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From debunking to prebunking: How to get ahead of disinformation on migration in the EU

Paul Butcher
Alberto-Horst Neidhardt



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About the authors



Paul Butcher is a Policy Analyst in the European Politics and Institutions programme. His primary research interests relate to disinformation and tech policy, democracy and citizens' participation, and EU enlargement to the Western Balkans. Prior to joining the EPC in 2017, he was a Research Assistant at the Karl-Franzens University of Graz. He has also completed traineeships at the European Parliament and with SOS Children's Villages in Vienna. He holds a BA in Modern and Medieval Languages from the University of Cambridge and an MA in Southeast European Studies from the Karl-Franzens University of Graz.



Alberto-Horst Neidhardt is a Policy Analyst in the European Migration and Diversity programme. His research areas include asylum, migration and integration matters, with a particular interest in the politics of migration and specific expertise on EU law. He also lectures on comparative law and legal pluralism at the University of Antwerp. Prior to joining the EPC, he was a PhD candidate in law at the European University Institute (EUI), Teaching Assistant at the School of Oriental and African Studies (SOAS) and Research Assistant at Queen Mary, University of London. He holds a PhD and an LLM in Comparative, European and International Laws from EUI and an MA in International and Comparative Legal Studies from SOAS.

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List of abbreviations

CSO	civil society organisation
DG	Directorate-General
DG COMM	European Commission Directorate-General for Communication
DG CONNECT	European Commission Directorate-General for Communications Networks, Content and Technology
DG EAC	European Commission Directorate-General for Education and Culture
DSA	Digital Services Act
ECA	European Court of Auditors
EDAP	European Democracy Action Plan
EDMO	European Digital Media Observatory
EEAS	European External Action Service
EPC	European Policy Centre
FEPS	Foundation for European Progressive Studies
FES	Friedrich-Ebert-Stiftung
GMMA	Global Migration Media Academy
MIL	media and information literacy
RAS	Rapid Alert System
SOMA	Social Observatory for Disinformation and Social Media Analysis
UNHCR	United Nations High Commissioner for Refugees (UN Refugee Agency)

List of terminology

Alternative narrative

A type of messaging that promotes a story or subject which is different from that promoted by disinformation actors. Alternative narratives focus on what society stands *for* rather than *against*. Unlike counternarratives, alternative narratives do not seek to respond directly to or rebuke an existing false narrative, but rather try to reframe the debate and shift the attention away from the threats and fears propagated by disinformation actors.

Communicator/communication actor

In the context of this Issue Paper, *communicators and communication actors* refer to all those practitioners who share the common purpose of counteracting disinformation by promoting a fair and balanced narration of migration. This includes communication officers and those responsible for campaign and advocacy strategies in the EU institutions, national governments, local and regional authorities, NGOs and international organisations.

Counternarrative

A communication strategy that tries to directly oppose a particular false claim or narrative by uncovering lies and untruths and by discrediting disinformation actors. See *alternative narrative*.

Debunking

Fact-checking activities that seek to expose false claims after they have been published.

Disinformation

“[A]ll forms of false, inaccurate, or misleading information designed, presented and promoted to intentionally cause public harm or for profit.”*

Disinformation actor

Any individual, organisation or institution contributing to the writing, spreading or propagation of disinformation. This may include state actors (notably Russia and China), but also domestic (European) supporters of radical political options. The precise origin or background of disinformation actors is not important for developing a communication-based response; rather, their message is important.

Foresight

An exploration of plausible future scenarios that deal with uncertainty in a structured and systematic way, using several different methods. It draws insights for policymaking, robust planning and better preparedness.

Media and information literacy (MIL)

All critical skills and technical competencies required to access, understand, analyse and evaluate print and electronic media autonomously.

Prebunking

Pre-empting disinformation by raising awareness of an impending threat and strengthening critical skills to identify manipulation techniques. This stands in contrast with fact-checking, which seeks to counteract disinformation messages *after* they have spread (see *debunking*). Prebunking can help communication actors take strategic action and promote alternative narratives before disinformation begins to circulate.

* High-Level Expert Group on Fake News and Online Disinformation (2018), [A multi-dimensional approach to disinformation: Report of the independent High Level Group on fake news and online disinformation](#), European Commission, p.5.

Executive summary

Despite increasing efforts to address disinformation, EU institutions, national governments and civil society still struggle to overcome one fundamental challenge. Disinformation actors can spread lies quickly and widely by adapting their messages to the news cycle and appealing to their readers' emotions, concerns and value systems. In doing so, they set the tone and content of the conversation ahead of everyone else. This is demonstrated by recent events in Afghanistan and Belarus, where disinformation campaigns quickly sprang up online, aiming to feed public anxieties and reinforce the belief that Europe is facing a repeat of the 2015 'migration crisis'.

In this context, debunking efforts – fact-checking individual false claims *after* they have been published – usually fail to effectively counter the lies they are meant to counteract. Nor do they prevent disinformation actors from exploiting attention-grabbing events to manipulate public perception and steer social divisions. In contrast with debunking, this Issue Paper argues that disinformation should be pre-empted by taking strategic action *before* it begins to circulate. The guiding principle of this approach is that of '**prebunking**'.

Prebunking relies on two pillars, each linked to a specific timescale. In the short to medium term, efforts should be devoted to identifying false stories as early as possible, or even anticipating future narratives. In the longer term, citizens should be provided with the critical skills to distinguish facts from falsehoods and filter out manipulative content (see infographic).

To successfully build **the first pillar** of the EU prebunking ecosystem, EU institutions and civil society should take account of the following recommendations:

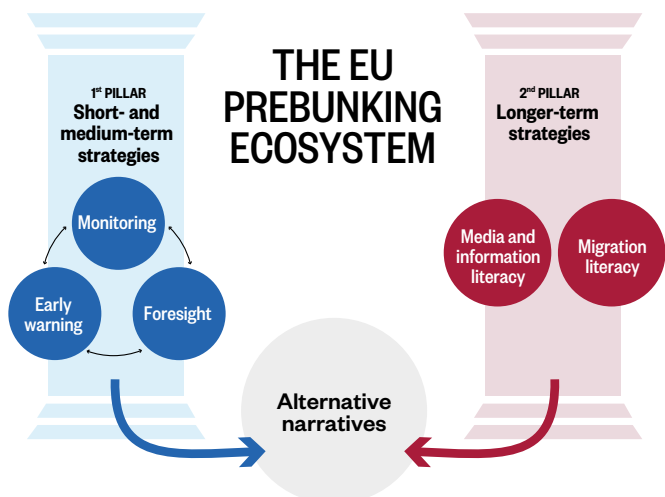
- ▶ Expand **monitoring activities** through coordinated multi-stakeholder initiatives to understand the spread of disinformation narratives and evaluate their potential to spread.
- ▶ Establish **early warning systems** based on civil society monitoring work to enable fact-checkers and communication professionals to assess the likely reach and impact of disinformation before intervening and craft swift responses where necessary.
- ▶ Use **foresight techniques** to anticipate which disinformation narratives might spread in response to particular events and how they might cross linguistic and political boundaries.

Each of these actions should support one another, helping EU institutions and civil society understand the disinformation landscape and respond to developments quickly. However, the success of these short- and medium-term measures constituting the first pillar of the EU prebunking ecosystem will be limited so long as disinformation meets a receptive audience. Especially while migration remains a sensitive and highly politicised subject, it will continue to attract manipulative content, and each new development will generate a new wave of disinformation.

To develop **the second pillar** and promote stronger societal resilience against future disinformation, EU institutions and civil society should:

- ▶ **Equip citizens with critical skills** via literacy campaigns to spot disinformation and resist bias and common manipulation techniques.
- ▶ **Promote 'migration literacy'** to prevent disinformation actors from exploiting the subject's complexity by developing subject-specific educational programmes alongside general training for journalists and other intermediaries.
- ▶ **Apply segmentation and targeting to media literacy efforts**, taking into due consideration the age, attitudes and value systems of those targeted by disinformation campaigns.

The EU prebunking system built through these actions will not only support ongoing efforts against disinformation. It will also help European citizens cope with and orient themselves within a rapidly changing information environment. It will promote an inclusive and fact-based public discourse. In a context where migration-related disinformation creates intergroup tensions and threatens the peace and security of European societies, prebunking efforts will also promote social cohesion, rebuild public trust and protect democratic institutions.



Introduction

Reading the news in 2021, little seems to have changed since 2015. The EU is said to be facing the prospect of another ‘migration crisis’.¹ Following the Taliban takeover in Afghanistan and increased border crossings from Belarus, the EU and its member states have invoked the need to take strong measures to prevent a repeat of 2015, when they were unable to address the unprecedented rise in irregular arrivals and asylum applications.² Even if migration experts regard comparisons with the pressure the EU faced in 2015 as misleading,³ recent events have brought about a tectonic shift in discourse and revived the ‘crisis narratives’ that dominated at that time.⁴ By pointing to the alleged inevitability of a “new wave of refugees”,⁵ some commentators and even some European leaders⁶ have explicitly evoked the supposed threat of imminent “mass” arrivals, calling for strict restrictions against migratory flows.⁷

Between 2015 and today’s latest developments, the salience of migration as a topic of policy debate in the EU had actually dropped significantly.⁸ The number of irregular arrivals steadily declined, hitting record lows in 2020.⁹ Public attention in Europe shifted elsewhere: all eyes were focused on climate change, the rule of law and, most notably, the COVID-19 pandemic.¹⁰ With the presentation of the New Pact on Migration and Asylum in September 2020, the von der Leyen European Commission had also explicitly distanced itself from the previous College’s communication strategy, trying to steer clear from crisis narratives and security-focused agendas. In the hope that it would open more opportunities for effective and fair policies, the Commission promoted a more balanced discussion, describing migration as a “constant feature of human history [...] [that] can contribute to growth, innovation and social dynamism” in the EU.¹¹

The inflammatory rhetoric used to describe the risk of imminent ‘waves’ of arrivals, combined with the high visibility of events in Afghanistan and Belarus, has multiplied opportunities for hostile actors to spread disinformation about migration, polarising the discourse and driving voters towards extreme positions.

While recent developments in Afghanistan and Belarus show that virtually all European policymakers are more conscious of the need to devise strategic plans to avoid past policy failures, the alarmist – even panicked – response has brought crisis narratives back to life. The inflammatory rhetoric used to describe the risk of imminent ‘waves’ of arrivals, combined with the high

visibility of events in Afghanistan and Belarus, has also multiplied opportunities for hostile actors to spread disinformation about migration, polarising the discourse and driving voters towards extreme positions.

GETTING AHEAD OF DISINFORMATION ON MIGRATION IN THE EU

Research conducted by the European Policy Centre (EPC) in 2020, alongside other studies, has demonstrated that disinformation adapts to key events. While disinformation narratives systematically frame migration as a threat to three partly overlapping areas (health, wealth and identity), their particular messages shift in response to each development in the news cycle.¹² Depending on the circumstances, migrants are thus described as an invasion force and threat to European cultural traditions and identity; as criminally minded and incapable of respecting social and legal norms; as stealing jobs; or as an infection risk. By strategically linking migration to broader societal concerns, disinformation actors exploit attention-grabbing events to manipulate public perception, steer social divisions, and set the tone and content of the policy agenda.

Against this background, this Issue Paper builds on the EPC’s earlier research, also conducted in cooperation with the Foundation for European Progressive Studies (FEPS) and the Friedrich-Ebert-Stiftung (FES). It explores short- and longer-term pre-emptive strategies against disinformation and innovative tools for evidence-based and balanced discussions on migration. The guiding principle of these recommendations is that of *prebunking*: the methods described in this paper will help communicators pre-empt disinformation about migration by taking strategic action *before* it begins to circulate. This stands in contrast with a reactive approach that tries to fact-check or counteract disinformation campaigns and messages *after* they have spread (i.e. *debunking*).

The methods described in this Issue Paper will help communicators pre-empt disinformation about migration by taking strategic action *before* it begins to circulate. This stands in contrast with a reactive approach that tries to fact-check or counteract disinformation campaigns and messages *after* they have spread (*debunking*).

Ideas of ‘prebunking’ disinformation are not entirely new. Although there are no widely agreed-upon definitions

for the term, it has emerged in various contexts in recent years. For example, the European Commission's Directorate-General for Communication (DG COMM) uses it in its guide to "identifying conspiracy theories" produced during the COVID-19 pandemic, noting that "empowered people are more resilient".¹⁵

Certain academics also employ the expression, frequently associating it with the concept of 'inoculating' the public against manipulative information campaigns.¹⁴ According to psychologist Stephan Lewandowsky, *inoculation* or *prebunking* consists of two components: an explicit warning of an impending threat and awareness of manipulation techniques.¹⁵ Scientific experiments have shown that inoculation efforts can effectively build resistance against disinformation.¹⁶ For the moment, such ideas largely remain theoretical or experimental. However, as this paper demonstrates, they are an excellent fit with several existing EU initiatives and can inspire new measures.

The Issue Paper focuses on two timescales for the ambitious task of prebunking. Chapter 1 looks into the prospects for **short- and medium-term** preparatory work, which can help inform the content of counter-disinformation strategies and generate timelier responses. In particular, it considers the need to identify and issue alerts about false stories as early as possible, or even anticipate future narratives before they spread. It therefore dwells on the concepts of (i) **monitoring** emerging disinformation threats and **early warning**; (ii) **multi-stakeholder partnerships** and **information sharing** to ensure a fast and coordinated response; and (iii) **foresight** to plan for and prepare responses to likely future developments.

