European Digital Media Observatory

Implementing the EU Code of Practice on Disinformation

An Evaluation of VLOPSE Compliance and Effectiveness (Jan–Jun 2024)

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List of Abbreviations

CoP	Strengthened Code of Practice on Disinformation
DSA	Digital Services Act
EDMO	European Digital Media Observatory
ERGA	European Regulators Group for Audiovisual Media Services
QRE	Qualitative Reporting Element
SLI	Service Level Indicator
VLOP	Very Large Online Platform
VLOSE	Very Large Online Search Engine
VLOPSEs	Very Large Online Platforms and Search Engines

List of Tables and Figures

Acknowledgements

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In line with the Observatory's commitment to provide policy analysis, including in the context of the implementation and monitoring of the Code of Practice on Disinformation, this is the second EDMO Analysis of Very Large Online Platforms and Search Engines (VLOPSEs) compliance with the Code of Practice on Disinformation.

The methodology for the present analysis was co-designed through a network-wide collaborative process which involved the creation, in June 2024, of a dedicated working group. The group brought together EDMO Hubs representatives, including the authors and contributors of this report, as well as representatives from EDMOeu, including ***Paula Gori,*** *EDMO Secretary-General,* ***Lisa Ginsborg,*** *EDMO Training and Research Coordinator,* ***Elena Maggi,*** *EDMO Hubs Coordinator, and* ***Rolf Nijmeijer,*** *Research Associate at STG/EUI, under the coordination of* ***Paolo Cesarini,*** *EDMO Executive Board Chair.*

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Executive Summary

In recent years, the European Union has stepped up its efforts to counter disinformation, with the **Code of Practice on Disinformation (CoPD)** serving as a cornerstone of its approach. Originally introduced in 2018 and revised in 2022, the CoPD is a self-regulatory framework guiding Very Large Online Platforms and Search Engines (VLOPSE) in their obligations to reduce the spread and impact of disinformation. As of July 1, 2025, the Code will become effective as a formal **Code of Conduct** under the **Digital Services Act**.

This report evaluates the implementation of the CoPD between January and June 2024, focusing on the actions reported by **Meta (Facebook and Instagram), Google (Search and YouTube), Microsoft (Bing and LinkedIn),** and **TikTok**. Large online platforms are required to submit transparency reports twice a year, detailing their efforts to meet commitments under the Code. This report focuses on certain key areas such as *improving transparency, supporting media literacy, enhancing fact-checking partnerships, and enabling research.*

The assessment examines the extent to which these seven VLOPSEs' services have met core commitments under the CoPD and evaluates the real-world impact of selected actions and initiatives taken under the Code. This report aims to establish an evidence-based benchmark for evaluating platforms' compliance with the Code's requirements and the effectiveness of their efforts. It identifies both successes and shortcomings, offering a foundation for the continued evolution of policy and future improvements in transparency and accountability measures.

The evaluation draws on multiple sources: transparency reports submitted in 2024, independent verification by EDMO researchers, and qualitative insights from a survey with experts. The analysis evaluates the progress of the VLOPSEs across **eight key commitments under three pillars of the CoPD**:

Empowering Users

- *Commitment 17: Media literacy initiatives*
- *Commitment 21: Tools to help users identify disinformation*

Empowering the Research Community

- *Commitment 26: Access to non-personal, anonymized data*
- *Commitment 27: Governance for sensitive data access*
- *Commitment 28: Cooperation with researchers*

Empowering the Fact-Checking Community

- *Commitment 30: Cooperation with fact-checkers*
- *Commitment 31: Fact-checking integration in services*
- *Commitment 32: Access to relevant information for fact-checkers*

Methodology

The research, conducted by EDMO researchers from different Hubs, involved reviewing transparency reports submitted by platforms, cross-referencing claims with external sources, and documenting areas where verification was not possible. Qualitative insights were drawn from a survey distributed among media literacy experts, fact-checkers, and disinformation researchers affiliated or collaborating with EDMO. Together, these methods provide a comprehensive perspective on platform performance and accountability. Notably, this is the first initiative of its kind to combine self-reported platform data with independent verification and external expert evaluation.

The report is organized into three parts. First, when assessing *Compliance*, EDMO researchers examined whether platforms' transparency reports contain comprehensive and detailed accounts of their disinformation mitigation efforts. These self-reported measures were evaluated using a standardized scale, based on a defined *set of indicators* (see *Annex A*). The reliability of the platforms' claims was assessed through cross-referencing with external sources, including public reports and input from EDMO colleagues and collaborators, where their expertise was applicable.

Second, the basis of assessing *Effectiveness* is an expert survey with affiliated media literacy experts, fact-checkers, and researchers. The survey was conducted to gather *qualitative insights* into how these efforts are perceived by professionals in the field (see *Annex C*). A total of 91 experts from 25 different countries took part in the survey, representing 14 EDMO Hubs.

Conducted between December 2024 and February 2025, the survey was organized into the same thematic pillars: (1) *Media Literacy/Empowering Users*, (2) *Research/ Empowering the Research Community*, and (3) *Empowering Fact-Checking*. Participants assessed the availability and relevance of over thirty measures—ranging from digital-skills campaigns and in-app warnings to data-access protocols and independent verification tools—and provided qualitative comments. These detailed insights were then cross-referenced with findings from transparency reports and expert feedback from EDMO's central team and individual Hubs, laying a robust foundation for evaluating platforms' performance and identifying gaps in support for media literacy or fact-checking, transparency, data sharing, and collaborative oversight.

Finally, the *Recommendations* synthesize the findings from both the assessment of completeness and verifiability of platforms' reports and the expert survey feedback, offering policy recommendations aimed at improving the future implementation of the Code of Conduct and strengthening platform accountability.

Key Findings

Effectiveness

Overall, as regards the effectiveness of VLOPSE initiatives and actions, the expert Survey suggests that the efforts undertaken so far remain very limited, lacking consistency, and meaningful engagement (see *Table 1*). While some platforms, notably **Meta** and **Google**, have launched initiatives to address disinformation, these are frequently criticized for being superficial or symbolic. In particular, some of **Meta**'s statements cast doubt on its future commitment and suggest a retreat from active collaboration. In every field, most VLOPSE tend to adopt a reactive rather than a proactive stance, with little transparency or structured support for users, fact-checkers and researchers. Even when formal agreements exist, their implementation often falls short of expectations. As a result, current efforts rarely translate into long-term, systemic support for counter-disinformation strategies.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
User Empowerment	**Mixed**	**Poor**	**Good**	**Fair**
Fact-Checking Empowerment	**Good**	**Poor**	**Good**	**Very poor**
Research Empowerment	**Excellent**	**Very poor**	**Good**	**Poor**

Table 1: Overview of VLOPSE Effectiveness Assessment on Selected CoPD Commitments

It should be noted that, by its very nature, the analysis conducted in this report only provides insights regarding the effectiveness of platforms' measures as *perceived* by a representative cross-section of relevant stakeholders (researchers, fact-checkers and civil society organisations), which is not necessarily indicative of the specific views of a single category of such stakeholders.

Compliance

As regards the assessment of compliance, the analysis of the completeness and verifiability of transparency reports from the four major online platforms under the CoPD reveals a consistent trend of partial implementation, with uneven progress across key areas.

Empowering Users

Efforts to empower users through media literacy and content labeling (*Commitment 17)* vary considerably across platforms. **Meta** (**Facebook** & **Instagram**) demonstrates engagement with media literacy through initiatives such as *We Think Digital* and in-app

prompts. However, these efforts lack transparency regarding their geographical scope and provide no substantive data on user engagement or measurable outcomes at the national level. **Microsoft**, through **Bing** and **LinkedIn**, references partnerships with services like *NewsGuard* and mentions participation in various campaigns, but offers no substantiated evidence of reach or effectiveness. These references come across as superficial, lacking any meaningful demonstration of impact. There are no user engagement figures, no reported outcomes, and no indication of the actual scale of these efforts.

Google's services (**Search** and **YouTube**) show greater structural commitment, notably through prebunking initiatives and features such as *"More About This Page."* However, these efforts remain largely unaccountable, as **Google** provides no concrete data on user reach or effectiveness. While the initiatives appear well-designed in theory, the lack of transparency around their actual performance makes it impossible to assess their real-world impact.

TikTok presents a more promising case, documenting a broader range of national campaigns and fact-checking partnerships. However, it still fails to provide country-specific detail or consistent engagement data. While it discloses limited behavioral indicators like share cancellation rates, it offers no comprehensive assessment of the overall impact of these interventions.

On tools to help users identify disinformation (*Commitment 21*), all platforms rely on labels, panels, or warnings, but none are willing to detail their work. **Meta** reports maintaining a substantial fact-checking network and applying content labels such as "False" or "Partly False." However, it provides little evidence of how these interventions affect user behavior, offering almost nothing beyond a single figure on interrupted reshares and a few isolated engagement statistics. **Microsoft** limits its efforts to commercial tools like *NewsGuard* and unspecified AI-based detection, with no accompanying metrics. **Google** applies labeling mechanisms on both **Search** and **YouTube**, reporting some aggregate reach data, but fails to present user impact or behavior change metrics. **TikTok** combines labeling with user notifications and provides partial insights into user behavior, such as share cancellation rates, although comprehensive evaluations remain absent.

Empowering the Research Community

Regarding access to non-personal, anonymized data (*Commitment 26)*, all platforms make at least nominal provisions, but the quality and transparency of these efforts diverge. **Meta** provides data access via the ICPSR (University of Michigan) but fails to disclose national-level usage or uptake metrics. **Microsoft** references beta programs without clear evidence of researcher access or data granularity. **Google** makes several research tools available, yet their utility for disinformation-specific studies remains limited. **TikTok** appears to make more progress in this category, offering a Research API

and dashboards with documented application processes and publicly available uptake metrics by Member State, even though the usability of the provided tools remains unclear.

