protection and human rights;

Ensure the full participation of civil society in efforts to address mis- and disinformation and hate speech;

We welcome the focus on supporting research, and would suggest two additions: first, that research on effective ways to counter mis- and disinformation through user empowerment activities be included; and second, that this principle be complemented by reference to the value of platforms sharing information about take-downs, and to ensure that there are no unreasonable barriers to access to data, such as overly strict vetting procedures which are likely to harm users.

We also welcome the reference to the full participation of civil society in efforts to address mis- and disinformation, and urge this to clarify that all stakeholders should be involved in decision-making, such as libraries.

Scaled-Up Responses

All stakeholders should:

Allocate resources to address and report on the origins, spread and impact of mis- and disinformation and hate speech, while respecting human rights norms and standards and further invest in fact-checking capabilities across countries and contexts;

Form broad coalitions on information integrity, bringing together different expertise and approaches to help to bridge the gap between local organizations and technology companies operating at a global scale;

Promote training and capacity-building to develop understanding of how mis- and disinformation and hate speech manifest and to strengthen prevention and mitigation strategies

We welcome this principle, and underline the value of country-wide networks such as libraries in allowing such scaled-up responses to happen, given adequate support, building on existing efforts.

Stronger Disincentives

Digital platforms should move away from business models that prioritize engagement above human rights, privacy and safety;

Advertisers and digital platforms should ensure that advertisements are not placed next to online mis- or disinformation or hate speech, and that advertising containing disinformation is not promoted;

News media should ensure that all paid advertising and advertorial content is clearly marked as such and is free of mis- and disinformation and hate speech;

We welcome this principle, but note that disincentives should not lead to over-blocking, and so be crafted in ways that uphold human right. There should be full transparency and accountability in the way that news media and digital content platforms mark content as free of misinformation, disinformation and hate speech.

Enhanced Trust and Safety

Digital platforms should:

Ensure safety and privacy by design in all products, including through adequate resourcing of in-house trust and safety expertise, alongside consistent application of policies across countries and languages;

Invest in human and artificial intelligence content moderation systems in all languages used in countries of operation, and ensure content reporting mechanisms are transparent, with an accelerated response rate, especially in conflict settings;

All stakeholders should take urgent and immediate measures to ensure the safe, secure, responsible, ethical and human rights-compliant use of artificial intelligence and address the implications of recent advances in this field for the spread of mis- and disinformation and hate speech.

We underline that use of AI in content moderation should be carried out with care, given its limitations, and that discussions about this should be multi-stakeholder, including libraries of course. We note in particular the rapid development of the role of libraries around AI, notably around AI literacy.

Other principles

Although already mentioned in points made above, we believe that a key way to address the challenge of mis- and disinformation online is to both give access to, and provide support and encouragement to use, quality information. We should not just combat information 'diseases', but promote information 'health and wellness' in a positive fashion. This can be done by strong library fields in all countries and communities.

Additional Suggestions for Methodologies of Implementation

We are aware that there are plans to create a capacity within the UN to work on this as an issue. We urge consideration of the place of libraries in this work at the global scale, but also that libraries are engaged in any national strategies and deliver plans.