Chapter 2 focuses on the **longer-term** means to strengthen **societal resilience** to disinformation about migration. The prospects for using various aspects of **media and information literacy** (MIL) to improve European citizens' ability to identify disinformation techniques and widespread narratives, particularly for complex topics like migration, forms the chapter's core. It thus considers (i) current initiatives at the European and national levels to strengthen societal resilience against disinformation; (ii) the types of critical skills required to spot disinformation, especially online, and to build awareness about how information eco-systems work; and (iii) how to raise **awareness and knowledge about migration specifically** to improve the ability to spot likely falsehoods.

Chapter 3 presents **recommendations** for the ideas examined in Chapters 1 and 2 and suggests how they could work in practice. The proposed actions complement the recommendations advanced in 2019 and 2020 EPC studies to help EU institutions, member state authorities and NGOs reframe the debate and rebalance the polarised public discourse on migration.¹⁷

PREBUNKING IN INSTITUTIONAL STRATEGIES SO FAR

Fighting disinformation, including disinformation about migrants and refugees, has been put front and centre of many of the activities and initiatives of the European Commission, Parliament and member states. In its Action Plan against Disinformation, presented in December 2018 together with the European External Action Service (EEAS), the Commission acknowledged that democratic societies "depend on the ability of citizens to access a variety of verifiable information so that they can form a view on different political issues."¹⁸ Accordingly, the Action Plan proposed to bring together several disparate actions under a combined strategy. The strategy consists of four pillars, each including relevant aspects to prebunking strategies:

- ▶ **Pillar 1:** Improving the capabilities of Union institutions to detect, analyse and expose disinformation
- ▶ **Pillar 2:** Strengthening coordinated and joint responses to disinformation
- ▶ **Pillar 3:** Mobilising the private sector to tackle disinformation
- ▶ **Pillar 4:** Raising awareness and improving societal resilience

Some of the actions introduced under these pillars can serve as a starting point for the prebunking ideas examined in this paper (see Chapters 1 and 2).

Since the publication of the 2018 Action Plan, the EU has taken further steps to expand its toolbox against disinformation. Of particular importance are the launch in 2020 of the European Digital Media Observatory, the adoption of the European Democracy Action Plan and the Digital Services Act.

Since the publication of the 2018 Action Plan, the EU has taken further steps to expand its toolbox against disinformation. Of particular importance for prebunking activities are the launch in 2020 of the European Digital Media Observatory (EDMO) and the adoption of two major legislative initiatives, the European Democracy Action Plan (EDAP) and the Digital Services Act (DSA). The EDAP, in particular, reflects the need to boost critical skills, highlighting that media and digital literacies "help citizens check information before sharing it, understand who is behind it, why it was distributed to them and whether it is credible" and enable "people to participate in the online environment wisely, safely and ethically."¹⁹

The prebunking approach explored in this Issue Paper addresses two challenges that current initiatives and measures only partly address. First, the quick reaction and adaptability of disinformation to high-visibility events calls for an analysis of the tools needed to identify and flag false stories as early as possible, or even anticipate future narratives. Second, fact-checkers or communication professionals cannot catch all potential disinformation articles and narratives and inform the public about each one. Citizens must therefore be provided with the ability to identify common manipulation techniques, apply critical skills to understand the biases and motivations behind each claim, and keep themselves *accurately* informed. This is especially the case for complex policy topics like migration. Accordingly, this paper identifies blind spots in MIL and explores innovative approaches, including civil society organisation-led efforts, to close down the existing vulnerability gaps that disinformation actors exploit.

The prebunking methods explored in this paper may contribute to a better understanding of disinformation threats and a more resilient population. However, they alone will not be enough to truly counteract the influence of disinformation on the migration debate and public opinion. That task also requires the construction of persuasive alternative narratives.

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alone will not be enough to truly counteract the influence of disinformation on the migration debate and public opinion. That task also requires the construction of persuasive alternative narratives: stories and messages that offer a more positive, balanced depiction of migration and can effectively reframe the debate away from the divisive rhetoric promoted by disinformation narratives.

The FEPS-FES-EPC paper published in 2020 provides recommendations on how these alternative narratives could look and be promoted. This follow-up paper, by contrast, develops ideas for how to prepare the ground for promoting them, based on analysis and anticipation of how the debate may develop. By applying some of the methods described below, communicators should be able to craft communication strategies to claim the discursive space before disinformation has a chance to spread.

METHODOLOGY

The findings of this paper are based on 17 interviews with institutional representatives, communication experts, fact-checkers and migration specialists carried out between March and October 2021. These interviews were complemented by two online EPC high-level roundtable events, in which initial ideas and preliminary recommendations were discussed with representatives of European institutions, civil society organisations (CSOs) and various disinformation and migration experts.

The authors also used quantitative data from their earlier research on the same topic in 2020, when they gathered and analysed 1,500 migration-related news articles published between May 2019 and July 2020 and the numbers of likes, comments and shares they received on Facebook and Twitter. This dataset, which offers a ‘snapshot’ of the migration disinformation landscape in four European countries – Germany, Italy, Spain and the Czech Republic – provides context for the analysis and the conclusions of this paper.²⁰

Chapter 1. Short- and medium-term initiatives: Monitoring, early warning and foresight

The concept of *prebunking* revolves around preparedness and increasing resilience. Preparing citizens against disinformation is largely a longer-term task that could take many years. However, preparing those on the communication frontlines to better spot, react to and counteract disinformation narratives can be achieved through various short- and medium-term means. This chapter explores some of these techniques, how they are currently implemented, and their potential for being scaled up or applied to tackling disinformation on migration.

Previous research, including by the EPC, demonstrates that the narratives employed by disinformation actors are constantly shifting in reaction to the news cycle, strategically incorporating headline-grabbing events and developments into already well-established narratives to feed public anxieties and concerns about migration.²¹ For example, a surge of articles and engagements (i.e. likes, comments, shares on social media) promptly followed the tensions at the Greek–Turkish border between February and March 2020, after Turkish President Recep Tayyip Erdoğan suspended the EU–Turkey statement.

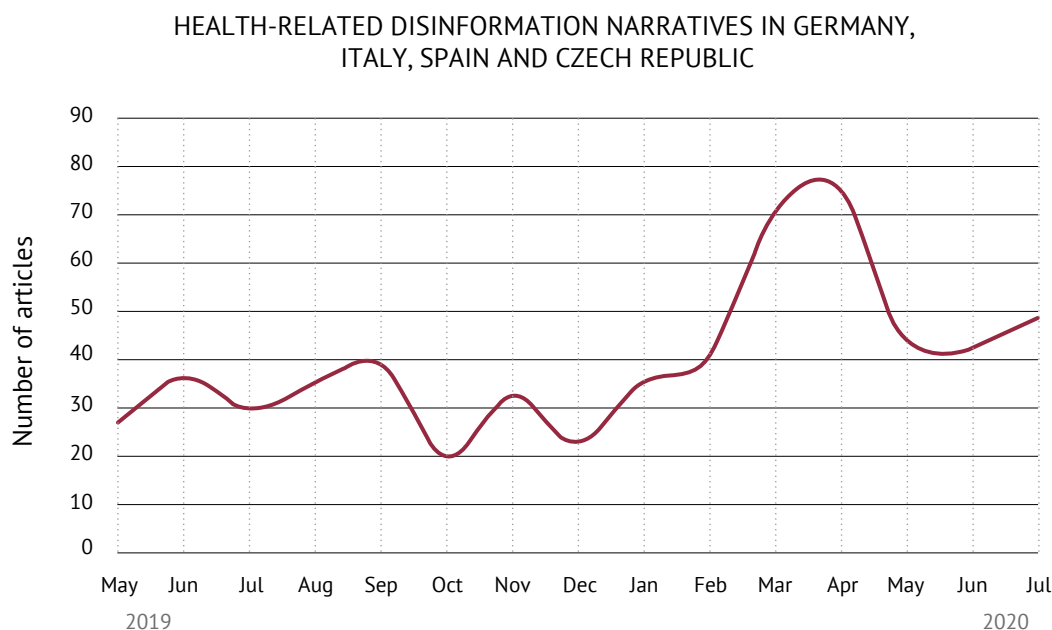
Events that could serve as a catalyst for spreading disinformation do not even need to have any inherent connection with migration to be exploited for the purpose of generating disinformation and confusion. The explosion of disinformation narratives soon after the World Health Organization’s declaration of the COVID-19 pandemic demonstrates this: disinformation actors linked migrants to the virus by depicting them as an infection risk (see Figure 1). Despite the health crisis

resulting in a gradual decline in the salience of migration, disinformation actors brought it back into the headlines and were thus able to generate new impetus behind their divisive agenda.²²

In this daily battle of narratives, communicators seeking to promote a more balanced debate must be able to respond quickly. By the time a message has been tweeted or reposted thousands of times, it becomes harder to appropriately respond as those exposed to it may be less likely to be convinced by an alternative, evidence-based version. Disinformation actors also have an inherent advantage, as false stories and narratives propagate faster and reach wider audiences than fact-based narratives, partly because they are symbolically and emotionally charged.²³ To successfully counteract the influence of disinformation, communicators must obtain a first-mover advantage and ensure that those exposed to misleading messages have previously been presented with an evidence-based alternative.

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Fig. 1



The first step in being prepared is therefore to stay informed about the latest disinformation trends through extensive and dependable real-time **monitoring**. The derived knowledge about disinformation narratives, sources and techniques provides the basis upon which all subsequent strategies can be built.

When new developments are detected through monitoring activities, various stakeholders could craft and distribute appropriate messages to pre-empt or counteract disinformation narratives. These may include government and/or EU institutions, international organisations, fact-checkers or other CSOs. To seize the initiative and pre-empt the large-scale spread of disinformation, however, they should be promptly informed and reached through an appropriate call to action. Therefore, this chapter explores **early warning systems** as a hitherto underexplored method of distributing monitoring results to all relevant stakeholders and speeding up response times. **Coordination and information sharing** between the wide variety of profiles involved in counter-disinformation work is another element that can improve the timeliness and effectiveness of their responses and is examined in this chapter's second part.

But even if these stakeholders are immediately informed about the disinformation narratives they need to counteract and respond quickly, an entirely reactive approach would be insufficient. It does not prevent those who seek to manipulate and divide from setting the agenda and tone of the public discussion. To build alternative narratives that can diminish the impact of disinformation in advance, stakeholders must be able to claim the ground first through preparatory work. This is where **foresight** comes in: a structured and systematic analysis of potential future scenarios will better prepare their communication strategies and disarm likely disinformation narratives in advance. The third part of this chapter will explore this idea in more detail.

These concepts do not operate independently; they all must be considered part of the same **future-oriented prebunking strategy** (see Chapter 3). Foresight cannot take place in a vacuum. It needs monitoring to provide the necessary information about the trends and developments and work out possible future scenarios. After such scenarios have been envisioned and prepared for, an early warning system is necessary to promptly inform stakeholders and enable them to implement their strategies in a timely fashion. An early warning system combined with foresight indicates when to intervene, but also when not to. Fact-checking activities or communication responses implemented at the wrong moment may inadvertently reproduce disinformation and its underlying frames.

Migration provides an excellent case study for how these ideas could be applied in practice. Extensive monitoring and research have been carried out and continue to map the migration disinformation landscape.²⁴ These exercises demonstrate the patterns in migration-related disinformation, including the kinds of events that grant disinformation actors an opportunity to

promote anti-migrant narratives, how they adapt their existing narratives, and the techniques they use in given scenarios. For example, any rise in actual or potential irregular arrivals (e.g. Mediterranean Sea crossings during the spring and summer seasons) is typically exploited by disinformation actors to feed theories that Europe is undergoing an 'invasion'.²⁵ Such 'invasion narratives' are then adapted to local circumstances and concerns, generating greater engagements and further polarisation.

Several examples have become prominent recently in connection with events in Afghanistan. Some Italian news outlets claimed in September 2021 that 250,000 Afghans were already on their way to Europe,²⁶ while others put imminent arrivals at over a million.²⁷ These articles use sensationalist language, referring to Afghan migrants as an "exodus" and "tsunami" and the situation as "out of control".²⁸ Meanwhile, social media posts promoted the long-established narrative that all Afghan refugees are men (see Figure 2).

Fig. 2

AFGHAN EVACUATIONS: PHOTOS USED OUT OF CONTEXT



Sources: Maldita (2021), Altas (2018), Reuters (2021)²⁹

This image began circulating online during evacuations from Afghanistan following the Taliban takeover in August 2021, with social media accounts claiming that all those escaping Kabul are men. Besides Spain, it was published on accounts from Austria, Belgium, France, Germany, Greece, Italy and Poland, among others. In reality, the photo is taken from an article published in April 2018 by a Turkish news agency on Afghans being returned from Turkey to Afghanistan. Left headline: "There is not even a single woman, because there is no risk in Afghanistan." Right headline: "6,846 irregular immigrants from Afghanistan returned to the country."

Although the attempt to predict future developments, including cross-border population movements or tomorrow's pandemics, is gradually becoming a core element of policymaking, anticipating future disinformation linked to such developments remains an area with largely untapped potential. By understanding which threat-based narratives could be linked to future events, it may be possible to say with a certain degree of confidence in which direction disinformation actors will attempt to push the discourse and take appropriate action to prebunk their efforts.

By understanding which threat-based narratives could be linked to future events, it may be possible to say with a certain degree of confidence in which direction disinformation actors will attempt to push the discourse and take appropriate action to prebunk their efforts.