Governance for sensitive data access (*Commitment 27*) represents a weak point across all platforms. **Meta, Microsoft**, and **Google** reference pilot programs but provide no substantive public documentation on governance frameworks or participant outcomes. **TikTok**'s participation in the EDMO data access pilot is acknowledged, though no conclusive evidence is provided regarding the effectiveness or transparency of these governance efforts.

In terms of cooperation with researchers (*Commitment 28*), **Meta** claims to offer various tools, yet the allocation processes and prioritization criteria are opaque. **Microsoft** demonstrates minimal engagement in this area, lacking structured programs or support mechanisms. **Google** presents more comprehensive support through EMIF funding and affiliated research initiatives but is similarly hampered by governance and transparency gaps. **TikTok** offers extensive documentation and structured resources, but the complexity of its application procedures continues to limit effective access.

Empowering the Fact-Checking Community

Cooperation with fact-checkers (*Commitment 30*) shows varying degrees of commitment. **Meta** lists multiple activities and partnerships but offers no systematic evaluation of their impact. **Microsoft** provides only minimal and vague references to cooperation. In contrast, **Google** describes well-integrated processes, including testing methodologies and financial support through EMIF, albeit without exhaustive metrics. **TikTok** similarly lists partnerships and fact-checking processes but does not provide sufficient evidence of their effectiveness or external validation.

The integration of fact-checking into services (*Commitment 31*) shows similar patterns. **Meta** claims to apply labels and reduce content visibility but lacks detailed reporting on effectiveness. **Microsoft** provides no meaningful reporting on fact-checking integration. **Google** demonstrates a more systematic approach, employing panels and A/B testing to assess effectiveness. **TikTok** applies labels but does not clearly articulate the impact on users or content creators.

Finally, access to relevant information for fact-checkers (*Commitment 32*) remains poorly documented across all platforms. **Meta** mentions internal dashboards but provides no external verification or measurable data. **Microsoft** fails to report any dedicated tools or interfaces for fact-checkers. **Google** does not describe any specific mechanisms for information sharing. **TikTok** references the availability of dashboards but admits to limited depth and a lack of systematic external validation. Annex B summarizes in greater detail each platform's actions with the critical commitments selected for analysis.

Overall, compliance of VLOPSE with the selected commitments of the *Code of Practice on Disinformation* remains inconsistent (see *Table 2*).

Commitment	**Meta** Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Media Literacy (17)	Partial	Low	Partial	High
Disinfo Tools (21)	Partial	Low	Partial	Partial
Access to Data (26)	Partial	Low	Partial	High
Governance (27)	Low	Low	Low	Partial
Research Cooperation (28)	Partial	Low	Partial	Partial
Fact-Checker Cooperation (30)	Partial	Low	High	Partial
Integration (31)	Partial	Low	High	Partial
Access for Fact-Checkers (32)	Low	Low	Low	Partial

Table 2: Overview of VLOPSE Compliance Assessment on Selected CoPD Commitments

While some reported actions are supported by independent evidence, many lack transparency or verifiable data. Although platforms like **Google** and **TikTok** demonstrate more structured approaches in certain areas, none provide full transparency, independent verification, or robust impact reporting. **Meta**'s efforts are undermined by poor disclosure and the absence of meaningful impact data. While **Microsoft**'s performance is particularly weak across all commitments, this result should be considered in connection with the specific risk-profile of its services. Strengthening the enforcement of reporting requirements and mandating independent audits are essential steps toward improving the accountability and effectiveness of VLOPSEs' commitments to implement the future Code of Conduct.

1. Introduction and Methodology

In recent years, disinformation has emerged as one of the most pressing issues in the digital age, posing significant challenges to political stability and societal trust. As the digital ecosystem grows ever more complex, the role of *Very Large Online Platforms and Search Engines* (VLOPSEs) has come under intense scrutiny. The EU has recognized the need for coordinated action against the spread of false information online, culminating in the introduction of the *Code of Practice on Disinformation* (CoPD) in 2018. This self-regulatory framework aims to set standards for platforms, holding them accountable for the content shared on their networks and ensuring they implement strategies to identify, mitigate, and prevent the spread of disinformation.

The EU regulatory landscape has evolved rapidly in response to mounting concerns about the influence of social media platforms on public discourse. *The Digital Services Act (DSA)*, passed by the EU in late 2022, marks one of the most significant legislative efforts to date in terms of regulating online platforms. The DSA introduces robust rules for transparency, accountability, and responsibility, especially for platforms with large user bases. It includes provisions that require these platforms to identify and remove illegal content, monitor and regulate advertising practices, and provide more transparency regarding their algorithms. However, the EU's disinformation mitigation policies are increasingly being tested by major policy shifts, particularly from some of the world's largest tech companies.

Despite these promising legislative efforts, recent developments from the platforms themselves reveal the complexities of balancing regulation with self-governance. **The objective of this report is to evaluate the compliance and effectiveness of seven platform services: Meta (Instagram & Facebook), Google (Search & YouTube), Microsoft (LinkedIn & Bing), and TikTok regarding eight core commitments outlined in the EU Code of Practice on Disinformation**. The assessment focuses on the transparency reports submitted by these platforms, with an emphasis on the quality, completeness, and verifiability of the reported information *and* the effectiveness of platform initiatives and actions taken.

First, the evaluation of the quality, completeness and verifiability of reported information followed a structured framework based on a predefined grid that measures compliance across multiple commitments under the *Code of Practice on Disinformation*. The eight commitments assessed include: **Enhancing Media Literacy (*Commitment 17*); Better Equipping Users to Identify Disinformation (*Commitment 21*); Empowering the Research Community (*Commitment 26*); Governance Structure for Data Access (*Commitment 27)*; Cooperation with Researchers (*Commitment 28*); Cooperation with the Fact-Checking Community (*Commitments 30 & 31*);** and **Fact-Checkers' Access to Relevant Information (*Commitment 32*).**

A team of EDMO researchers conducted the assessment, with two independent reviewers assigned to each platform service to ensure reliability and consistency. Each reviewer applied the evaluation grid to examine the respective platform's transparency report. The process involved several key steps. First, researchers reviewed the transparency reports submitted by each platform from January 1, 2024, to June 30, 2024. Next, each platform's reported information was systematically assessed based on the predefined grid criteria. Independent reviewers then cross-validated findings to identify discrepancies and ensure objectivity. When applicable, external data sources were consulted to verify the accuracy of reported metrics and claims. A blank copy of the assessment grid can be found in *Annex A*. Finally, a comprehensive assessment report was compiled, summarizing the compliance level of each platform across the evaluated commitments.

While the assessment provides a structured evaluation of compliance, certain limitations must be acknowledged. The analysis is based solely on publicly available transparency reports and additional sources where applicable. The ability to verify reported data varies by platform, depending on the extent of public disclosures. Additionally, some commitments rely on qualitative assessments, which may introduce a degree of subjectivity despite cross-validation efforts. Despite these limitations, the methodology applied in this assessment ensures a rigorous evaluation of platform compliance with the eight commitments of the CoPD selected for the analysis.

Second, the evaluation of the effectiveness of platform initiatives and actions is based on an expert survey with media literacy experts, fact-checkers, and researchers. The survey was conducted to gather qualitative insights into how these efforts are perceived by professionals in the field. A blank copy of the community survey can be found in *Annex C.* A total of 91 experts from 25 different countries took part in the survey, representing 14 EDMO Hubs. Respondents came from a wide array of institutions: academia (33%), media-literacy organizations (10%), news agencies and media outlets (21%), fact-checking bodies (15%), NGOs (10%), and various civil-society or "other" actors. Their professional roles spanned researchers, fact-checkers, editorial leaders, project managers, and policy officers, ensuring a richly diverse set of perspectives on disinformation counter-measures (see *Figures 1 and 2*).

