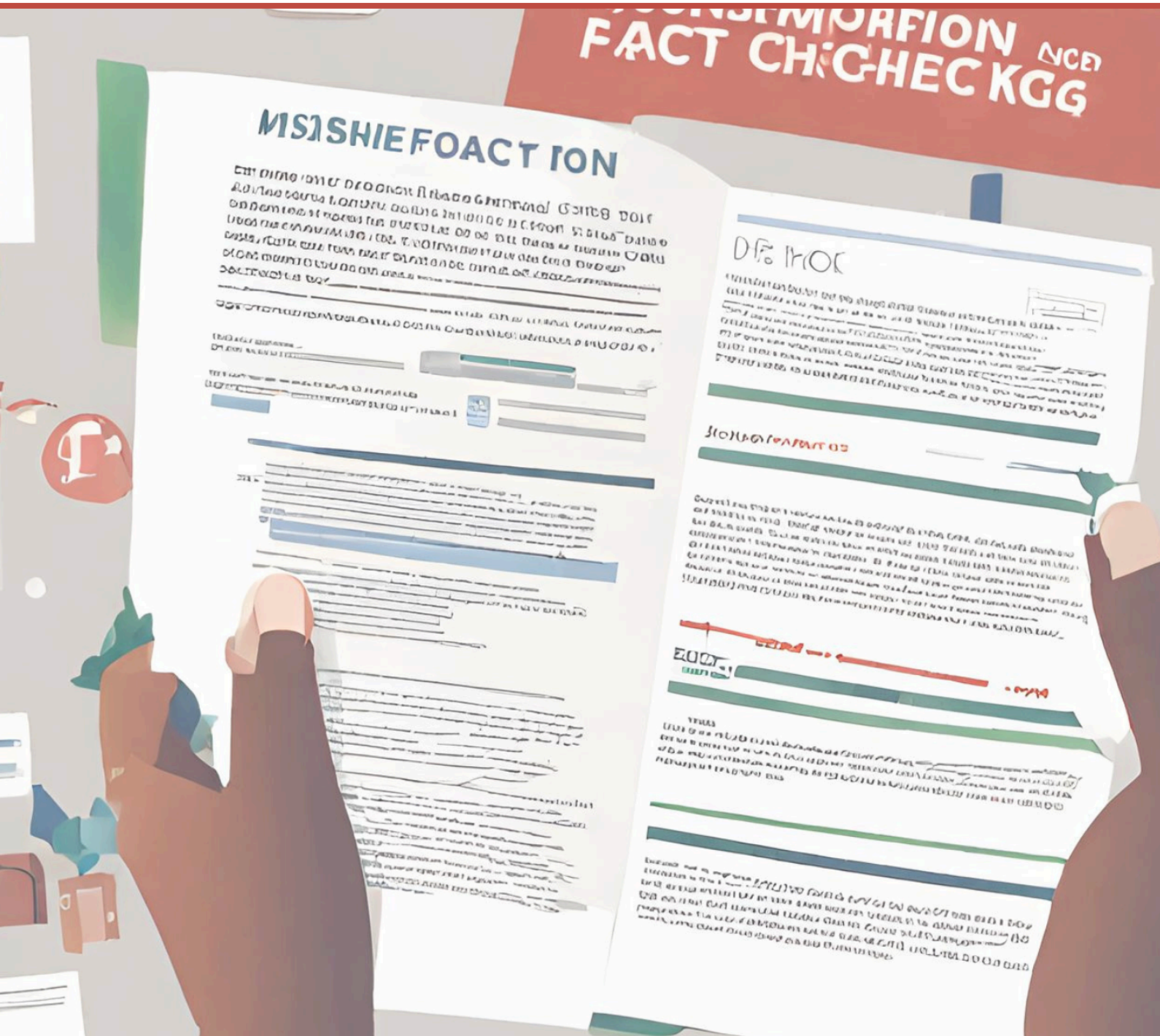




Misinformation Combat Alliance

Consultation on FCN Board Charter & Code of Principles

Apr 2024





Consultation on FCN Board Charter & Code of Principles TQH Comments

Misinformation presents a growing threat in India, with significant implications for law and order and the broader health of public discourse. The World Economic Forum (WEF)'s [Global Risks report 2024](#) underscores the nation's susceptibility to misinformation and disinformation, ranking it as the most exposed country to such risks.