The concepts explored in this chapter are not entirely new. The EU institutions and member state governments have, for example, taken some limited steps to implement monitoring (i.e. the EUvsDisinfo platform); set up an early warning system (i.e. the Rapid Alert System); and improve coordination, especially among civil society stakeholders (i.e. EDMO). But each of these initiatives faces political, legal and practical limitations, such as limited mandates, or have not yet demonstrated their full potential. Foresight, meanwhile, has not yet been applied systematically to the challenge of disinformation or communication strategies about migration. This chapter examines each of these initiatives and their potential for three concepts of (i) monitoring and early warning, (ii) stakeholder coordination, and (iii) foresight.

1.1. MONITORING AND EARLY WARNING

Civil society – including fact-checkers, political campaigners and academics – carry out many of the activities relating to monitoring and understanding disinformation trends. However, the EU also conducts some monitoring, supported by the member states. Documenting disinformation activities has been an important part of the work of the EEAS since at least 2015, when the European Council requested it establish an “action plan on strategic communication” to “challenge Russia’s ongoing disinformation campaigns”.⁵⁰ The resulting East StratCom Task Force and its initiatives, such as the EUvsDisinfo online platform, which provides a database of Kremlin-linked claims and narratives, constitute the EU’s main disinformation monitoring effort.

However, all EU institutional efforts to monitor disinformation are strictly limited by the EEAS’ 2015 mandate and its remit as the EU’s diplomatic service. They can only focus on threats originating from *outside* the Union; predominantly hostile states – originally mostly Russia, but more recently also including ‘emerging threats’ like China and Iran – and foreign non-state actors (e.g. terrorist groups). Using the EU institutions’ terminology, the EEAS mandate is restricted to the *external* dimension of disinformation, while the *internal* dimension – which includes all EU-based media, activists, trolls or politicians – lies beyond their scope.⁵¹

This is an inherently limited view of the whole disinformation landscape. A large share of disinformation, including on migration, appears to be home-grown. Studies have shown that many networks actively spreading disinformation about migration are based in Europe. Moreover, the lines between the internal and external are inevitably blurred. Disinformation networks do not operate in isolation but, on the contrary, are transnational in nature, replicating actions and narratives employed abroad.⁵² Stories originating from Russian sources may be picked up and spread widely by domestic European sources, and vice versa. Baseless stories claiming that migrants are deliberately infecting natives with COVID-19, for example, have been repackaged in various national contexts.⁵³ This makes it difficult to say with certainty where false stories originate.⁵⁴

An actor-based approach that privileges the identification of malicious content generated by foreign actors over all potentially damaging disinformation, regardless of its origin, produces only a partial picture of disinformation in Europe and weakens potential responses.

An actor-based approach that privileges the identification of malicious content generated by foreign actors over all potentially damaging disinformation, regardless of its origin, produces only a partial picture of disinformation in Europe and weakens potential responses. Nonetheless, maintaining the ‘internal versus external’ distinction is necessary for practical, political and legal reasons, especially considering the risk that EU institutions’ monitoring activities could violate media freedom laws.⁵⁵ This means that monitoring activities led by EU institutions and agencies will only ever provide a partial picture of currently circulating disinformation narratives.

Monitoring activities may also be carried out in the framework of other EU and national initiatives. One of these, the Rapid Alert System (RAS), also embodies the

potential of early warning as a counter-disinformation tool. It was established following the Action Plan against Disinformation in recognition of the fact that “[t]he first hours after disinformation is released are critical for detecting, analysing and responding to it.”³⁶ A joint initiative of the member states and facilitated by the EEAS, the RAS was set up ahead of the 2019 European elections to speed up the exchange of information in the wake of malicious campaigns conducted by foreign states and “to provide alerts on disinformation campaigns in real-time through a dedicated technological infrastructure.”³⁷

At first glance, the RAS appears to be the perfect vehicle for a Europe-wide monitoring and early warning system. However, being a tool of member state governments and EU institutions, it faces the same limitations as the East StratCom Task Force with regard to internal threats: its monitoring activities are restricted to external threats from foreign state and non-state actors. In practice, its potential as an early warning system is also underdeveloped. The headline purpose of ‘issuing alerts’ – via emails or text messages for exceptionally urgent cases – has not been a prominent part of the RAS’ activity. In their audit of the Action Plan against Disinformation, the European Court of Auditors (ECA) noted that “the RAS had not yet issued alerts at the time of the audit and has not been used to coordinate common action”.³⁸ In fact, the ‘alerts’ system is of secondary importance for even the EEAS. Its *raison d’être* is merely bringing together a community of relevant officials from all member states and EU institutions – something which did not previously exist.³⁹

The RAS’ role as an ‘early warning’ mechanism is therefore rather limited. Despite what its name suggests, its primary function is not so much to issue rapid alerts as to allow disinformation experts to work together to address the common threats they face from *foreign* disinformation. This is a gap in the current counter-disinformation landscape, as no initiative to deliver early warning alerts on internal threats currently exists (see Table 1). But despite its inherent limitations, the RAS embodies a recognition of the importance of early interventions, information-sharing and coordinated

responses. Considering its restrictions, it is a good starting point for developing a similar mechanism or early warning system which would be ‘actor-agnostic’, focusing its attention on a wider range of disinformation.

There is a gap in the current counter-disinformation landscape, as no initiative to deliver early warning alerts on internal threats currently exists.

So long as monitoring and counter-disinformation efforts focus on the origin of the material rather than its potential to violate basic rights, undermine public trust or endanger democratic institutions, there will be a void that disinformation actors can exploit. Because of these inherent limitations, a coherent and effective prebunking strategy against disinformation cannot rest on state or EU authorities alone. Private entities and civil society stakeholders, including fact-checkers and academics, have also become increasingly involved in supporting a wider variety of counter-disinformation efforts. The following section examines their role and explores some of the efforts to coordinate these activities.

1.2. MULTI-STAKEHOLDER COORDINATION AND INFORMATION SHARING

If there is one hallmark of the efforts against disinformation in Europe, it is quantity.⁴⁰ A huge number of think tanks, consultancies, CSOs, media organisations, academics, start-ups and fact-checkers are involved in one way or another in this issue, from all angles and all member states. With such a variety of individual initiatives taking place simultaneously, there is inevitably a certain amount of overlap, duplication of efforts and missing connections.

Table 1. Current EU initiatives on countering disinformation originating inside and outside the EU

Task	Internal	Both	External
Monitoring	Civil society activities	Civil society activities	EUvsDisinfo East StratCom Task Force
Early warning/alerts			Rapid Alert System
Information sharing	Network against Disinformation	European Digital Media Observatory	Rapid Alert System

While ‘internal’ sources of disinformation are covered by monitoring and information sharing initiatives, there is no internal activity relating to early warning comparable to the Rapid Alert System.

Although the 2018 Action Plan against Disinformation lists “mobilising [the] private sector to tackle disinformation” as one of its four pillars,⁴¹ this refers primarily to the EU’s cooperation with big tech companies in developing guidelines and, ultimately, social media regulations. The EU mostly provides financial support to civil society and researchers through Horizon 2020 or other established funding streams without playing a more formal role in activity coordination.

However, in the last few years, the EU has started to take a stronger role in facilitating connections between civil society actors, mainly through two overlapping projects. First, the Social Observatory for Disinformation and Social Media Analysis (SOMA) ran from November 2018 until April 2021. It sought to lay the basis for a Europe-wide network of fact-checking organisations. But in practice, it only attracted a small number of members, most of whom did not appear to make much use of the project platform.⁴²

In the last few years, the EU has started to take a stronger role in facilitating connection between civil society actors, mainly through two overlapping projects: the Social Observatory for Disinformation and Social Media Analysis and the European Digital Media Observatory.

SOMA’s activities have largely been taken over since June 2021 by the more ambitious European Digital Media Observatory (EDMO). The latter is a Europe-wide network of not only fact-checking organisations but also academics, researchers and media institutions. Built around a European level of partner organisations, with several national and regional hubs that are in the process of being set up, its goal is to strengthen cooperation, raise awareness and empower citizens to respond to online disinformation (see Infobox 1). To this end, it conducts original research, maps and supports existing fact-checking and research activities, and seeks to build a European community of fact-checkers that will collaborate continually, contributing to a culture of cross-border cooperation.

EDMO’s structure is, therefore, by design, cross-sector, cross-border and cross-purpose, in that it aims to develop research and understanding about disinformation while also working practically to counter it. Although each of its national and regional hubs is composed of different organisations working together in different ways, the various national experiences should allow for exchange and mutual learning between countries. This transnational perspective, informed by expertise on national and regional dynamics, helps monitor the spread of disinformation more effectively, regardless of its origin, and contribute to finding and coordinating effective responses against it.

INFOBOX 1. EUROPEAN DIGITAL MEDIA OBSERVATORY HUBS IN GERMANY, ITALY, SPAIN AND THE CZECH REPUBLIC⁴³

Germany: None

Italy: The Italian Digital Media Observatory is coordinated by the LUISS Guido Carli. Other members include the Tor Vergata University of Rome, the national public broadcaster RAI, the fact-checking organisation Pagella Politica, the research and consulting company T6 Ecosystems, the journalism tool NewsGuard, and other major media and telecoms operators like Gedi and Telecom.

Spain: IBERIFIER covers Spain and Portugal, and is coordinated by the University of Navarra. Members include 12 universities from both countries; 5 media organisations and fact-checkers, including Maldita, EFE Verifica and Vericat; and 6 multidisciplinary organisations, such as the think tank Real Instituto Elcano and the Barcelona Supercomputing Centre.

Czech Republic: The Central European Digital Media Observatory consists of the Czech Republic, Slovakia and Poland, and is coordinated by the Charles University in Prague. Other members include the Czech Technical University, the fact-checking platform Demagog.cz, the Kempelen Institute of Intelligent Technologies, Agence France-Presse and as-yet undetermined Polish partners. It will focus particularly on the use of artificial intelligence to support fact-checking.

The European-level EDMO partners currently use two main instruments to pursue this goal: in-depth **reports**, based on surveys among fact-checkers, that shed light on disinformation patterns and narratives prevailing across European countries; and **monthly briefs** that provide up-to-date situational insights into disinformation narratives dominating at transnational level, examining and identifying cross-border patterns regularly.

Both formats reveal links between broader disinformation trends and narratives about migrants. The first report, dedicated to COVID-19 vaccines, for example, underlines that disinformation narratives also falsely accused national governments of having imposed COVID-19-related restrictions to facilitate and cover up immigration.⁴⁴ The August 2021 monthly brief, meanwhile, refers to false claims like migrants in Greece receiving €450 each month.⁴⁵ Previous EPC research shows that this common, wealth-based anti-immigration claim attracts high engagements in countries with high unemployment rates and economic uncertainty, such as Italy and Spain.⁴⁶ The brief from September 2021 confirms a significant surge of false or misleading articles relating to Afghanistan across Europe, claiming that migrants are all male adults and “not real refugees”.⁴⁷

Monitoring activities can therefore help draw links between the broader political environment and disinformation at the national and European levels. However, reports and briefs can also provide useful information to external organisations, whether these are fact-checkers operating at the national level or

international organisations promoting campaigns to pre-empt disinformation narratives.

Although it is too soon to draw conclusions on EDMO's effectiveness, its potential future challenges are nevertheless becoming apparent. As the hubs consist of organisations and institutions selected by the European Commission, other national actors who applied but were not successful may be resistant or reluctant to cooperate. Furthermore, the sometimes very different compositions of each national hub mean that each country's contribution may vary, for example, by prioritising fact-checking over media literacy activities, or vice versa.

Networks like the European Digital Media Observatory provide a first response to the blurred lines between foreign and domestic sources and the 'transnationalisation' of disinformation.

Despite its shortcomings, EDMO is an excellent example of how diverse groups of actors can be brought together to produce situational insights, identify cross-country patterns and coordinate responses. As part of this effort, EDMO also plans to launch a Secure Online Collaborative Platform. Similarly to the RAS' role for governments and EU institutions, the Platform will function as a virtual place where fact-checkers can cooperate, launch joint investigations, and share best practices and information. In the future, the Platform may also launch early alerts against disinformation, thus contributing to closing the existing gaps.⁴⁸ While providing real-time data across national and linguistic divides and insights into the dynamics of the European disinformation ecosystem, members of EDMO would be ideally positioned to launch early warnings for especially damaging disinformation, regardless of its origin. Networks like EDMO provide a first response to the blurred lines between foreign and domestic sources and the 'transnationalisation' of disinformation.

EDMO's monitoring and information-sharing activities also show that they can take place on a much larger scale than before. However, the hubs and their organisations are generally not subject-specific. EDMO's activities so far have focused on building networks of fact-checkers and disinformation experts. External researchers and CSOs with a specific focus on politically sensitive policy topics, such as migration, are not systematically involved in drafting reports or selecting points of focus.

However useful or indispensable, monitoring activities and early warning systems can only narrow the gap between events triggering disinformation and the response by public institutions, civil society and other stakeholders. Disinformation's inherent capacity to spread faster and wider than fact-based reporting structurally limits the

effectiveness of early warning systems.⁴⁹ Being properly prepared and claiming the ground of the debate first requires going a step further and anticipating potential future disinformation about migration.