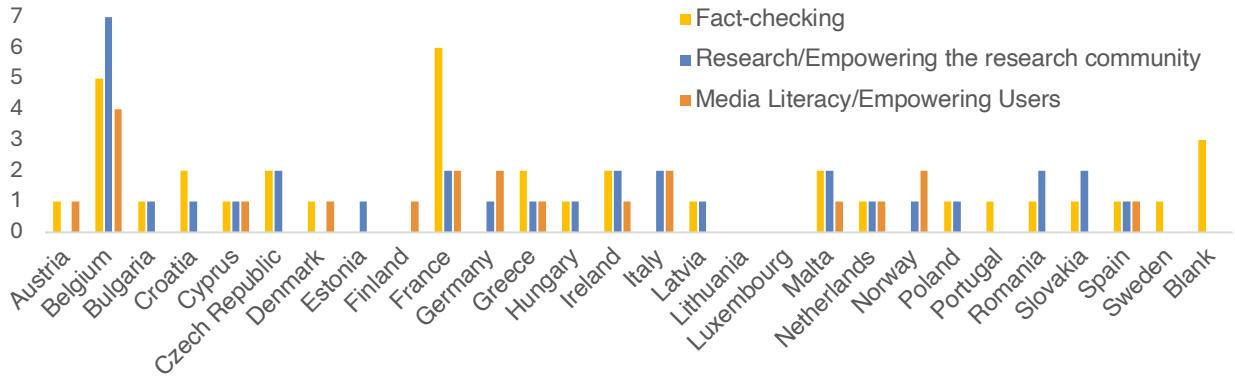

Figure 1: Community Survey - Responses per Country and CoPD Area

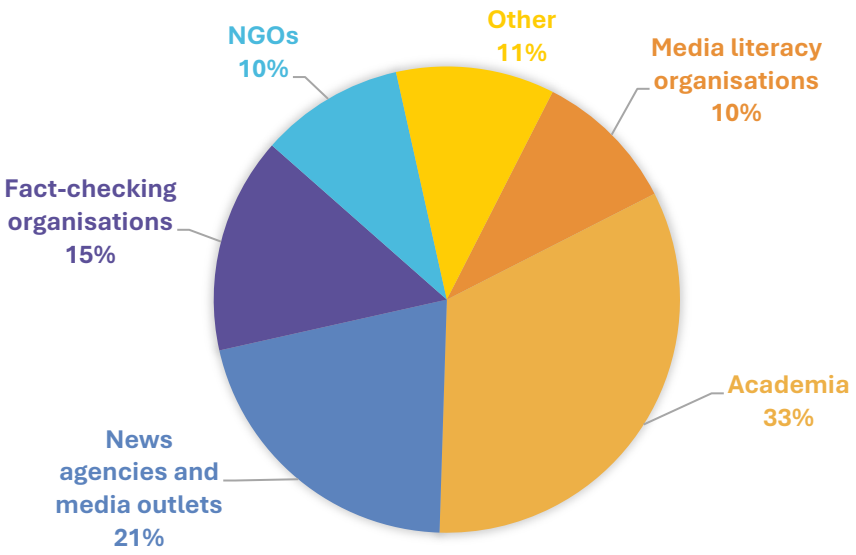

Figure 2: Community Survey - Responses per Stakeholder Type

Conducted between December 2024 and February 2025, participants assessed the availability and relevance of over thirty measures. The survey produced 21 valid responses for the questions on user empowerment, 35 on research empowerment, and 41 on fact-checking empowerment. In terms of collaboration, respondents reported 27 media literacy tools, activities and/or partnerships, 26 research collaborations, agreements and/or contracts, and 50 fact-checking agreements (see *Table 3*). These detailed insights were then cross-referenced with findings from transparency reports and expert feedback from EDMO's central team and individual Hubs, laying a robust foundation for evaluating platform compliance and identifying gaps in support for media literacy or fact-checking, transparency, data sharing, and collaborative oversight.

	Meta		Microsoft		Google		Tik-Tok	Total
	Face-book	Insta-gram	Bing	Linked-In	Search	You-Tube		
Users	8	2	2	1	9	1	4	**27**
Researchers	11	6	0	0	4	3	2	**26**
Fact-Checkers	18	18	4	0	4	2	4	**50**
Total	**37**	**26**	**6**	**1**	**17**	**6**	**10**	**103**

Table 3: Community Survey - VLOPSE Collaboration to Assess

The findings, based on an assessment of the completeness and verifiability of transparency reports, indicate significant variation in platform performance, highlighting both notable achievements and critical shortcomings.

One of the core aims of the CoPD is to equip users with the tools necessary to identify disinformation. Under ***Commitment 17***, which emphasizes media literacy, **Google, Meta, Microsoft,** and **TikTok** have launched a variety of initiatives designed to educate users about misinformation and promote critical thinking. Leading up to the 2024 EU elections, platforms took steps to empower users with tools to identify election-related misinformation. **Google** launched pre-bunking campaigns to educate users on recognizing misinformation tactics, while **Meta** partnered with ERGA to raise awareness across **Facebook** and **Instagram**. **Microsoft** introduced AI-driven tools to detect synthetic media, and TikTok rolled out localized media literacy campaigns in certain EU member states. However, challenges arose as platforms provided insufficient engagement data, making it difficult to assess the true impact of these initiatives.

Commitment 21 takes responsibility towards users further by ensuring that they have the means to identify disinformation directly. To help users identify disinformation, **Google** and **Meta** introduced political ad labeling and fact-checking labels, and **Microsoft** developed *Content Integrity Tools* for media authentication. **TikTok** collaborated with IFCN-accredited fact-checkers to verify content in multiple languages. Yet, accessibility of these tools remains an issue, compounded by a lack of data on how many users actively engage with them on a country-by-country basis. While reports mentioned that millions of users were reached, the platforms have not provided detailed engagement data—such as how often users interacted with fact-checking labels or media literacy tools. This lack of empirical data on user behavior undermines the ability to assess whether these initiatives have had a tangible impact on helping users to identify disinformation. Furthermore, while these provided tools may be useful, they are not always readily accessible to the average user. The platforms need to develop more intuitive tools and provide transparency about their usage and effectiveness in curbing disinformation.

Another cornerstone of the CoPD is to provide support for fact-checking organizations and the research community, crucial players in the ongoing battle against disinformation. ***Commitments 26, 27,*** and ***28*** underscore the importance of data accessibility for researchers studying the spread of disinformation. **Google** has reported investments in research grants and collaborations with academic institutions. **Microsoft** reported that its AI for Good Lab focuses on creating tools that help detect and assess disinformation, while also supporting research partnerships. However, access to platform data for independent researchers remains opaque. Platforms like **Google** and **Meta** have not clearly outlined how researchers can gain access to the data required for robust academic studies on disinformation, which hinders the development of a broader understanding of its impact.

In terms of ***Commitments 30*** and ***31***, which emphasize the role of fact-checkers, all four platforms have partnered with various fact-checking organizations to help identify and address misleading content. **Google** and **Meta**, in particular, have offered funding through initiatives like the *Google News Initiative,* while **Microsoft** provides technical

tools to aid in the identification of AI-generated content. However, similar to the issues surrounding research data access, the platforms have not provided sufficient transparency on how fact-checkers are supported. The platforms' data-sharing mechanisms remain underdeveloped, and a clearer structure for fact-checkers to access the data they need is crucial to enhancing their efficiency and impact.

Platforms often retreat from collaborative efforts when self-regulation becomes too burdensome or when it interferes with their business models. The evolving relationship between platforms and regulatory frameworks will continue to shape the future of disinformation mitigation. Without stronger enforcement mechanisms, platforms may prioritize profits and user engagement over the responsible management of harmful content.

2. Empowering Users

2.1 Commitment 17: Media literacy initiatives

Compliance

Media literacy is widely recognized as a key element in strengthening societal resilience to disinformation. However, an assessment of platform activities under Commitment 17 (see *Table 4*) shows that while all major services claim to support media literacy, their efforts remain largely unaccountable, lacking transparency, and uneven in scope and quality.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Partial**	**Low**	**Partial**	**Partial**
Notes	General initiatives like 'We Think Digital', no engagement metrics or national reporting.	References to NewsGuard, no measurable impact or audience data.	Structured tools like prebunking and 'More About This Page', no usage data disclosed.	Wider declared coverage, local campaigns, but minimal engagement or verification data.

Table 4: VLOPSE Efforts on Media Literacy (Commitment 17) - Compliance

Meta (Facebook & Instagram) promotes initiatives such as *We Think Digital* and various in-app prompts aimed at educating users about misinformation. However, these initiatives are presented at a high level with no disclosure of country-specific activities, participant numbers, or engagement outcomes. The absence of measurable data undermines Meta's claims and makes it impossible to evaluate the scale or effectiveness of these programs.

Microsoft (Bing & LinkedIn) points to partnerships with commercial services like NewsGuard and mentions a small number of media literacy campaigns. Yet, it fails to provide any supporting data on audience reach, user engagement, or campaign outcomes. This lack of transparency raises doubts about whether these efforts are anything more than declarative gestures.

Google (Search & YouTube) appears to take a more structured approach, highlighting initiatives such as prebunking campaigns and features like "More About This Page" designed to encourage critical information engagement. Despite these positive developments, Google fails to disclose how widely these tools are used, how they are

received by users, or whether they improve media literacy outcomes. The lack of usage and impact data remains a major weakness.

TikTok claims broader coverage through country-specific campaigns and partnerships with fact-checkers, positioning itself as more proactive than other platforms. However, TikTok's reporting lacks the necessary detail to validate these claims. Limited engagement metrics and the absence of clear outcome evaluations leave the real impact of these efforts unclear.

While media literacy is a central pillar of the Code of Practice, none of the major platforms deliver fully verifiable evidence of meaningful impact. Meta and Microsoft provide little more than generic claims. Google and TikTok show greater ambition, but both fall short on transparency and measurement. Without standardized reporting and independent evaluation, these media literacy initiatives risk remaining more rhetorical than effective.

Additionally, reviewers noted that platforms provided limited transparency regarding user engagement, and there is insufficient data on behavioral changes resulting from these campaigns.The absence of robust impact assessment metrics makes it difficult to determine their effectiveness or, more specifically, to determine whether these initiatives translated into changes in user behavior or an improvement in critical thinking skills.

Furthermore, transparency remains a critical challenge. While platforms provided general reports on their activities, detailed data on the performance of these initiatives across various countries or regions within the EU was often scarce. This limited regional insight, and the underreporting of local adaptations or expert feedback further hinder the transparency of these efforts.

Effectiveness

Tools *reported by respondents.* Respondents in nine countries provided a list of media literacy tools for at least one platform (out of fourteen countries with at least one valid response). The tools of Meta and Google Search feature most often, such as Meta's Content Library (3) or Google's Fact Check Explorer (2). However, respondents rarely reported any tool for Linkedin, Microsoft Bing (2), TikTok (3) and YouTube (1), and many respondents did not report any tool for any platform.

Activities *reported by respondents.* Respondents in nine countries provided a list of media literacy activities for at least one platform. Again, the activities of Meta (6) and Google Search (6) feature most often. Facebook's Get Digital program received two mentions. Regarding other platforms, TikTok activities were mentioned 3 times, including two mentions of their video campaigning on disinformation during the EU elections. However, respondents rarely report activities for Linkedin (0), Bing (1) and YouTube (2).

Partnerships *reported by respondents.* Respondents in eight countries reported media literacy partnerships with platforms. Here again, one can observe that Meta is the most

cited platform (6). Only 2 partnerships with Google Search and TikTok are listed. LinkedIn and Bing are only mentioned in 1 country (France).

Engagement in designing, implementing, and measuring the impact *of tools and activities aimed at improving media literacy and critical thinking (Commitment 17, Measure 17.3) reported by correspondents.* The two platforms that are engaged in designing, implementing and measuring the impact of their tools and activities are Meta and Google Search. However, they do not seem to be active in every country. Except for France, which reported multiple platforms, there is no other country mentioning such engagement.