As policymakers discuss strategies to address the inundation of misinformation in the information ecosystem, fact-checking emerges as a powerful tool in combating falsehoods. While not a panacea, it has [proven effective](#) in debunking beliefs, particularly among audiences less entrenched in partisan narratives. India benefits from a [robust ecosystem of fact-checkers](#) capable of operating in regional languages, flagging false narratives as they emerge in local discussions. Leveraging these resources could greatly enhance efforts to combat misinformation. **However, it is crucial to establish and adhere to robust standards that uphold the highest levels of integrity in the fact-checking process.**

In this regard, TQH welcomes the genesis of the [Misinformation Combat Alliance](#) (Alliance) - a collaborative cross-industry effort to combat misinformation in the Indian context. We believe that this initiative holds significant promise in driving a whole-of-ecosystem approach. Additionally, we believe that the Alliance would help uphold the integrity of the fact checking ecosystem in India, akin to the role of the [International Fact Checking Network](#) (IFCN) and the [European Fact-Checking Standards Network](#) (EFCN) globally.

On the occasion of the International Fact Checking Day on April 2, 2024, the Misinformation Combat Alliance, released their [Oversight Board \(Fact Checking Network Board\) Charter](#) and [Code of Principles](#) for public review.

[The Quantum Hub \(TQH\)](#) team has closely analyzed these documents and synthesized our insights into a submission. Through our submission, we attempt to provide inputs on how international frameworks may be adapted to better suit Indian realities, while creating the right impetus and incentives for all relevant stakeholders. We also suggest measures to increase the robustness of the evaluation process for verified signatories, and optimize operations to facilitate smoother functioning for the MCA.

The full text of our submission to the Alliance is set out below.

TQH Response to MCA Consultation on FCN Framework

In collating our inputs on the draft Fact Checking Network Board Charter (Charter) and the Code of Principles (Code), we have kept in mind the following objectives and principles:

- Adapting existing international best practice mindfully to **Indian realities**.
- Assessing the ability of **nascent players** in the Indian fact checking (FC) ecosystem to navigate the compliances that come with verification as a signatory.
- Incentivising conduct that improves the **overall quality of Indian FC**.
- Ensuring **optimization and agility of the Alliance's operations** to meaningfully execute its functions.

Accordingly, we present the following inputs for the Alliance's consideration:

A. Tailoring the Code to Indian realities

We believe that the Indian information landscape poses unique challenges to the FC ecosystem. Therefore, any Code or Charter built to serve India's FC ecosystem must respond to India's cultural and **linguistic diversity, prevalence of nascent and micro-level FC organizations**, and evolving techniques and technologies deployed by disinformation actors. To this end, we propose that:

1. The Alliance must accommodate FC organizations that work **primarily/only in Indian languages**. We advocate for **flexibility in the eligibility criteria** outlined in draft Article 11.1(iii) of the Charter, suggesting the omission of English being a mandatory criteria. When only **~10%** of the Indian population speaks English, such a requirement can limit the accessibility of Alliance verified fact checks to a significant portion of the Indian audience.
2. Additionally, recognizing the **resource constraints** FCs face, we propose revisiting draft Principle #6.1 of the Code to clarify that secondary insights or research that builds upon fact checks done by FCs can be **paywalled, even if the fact checks themselves are not**. This would help incentivise further research on issues such as studying co-ordinated misinformation narratives, etc, and allow freedom to FCs to explore diverse revenue models.

3. As the Indian FC ecosystem grows and evolves, we recommend that the **Code be reviewed periodically** (eg; every 2 or 3 years) to account for changing trends in the Indian information landscape.