1.3. ANTICIPATING THE FUTURES OF DISINFORMATION ABOUT MIGRATION

The EU currently does not devote significant resources to foreseeing future disinformation trends. However, the von der Leyen Commission has started to embed foresight into its policymaking activities more generally, creating the opportunity to bring a culture of preparedness and evidence-based anticipation into strategies against future disinformation. Foresight, which the Commission describes as "the disciplined analysis of alternative futures",⁵⁰ seeks to inform actions and support decision-making "based not on simplistic extrapolations of the past but on smart estimates of the future."⁵¹ Accordingly, foresight efforts aim to anticipate possible future developments while also strengthening resilience and the ability to cope with challenges as they arise. Its use by the Commission reflects the need for European democracies to become more adaptive, resilient and responsive to a fast-changing and uncertain world.⁵²

Foresight efforts aim to anticipate possible future developments while also strengthening resilience and the ability to cope with challenges as they arise. Its use by the European Commission reflects the need for European democracies to become more adaptive, resilient and responsive to a fast-changing and uncertain world.

Foresight shares some ground with 'forecasting', which measures the likelihoods of particular future outcomes. But the two terms are not equivalent. Forecasting techniques typically rely on past trends to determine the direction of the future. Migration has also seen a growth of forecasting efforts to improve its governance.⁵³ For example, experts have looked into past and present migration patterns from and within Africa and extrapolated the main drivers and characteristics of migratory flows, from which they assessed the probability of future scenarios.⁵⁴ Some projects are even more ambitious, as they aim to predict future trends in migration mobility by, for example, studying online search trends. Their objective is to provide insights for finetuning policies in numerous fields, including the reception, relocation, settlement and integration of migrants and asylum seekers.⁵⁵

Recent events, including in Afghanistan and Belarus, demonstrate the need for such efforts to ensure better preparedness for emergencies and more strategic planning. However, ‘predicting’ the future, which is inevitably fraught with great uncertainty, is unlikely to be a fruitful endeavour – especially if done by relying primarily or exclusively on past trends and without questioning underlying assumptions. In contrast with forecasting efforts, then, foresight aims not to predict the future but to support policymaking, foster resilience and build the capacity to ‘shape the future’ by identifying risks and uncertainties, as well as transformations and opportunities.

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Recent migration-related developments confirm the increasing political, social and economic instability – not to mention uncertainty – of the present context, all of which can undermine the predictive power of forecasting. At the same time, they highlight simplistic assumptions about ‘repeating’ past events. For example, drawing comparisons between current events and those that led to the 2015 ‘migration crisis’ to estimate the potential number of Afghan asylum seekers who might seek to enter the EU in the months to come would be misleading if the policies put in place since then and future uncertainties are not considered. As experts have underlined, a repeat of the 2015 situation is unlikely due to the strong containment policies and securitised borders now in place along the various migration routes to the EU.⁵⁶ In addition, most of the Afghans forced to flee have remained within the country so far, meaning that major international displacement may remain an implausible scenario in the short- and mid-term future.

Focusing on numbers alone and making short-term predictive forecasts based on partial historical data also show the inherent risk of involuntarily reinforcing negative stereotypes and security agendas. As false stories connected to events unfolding in Afghanistan and Belarus show, disinformation actors may exploit fears of an ongoing or future crisis, or imminent ‘invasions’, to polarise the debate once again and push citizens towards extreme positions. While greater awareness of possible future scenarios is thus necessary to avoid past policy failures, policymaking based on misguided assumptions could lead to the very same failures and prevent an evidence-based exploration of the challenges – and opportunities – which future scenarios may also bring.

To overcome these limits, foresight combines the virtues of forecasting with an open-ended analysis of possible, plausible, undesirable and preferred futures to ensure maximum preparedness and build a forward-looking

vision.⁵⁷ Like forecasting efforts, foresight tries to come up with realistic assessments. However, it also identifies key uncertainties and deals with them in a structured way by reviewing current circumstances and policies, monitoring developments and emerging trends, and continuously revising its assessments against evolving circumstances. Above all, foresight promotes the idea that the future is not fixed nor predetermined but can be actively shaped, thus helping policymakers exercise their agency and overcome deterministic thinking.

Upon taking office in 2020, Commission President Ursula von der Leyen named Maroš Šefčovič as Vice-President for Interinstitutional Relations and Foresight, reflecting the central importance of this concept for the new Commission. The Strategic Foresight Network, which he oversees, makes use of several techniques, including “horizon scanning” (i.e. determining likely developments and indications of change), “megatrends analysis” (i.e. working with interacting trends to build “a story of the future”), and “scenario planning” (i.e. interactive modelling of plausible futures, including the steps that may lead to them), to assist policymakers.⁵⁸

Since 2020, the Commission has started to publish annual Strategic Foresight Reports, which identify emerging challenges and uncertainties as well as policy choices that will shape the future of Europe. The 2021 Report examines possible future migration trends. Instead of predicting future population movements, it draws attention to the political and economic instability in regions outside the EU and potentially aggravating factors, including not only COVID-19 but also future pandemics and climate change. At the same time, it also highlights the potential policy options that could help mitigate future challenges.⁵⁹

Building on current efforts, foresight may be applied to preparing responses to disinformation, including disinformation about migration. The 2021 Report highlights that large-scale disinformation will increasingly challenge democratic systems by polarising debates and feeding instability. The Report also warns that “the instrumentalisation of migration for political purposes, could increasingly threaten EU security.”⁶⁰ Accordingly, it calls for stronger and more resilient institutions, advocating the use of strategic foresight capabilities to “assess the impending risks and better prepare to deal with crises and emerging opportunities”.⁶¹ However, the Report does not specifically refer to countering disinformation as part of this crisis management.

Foresight could assist policymakers and communicators in being better prepared for future disinformation. Yet, so far, the Commission’s foresight activities have not been applied to anticipating future disinformation trends and narratives in various scenarios, such as a future pandemic, rising unemployment, or an increase of irregular arrivals. Nevertheless, recent examples show the potential of this approach, particularly when read in the light of the widespread disinformation that rapidly followed increased migration movements in other contexts. One example where the EU and member states could have better prepared for disinformation about migration occurred in

Lithuania in summer 2021, following an increase in cross-border movements from neighbouring Belarus.

Foresight could assist policymakers and communicators in being better prepared for future disinformation. Yet, so far, the European Commission’s foresight activities have not been applied to anticipating future disinformation trends and narratives in various scenarios.

Between June and July 2021, Belarus suspended its participation in the EU’s Eastern Partnership and stopped fulfilling its border management responsibilities in retaliation against EU economic sanctions. This led to a rise in irregular arrivals in neighbouring Lithuania. As early as May, Belarusian President Alexander Lukashenko announced that his regime would do nothing to prevent migrants from entering Lithuanian territory. Although Lithuanian and EU authorities took Lukashenko’s words seriously, leading to the immediate deployment of additional national and Frontex guards at the border with Belarus, the risk of disinformation was not anticipated. Alongside the rise in irregular arrivals, disinformation spiked, with perpetrators spreading false stories about where migrants would be accommodated in Lithuania.⁶² Allegations were made that those crossing the borders were armed with weapons.⁶³ Disinformation spread from groups inside Lithuania and neighbouring countries.⁶⁴

It is rather surprising that national and EU authorities did not foresee the risk of disinformation.⁶⁵ No specific action was taken to debunk these common narratives that aim to stoke fears among local communities and increase the sense of confusion and uncertainty. This is especially the case given previous examples of disinformation spreading in similar contexts. For example, a great

deal of disinformation followed the tensions at the Greek–Turkish border between February and March 2020, which were preceded by repeated threats from President Erdoğan that he would suspend the EU–Turkey statement and “flood Europe with millions of migrants”.⁶⁶ Considering Lithuanian authorities’ long experience with Russian propaganda activities, local commentators argued that disinformation should have been met with greater preparedness.⁶⁷

Factoring in the possible deliberate spread of disinformation in specific future scenarios should be an integral step in foresight activities.

The disinformation that followed the rise in irregular arrivals in Lithuania provides **two valuable lessons**. First, factoring in the possible deliberate spread of disinformation in specific future scenarios should be an integral step in foresight activities. Second, past trends observed and examined through monitoring activities can provide valuable lessons as to what kind of disinformation narratives may spread in given circumstances and with what possible consequences.

These examples show how foresight could anticipate potential future disinformation narratives. With growing inequalities and social and economic instability linked to the COVID-19 pandemic, and the possible increase of mixed migratory movements, disinformation actors will be presented with new opportunities to link migration to salient issues and propagate lies and hateful narratives. The insights gleaned from monitoring activities can inform foresight efforts to assess which disinformation frames and narratives may be exploited in specific future scenarios. This would enable the pre-emptive development of suitable communication-based responses.

Chapter 2. Longer-term initiatives: Societal resilience through migration, media and information literacy

The short- and medium-term measures described in Chapter 1 may help institutions, CSOs and other communicators understand the disinformation landscape, respond to developments quickly and prepare their content ahead of time. But so long as they face an environment where disinformation encounters a receptive audience, their efforts are likely to have limited success. Especially while migration remains a sensitive and highly politicised subject, it will continue to attract manipulative content, and each development will generate a new wave of disinformation.

To a certain extent, the impact of disinformation could be undermined by making changes to the media ecosystem, such as making social media algorithms and advertising more transparent, requiring tech companies to crack down on proven malicious actors, or providing greater support for independent journalism.⁶⁸ However, such measures will not be enough on their own unless citizens are supported in understanding the media environment around them and the particular role that disinformation plays in it. These challenges call for a longer-term approach to prebunking: strengthening societal resilience and making citizens better able to spot, resist and reject disinformation about migration. This requires significant and consistent investment in boosting critical and technical skills through MIL.

To a certain extent, the impact of disinformation could be undermined by making changes to the media ecosystem. However, such measures will not be enough on their own unless citizens are supported in understanding the media environment around them and the particular role that disinformation plays in it.

Stepping up MIL would help undermine disinformation and manipulation in several ways. Helping people recognise manipulative content is an important part of reducing its appeal. When made aware of online dis- and misinformation through fact-checking, many users start questioning the story they have read and take more informed decisions, such as refraining from liking or sharing it.⁶⁹ However, studies have also shown that simply labelling something as ‘false’ or ‘fake news’ is not enough to convince all those exposed to it to stop sharing and propagating it further.⁷⁰ In some cases, telling people they are wrong may even backfire, strengthening misconceptions and reinforcing prior beliefs.⁷¹ In addition, many European citizens are exposed to private messages of disinformation via encrypted messaging

apps like WhatsApp and so are for the most part outside the reach of fact-checkers. Thus, citizens must spot false or manipulative content themselves; they cannot rely entirely on fact-checkers or others.

MIL programmes can help address these problems by taking a proactive approach which raises citizens’ agency and enables them to identify disinformation and manipulation themselves. The European Commission understands media literacy as “the ability to access, analyse and evaluate the power of images, sounds and messages”⁷² and an awareness of how the media filters citizens’ perceptions and beliefs.⁷³ Hence, a media-literate person should be able to evaluate, analyse and produce both print and electronic media autonomously and mindfully.⁷⁴

Strengthening these critical skills could turn citizens from targets and amplifiers of harmful information into ‘gatekeepers’. Although disinformation campaigns are often conducted by organised groups with political agendas, empirical research indicates that much disinformation is also created and shared from the bottom-up by ordinary users.⁷⁵ Thus, providing citizens with essential critical skills would ensure that they are better equipped to protect not only themselves but others too, distinguishing facts from falsehoods and filtering out manipulative content. The skills required are not strictly codified or standardised, but they are widely agreed to include recognising bias, selective reporting and appeals to emotion; understanding how to analyse and evaluate claims; and appraising the trustworthiness of sources.⁷⁶

Providing citizens with essential critical skills would ensure that they are better equipped to protect not only themselves but others too, by distinguishing facts from falsehoods and filtering out manipulative content.

Several national governments recognise the importance of MIL and are stepping up their efforts. However, current approaches may not go far enough, with experts pointing to limited target groups,⁷⁷ national and local variation, and insufficient coordination as some of the causes undermining the full potential of MIL campaigns.⁷⁸

Chapter 2 explores existing initiatives by member states and civil society actors before considering the potential for migration-specific educational efforts to boost citizens’ resistance to manipulative content. Migration is a complex subject. Findings from previous EPC research

show that disinformation actors exploit this complexity to further confusion and stoke fears.⁷⁹ Besides technical training, some groups (e.g. journalists) could develop subject-specific expertise to better recognise manipulation techniques and avoid reproducing disinformation narratives about migration.

This chapter also engages with the question of how to maximise the impact of literacy programmes via a personalised approach that reflects demographic differences and the pre-existing attitudes of the target groups. In doing so, it builds on the findings and recommendations of the 2020 FEPS-FES-EPC study on online disinformation about migration, which recommended developing communication strategies that account for the concerns and reflect the values of the targeted audience.⁸⁰

2.1. THE FRAGMENTED EUROPEAN MEDIA AND INFORMATION LITERACY LANDSCAPE

Growing initiatives by the EU, national authorities, international organisations, media companies and civil society reflect the need to step up MIL campaigns in the face of rampant disinformation and more complex technological challenges. Prior to the presentation of the Communication Tackling Online Disinformation: a European approach in 2018, the European Commission set up a High-Level Expert Group on Fake News and Online Disinformation. The Group was composed of representatives of civil society, social media platforms, news media organisations, journalists and academia, to provide recommendations for its upcoming strategy. The Group concluded that MIL has become an “essential competence” in our digital age and called for strengthening critical thinking to promote “good personal practices for discourse online, and consequently also in the offline world.”⁸¹

The Action Plan against Disinformation dedicated one of its four pillars to “Raising awareness and improving societal resilience”, particularly emphasising media literacy (see Introduction). Other than encouraging member states to strengthen their efforts (media literacy being primarily a member state competence due to its overlap with education policy), the Commission pledged to “further step up its commitment and current activities in relation to media literacy to empower Union citizens to better identify and deal with disinformation.”⁸²

Reflecting this, the DG for Communications Networks, Content and Technology (DG CONNECT) has facilitated a Media Literacy Expert Group for several years, involving audio-visual regulators from each member state. The Group, which is now jointly run by DG CONNECT and the DG for Education, Youth, Sport and Culture (DG EAC), has increased the number and frequency of its meetings and has recently been tasked with developing common EU approaches to the provision of media and digital skills.