Effectiveness of tools *based on the assessment of every tool made by respondents.* The global effectiveness of the tools provided by platforms is 'very poor'. This can be explained by the fact that many platforms do not seem to be providing any sort of tools in many countries involved in the questionnaire. However, when there are tools reported for Google Search or YouTube, they have been rated as 'fair' or 'good'. Assessments of Meta's tools are mixed. If they are rated as 'good'/'fair' on average, one respondent rated them as 'very poor'. Indeed, the latter mentioned that the platform was certainly helping when they used the tool, however it appears to him that the platform was less and less involved in empowering users.

Effectiveness of activities *based on the assessment of every activity made by respondents.* The global effectiveness for the activities provided by platforms is 'very poor'. This can be explained by the fact that many platforms do not seem to be providing any sort of activities in many countries involved in the questionnaire. However, when there are activities reported for Google Search, They are ranked as 'excellent' or 'good'. The rest of the platforms that are reporting activities are rated 'fair'. It seems that there is a gap between Google Search's engagement to empower users, and the rest of the platforms.

Effectiveness of partnerships *based on the assessment of every partnership made by respondents.* The global effectiveness for the partnerships with the platforms is 'very poor'. This can be explained by the low number of platforms that are actively engaging with MIL experts. Meta and Google Search are rated between 'fair' and 'good' most of the time, and 'excellent' in the specific case of Denmark. Even if Bing is only mentioned once, the partnership was rated as 'excellent'. TikTok is globally rated between 'poor' and 'fair'.

Effectiveness of engagement/collaboration *(Commitment 17, Measure 17.3) based on the assessments of respondents.* On average, the effectiveness of the engagement is rated between 'very poor' and 'fair'. Considering that very few platforms are involved in any sort of collaboration to measure their tools and activities, we can sum up the global effectiveness as 'poor'.

	Meta		Microsoft		Google		Tik-Tok
	Face-book	Insta-gram	Bing	Linked-In	Search	You-Tube	
Tools	Fair/Good *1x very poor*	Fair/Good *1x very poor*	Fair	Fair	Good/Fair	Good/Fair	Fair
Activities	Fair	Fair	Very poor	Very poor	Excellent/ Good	Fair	Fair
Partnership	Good	Poor	Excellent	Very poor	Mixed	Fair	Good/Fair

Table 5: VLOPSE Efforts on Media Literacy (Commitment 17) - Effectiveness

Suggestions for improvement

- Detailed reporting: The VLOPSEs should provide more granular data, including surveys or studies that track the success of media literacy campaigns on a country-by-country basis, both in terms of reach and user impact. This will contribute to the assessment of the effectiveness of these campaigns.
- Greater transparency in tool access: Platforms should ensure that tools are accessible to all users, not just those who are already informed. Additionally, they should be transparent about how these tools are being utilized.
- Local expert feedback: The involvement of local experts should be better documented, and their feedback on how these initiatives are being implemented should be shared. Platforms should actively seek out expert opinions and use this feedback to refine their strategies.

2.2 Commitment 21: Tools to help users identify disinformation

Compliance

While all major platforms claim to provide tools designed to help users identify disinformation, their implementations reveal significant shortcomings in transparency, effectiveness assessment, and user impact measurement (see *Table 6*). However, user engagement data remains limited across all platforms, making it challenging to assess whether these tools are actively utilized or effective in limiting disinformation. Google and Meta reported the most structured interventions, whereas TikTok and Microsoft offered fewer transparency details on how their tools are integrated and assessed.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Partial**	**Low**	**Partial**	**Partial**
Notes	Extensive fact-checking network, labels applied, but minimal impact evaluation.	Limited to NewsGuard and AI detection, no metrics provided.	Labels and fact-check panels; some reach data, but little behavioral impact reporting.	Uses labels and notifications, shares limited behavior data (e.g., share cancel rate).

Table 6: VLOPSE Efforts on Tools to Identify Disinformation (Commitment 21) - Compliance

Meta (Facebook & Instagram) highlights its extensive partnerships with independent fact-checkers and the application of labels such as “False” or “Partly False” to misleading content. However, Meta provides almost no evaluative data on the real-world impact of these interventions. Without metrics showing how labels influence user engagement, sharing behavior, or content reach, it is impossible to assess whether these tools are genuinely effective or simply cosmetic.

Microsoft (Bing & LinkedIn) performs the weakest in this area, limiting its disinformation response to the integration of third-party services such as NewsGuard and unverified claims of AI-driven detection. Crucially, Microsoft provides no data on how these tools function in practice, who uses them, or what outcomes they produce, rendering its efforts largely unverifiable.

Google (Search & YouTube) presents a more developed implementation, offering fact-check panels and labeling mechanisms directly on content surfaces. The platform reports large-scale reach figures for these panels but fails to provide meaningful data on user behavior or the actual effectiveness of these interventions. As a result, it remains unclear whether these tools inform users or merely serve as passive informational elements.

TikTok employs a combination of labels, notifications, and user prompts to flag misleading content. It distinguishes itself by providing limited behavioral data, such as the rate at which users cancel shares after encountering a label. However, TikTok stops short of providing comprehensive impact assessments, leaving key questions about the overall effectiveness of these tools unanswered.

Across all platforms, efforts to equip users with tools to recognize disinformation remain poorly evaluated and inconsistently documented. While Meta and Google show greater implementation scale, neither provides sufficient evidence of user-level impact. TikTok offers some user behavior insights but lacks comprehensive reporting. Microsoft’s efforts appear largely declarative, with no supporting data. Meaningful progress requires not just tool deployment, but also transparent evaluation and independent verification of user outcomes.

A major concern, just like in the case of implemented media literacy campaigns, is the lack of engagement data, which is essential for understanding how users interact with the tools provided. Engagement metrics, such as how often users click on or engage with the information panels and fact-checking labels, are key for evaluating the impact of these initiatives. Another significant limitation lies in user understanding. For instance, it is uncertain whether users are aware of the availability of these tools, how to access them, or how to make sense of the information provided.

Effectiveness

Consultations *to conduct research and testing on warnings or updates targeted to users who interacted with content that violated the platform's policies reported by respondents.* There is rarely any consultation reported on this subject, except for one mention of Google Search. In addition, based on the assessments by survey respondents, no platforms (except Google Search) provided any feedback either, on how platforms take scientific evidence and users' needs into account when developing and deploying labeling and warning systems.

Effectiveness of consultation. As a result, the effectiveness of consultations is considered 'very poor'.

Suggestions for improvement

- Improve user feedback mechanisms: Platforms should develop better systems to collect and analyze user feedback on the effectiveness of disinformation identification tools. This data will help refine these tools and assess whether they are achieving their goal of empowering users.
- Increase transparency in usage metrics: VLOPSEs should publish more detailed metrics on how often users engage with fact-checking tools or transparency labels. This will help evaluate the real-world impact of these initiatives.
- Educational campaigns: To complement the tools provided, platforms could run educational campaigns that explain how to use these tools effectively, particularly for users who may not be familiar with these features.

3. Empowering the Research Community

3.1 Commitment 26: Access to non-personal, anonymized data

Compliance

Despite being a core pillar of the Code of Practice, access to non-personal, anonymized data remains inconsistently implemented across major platforms. Google, Microsoft, and Meta provide access to certain datasets through researcher programs, but the overall accessibility of disinformation-related data is highly restricted (see *Table 7*). Meta's decision to discontinue CrowdTangle has further complicated research efforts, raising concerns about the transparency of disinformation trends. TikTok's Research API provides some support, in theory, but the criteria for data access are not well-defined, limiting independent verification. Multiple reviewers reported difficulties in obtaining research access to platform data, with unclear eligibility criteria and opaque application processes serving as barriers to independent study.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Partial**	**Low**	**Partial**	**High**
Notes	Access through ICPSR; limited national-level data or uptake metrics.	Beta programs exist but lack transparency and data granularity.	Some tools available, limited scope for disinformation research.	Research API and dashboards with published documentation; uptake metrics by Member State available.

Table 7: VLOPSE Efforts on Access to Data for Researchers (Commitment 26) - Compliance

While several services highlight existing tools or pilot projects, meaningful access remains limited by unclear procedures, restricted data granularity, and a general lack of transparency regarding actual researcher uptake.

Meta (Facebook & Instagram) points to its data access infrastructure via the ICPSR at the University of Michigan. However, the company provides no breakdown of researcher uptake by country or thematic focus, nor does it report on the effectiveness or accessibility of this system. The discontinuation of broader tools like CrowdTangle further limits Meta's claims, raising concerns about the shrinking availability of public-interest data.

Microsoft (Bing & LinkedIn) references beta programs for researcher access, but offers no documentation on how these programs operate, who can apply, or what data is

actually provided. The absence of transparency and the lack of any reported outcomes suggest that access remains largely theoretical and untested in practice.

Google (Search & YouTube) makes available some tools, such as Google Trends and selective research partnerships. However, these resources are of limited use for disinformation research, as they provide only aggregate data without the granularity or contextual depth needed for systematic analysis. Access procedures also remain unclear and selective.

TikTok distinguishes itself by offering a documented Research API and dashboards, accompanied by published application processes and terms of use. The platform further reports on researcher application metrics by Member State, providing a level of transparency not matched by its peers. Nevertheless, while TikTok's documentation is stronger, the platform still faces challenges with access complexity and limited data granularity.

Furthermore, while some platforms have supported researchers, the collaboration could be significantly deeper. For example, providing open data sets for disinformation research could allow academic institutions to carry out more comprehensive studies. Currently, the limited scope of collaboration restricts the ability of researchers to gain a complete understanding of the disinformation landscape.

Effectiveness

Tools and processes *for public access to non-personal data and anonymized, aggregated and manifestly-made public data pertinent to undertaking research on disinformation based on the response in the raw data (Measure 26.1).* Overall, survey respondents report that platforms are partially providing tools and processes for public access to non-personal data and anonymized, aggregated and manifestly-made public data pertinent to undertaking research on disinformation. There is an average of two tools and processes for public access to non-personal and anonymized data per country reported. Meta's and Google's tools are mentioned multiple times, especially Meta Ad Library (4), Meta Ad Library API (3), Meta Content Library (2) and Facebook CrowdTangle (2). Regarding Google, the tools are more diverse. For YouTube and TikTok, respondents mention use of their API. No tools and processes for public access to non-personal and anonymized public data are reported for LinkedIn and Bing.