B. Rationalizing compliance for small fact checkers

India is home to a **large number** of independent fact checkers, constituting an amorphous and uncoordinated group. With resource and funding shortages being the **main** limitation FCs have highlighted globally, this problem is likely to be far greater in India. We believe that verification as a signatory by the Alliance should serve as an **enabler for small FCs**, rather than compounding operational challenges. In this regard:

4. We advocate for **carve outs, exemptions/relaxations** on costing and compliance requirements that apply to small FCs that typically service underrepresented communities or markets, with a view to encourage their sustained market presence and partnership with the Alliance. This could be achieved through tiered fee structures, provision of waivers, grants, access to a legal defense fund etc. to small FCs.
5. We recommend **extending the validity period** for verified signatories (eg: 5 years). Review and re-application cycles can significantly increase costs, both for FCs as well as the Alliance.

C. Improving overall quality of Indian FCs

The Alliance's Code holds significant potential to nudge Indian FCs to prioritize particularly harmful false narratives and increase the overall quality and accuracy of their operations.

6. **Objectivity (as far as practicable)** and hygiene in FCs' methods to select narratives to fact check is crucial in optimizing their larger public utility and safeguarding their credibility. Draft Principle 4 of the Code fulfills this objective by mandating disclosure of methodology and narrative selection. The Code could go a step further to **illustrate categories of misinformation** that bear the greatest risk of harm to life, peace, and property. For instance, an illustration to draft Principle 4.2 could provide examples or themes of potent misinformation (**law and order disruption, public health, etc.**) to develop a more **contextual understanding of the phrase 'importance'**.
7. We observe that the Charter's eligibility criteria for signatories under draft Article 11.1(IV) establishes a tiered **quantitative threshold** pegged to the *number* of fact checks published. We recommend introducing an additional criteria assessing the **overall accuracy of the applicant's fact checks**. For instance, applicants should have a demonstrable level of accuracy in their fact checks, which are vetted as being error-free. Additionally, an evaluation of the applicant's adherence to its correction policy and its frequency is something the board could consider. This addition would ensure a higher standard for the quality and reliability of fact-checking, thereby provisioning a more robust assessment of applicants' trustworthiness.

D. Optimize operations for the Alliance

8. **Ease of operations:** A Board composed of independent and well reputed

individuals is welcome and lends credibility to the Alliance. However, this must be balanced with **operational agility and ease**, to ensure that the Board meetings are **regular, meaningful, and substantive**. The Charter could also envision a **greater role for the Secretariat** in routine operations, and envisage **sub-committees** (working under Board supervision) to speed up Board-level decisions. Finally, we believe that Board meetings must be **open for public audiences**, which will increase the overall credibility of the Alliance/Board's conduct in the socio-politically sensitive market of fact checking.

9. **Dispute Resolution:** Oversight by industry peers, civil society, and Alliance signatories on compliance with the Code is a healthy model that encourages industry to serve as an **additional line of scrutiny** that ultimately improves the quality of fact checks available to the public. However, resolution of peer v/s peer complaints could become a time consuming process, especially if revocation of the 'verified signatory' status is threatened. The Alliance could consider placing a **minimum threshold or specifying serious categories of derogations that warrant Board level action**, to prevent overloading the Board with inter-member disputes. The Alliance can also consider increasing the frequency of Board meetings or envision **sub-committees that can oversee completion of proceedings** until a final decision has to be made at the Board level. Such processes can also benefit from **inputs/representations made by other peers/stakeholders**, that can be provided for in the Charter. Finally, the Charter contemplates an 'appeal' mechanism whereby the Board reviews its own decisions upon parties' request. 'Appeals' according to rule of law principles like the right to be heard would normally require that a different or superior authority scrutinize the decision that is appealed against. We would

recommend that the procedure be re-styled as a request for review or reconsideration), so that it complies with well established principles of natural justice.

Creating a multiplier effect

The Code has the potential to align FC incentives with well-thought-out best practices. By going beyond certification, the Alliance is also well placed to realize positive outcomes by enabling a platform for **peer-to-peer knowledge sharing, collective stakeholder engagement, and capacity building**. **Public facing initiatives** targeted at improving **media literacy** can also **create a positive feedback loop** that benefits the general public, fact checkers, as well as the Alliance itself. This can contribute significantly to strengthening the integrity of the Indian public discourse.