Initiatives by the Commission and the EEAS recognise the importance of critical thinking and literacy skills in the fight against disinformation, as well as highlighting the limited role and tools available to the EU institutions. In practice, however, the only new action relating to media literacy directly implemented by the Commission

was the organisation of the European Media Literacy Week in 2019. A week-long series of events across Europe, it serves chiefly to highlight member states’ existing efforts and does not necessarily include a special focus on disinformation. Originally intended to be a regular annual event, the 2020 edition was cancelled due to COVID-19, and no events have taken place under this banner since.

The subsequent actions have been limited to providing guidance and trying to step up coordination. For example, the Commission’s Digital Education Action Plan, presented in September 2020, recommends several measures to foster a more inclusive digital education ecosystem and enhance digital skills. Included are the launch of a strategic dialogue with member states to facilitate successful digital education, the development of common guidelines for educational staff to foster digital literacy and fight disinformation, and the introduction of an EU target for student digital competence.

In December 2020, the Commission launched the Media and Audiovisual Action Plan to equip citizens with the necessary skills to fully understand the mechanisms that shape online interactions via the likes of a media literacy toolbox and guidelines for member states. In the same month, the EDAP laid out several actions for improving media literacy to combat disinformation specifically. The Commission committed to increasing funding and support for civil society initiatives and tasking EDMO with supporting national efforts.

As member states are competent for educational policies, the responsibility for media literacy falls to national and local authorities. This leads to a fragmented educational landscape in Europe.

The Commission therefore remains limited to supporting national MIL programmes and coordinating the exchange of information and good practices. As member states are competent for educational policies, the responsibility for media literacy falls to national and local authorities. This leads to a fragmented educational landscape in Europe, which also has repercussions on the provision of media literacy training and the implementation of common objectives (see Infobox 2). For example, the Audiovisual Media Services Directive 2018/1808 requires member states to promote the development of media literacy skills. In the Tackling Online Disinformation Communication, the Commission accordingly encouraged “Member States to mobilise resources and include in their educational policies digital citizenship, media literacy, the development of critical-thinking skills for the online environment, and awareness-raising activities on disinformation and online amplification techniques.”⁸³ Despite the Commission’s calls and the Council’s recognition of the need to develop media literacy,⁸⁴ several member states have not yet transposed the Directive.⁸⁵

INFOBOX 2. MEDIA LITERACY EDUCATION IMPLEMENTED IN SELECTED EUROPEAN COUNTRIES

Czech Republic: Czech schools have been obliged to include media literacy education in their curricula since 2007 but are free to determine how many teaching hours students should receive. The Ministry of Education does not provide any teaching materials. Most students receive fewer than 10 hours of media literacy training on average, with those in technical schools and rural areas receiving significantly less than city-based students from more academic schools. Only 62% of Czechs possess basic or above basic digital skills.⁸⁶ One report has also highlighted low levels of media literacy training among teachers as a barrier to dedicating significant time to the subject.⁸⁷

Germany: Education is a competence of the federal states (*Bundesländer*), with no general curriculum at the federal level. While media education is not a specific subject in any state, a 2017 federal law includes media literacy as part of a variety of measures for protecting youth that is to be taught at various levels, from early in school through to higher education.⁸⁸ German CSOs also play a prominent role in supporting and teaching media literacy in schools (see Infobox 4, p24 for more details).

Italy: While media use and mass media analysis have been taught in Italian schools for some decades, there is no compulsory media literacy training for teachers nor students, and efforts and initiatives are instead run by a wider range of non-state actors.⁸⁹ The Italian Chamber of Deputies adopted a Declaration of Internet Rights in 2015 that includes the “right to online knowledge

and education”, including digital media literacy.⁹⁰ This obliges public institutions to update citizens’ skills but stops short of mandating it in school curricula.⁹¹

Spain: The compulsory school curriculum counts digital and media literacy among the skills students are expected to attain, but there are no dedicated classes on media. The law on minimum standards for secondary education requires curricula to include the promotion of basic skills and media competences, particularly regarding checking information sources. However, it does not mention any minimum standards.⁹²

Finland: Finland is widely considered to be at the forefront of MIL efforts, especially with regard to disinformation. In this respect, it is an example to follow.⁹³ It is one of the few countries with a governmental media education authority, the National Audiovisual Institute. MIL is considered a basic civil competence and matter of national security, leading to the inclusion of information literacy, knowledge of communication technology, and critical thinking in the national school curriculum since the 2010s.⁹⁴ MIL promotion starts at a very early age, and the related competences are practised across different subjects. This means that in history classes, for example, students study notable propaganda campaigns; in maths lessons, they learn how easy it is to lie with statistics; in art, they learn how images can be manipulated; while language teachers show pupils how words can be used to mislead and deceive.

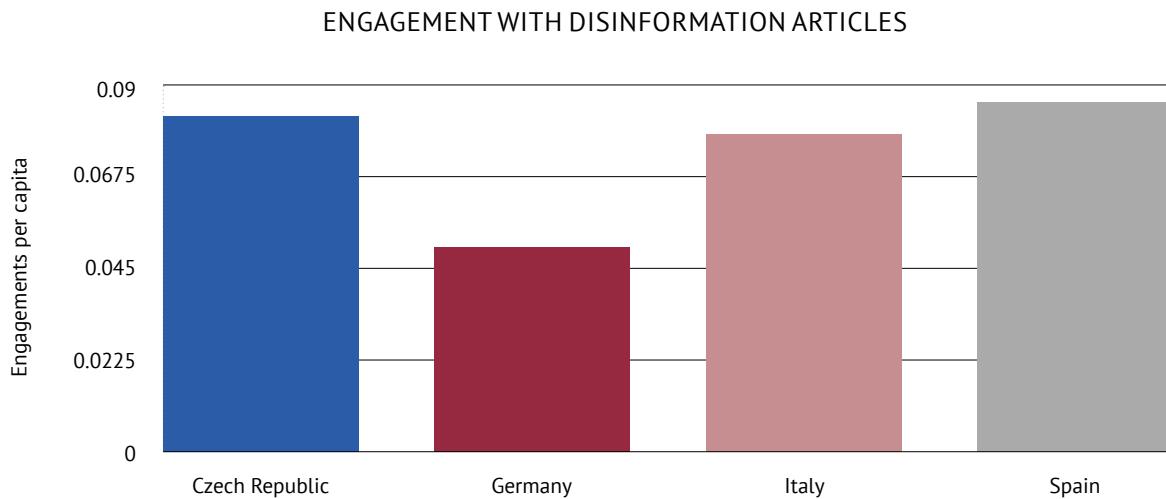
As a result, many member states continue to have underdeveloped media literacy policies, or no specific policy at all.⁹⁵ Where present, education policies in relation to MIL skills also vary significantly across Europe. Media education is not always explicitly mentioned in or made a core part of school curricula. Some member states have internal administrative and linguistic divisions, generating further fragmentation. Policies concerning the training of teachers also vary, affecting the development of media competencies in the rest of the population. Furthermore, pedagogical approaches to MIL have been found to differ greatly.⁹⁶

Currently, there is no harmonised system for evaluating and ranking European citizens’ ability to deal with online challenges and threats. However, the Media Literacy Index, a private initiative led by the Open Society Foundations, measures national differences in resilience to disinformation by considering and comparing “predictors” of media literacy (e.g. media freedom, reading competences). Among others, the Index reveals that access to digital technologies and training on their use vary significantly between

European countries and at the local level. Media literacy also partly depends on citizens’ socio-economic backgrounds.⁹⁷

The fragmented landscape and the sluggish implementation of some member states’ MIL programmes could be factors in citizens’ engagement with disinformation across the EU. The 2020 FEPS-FES-EPC study found that disinformation articles tend to generate fewer engagements (i.e. likes, comments and shares on social media) in those countries where media literacy efforts are more firmly established and where public authorities support non-state initiatives (e.g. Germany).⁹⁸ Conversely, countries where media literacy is not at the centre of educational efforts (e.g. Italy, the Czech Republic) present higher risks. For example, articles from German sources received only 57% as many engagements as those from Spain (see Figure 3). Each member state has a unique media landscape, including different cultures of news consumption. In countries with stronger MIL efforts, the public appears to be more reluctant to engage and propagate disinformation about migration.

Fig. 3



Source: Butcher and Neidhardt (2020)⁹⁹

These four countries are the case studies of the 2020 FEPS-FES-EPC study. The totals of engagements (i.e. likes, comments, shares) of all the articles studied are adjusted by population size.

There is no overarching EU strategy for media literacy to combat disinformation. Because of this, member state activities remain without guidance and all EU activities cannot be effectively coordinated and directed towards particular objectives.

This diversity of efforts and experiences across Europe betrays that there is no overarching EU strategy for media literacy to combat disinformation. Because of this, member state activities remain without guidance and all EU activities cannot be effectively coordinated and directed towards particular objectives. Where national authorities consider MIL a priority, efforts remain rather disconnected and ad hoc, risking overlap or duplication of efforts. Where absent or affected by slow implementation, the lack of basic critical skills may compromise efforts to strengthen societal resilience against disinformation. The ECA, for example, called for a European media literacy strategy that includes tackling disinformation to be developed as a matter of priority.¹⁰⁰ However, defining a unified strategy is also contingent on a common and up-to-date understanding of the critical skills needed to boost societal resilience against disinformation – something which is currently lacking.

2.2. THE BUILDING BLOCKS OF SOCIETAL RESILIENCE: MEDIA, DIGITAL, DATA AND INFORMATION LITERACIES

To be able to defend themselves against disinformation, European citizens need complex and comprehensive critical skills. Institutional actors frequently refer to the

concept of media literacy, but in practice, the term has multiple interpretations and overlaps with the related concepts of digital, data and information literacies.¹⁰¹ Information literacy is typically understood as the capacity to access, assess and use information from different sources.¹⁰² Digital literacy emphasises the need to learn specific skills to deal with digital media and understand the relationship between digital sources and the fast-transforming communication environment.¹⁰³ Data literacy, meanwhile, refers to understanding how different kinds of data are collected and used.¹⁰⁴

Despite intensified efforts at the political level and growing specialised literature, there is no universally accepted nor clear-cut definition of these competences that also reflects the different national preferences and cultural lenses.¹⁰⁵ The wealth of definitions and conceptions causes confusion and can lead to problems for policymakers who have to decide which to follow and which specific literacy to prioritise.¹⁰⁶ This lack of consensus on key concepts, together with the absence of a harmonised system to compare and rank competences across member states, reflects that there is no coordinated or EU-wide strategy or guidelines on how critical skills could be integrated into national education systems.

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Nevertheless, experts tend to concur on what these literacies entail and that the set of critical skills required to fend off disinformation has become more complex

and comprehensive, especially due to the digital transformation of the news media and the growth of social networks and online activities. They cover a wide spectrum of skills extending from critical thinking to technical competencies.¹⁰⁷ Accordingly, experts stress that literacy programmes should cover all basic media, digital, information and data skills. These skills will not only improve citizens' capacity to assess content and source credibility both online and offline, but also raise awareness about the variety of manipulation and persuasion techniques used to push disinformation.¹⁰⁸

The 2020 FEPS-FES-EPC study demonstrates the need to amplify the skillset for understanding and navigating the (dis)information ecosystem. Only a fraction of the material it analysed was demonstrably false: of the 1,425 articles analysed, only 226 (16%) contain a central claim that is clearly and verifiably inaccurate. Most contained information that was either manipulated (e.g. distorted statistics, 329 articles, 23%) or presented misleadingly (e.g. accurate figures or facts used out of context, 486 articles, 34%). A large share (373 articles, 26%) are based around statements that are simply unverifiable, often because they do not contain sufficient details to fact-check. Nevertheless, they systematically reproduce content that matches the hostile frames used in outright false stories, strongly implying a malicious intent to mislead (see Figure 4).¹⁰⁹

Such techniques make it more difficult for readers to differentiate between fact-based content and articles

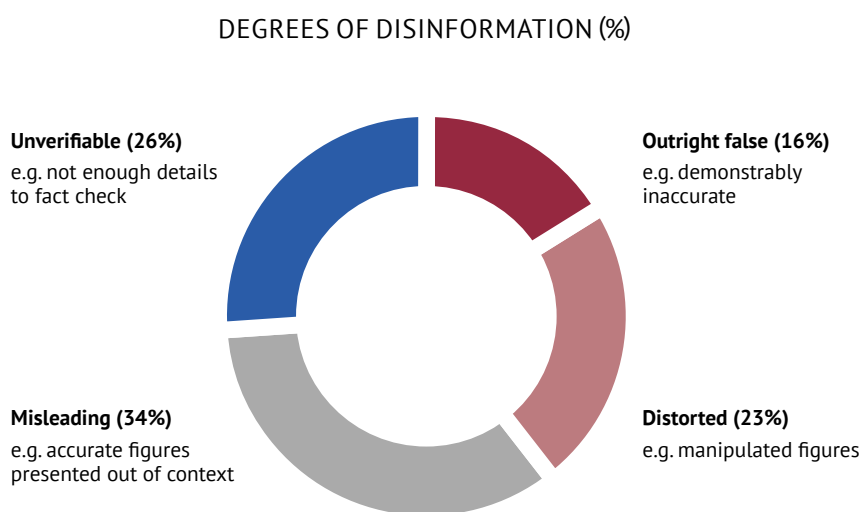
which are either misleading or false, especially when they have sensationalistic undertones and target groups with specific values and concerns.