Access to real-time, machine-readable data *(e.g. API) for research purposes (Measure 26.2).* Many respondents did not report having API access. Among those who applied for or have access to a platform's API, experienced hurdles.

Experience with reporting malfunctions *(Measure 26.3).* One survey respondent formally reported malfunctions regarding the TikTok API.

Effectiveness of tools and processes *for public access to non-personal data and anonymized, aggregated and manifestly-made public data (Measure 26.1).* Meta's and Google's tools are rated as 'useful' or even 'very useful'. The Meta Ad Library API was rated as 'fair'. The TikTok API was rated as 'not useful'. According to this respondent, even if the tool worked sufficiently for their particular study, "the TikTok API is delivering poor quality data (mismatch with data coming from scraping) and many research questions are therefore not possible to explore."

Effectiveness of access *to real-time, machine-readable data (Measure 26.2).* Regarding the Meta Ad Library API, while access has been reported as relatively simple and feasible, many of the respondents also expressed concerns regarding access and quality of the data. For the TikTok API, access is more complicated, and access and quality of the data is partial/poor. Data is reported as easily findable, usable and useful via the YouTube API.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Quantity	**17**	**0**	**7**	**2**
Quality	**Very useful/ Useful**	**N/A**	**Very useful/ Useful**	**Not useful**
Overall	**Excellent**	**Very poor**	**Good**	**Poor**

Table 8: VLOPSE Efforts on Access to Data for Researchers (Commitment 26) - Effectiveness

Suggestions for improvement

- Open data access: Platforms should open more data sets related to disinformation for researchers to analyze. This could be done through collaborations with academic institutions or through independent audits of the data.
- Increased transparency: Clearer guidelines on how researchers can access data and the kind of data available would help improve the transparency and usefulness of the research community's efforts to counter disinformation. Volumes of accessible data, timeframes for data usage and affordable economic access conditions should be part of these transparency efforts.

3.2 Commitment 27: Governance for sensitive data access

Compliance

The implementation of governance mechanisms for sensitive data access remains one of the weakest and least transparent areas across all major platforms (see *Table 9*). While platforms reference pilot programs and collaborations with organizations such as the *European Digital Media Observatory* (EDMO), these efforts are rarely accompanied by specific details on implementation and researcher participation. No platform has fully outlined a governance model that allows for independent oversight of data-sharing practices. Reviewers also noted that platforms often provide only high-level descriptions of governance mechanisms without offering substantive details on enforcement or evaluation procedures.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Low**	**Low**	**Low**	**Partial**
Notes	References EDMO and CASD pilots, but lacks public documentation.	Mentions beta programs without clarity on governance.	Lists pilots but without details on governance structures.	Participates in EDMO pilot, lacks transparency on outcomes.

Table 9: VLOPSE Efforts on Governance Structure for Data Access (Commitment 27) - Compliance

Despite references to various pilot projects and collaborations, none of the platforms provide clear evidence of established governance structures, public accountability, or operational transparency.

Meta (Facebook & Instagram) refers to its participation in data access pilots coordinated by EDMO and the French Centre d'Accès Sécurisé Aux Données (CASD). However, no substantive public documentation is provided regarding the structure, scope, or outcomes of these pilots. Without this information, Meta's references remain superficial and unverifiable.

Microsoft (Bing & LinkedIn) similarly mentions beta programs related to researcher access, yet fails to offer any clarity on how these programs are governed. There are no published criteria, oversight mechanisms, or public reporting on how sensitive data is managed or made available in a secure and accountable manner.

Google (Search & YouTube) lists several data-sharing pilot initiatives but, like its peers, provides no detail on the governance models that underpin these efforts. The absence of information on who oversees access, how eligibility is determined, or what safeguards are in place leaves serious questions about the integrity and fairness of these processes.

TikTok's participation in the EDMO DSA Data Access Pilot is publicly acknowledged, but the platform has not disclosed the outcomes, lessons learned, or any follow-up actions stemming from this engagement. As such, TikTok's claims of participation offer little more than procedural recognition without any demonstration of meaningful governance practice.

Overall, platform efforts on governance for sensitive data access are underdeveloped, poorly documented, and lacking in transparency. None of the platforms assessed provide credible evidence of operational governance frameworks that would ensure secure, fair access.

The main limitation across the platforms examined remains the insufficient provision of external data access, more specifically, limited direct pathways for independent researchers to systematically access platform data. This constrains the capacity for independent research inquiry into the dynamics and societal impacts of disinformation. Compounding the issue is the opaque governance surrounding data access, with little transparency on how researchers or institutions can submit access requests, what criteria apply, or how decisions are made. Such opacity undermines both the credibility of platform commitments and the broader principle of open, collaborative research.

In response to these persistent barriers, the European Commission has made significant progress toward a regulatory solution through the *Delegated Act* under Article 40 of the DSA. As of April 2025, the draft Delegated Act sets out detailed procedures, eligibility requirements, and technical standards for granting vetted researchers access to non-public data held by VLOPs and VLOSEs. Central to the draft is the proposed DSA Data Access Portal, a centralized interface designed to streamline data requests and facilitate coordination between researchers, Digital Services Coordinators (DSCs), and platform providers. The Act also mandates the publication of data inventories and outlines provisions for secure processing environments. However, questions remain regarding the transparency and independence of these environments, particularly if operated by the platforms themselves. While the final adoption of the *Delegated Act* is expected later in 2025, it represents a critical step toward institutionalizing researcher access and reinforcing data transparency as a pillar of digital platform accountability.

Effectiveness

Participation in a pilot program for data sharing *(Commitment 27, Measure 27.4).* One respondent mentioned having participated in a data sharing program (with Meta, data set for EU elections) and ranked the participation as 'good'.

Suggestions for improvement

- Develop a clear governance framework: Transparency reports should go beyond describing general partnerships or funding arrangements and provide explicit,

detailed information on how independent researchers can access platform data. They should also consider creating dedicated portals where researchers can apply for access to datasets. This aligns with the upcoming requirements of the *Delegated Act* under Article 40 DSA, and early voluntary compliance would demonstrate good faith and leadership in the sector.

- Expand data access: Allowing researchers to access anonymized data sets related to disinformation would enable more comprehensive academic studies on the topic. Platforms should consider working with third-party auditors to ensure that data is shared responsibly and securely. Greater clarity here would address concerns about opaque, inconsistent, or biased data gatekeeping, which currently hinders the credibility of many transparency reports.

- Publish detailed data inventories: reports should include or link to public-facing data inventories. This would support researchers in formulating specific and feasible data requests and is also anticipated as a requirement in the *Delegated Act*.

- Report on the use and functioning of secure data environments: if data access is provided through secure environments, platforms should explain who operates them (the platform or a third party); what types of research are possible within them, and what limitations apply (e.g., code export, replication rights). This level of transparency, including fair and affordable access conditions, is essential to ensure that "secure" access does not become a mechanism for indirect data denial or reputational shielding.

- Integrate metrics on academic and civil society engagement: transparency reports should present quantitative and qualitative metrics on the number of research requests received, granted, or rejected; the types of institutions engaged (academic, NGO, EU-based, international), and outputs enabled through these collaborations (e.g., publications, policy briefings). Such metrics not only demonstrate public interest value but also align with democratic and scientific expectations of accountability from platforms.

3.3 Commitment 28: Cooperation with researchers

Compliance

Most platforms claim to cooperate with independent researchers, but the extent and effectiveness of this cooperation are unclear (see *Table 10*).

While some research grants and partnerships have been reported, there is a lack of publicly available information on how platforms select research collaborators and what methodologies they use to evaluate disinformation trends. Moreover, data access

restrictions limit the ability of researchers to conduct comprehensive, independent assessments of misinformation mitigation strategies. Reviewers expressed concern that the transparency centers maintained by platforms lack verifiable research outputs and do not facilitate meaningful researcher engagement. While all major platforms make general claims about supporting researchers, these claims are rarely backed by clear procedures, measurable uptake data, or independent oversight.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Partial**	**Low**	**Partial**	**Partial**
Notes	Provides tools with unclear allocation or prioritization.	Minimal support, no structured programs.	EMIF funding and several research programs, but governance gaps.	Better documentation, but access procedures remain complex and no data on researcher uptake.

Table 10: VLOPSE Efforts on Cooperation with Researchers (Commitment 28) - Compliance

Meta (Facebook & Instagram) references several research tools, including access to content archives and advertising libraries. However, the allocation of these resources remains opaque, with no information provided on prioritization criteria, researcher selection processes, or actual uptake. This lack of clarity raises concerns about the selective or inconsistent availability of data to the research community.

Microsoft (Bing & LinkedIn) performs weakest in this area, offering no evidence of structured research support programs or dedicated data access mechanisms. Beyond vague references to beta initiatives, Microsoft provides no detail on how researchers can access platform data, which topics are prioritized, or what governance frameworks apply.

Google (Search & YouTube) shows greater investment in research collaboration, notably through its financial support for the European Media and Information Fund (EMIF) and partnerships with academic projects. However, while these funding streams are commendable, Google provides limited transparency regarding the governance of its research programs and offers little information on how data access is managed or prioritized for independent researchers.

TikTok appears to offer more robust documentation, including published API documentation and application procedures for researchers. However, these processes remain overly complex, and TikTok fails to provide public data on how many researchers have been granted access, on what terms, or for what research purposes. The absence of uptake metrics and independent reporting limits the credibility of TikTok's claims of openness.

One of the main shortcomings is the lack of formalized cooperation. Despite the financial investment reported, the actual cooperation with independent researchers is not well-documented. The platforms should establish clearer, more structured processes for engaging with researchers and sharing insights. Limited data sharing is another problem. Researchers need more access to platform data to conduct thorough, objective studies.

Effectiveness

Experience with resources/processes to facilitate research *(Commitment 28, Measure 28.1) as reported by respondents.* The efforts to facilitate research through provisions of tools and processes are unequal. Respondents identified Meta workshops and several tools, and a workshop with the Tiktok API team, as resources/processes to facilitate research.

Prohibited/discouraged from conducting research *(Commitment 28, Measure 28.3) as reported by respondents*. Two respondents reported action that discouraged research (no further details requested).

Suggestions for improvement

- Formalize and structure research cooperation: Platforms should create formal partnerships with academic institutions, where researchers have clear, structured access to data and can collaborate on disinformation studies.
- Increase transparency of research projects: Platforms should publish the results of research collaborations to provide transparency and foster trust with the public. This would also highlight the efficacy of their disinformation strategies.

4. Empowering the Fact-Checking Community

4.1 Commitment 30: Cooperation with fact-checkers

Compliance

Fact-checking remains a critical pillar of the CoPD, yet transparency and effectiveness vary widely. Google and Meta have established partnerships with numerous fact-checking organizations, but disclosures on funding, geographic coverage, and long-term sustainability are limited (see *Table 11*).

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Partial**	**Low**	**High**	**Partial**
Notes	Lists activities and partners but lacks detailed impact evaluation.	Minimal reporting; Bing mentions language coverage without context.	Clear integration processes, some testing data, EMIF support.	Lists partners and processes, but limited impact metrics or external verification.

Table 11: VLOPSE Efforts on Cooperation with Fact-Checkers (Commitment 30) - Compliance

An examination of engagement with fact-checkers under *Commitment 30* reveals a fragmented and largely opaque landscape. While most platforms reference partnerships, few offer convincing evidence of structured cooperation or measurable outcomes.

Meta (Facebook & Instagram) highlights an extensive network of fact-checking partners and describes activities aimed at labeling and reducing the visibility of misinformation. However, it fails to provide detailed reporting on the scale or effectiveness of these collaborations. The absence of systematic impact evaluations limits the ability to assess whether these partnerships go beyond symbolic compliance.

Microsoft (Bing & LinkedIn) performs poorly, offering only minimal references to fact-checker cooperation. Bing mentions language coverage but provides no supporting details on how fact-checking partnerships operate or what impact they achieve. The lack of transparency suggests minimal engagement in practice. Microsoft and TikTok report engagement with fact-checkers but do not offer detailed public reports on the scope of these collaborations.

Google (Search & YouTube) demonstrates the most structured cooperation, documenting integration mechanisms such as information panels and labels, supported by some testing data. Google's financial contributions to initiatives like EMIF further strengthen its position, although detailed, disaggregated impact data remains limited.

TikTok claims to engage with fact-checking partners and describes internal moderation processes, but it provides little concrete evidence of how these relationships function or what outcomes they produce. Limited metrics and the absence of independent verification weaken the credibility of these claims.

Despite public claims of cooperation with fact-checkers, most platforms fail to provide evidence of meaningful, measurable, or independently verified impact. Only Google demonstrates a relatively structured approach, while Meta and TikTok offer limited and largely unsubstantiated accounts. Microsoft's performance remains particularly weak, highlighting a significant compliance gap across the sector. A significant issue across platforms is the lack of transparent compensation structures for fact-checking organizations, raising concerns about sustainability and impartiality. Reviewers highlighted that platforms have not detailed how fact-checkers are compensated for, the frequency of their reviews, or how their impact is measured over time.

Effectiveness

Fact-checking agreements/contracts *reported by respondents.* The majority of the respondents have fact-checking agreements with Meta (17). Other platforms receive less mention. If Google Search (4), TikTok (4) and Microsoft Bing (4) are cited several times, YouTube is only engaged in two of the countries involved in the study, and Linkedin is never mentioned.

Overall experience *of fact-checking agreements/contracts based on the assessments of respondents.* On average, the respondents rated their overall experience regarding their partnership with Meta and Google as 'good'. The overall experience of fact-checking agreements with Microsoft Bing is rated as 'fair', and the rating for TikTok ranges from 'very poor' to 'fair'. It should be noted that the survey ran between December 2024 and February 2025, which coincides with the period when Mark Zuckerberg announced changes to partnerships with third party fact-checking organisations in the United States. Moreover, the assessment appears to vary strongly depending on the country involved.

Quality *of fact-checking agreements/contracts based on the assessments of respondents.* The quality of the collaboration is, in most cases, slightly lower than the overall experience. However, the respondents assessed the quality of their agreement with Meta as 'excellent'. Once again, the assessment greatly depends on the country in question.

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Overall experience	**Good/Fair**	**Fair/Poor**	**Good/Fair**	**Poor**
Quality	**Good/Fair**	**Poor**	**Good/Fair**	**Very poor**

Table 12: VLOPSE Efforts on Cooperation with Fact-Checkers (Commitment 30) - Effectiveness

Suggestions for improvement

- Create clear data-sharing frameworks: Platforms should establish clear and accessible data-sharing frameworks with fact-checkers, ensuring they have the tools they need to effectively verify content.
- Increase transparency: Providing detailed insights into how fact-checkers can access data would improve the transparency and accountability of disinformation detection.
- Ensure effective, stable and well-resourced cooperation frameworks to support running costs and scale-up investments of fact-checking organisations while respecting their autonomy and editorial independence.

4.2 Commitment 31: Fact-checking integration in services

Compliance

An examination of how major digital platforms integrate fact-checking mechanisms into their services reveals wide disparities in both practice and transparency (see *Table 13*).

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Partial**	**Low**	**High**	**Partial**
Notes	Labels and demotions used but lack comprehensive impact data.	Minimal to no integration reported.	Systematic integration with panels and A/B testing.	Labels applied but lacks clarity on creator notifications and user impact.

Table 13: VLOPSE Efforts on Fact-checking Integration in Services (Commitment 31) - Compliance

While most platforms claim to apply fact-checking labels or demotion techniques, few provide credible evidence of the effectiveness or reach of these measures.

Meta (Facebook & Instagram) continues to reference the use of labels such as “False Information” and content demotion strategies aimed at reducing the visibility of misleading content. However, these claims remain largely unsupported by robust impact data. Meta provides no systematic analysis of how these interventions influence user behavior, content dissemination, or platform-wide misinformation trends. The absence of measurable outcomes significantly undermines the credibility of Meta’s reported efforts, suggesting that their integration of fact-checking remains more performative than evidence-driven.

Microsoft (Bing & LinkedIn) performs even more poorly in this area. Beyond minimal and unspecific mentions of misinformation-related moderation, Microsoft fails to document any meaningful integration of fact-checking tools or mechanisms across its services. No evidence of systematic labelling, demotion, or engagement with fact-checking partners is presented. This complete lack of transparency positions Microsoft as a non-compliant actor in the implementation of Commitment 31.

In contrast, **Google (Search & YouTube)** demonstrates the most structured and transparent approach among the platforms assessed. Google reports the integration of fact-checking information panels in search results and on YouTube content, along with documented testing methodologies such as A/B experiments. These experiments aim to evaluate the effectiveness of fact-checking interventions on user behavior. While Google's reporting could benefit from more granular data at the national level, its systematic approach and documented testing place it ahead of its peers in both design and implementation.

TikTok acknowledges the application of fact-checking labels on content and the use of user notifications. However, the platform fails to clarify how these labels are communicated to content creators or whether such measures have any measurable impact on user engagement or misinformation spread. TikTok's reporting lacks transparency regarding the operational details of its fact-checking integration, making it difficult to assess the platform's actual commitment to this objective.

Effectiveness

Quality *of use and integration of fact-checking in platform products (Commitment 31, Measure 31.1) based on the assessments of respondents.* On the one hand, the quality of the use and integration of fact-checking in Meta's products is on average rated as 'good' or 'fair'. On the other hand, TikTok's efforts to integrate fact-checkers' work into their products are rated 'poor' to 'very poor'.

Suggestions for improvement

- Maintain/increase use and integration: Platforms should continue to support third party fact-checking and provide clear documentation on how they integrate fact-checks into their products and services.

4.3 Commitment 32: Access to relevant information for fact-checkers

Compliance

The analysis of platform compliance with *Commitment 32,* which calls for providing fact-checkers with meaningful access to information necessary for their work, reveals uniformly weak performance across all major services (see *Table 14*).

	Meta Facebook and Instagram	**Microsoft** Bing and LinkedIn	**Google** Search and YouTube	**TikTok**
Compliance Level	**Low**	**Low**	**Low**	**Partial**
Notes	Mentions dashboards but provides no clear data or external verification.	No interfaces or tools detailed.	No detailed support described.	Provides dashboards with limited metrics; lacks systematic external validation.

Table 14: VLOPSE Efforts on Access to Relevant Information for Fact-Checkers (Commitment 32) - Compliance

Meta (Facebook & Instagram) reports providing dedicated dashboards to support fact-checkers, but it fails to disclose any data on how these tools are used or whether they offer meaningful insights into content reach, engagement, or manipulation patterns. The lack of external verification or independent assessment further undermines the credibility of these claims.

Microsoft (Bing & LinkedIn) offers no documented tools, interfaces, or data access specifically designed for fact-checkers. This complete absence of dedicated support mechanisms positions Microsoft as non-compliant with the basic expectations of this commitment.

Google (Search & YouTube) likewise falls short, providing no clear description of mechanisms, tools, or data channels that fact-checkers can reliably use to access platform information. Despite broader fact-checking collaborations, Google's lack of operational support tools limits the practical utility of these partnerships.

TikTok reports the availability of dashboards for fact-checkers but fails to provide evidence that these tools offer sufficient depth or real-time data. Moreover, the platform does not document whether fact-checkers have access to metrics such as impressions, reach, or user engagement, nor does it offer external validation of the system's effectiveness.

To conclude, none of the platforms assessed meet the standard of providing fact-checkers with transparent, systematic, and verifiable access to relevant information. Across the board, access is either absent, inadequately documented, or lacks independent oversight, limiting the capacity of fact-checkers to perform their role effectively on these platforms.