Further disinformation techniques identified in the 2020 FEPS-FES-EPC study include the repackaging of old content to expand the acceptance of disinformation narratives through repetition, and 'information laundering', when the same text is used across different sites (see Infobox 3). This builds the impression that multiple sources are reporting the same 'facts', thus raising their credibility.¹¹⁰ These techniques are often employed simultaneously, making it harder to distinguish fact from truth.

Although research is also needed to demonstrate what approaches and literacy programmes work best, all basic critical skills acquired through media, digital, information and data literacies are required in a fast-changing media ecosystem where disinformation is so widespread and manipulation techniques so subtle and complex.

The lessons learnt from fact-checking activities, monitoring and research can be put to good use by raising awareness about manipulation techniques.

Fig. 4



Source: Butcher and Neidhardt (2020)¹¹¹

Only a small proportion of disinformation on migration makes use of information that is clearly and demonstrably false, while the majority is made up of manipulated or partly true information.

INFOBOX 3. EXAMPLES OF MANIPULATION TECHNIQUES¹¹²

Manipulated statistics: Statistics are manipulated, fabricated or presented out of context to stoke fears (e.g. of “invasions” of migrants) or reinforce negative clichés, such as hard-working Europeans maintaining immigrants who do not want to work. For example, in June 2019, Italian news outlets inaccurately claimed that 100,000 immigrants who have never worked in Italy receive social benefits and falsely stated that there are no conditions to access them.¹¹³

Information laundering: A story, which lacks sources, is cited by different outlets to make it seem more credible.¹¹⁴ In some cases, a source is cited, but it is manipulated and then laundered by other outlets. For instance, German online media misleadingly used national statistics in May 2019 to falsely claim that European governments secretly flew thousands of refugees into Europe.¹¹⁵ This story was then picked up and reused by Czech and Slovakian websites.¹¹⁶

Exploiting confirmation bias: False stories implicitly or explicitly refer to widely publicised events, such as the 2015-16 New Year’s Eve sexual assaults in Cologne. For example, Italian websites claimed that during the 2019-2020 New Year’s Eve celebrations, Afghan and Pakistani migrants threw firecrackers at families and passers-by in the town of Udine. They further dramatised the story by adding that an Italian father had to protect his daughter from a group of sexual predators. Although no sources are cited, the articles – one of which is titled

“Like in Cologne” – also reported an unrelated sexual assault against an Italian woman carried out the same night by an unidentified individual,¹¹⁷ implying that the same group of foreign nationals was responsible.

Cross-country references: The disinformation in articles refers to developments in other countries, as limited knowledge of the foreign context makes it easier to use unverifiable sources or fabricate stories. Examples include unsubstantiated accusations that foreigners are responsible for more crimes than nationals or false stories of no-go areas entirely controlled by migrants.¹¹⁸ In some cases, the same hoaxes travel across Europe. For example, a story first published by a French monthly magazine claiming that 70% of Belgian Muslims believe that *sharia* is superior to Belgian civil law was later used by Italian websites to spread fears of an ongoing cultural replacement of national traditions.¹¹⁹

Recycling: Old articles are repackaged to reproduce fear, anger and prejudice. For example, articles claiming that migrants violently attacked police officers and set a detention centre on fire reappeared on Italian websites years after their first publication.¹²⁰ Unverified videos from 2016 reappeared in Germany in 2020, showing men, seemingly of foreign descent, shouting in German and shooting what appear to be automatic weapons in the air on New Year’s Eve. This was presented as ‘evidence’ that Europe is descending into lawlessness because Muslim migrants are unwilling to integrate.¹²¹

While not all member states have set up effective MIL campaigns, thus potentially compromising their efforts to fight disinformation, civil society initiatives have grown exponentially in recent years. Private entities like CSOs, fact-checkers and consultancies can close existing gaps and deliver MIL more effectively thanks to their hands-on experience and regular engagement with manipulative content (see Infobox 4, page 24). Given their engagement in monitoring and analysing disinformation regularly, and thereby their recognition of the need for suitable responses, it is unsurprising that fact-checkers are closely involved in the elaboration and implementation of many media and digital literacy programmes across Europe. The lessons learnt from fact-checking activities, monitoring and research can be put to good use by raising awareness about manipulation techniques.

Reflecting the need to raise awareness, empower citizens, strengthen cooperation and improve coherence, EDMO (see Chapter 1) supports media literacy campaigns by providing practitioners and teachers with information and training materials. Yet, these efforts are likely to remain sporadic and disconnected so long as the networks, such as those operating through EDMO, do not have a single strategy nor set of guidelines for literacy promotion.

Despite some problems of coordination, CSOs and private entities can develop innovative, engaging and suitable delivery methods to reach new audiences. Traditional, state-led, school-based approaches can rely on the present infrastructure to effectively target children from a young age, or at least by the time they start reading the news and developing an interest in social and political matters. However, literacy activities need not be limited to classic ‘classroom’ formats or training sessions.

Literacy activities need not be limited to classic ‘classroom’ formats or training sessions. One engaging way of raising awareness about how manipulative tools work is through games.

INFOBOX 4. EXAMPLES OF CIVIL SOCIETY INITIATIVES ON MEDIA AND INFORMATION LITERACY

Lie Detectors is a journalist-led news literacy organisation that operates in several countries, including Germany. It deploys journalists to teach interactive classroom sessions in primary, middle and secondary schools. The programmes teach pupils how the news is produced and how to spot false posts on social media. For more advanced students, examples of actual disinformation are used in the sessions, including false stories involving migrants.¹²² Recognising that disinformation pressures young persons into extremism or political apathy, Lie Detectors does not ask them to pick sides. Instead, its objective is to make teens and pre-teens more aware of fake news and help them make informed choices from an early age when they start forming their worldviews.

Dataninja is an Italian private entity that improves journalists' data literacy. It also seeks to teach high school teachers essential media and data skills via its new project, Open the Box. This project offers online training to verify information sources, distinguish between different types of disinformation, and recognise image manipulation techniques. The objective is to promote a fact-checking culture, better prepare students to navigate online content, and encourage them to seek reliable information. Dataninja also participates in various European research projects to create harmonised training programmes and handbooks (e.g. **DALFYS**) and develop coherent didactic frameworks and standardised assessment methods across the EU (e.g. **Datalit**).

Maldita, a Spanish fact-checking organisation, offers basic MIL programmes for young and old citizens and more advanced programmes for specific categories of professionals. For example, it offers workshops and full courses to employees of private companies, public administrators and university students. It provides courses for journalists that cover verification tools, data and statistical skills. Maldita also trains teachers in the hope of reaching younger persons more effectively. In its campaigns, Maldita uses real examples of disinformation on migration circulating in Spain. Hoaxes identified through fact-checking activities are used to make the training programmes resonate with participants' experiences.

Demagog.cz is a Czech fact-checker that focuses on politicians' statements. In addition to its fact-checking work, it organises workshops for schools, universities and any other organisations wishing to use its services. It offers two types of workshops: one focuses on fact-checking techniques while the other covers critical thinking and media literacy, including psychological and social biases, the differences between fact and opinion, and how to recognise manipulation.¹²³ It primarily uses current media reports for up-to-date examples, adapting the subjects chosen according to the needs and interests of each client.

One engaging way of raising awareness about how manipulative tools work is through games. For example, the Cambridge Social Decision-Making Lab and the organisation DROG have developed several online games that help players identify conspiracy theories and tools that seek to manipulate emotions and polarise political opinions (see Figure 5). Instead of being told what disinformation is or how it works, players are asked to produce disinformation themselves in these simulated environments, thereby providing an insight into the mind and motives of those who spread it.¹²⁴

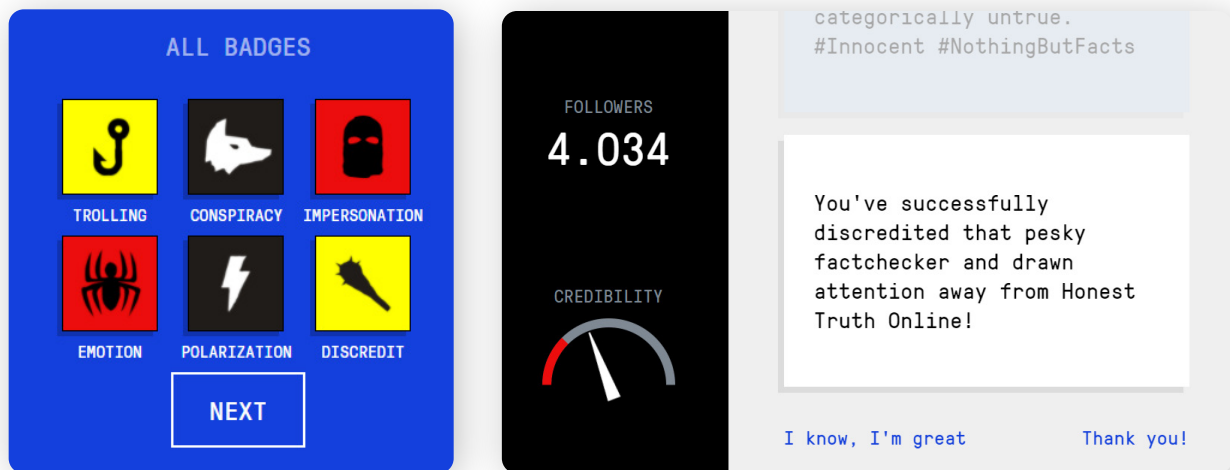
Fakey, another game that was developed by Indiana University Bloomington, shows headlines, images and the first couple of sentences of news articles. Players are asked to share or like credible articles and report suspicious ones for fact-checking, learning at a later stage which articles are hoaxes and which ones are not. The theory behind these games is that, in this way, the gamers – who tend to be in younger age groups – will better recognise disinformation in other contexts. Notably, these games try to account for cultural differences, thus maximising psychological resistance in different linguistic and cultural environments.¹²⁵

Other demographics, however, are more difficult to convince through gamified literacy programmes, which generally focus on high school pupils and other young people. Mid-career professionals can be reached through

campaigns in the workplace, especially for those careers which require good critical skills or are connected to common disinformation topics. Older citizens, however, can be harder to reach through such methods.¹²⁶ This is problematic, as the elderly tend to be more likely to read, share and be influenced by disinformation.¹²⁷ Other disadvantaged groups face similar problems: demographic factors frequently intersect with structural social and economic inequalities, determining a shortage of critical skills while also posing greater obstacles to MIL. For this reason, experts have called for tailor-made training programmes and learning methods for not only specific disadvantaged communities (e.g. the elderly) but also the unemployed and those living in precarious socio-economic conditions.¹²⁸

Experts have called for tailor-made training programmes and learning methods for not only specific disadvantaged communities but also the unemployed and those living in precarious socio-economic conditions.

PREBUNKING THROUGH GAMES



Source: *Bad News*¹²⁹

The game Bad News, developed by DROG, puts players in the shoes of an editor of a 'fake news' outlet. By mastering disinformation and manipulation techniques, they must grow their followers while maintaining their credibility. In doing so, they learn how to spot – and, therefore, resist – similar manipulation in the real world.

Other population segments, however, may be just as hard or even harder to reach. Beyond demographic and socio-economic differences, it is important to consider attitudinal ones. The 2020 FEPS-FES-EPC research revealed that disinformation about migration exploits pre-existing concerns and value systems, especially those of the 'conflicted' or 'anxious middle'.¹³⁰ Other empirical studies show that users who are most likely to like and share disinformation articles either consider the content to be true or have pre-existing attitudes consistent with their underlying message.¹³¹ Those who belong to these middle groups may not only be among those most exposed to disinformation about migration but also among those who cannot be reached by conventional MIL campaigns.

MIL can increase agency, produce a change in online and offline behaviour, and significantly reduce the dissemination of disinformation. But one of the current challenges is to develop targeted campaigns and formats which are suitable for all population segments that are likely to be exposed to disinformation. These range from non-digital natives to middle groups whose beliefs and attitudes make them particularly likely targets.

2.3. THE CASE FOR MIGRATION LITERACY: PROVIDING SUBJECT-SPECIFIC KNOWLEDGE

Generally speaking, MIL initiatives approach literacy campaigns without referencing any specific issues aiming to promote citizens' critical skills so that they can be applied to any subject area. Virtually all fact-checking organisations providing MIL also follow a

strictly neutral ideological stance: they do not engage in 'counternarratives' and defend themselves from accusations of engaging in propaganda. Their training programmes tend to avoid using politicised and divisive issues like migration to illustrate manipulation techniques, preferring instead to use more innocuous examples (e.g. sports). This is partly justified, as drawing on politicised topics could distract from the purpose of the training, thus reducing its impact. However, understanding or even recognising disinformation out of context is not always possible.

Migration is an inherently complex subject that can be easily twisted or misrepresented by disinformation actors.