Effectiveness

Availability/relevance of data *(Commitment 32, Measure 32.1) based on the assessments of respondents*. On average, the availability and the relevance of the data provided by any platform is rated between 'very poor' to 'fair', meaning that when collaborations exist and are well assessed, the data provided appears to be of lower quality.

Suggestions for improvement

- Provide detailed support structures: Platforms should offer a detailed account of how they support fact-checkers, including direct data access, financial support, and technical resources.
- Ensure data accessibility: Platforms should develop transparent, easy-to-use data sharing systems that allow fact-checkers to access the data they need to address disinformation.

5. Concluding Remarks

This assessment of the implementation of **eight** core **CoPD commitments** by four VLOPs and VLOPSEs—**Meta (Facebook & Instagram), Google (Search & YouTube), Microsoft (LinkedIn & Bing)**, and **TikTok**—covering the period from 1 January 2024 to 30 June 2024, highlights a clear gap between the platforms' stated commitments under the *Code of Practice on Disinformation* and the verifiable evidence of their implementation. Overall, the assessment identifies consistent gaps in transparency, independent oversight, and measurable outcomes across all commitments, implying that, without stronger enforcement, the implementation of the Code risks remaining performative rather than impactful.

Commitment 17 (Media Literacy Initiatives) shows that while platforms frequently promote branded campaigns and educational tools, very few provide data on user reach, engagement, or learning outcomes. Country-level reporting is rare, and expert consultation remains poorly documented.

Commitment 21 (Tools to Help Users Identify Disinformation) highlights a common reliance on content labels, panels, and warnings. However, platforms generally fail to provide evidence that these interventions change user behavior or reduce misinformation exposure. Impact evaluations are either absent or limited to isolated metrics.

Commitment 26 (Access to Non-Personal, Anonymized Data) demonstrates that while most platforms advertise research access programs, these are often restricted, inconsistently managed, and lack meaningful uptake reporting. Few provide transparent procedures or country-level engagement metrics.

Commitment 27 (Governance for Sensitive Data Access) is the most underdeveloped area, with all platforms failing to document clear governance structures, oversight mechanisms, or outcomes of pilot projects. References to governance efforts often lack detail and independent validation.

Commitment 28 (Cooperation with Researchers) suffers from unclear access policies, selective partnerships, and a lack of independent allocation mechanisms. While some platforms mention support for research, few provide evidence of systematic, equitable cooperation across the research community.

Commitment 30 (Cooperation with Fact-Checkers) shows varied levels of engagement, but all platforms fall short in demonstrating the real-world impact of these partnerships. Reporting typically lists partners without providing meaningful data on reach, effectiveness, or user engagement.

Commitment 31 (Fact-Checking Integration in Services) reveals that while some platforms implement labelling and demotion systems, they rarely offer detailed testing

results or evaluations of user behavior change. Most platforms fail to explain how these systems operate across different content formats or countries.

Commitment 32 (Access to Relevant Information for Fact-Checkers) remains critically weak across the board. Platforms provide limited or no tools to support fact-checkers' long-term monitoring of misinformation, and they rarely share metrics on how their fact-checking systems perform at scale or in specific regions.

While all platforms cite tools, campaigns, and partnerships as examples of compliance, meaningful impact measurement, transparency, and independent verification remain limited or entirely absent. A synthetic comparative assessment can be found in *Annex B*. As summarized above, the effectiveness of the collaboration of platforms as reported by media literacy experts can be rated as 'very poor', with some exceptions for Meta and Google Search. Further, except for Google (including YouTube) and Meta, the effectiveness of platform empowerment of the research community can be considered 'very poor'. Finally, the situation for the fact-checking community seems to vary depending on the country involved, however the effectiveness of platform fact-checking empowerment is often rated as 'very poor', even when there are formal agreements with fact-checkers.

Meta (Facebook & Instagram) presents *We Think Digital*, *News Integrity Initiative*, and fact-checking partnerships covering 29+ organizations in 23 languages as flagship efforts. It also references tools such as warning labels, fact-check panels, and the Meta Content Library via ICPSR. Yet, Meta provides little to no country-level data on user engagement, the scale of fact-checking interventions, or the effectiveness of these tools. Its reporting lacks meaningful transparency on how these programs are implemented, evaluated, or improved over time.

Microsoft (Bing & LinkedIn) mentions NewsGuard, Page Insights, and general partnerships with the News Literacy Project and the Trust Project. Despite claiming beta research access programs and open dataset initiatives like MS MARCO, it provides no documentation on their operational scope or researcher uptake. Its reporting fails to demonstrate any meaningful cooperation with fact-checkers or media literacy initiatives, reducing these references to what appear to be box-ticking exercises without real impact assessment.

Google (Search & YouTube) highlights its *Google News Initiative*, *Be Internet Awesome*, the *Fact Check Explorer*, and prebunking campaigns such as *"About This Page"* and YouTube's *"Hit Pause"*. It claims structured partnerships through the European Media and Information Fund (EMIF) and support for research via Google Trends and YouTube's Researcher Program. However, Google provides little granular data on how these tools perform at the country level or how users interact with them. Its evaluations remain general, and governance of researcher access is underdeveloped.

TikTok offers a more consistent documentation of localized media literacy campaigns, citing partnerships with fact-checkers like AFP, and in-app tools such as video notice tags, search interventions, and AI-generated content labels. It provides dashboards, APIs, and uptake data by Member State, positioning itself as comparatively more transparent. However, even TikTok stops short of providing systematic evaluations of the long-term effectiveness of these measures or transparent governance of its data-sharing programs.In conclusion, while all platforms present tools and initiatives as evidence of their commitment, these remain largely unaccountable. There is little consistency in reporting metrics, no systematic evaluation of user behavior change, and minimal independent oversight. Platforms continue to control access to data and define the terms of engagement with researchers and fact-checkers, undermining the credibility of their compliance claims.

Going forward, **strengthening enforcement of reporting requirements**, **mandating independent audits**, and requiring **publicly accessible, country-specific metrics** will be essential to bridge the gap between stated commitments and actual accountability.

6. Key Recommendations

Overall, there is a strong call for platforms to move from general compliance to active collaboration. On the basis of the suggestions for improvement produced throughout this report and EDMO Hub country briefs, we provide the following recommendations.

Empowering Users

1. Establish stable and long-term cooperation

Platforms should establish sustained and formal collaborations with national and local stakeholders, including media literacy experts, educators, civil society organizations, and researchers. These partnerships must extend beyond ad hoc projects and include fair and sustainable contractual conditions.

2. Strengthen engagement with local experts

It is essential for platforms to actively and meaningfully involve local media literacy experts in their efforts. This includes recognizing their expertise, integrating them into decision-making processes, and broadening collaboration beyond established institutional networks. A diverse and inclusive engagement with educators, fact-checkers, and researchers ensures that initiatives are grounded in local realities.

3. Integrate media and information literacy into platform experiences

Media literacy tools and educational content should be embedded directly into the user experience. This can include fact-check labels, contextual information boxes, in-platform educational modules, or interactive prompts. By providing accessible and timely resources at the point of content consumption, platforms can help users navigate information more critically and responsibly.

4. Localize tools and resources

Media literacy efforts must be linguistically and culturally adapted to local contexts. This involves offering tools and resources in local languages, reflecting national media environments, and designing content that resonates with users' lived experiences. Localization is key to ensuring relevance, usability, and effectiveness in addressing misinformation.

5. Improve transparency and support education

Platforms need to increase transparency by publicly sharing information on their media literacy initiatives, partnerships, and the impact of their content moderation and fact-checking tools. At the same time, they should support educational and awareness-raising initiatives, such as public campaigns, school programs, and teacher training. These efforts help build long-term resilience and critical thinking skills among users of all ages.

Empowering the Research Community

1. Facilitate access to data for research

Platforms should ensure broader, simpler, and clearer access to data relevant for research on disinformation. This includes providing anonymized, non-personal, and aggregated data-sets, but also definition of what constitutes a “manifestly-made public” data under the DSA, and clear application procedures for API’s access and user-friendly dashboards. These improvements regarding access to data, including fair and workable access conditions, would allow researchers to analyze trends in dis- and mis-information and evaluate platform policies with scientific rigor.

2. Establish structured partnership and engagement mechanisms

There is a strong need to formalize and structure collaborations between platforms and the research community. In this regard, platforms should :

- Create dedicated research support teams, contact point, and engagement structures,
- Form formal partnerships with universities, and independent researchers and/or independent intermediary bodies,
- Participate in national-level frameworks (e.g. EDMO Network) and advisory boards to align efforts with ongoing academic work.

3. Enhance transparency of research processes and policy impact

Platforms must increase transparency around how they collaborate with researchers and how findings are used. In order to achieve it, clear communication on how researcher input shapes tools and policy is needed. Moreover, they should share public summaries or evaluation of ongoing research collaboration, and provide visibility into content moderation guidelines and their effectiveness.

4. Provide funding and capacity-building opportunities

Support for the research community must go beyond data access and include robust financial and technical assistance. Platforms should offer grants, fellowships, and direct funding to academic institutions and independent researchers to enable in-depth studies on disinformation. They should also organize or support training programs, workshops, and technical guidance, taking into account country-specific ecosystems. Active collaboration with local research communities in the design, testing, and evaluation of tools will ensure that platform initiatives are grounded in real-world expertise and needs.

5. Localize supports and outreach

Research support efforts must be adapted to national contexts to ensure relevance and impact. Platforms should guarantee the visibility and accessibility of their research tools, data, and procedures across all EU member states. This includes the creation of localized support mechanisms, such as national liaisons, help centers, and translated documentation. By engaging directly with local observatories, universities, and research institutions, platforms can better understand and address the specific challenges and capacities of each country's research landscape.

Empowering the Fact-Checking Community

1. Establish, formalize, and strengthen partnerships with fact-checking organizations

Platforms must move beyond informal or ad hoc interactions by developing formal, structured agreements with independent fact-checking organizations at the national level. This includes establishing clear and fair terms of collaboration, responsibilities, and mutual expectations. Moreover, we highlight the importance of recognizing and integrating local expertise. For platforms that currently lack agreements (e.g. in Greece, Hungary, Ireland), urgent action is needed to close this gap and ensure that independent fact-checkers are treated as core partners in countering mis- and disinformation.