The skills and competences needed to recognise and resist disinformation may thus partly vary with the specificity of each subject area. Migration is an excellent illustration of this need, as it is an inherently complex subject that can be easily twisted or misrepresented by disinformation actors. Migration governance is shaped by various institutions, including international organisations, the EU, member states and local authorities. Migration is also connected to broader social and political issues with great symbolic and historical meaning, such as religion, identity, sovereignty and borders. Facts and evidence relating to migration, including data and statistics, are often hard to retrieve and

access.¹³² In addition, uncertainty is inherent in migration, leading to complex and divisive debates.¹³³

Disinformation actors exploit the complexity of migration and its ‘political currency’ to raise fears about migrants, polarise public opinion and influence citizens’ views. For example, Europeans consistently overestimate the number of residents born abroad, partly due to the dominance of ‘invasion’ narratives and manipulated statistics (see Figure 6). This generates greater popular support for stricter measures against new arrivals.¹³⁴ One study showed that one in three Spaniards believes that migrants are treated better than nationals.¹³⁵

Specialists class mobile individuals into several categories, from ‘refugees’ and ‘asylum seekers’ to ‘economic migrants’. Population movements are also sometimes divided between forced, voluntary and mixed migration. The general public may be unaware of the full meaning of terms typically used by policymakers, experts and CSOs, thus playing into the hand of actors reproducing negative clichés. By contrast, disinformation actors consistently use colloquial terms in their communication, associating them with negative frames. The 2020 FEPS-FES-EPC study showed, for example, that Italian media contemptuously use the word *clandestino* (clandestine, illegal immigrant) to refer to all foreign nationals arriving irregularly, regardless of their legal status.¹³⁶

While the 2020 study recommended that communicators use easily accessible terminology as much as possible when reaching out to the wider public, understanding the distinctions between a migrant, refugee and asylum

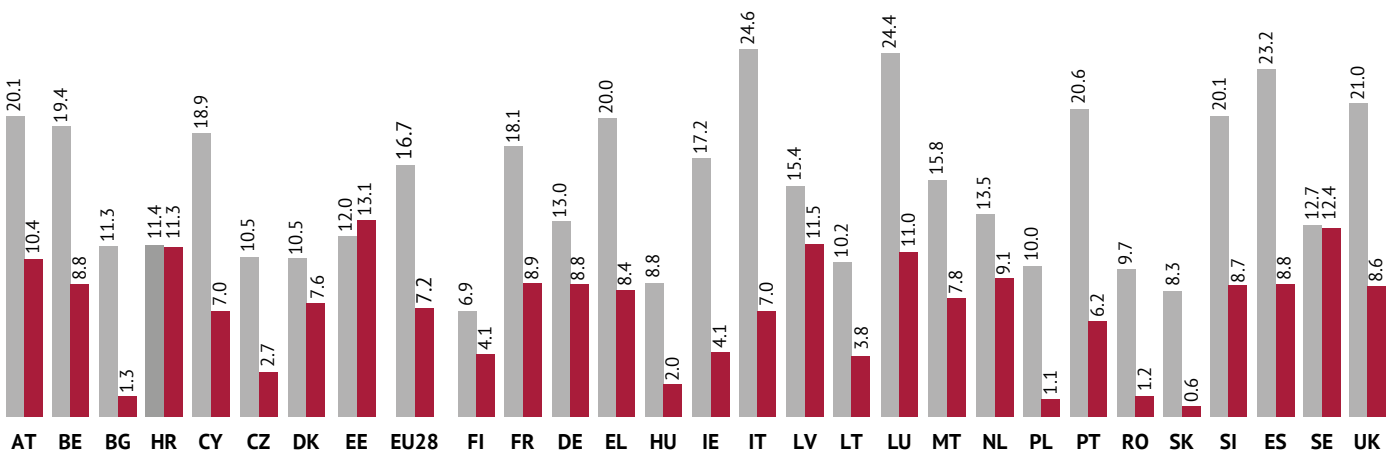
seeker or further sub-categories like economic migrant or unaccompanied minors is essential for building a more informed public body and strengthening psychological resistance against disinformation. Some international organisations working on migration have launched campaigns with the ultimate goal of providing citizens with fact-based information about migratory phenomena, a task that could be described as providing ‘migration literacy’.

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Ongoing initiatives do not try to directly reach all citizens and social groups, however. International organisations recognise that they face certain obstacles (i.e. financial, practical, cultural) in reaching all segments of the population – and that those migration-sceptic groups most likely to be targeted by disinformation may be among those who distrust CSOs protecting migrants’ rights. So, instead, they seek to deliver educational efforts through ‘intermediaries’, such as teachers and journalists.

Fig. 6

ACTUAL AND PERCEIVED PROPORTION OF IMMIGRANTS IN TOTAL POPULATION (2017, %)



Source: European Commission (2018d)¹³⁷

In nearly all EU member states, citizens believe the migrant population is higher than the reality – often considerably so.

UNHCR's Teaching about Refugees campaign is one such example. This initiative came about after the increased arrivals experienced between 2015 and 2016, when many European headmasters and teachers asked UNHCR to provide them with teaching toolkits to address their students' growing demand for accurate information.¹³⁸ While news media constantly reproduced images of desperate persons arriving at the Southern European shores and the 'crisis narrative' became embedded in the European political discourse, students, including young pupils, were exposed to an unprecedented number of stories about refugees and migrants. Due to the absence of teaching materials on the subject, UNHCR developed a repository and online teacher training course. The teaching materials are still being updated and are now organised by student age group, translated into different languages and freely available.

Despite pursuing UNHCR's humanitarian objectives, the Teaching about Refugees campaign should not be misunderstood as propagandistic. The Agency must remain politically neutral and, concerning education, act within its mandate to create a safe and inclusive learning environment. Rather than politically motivated narratives, its pedagogical material is meant to provide fact-based evidence to European citizens. It does recognise that MIL plays a crucial role in addressing and preventing widespread disinformation and misconceptions about refugees. Nevertheless, UNHCR avoids combining and conflating its campaign with MIL, leaving it to specialist actors to provide technical skills to students. MIL and subject-specific initiatives are regarded as integral parts of a common effort against disinformation but involve different expertise and are considered to be best implemented by other actors.

Journalists have a particular responsibility to report fairly and accurately. They can only fulfil this duty consistently if they are well-informed about the subject area in question.

Other migration literacy programmes, meanwhile, use journalists as intermediaries, trying to improve the quality of reporting and thereby pre-empt disinformation. In a context where migration remains a salient political issue, and the public is exposed to polarising narratives, journalists, especially those working in mainstream media, play a very important role, being one of the main sources through which citizens inform themselves. Journalists, therefore, have a particular responsibility to report fairly and accurately and not (re)produce disinformation, even if unintentionally.¹³⁹ They can only fulfil this duty consistently if they are well-informed about the subject area in question.

Initiatives like the Global Migration Media Academy (GMMA), launched by the International Organization for Migration and the National University of Ireland Galway, seek to deliver migration-specific literacy skills to journalists and media students. The GMMA's goal is to discourage the spread of hate speech and prevent information manipulation by equipping media practitioners with ethical standards, technical tools and the contextual knowledge to make sense of migration-related stories. The GMMA particularly emphasises training for media students to ensure that new generations of communicators are more aware of the realities and nuances of migration.

By training journalism students to identify and track disinformation and harmful content, including fact-checking and data journalism techniques, the GMMA is trying to fill a subject-specific educational gap. Migration studies is not considered a discipline in itself in many European universities,¹⁴⁰ and there are few courses on migration for journalists and other communicators. Newsrooms may include journalists with specific expertise in law, economics or politics, for which they have received specialist training or qualifications – but the same is rarely true for migration.

This means that many who communicate about migration, including not only journalists but also other figures such as government spokespeople, do not necessarily have the background knowledge to talk about it accurately. This can be seen in cases of well-intentioned journalists or other communicators using misleading terminology, such as referring to migrants as 'refugees' or erroneously presenting forced displacement as 'illegal migration'. Nor do all of them possess the ability to retrieve accurate statistics about newly arrived asylum seekers to fact-check their sources or understand how manipulated statistics can be used to reproduce invasion narratives.¹⁴¹

If journalists covering migration do not have suitable training, they may confuse terms, fail to provide sufficient context, or inadvertently repeat disinformation-based and/or misleading messages – then pass these errors on to their readership. By providing the resources to 'upskill' journalists and ensuring they can access reliable information, initiatives like the GMMA can undermine disinformation close to the source.

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Besides stimulating a more informed discussion, migration literacy initiatives also promote stronger and more inclusive democratic societies. According to its promoters, for example, the GMMA aims to ensure that diverse voices and nuanced opinions are heard in a time of uncertainty, when disinformation incites fear and sows divisions, thus helping to strengthen democratic principles and social cohesion.

Furthering subject-specific expertise and MIL would therefore do more than just expose disinformation techniques and hostile narratives about migrants. It would enable citizens to better understand the links between disinformation and the broader political and communication environment and improve the quality of the information to which individuals have access. Hence, if combined with other proactive communication strategies, MIL and subject-specific trainings would pre-empt disinformation, open spaces for meaningful democratic engagement, and contribute to rebuilding trust in institutions and other groups and communities.¹⁴²

Chapter 3. Recommendations

3.1. SHORT-TERM INITIATIVES: MONITORING, EARLY WARNING AND FORESIGHT

RECOMMENDATION 1: Expand monitoring activities through coordinated multi-stakeholder initiatives

Monitoring disinformation narratives is an important task to ensure that all stakeholders and communicators understand what they consist of, how they spread and how effective responses can be crafted. Currently, there are a huge number of different actors engaged in this task. To avoid the duplication of efforts and improve access to information, monitoring and research should be coordinated as much as possible. Initiatives like EDMO are a promising step in this direction and should be expanded.

To avoid the duplication of efforts and improve access to information, monitoring and research should be coordinated as much as possible.

Monitoring networks and activities should have an open and constantly expanding membership so that **all the relevant stakeholders can get involved**. Their work should be pursued according to a **common framework** to ensure comparability and identify trends across linguistic and geographical borders. Stakeholders with **particular expertise in topics like migration** (e.g. international organisations or journalists with a migration focus) should be invited to contribute their knowledge and expertise, either directly as network members or ad hoc.

In practice...

An **EU online platform against disinformation** should be founded, serving as a hub for all interested stakeholders. The European Commission should fund and support the platform, but ultimately, civil society partners chosen for the purpose should operate it. Fact-checkers and researchers should be able to upload the results of their monitoring and research activities to this platform. The results would preferably be in a common format to facilitate exchanges (e.g. listing source and country, disinformation claim or narrative, examples if appropriate, a brief ‘debunk’ or explainer of why the claim qualifies as disinformation).

Each entry in the platform should be open for comments from other users and be ‘taggable’ with keywords to aid

search functions (e.g. all migration-related disinformation should be indicated as such). Machine translation can provide a greater level of accessibility. While not perfect, such a method has already been demonstrated to facilitate a genuine degree of transnational exchange and debate (e.g. the multilingual online platform of the Conference on the Future of Europe).

Platform membership should, in principle, be open to all interested stakeholders, but it may be appropriate to include a straightforward application process to vet their credentials and intentions. For example, fact-checkers should prove that they are members of the International Fact-Checking Network, researchers that have a university or institutional affiliation, and so on. Ideally, the platform would facilitate a community of engaged experts that includes not only fact-checkers and researchers but also representatives of the EU institutions, national governments, local authorities, journalists and media specialists, and international organisations.

RECOMMENDATION 2: Establish early warning systems based on civil society monitoring work

Monitoring and research efforts can help **communicators and other stakeholders react promptly** to new developments through early warning systems. However, just because a certain narrative is increasing in frequency does not necessarily mean it warrants a response. Such systems should therefore work with monitoring mechanisms to enable fact-checkers and communication professionals to **assess the likely reach and impact of disinformation** before intervening, and **craft swift responses** where necessary.

Monitoring and research efforts should enable fact-checkers and communication professionals to assess the likely reach and impact of disinformation before intervening, and craft swift responses where necessary.

By taking place within civil society-driven networks, this work can take an **actor-agnostic approach**. This can bypass the political, practical and legal obstacles that prevent governments and EU institutions (e.g. the RAS, facilitated by the EEAS) from treating ‘internal’ disinformation threats in the same way as ‘external’

ones. Disinformation about migration originates not only outside but also from within Europe and is propagated by networks that are active across borders. This approach should thus lead to timely interventions against disinformation, regardless of its sources.

In practice...

Early warning measures could be built into the EU online platform against disinformation described above, with a dedicated channel or group for early warning activities. Platform users could signpost specific cases following a predefined set of criteria. For example, they could assign each disinformation case a 'grade' which reflects the characteristics of the individual story or narrative.

'Red alerts' could be used for disinformation that has a strong potential to make headlines or even put people's well-being directly at risk, or is trending online and will likely attract significant further engagement, possibly across borders and linguistic communities. This type of disinformation would require immediate action to prevent its spread. 'Orange' or medium-level alerts could be used for disinformation that has the potential to affect the general discourse or generate discussion among certain groups but may not reach the wider public. This kind of threat may not require an immediate reaction but would still be valuable for studying the crafting of alternative narratives. 'Yellow' or low-level priority flags could be used for stories unlikely to generate engagement outside of niche audiences. In these cases, no action would be necessary besides monitoring to gauge their frequency and any rise in engagements.

These flags could trigger automated alerts to stakeholders who have joined the platform and indicated their willingness to be informed about developments. RAS contact points should be granted access to the platform and alerted. In turn, they should upload any other material they have detected through their own work which is not classified or otherwise sensitive. In this way, governmental and civil society efforts would support one another.

RECOMMENDATION 3: Use foresight techniques to gain a first-mover advantage and fine-tune communication efforts

By using techniques like forecasting and scenario planning, stakeholders can **anticipate future disinformation about migration**, thus helping them to be prepared for future developments. Foresight efforts should account for various potential scenarios, assess which disinformation narratives and frames may be used in specific circumstances, and draw on situational insights to determine whether and how future disinformation might spread across linguistic and political boundaries in response to particular events. It should also take into account how stories and narratives can **harness widespread concerns and target particular population segments**.

Foresight efforts should account for various potential scenarios, assess which disinformation narratives and frames may be used in specific circumstances, and whether and how future disinformation might spread across linguistic and political boundaries in response to particular events.

Through such efforts, communicators and fact-checkers would be one step ahead of disinformation actors and ensure they are suitably prepared for each new development. Communicators should promote alternative narratives to pre-empt disinformation narratives before they emerge, while fact-checkers should seek the facts and statistics they are likely to need. Particular attention should be devoted to avoiding any risk that the foresight activities could backfire and create further opportunities for migration-related disinformation to circulate.

In practice...

The EU online platform against disinformation described above could also include a channel dedicated to foresight activities, bringing together experts, CSOs, and national and EU institutions interested in engaging in strategic foresight work. The European Commission or civil society partners overseeing the platform should arrange regular meetings to encourage these discussions. Combining the expertise and experience of different stakeholders, such meetings would allow for detailed explorations of plausible future scenarios and how disinformation threats may evolve, breaking silos between civil society and government.

Foresight activities should be coordinated by the subject to ensure the presence of relevant experts. For instance, foresight meetings on migration would consider the latest research on migratory movements in addition to the monitoring activities reported on the platform. Foresight activities could also assess possible disinformation threats by theme (e.g. invasion, infection or welfare narratives), based on the possible scenarios envisaged (e.g. increased arrivals, epidemic breakout, growing unemployment).

The stakeholders should consider producing documents like the Commission's Strategic Foresight Reports, but shorter and published more regularly (e.g. monthly). These reports, and the outcome of their foresight activities more generally, should be fed back into the platform for external feedback and shared with communication stakeholders to help them prepare their messages. Following this feedback, experts should reassess their previous foresight conclusions based on new emerging trends while avoiding reproducing unnecessary fears and mitigating the risks of backfire effects.

3.2. LONGER-TERM INITIATIVES: MIGRATION, MEDIA AND INFORMATION LITERACY

RECOMMENDATION 4: Prepare citizens to recognise disinformation via literacy campaigns that cover all basic critical skills

To be able to distinguish actual news from rumours and manipulation, European citizens must be equipped with a comprehensive set of critical skills to cope with the dynamic and fast-developing (dis)information environment. This goes beyond **media literacy** to include other skills, including **information, digital, data and other literacies**. Rather than being informed about individual stories and messages, citizens should be made able to **spot and resist bias and common manipulation techniques** and so develop psychological resistance to disinformation.

European citizens must be equipped with a comprehensive set of critical skills to cope with the dynamic and fast-developing (dis)information environment. This goes beyond media literacy to include other skills, including informational, digital, data and other literacies.

Although education and, consequently, media literacy programmes are member states' responsibility, the EU can help fund projects and coordinate EU-wide initiatives. This also applies to civil society initiatives. Fact-checking organisations and those taking part in monitoring activities are especially well-positioned to craft up-to-date skills courses that cover manipulation techniques. Accordingly, the EU should encourage and adequately support their efforts. At the same time, the EU should strive to a degree of harmony despite different national educational policies.

In practice...

To overcome the challenges posed by the diversity and fragmentation of education systems across Europe, the EU should develop a common definition of MIL and outline the critical skills required to build resilience against disinformation. An ambitious European MIL strategy against disinformation should be crafted. As part of this effort, guidelines and tools should be made available for national, regional and local educational authorities. National best practices (e.g. Finland; see Infobox 4, page 24) can inform these guidelines.

A system assessing which EU countries are lagging should also be created. A harmonised system to measure European citizens' acquisition of MIL competences

– for example, a common benchmark integrated into the Organisation for Economic Co-operation and Development's Programme for International Student Assessment standards – would make it possible to compare country differences, thus facilitating systemic improvements across the EU.

The European Commission's Media Literacy Expert Group, which already involves representatives and experts from across Europe, could facilitate and partly address these tasks. European CSOs that demonstrate MIL experience should also inform such efforts, sharing good practices and engaging forms of media education inside and outside the classroom. The platform should form a channel of interested organisations, and the interested national and local authorities responsible for educational policy should reach out to them when designing MIL curricula.

RECOMMENDATION 5: Promote migration literacy through subject-specific training for intermediaries

Migration is an inherently complex subject, offering malicious actors a variety of entry points to propagate divisive narratives. Considering the unique characteristics of disinformation about migration, **subject-specific educational programmes** should be promoted alongside general training about disinformation. **Awareness-raising efforts** should be directed towards those with an 'intermediary' role: notably journalists and the media, but also teachers.

Subject-specific educational programmes should be promoted alongside general training about disinformation. Awareness-raising efforts should be directed towards those with an 'intermediary' role: notably journalists and the media, but also teachers.

Journalists and other information providers have a particular responsibility to ensure that their content is accurate and balanced. Teachers should therefore encourage students to apply a critical attitude to information while also ensuring that they are **better informed about the realities of migration**. Such initiatives would not only help reduce the spread of disinformation but also promote a more balanced and inclusive public debate without promoting a specific political agenda. The insights from monitoring activities could ensure that such training keeps pace with the most recent and prevalent disinformation narratives relating to migration.

In practice...

Training for teachers on how to cover common disinformation subjects, like migration, could be included in future European-level media literacy guidelines. To avoid any risk of the efforts becoming politicised, the content and teaching material for such training should be developed by international organisations or civil society rather than governments or the EU. CSOs should play a leading role in their implementation.

Universities and colleges should also integrate subject-specific expertise on disinformation into their journalism and communication courses. Regarding migration, for example, such courses should explain common myths, the misleading use of inaccurate terminology and examples of how disinformation actors manipulate facts.

Crucial information to understand the phenomenon of migration should also be provided to stimulate an evidence-based discussion on the topic. Training for journalists should occur on an ongoing basis, and news organisations, journalists' unions and other professional organisations should be incentivised to provide such training to their members and staff. For example, EU or national government funds could be directed towards CSOs and international organisations so that they can provide subject-specific training courses to journalists for free.

RECOMMENDATION 6: Apply segmentation and targeting to media literacy efforts

European citizens from **all ages and walks of life** should be provided with the opportunity to regularly strengthen and update their critical skills. MIL programmes should reflect the needs of different age groups, from children born in the digital age who are heavy users of social media to older generations who are new to digital technologies. The programmes should consider not

only **demographics** but also the **values, beliefs and concerns** of different segments of society. Those with specific pre-existing values and concerns, including those that make them especially receptive to disinformation about migration, may not be reached by communication strategies that work for other groups. To maximise their outreach and impact, MIL programmes and training methods for groups other than children and young persons should take into due consideration the attitudes, preferences, and value systems of those most likely to be the targets of disinformation campaigns.

Media and information literacy programmes should reflect the needs of different age groups, from children to older generations. The programmes should consider not only demographics but also the values, beliefs and concerns of different segments of society.

In practice...

The European media literacy strategy should go beyond the formal education system and consider methods to reach out to other segments of European society. For example, it could include funding for projects that provide training through professional and business organisations, or recruit influencers and/or community leaders to promote MIL among hard-to-reach groups. Information channels themselves, including journalists and social media companies, should also take greater steps to ensure that their readers and users are well-informed about how content reaches them, how to check sources, and other critical skills.

Conclusion: Towards a coherent prebunking ecosystem

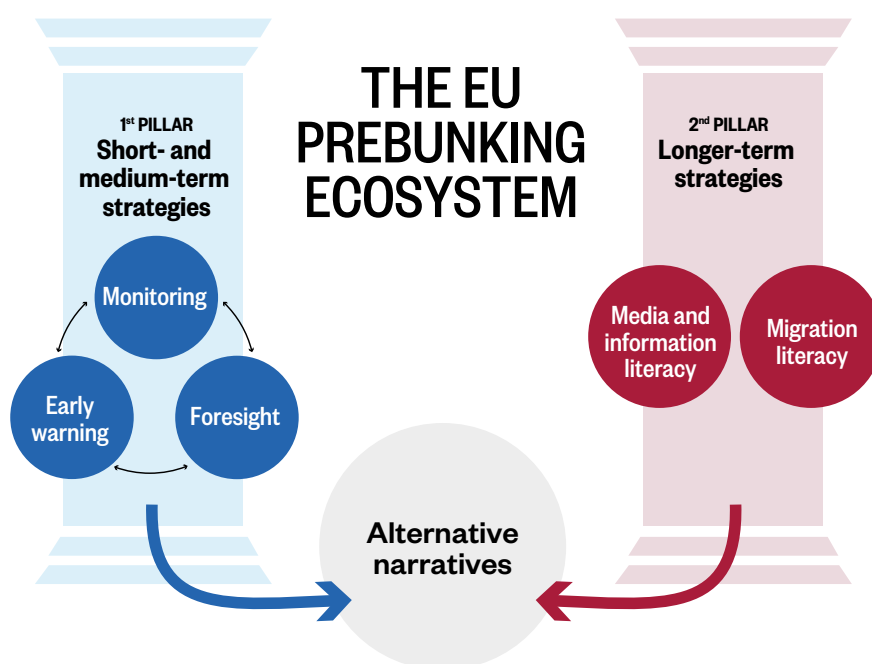
Despite increasing efforts to address disinformation, communicators from the EU institutions, national governments and international organisations still struggle to overcome one fundamental challenge. Disinformation actors can spread lies quickly and widely by strategically linking and adapting their messages to headline-grabbing events. In other words, they set the tone and content of the conversation ahead of everyone else. This was demonstrated by the recent events in Afghanistan and Belarus, where disinformation campaigns quickly sprang up online, aiming to raise fears of imminent mass arrivals and reinforce the belief that Europe is facing a repeat of the 2015 ‘migration crisis’.

Communicators and institutions who seek to promote a balanced view of migration and prevent security-oriented agendas from dominating the policy debate must acquire a first-mover advantage, intervening before disinformation frames and narratives become part of the news and policy cycles. This Issue Paper argues that their strategies should focus on *prebunking*: inoculating citizens against future disinformation while undermining the appeal of a given narrative by being the first to shape an inclusive and fact-based discursive space.

Communicators and institutions who seek to promote a balanced view of migration and prevent security-oriented agendas from dominating the policy debate must acquire a first-mover advantage. Their strategies should focus on *prebunking*: inoculating citizens against future disinformation while undermining the appeal of a given narrative.

To successfully anticipate and prebunk future disinformation, EU institutions and civil society should develop a comprehensive and coherent approach that is based on **two pillars**: (i) a warning system of future disinformation threats in the short and medium terms; and (ii) critical skills against manipulation in the longer term.¹⁴⁵ Although some initiatives already exist in relation to each pillar, they largely operate independently of each other. To function effectively, the EU prebunking ecosystem must work as a coherent whole (see Figure 7).

Fig. 7



Each part of the **first pillar** can support the other directly: monitoring cross-border patterns and themes raises awareness of impending threats, which can be communicated to fact-checkers and CSOs through early warning efforts. In turn, monitoring and early warning should support disinformation foresight. Foresight exercises require constant input about the latest developments to identify the themes – and target groups – of possible future disinformation. The output of that foresight work can then feed back into monitoring and early warning activities, flagging areas to be monitored and revealing potential future risks.

Each of these measures should support one another. Their interconnections could be facilitated by a common space, such as an online platform, where different stakeholders can exchange and pool their respective expertise. Currently, no such shared space exists, as current initiatives that serve a coordinating function, such as EDMO and RAS, only focus on individual parts of the picture rather than the whole ecosystem.

The **second pillar** of the prebunking approach addresses longer-term needs: strengthening MIL and raising subject-specific competences. A comprehensive prebunking ecosystem also needs a receptive audience. If European citizens are unaware of the risks of disinformation and unable to spot manipulation, hoaxes will continue to be shared and spread further, contributing to a polarised debate on migration. For this reason, the EU and member states should scale up their efforts and ensure that citizens are equipped with **essential critical skills**. To consolidate the second pillar, subject-specific competences are also needed. **Migration literacy** would enable specific categories of professionals, such as journalists and teachers, to act as gatekeepers against disinformation narratives while also creating the preconditions for a more balanced and informed public discussion.

The outcome of this coherent prebunking ecosystem would be an environment in which the public salience

and appeal of disinformation themes are reduced, and alternative narratives can flourish.¹⁴⁴ **Monitoring and early warning** should also be used to design alternative narratives and implement them swiftly when required. **Foresight** should help craft narratives that address likely future concerns without reproducing fears. At the same time, MIL would help filter out disinformation, while migration literacy provides the basis for a balanced and inclusive space for debate.

The EU prebunking system would equip European citizens with the skills to cope with and orient themselves within a rapidly changing information environment. It would also promote social cohesion, rebuild public trust and protect democratic institutions.

The EU prebunking system is therefore not only about aiding the efforts against disinformation of diverse institutional and civil society stakeholders. Rather, it would equip European citizens with the skills to cope with and orient themselves within a complex and rapidly changing information environment. Prebunking efforts are a prerequisite for them to engage meaningfully in public life and fully exercise their rights and freedoms while also protecting those of others – particularly those of people on the move and minorities. In a context where migration-related disinformation creates intergroup tensions and threatens the peace and security of societies, prebunking efforts can promote social cohesion, rebuild public trust and protect democratic institutions.

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