2. Improve data access and transparency to fact-checkers

Fact-checkers require reliable, timely, and relevant access to data to effectively identify and counter dis- and misinformation. Platforms should grant access to anonymized, non-personal datasets and fact-checking performance metrics, enabling organizations to understand and demonstrate their impact. Additionally, platforms must report more transparently on how they detect, moderate, and respond to dis- and misinformation, including the use of fact-checks in content ranking and labeling systems.

3. Integrate fact-checked content into platforms systems

There is a strong call for platforms to make better use of verified fact-checks by integrating them visibly into platform experiences. This includes improving the visibility of fact-checked content, using fact-checks to inform ranking and labeling algorithms, and clearly indicating corrections to users.

4. Provide financial and technical support for fact-checking initiatives

To ensure the sustainability and effectiveness of fact-checking organizations, platforms must contribute through funding, training, and technical resources, especially for smaller or emerging fact-checking communities. Support may include grants, capacity-building programs, access to moderation tools, and collaborative infrastructure to strengthen local capacities and resilience.

5. Localize engagement and improve responsiveness

Fact-checking support must be context-specific, reflecting the linguistic, cultural, and political realities of each country. Platforms should develop national-level communication channels, establish designated contact points, and engage regularly through feedback loops and consultations.

Annex A: Quality, Completeness and Verifiability of VLOPSE Reported Information on Selected CoPD Commitments - Assessment Grid

Annex A. Quality, Completeness and Verifiability of VLOPSE Reported Information on Selected CoPD Commitments - Assessment Grid

Section 1: Media Literacy/Empowering Users

Commitment 17: Enhancing Media Literacy

Part A: Quality and Completeness of Reported Information

A.1. Has [name of VLOPSE's service] adequately documented the following actions implemented in your country to improve media literacy and critical thinking? (Yes/No)

- Tools
- Activities
- Partnerships with Media and Information Literacy (MIL) experts

Part B: Evidence in Support of Reported Information

B.1.a. Tools – Were the following data provided for your country? (Yes/No)

- Count of impressions
- Interactions/engagement

B.1.b. Activities – Were the following data provided for your country? (Yes/No)

- Reach of campaigns
- Engagement metrics
- Number of interactions with online assets
- Number of participants

B.1.c. Partnerships – Were collaborative actions and/or frameworks identified for your country? If yes, please provide a short description.

B.1.d. Can we find evidence of what is reported by the Signatory? (Yes/No)

Please insert below any other comments you might have:

Commitment 21: Better Equipping Users to Identify Disinformation

Part A: Quality and Completeness of Reported Information

A.2.a. Please detail whether [name of VLOPSE's service] has reported on the following actions regarding your country: (Yes/No)

- Independent fact-checkers they work with to label content;
- The language(s) they operate in;
- The policies under which they work;
- Any labels applied;
- Any tool/feature used to inform users that the content they interact with has been rated by an independent fact-checker;

A.2.b. Please detail whether [name of VLOPSE's service] has reported on the following actions regarding your country: (Yes/No)

- Studies conducted to evaluate the impact of warnings for users who interacted with problematic content.

Part B: Evidence in Support of Reported Information

B.2.a. Has [name of VLOPSE's service] provided the following data for your country? (Yes/No)

- Total impressions of fact-checks
- Ratio of impressions of fact-checks to original impressions of fact-checked content
- Number of articles published by independent fact-checkers

- Number of labels applied to content
- Meaningful metrics on the impact of the above measures

B.2.b. Were you able to verify the data provided by the Signatory? (Yes/No)
Please insert below any other comments you might have:

Section 2: Empowering the research community

Commitment 26: Empowering the Research Community

Part A: Quality and Completeness of Reported Information
A.3.a. Has [name of VLOPSE's service] documented the following tools and procedures for access to relevant non-personal data for disinformation research: (Yes/No)

- Documentation of tools for public access?
- Processes and tools for real-time or near real-time access to non-personal data?

A.3.b. Were metrics provided on the uptake and efficiency of these tools at the member state level, including user numbers and application outcomes? (Yes/No)
A.3.c Has [name of VLOPSE's service] provided definitions for manifestly-made public data and application processes for accessing non-personal data as per Measure 26.2? (Yes/No)

Part B: Evidence in Support of Reported Information
B.3.a. What local or EU-level information is available to verify the data provided by [name of VLOPSE's service]?
B.3.b. Has [name of VLOPSE's service] published comprehensive information on data points available for disinformation research? (Yes/Insufficiently or Partially/ No)

Commitment 27: Governance Structure for Access to Data for Research Purposes Requiring Additional Scrutiny
Part A: Quality and Completeness of Reported Information
A.4.a. Has [name of VLOPSE's service] outlined ongoing pilot programs for data sharing with researchers, including details, participating teams, and research topics?
A.4.b. Is the qualitative information provided by [name of VLOPSE's service] relevant to the reporting objectives of Commitment 27?

Part B: Evidence in Support of Reported Information
B.4.a. Are you aware of the progress made towards the development of the independent third party body as described in Commitment 27.
B.4.b. If so, are you aware of any information that can corroborate [name of VLOPSE's service] reporting on Commitment 27?

Commitment 28: Cooperation with Researchers
Part A: Quality and Completeness of Reported Information
A.5. Does [name of VLOPSE's service]'s report provides the following information regarding actions under the cooperation framework with the European research community:
A.5.a. the (human) resources and processes used to support research and engage with the research community (e.g., dedicated teams, tools, help centres, programs, and events)
A.5.b. the data types accessible to European researchers (e.g., APIs, tools and programs)

A.5.c. the resources allocated for disinformation research under the cooperation framework with the European research community
A.5.d. the resources allocated for disinformation research with the assistance of EDMO
A.5.e. the procedures for independent resource management based on scientific merit

Part B: Evidence in Support of Reported Information
B.5.a. What local or EU-level information is available to verify the data provided by [name of VLOPSE's service] for Commitment 28?
B.5.b. Is the information on the resources and processes used to support research and engage with the research community, including dedicated teams, tools, help centers, programs, and events, easily available and/or publicly accessible?

Section 3: Empowering the fact-checking community

Commitment 30: Cooperation with Fact-Checkers

Part A: Quality and Completeness of Reported Information
A.6.a. Has [name of VLOPSE's service] provided details for your country on the following aspects of cooperation with fact-checkers? (Yes/No)

- List of fact-checking partners and their accreditation (e.g., IFCN, EFCSN)
- Languages and countries covered by these partnerships
- Description of the cooperation framework (e.g., advisory role, content review, moderation workflows)
- Description of any financial or technical support provided to fact-checkers
- Any collaborative mechanisms for addressing country-specific misinformation trends

Part B: Evidence in Support of Reported Information
B.6.a. Has [name of VLOPSE's service] provided the following data for your country? (Yes/No)

- Number of fact-checks published by partners
- Number of pieces of content treated based on fact-checker input
- Metrics on the visibility or reach of fact-checker contributions
- Any evaluations or user research on the effectiveness of these partnerships

B.6.b. Were you able to verify the data provided by the Signatory through independent or public sources? (Yes/No)
Please insert any additional comments you may have:

Commitment 31: Fact-Checking Integration in Services
Part A: Quality and Completeness of Reported Information
A.7.a. Has [name of VLOPSE's service] documented the following for your country? (Yes/No)

- Description of how fact-checking labels are integrated into content (e.g., labels such as "False Information")
  Explanation of how visibility or engagement with labeled content is limited (e.g., demotion, warning screens)
- Information on whether creators are notified when their content is labeled
- Description of how these measures are applied across different content formats (e.g., images, videos, links)

Part B: Evidence in Support of Reported Information

B.7.a. Has [name of VLOPSE's service] provided the following data for your country? (Yes/No)

- Number of labeled content items
- Impact metrics (e.g., reduction in shares, visibility)
- User interaction data with labeled content (e.g., click-through, engagement rates)
- Evaluations of user understanding or behavior change

B.7.b. Were you able to verify the data provided by the Signatory through independent or public sources? (Yes/No)

Please insert any additional comments you may have:

Commitment 32: Access to Relevant Information for Fact-Checkers

Part A: Quality and Completeness of Reported Information

A.8.a. Has [name of VLOPSE's service] described the following support provided to fact-checkers for your country? (Yes/No)

- Access to internal dashboards or data reporting tools
- Metrics on labeled content reach, engagement, and reshare rates
- Feedback mechanisms or regular consultations with fact-checkers
- Description of any real-time or near real-time data access
- Information on financial or operational support for fact-checking organizations

Part B: Evidence in Support of Reported Information

B.8.a. Has [name of VLOPSE's service] provided verifiable data or evidence of the following? (Yes/No)

- Number of fact-checkers with access to internal tools
- Usage metrics of these tools (e.g., frequency, number of accessed items)
- Evaluations or feedback from fact-checkers on the usefulness of the tools
- Any independent audits or external evaluations of these support systems

B.8.b. Were you able to verify the data provided by the Signatory through independent or public sources? (Yes/No)

Please insert any additional comments you may have:

Annex B: Quality, Completeness and Verifiability of VLOPSE Reported Information on Selected CoPD Commitments - Detailed Assessment of Compliance

Annex B. Quality, Completeness and Verifiability of VLOPSE Reported Information on Selected CoPD Commitments - Detailed Assessment of Compliance

Platform	**Commitment 17:** *Media literacy initiatives*	**Commitment 21:** *Tools to help users identify disinformation*	**Commitment 26:** *Access to data for researchers*	**Commitment 28:** *Cooperation with researchers*	**Commitment 27:** *Governance for data access*	**Commitments 30, 31, 32:** *Fact-Checking Initiatives and Support*
Facebook	Listed initiatives: We Think Digital, News Integrity Initiative; Provides impressions/views, but lacks interactions, click-through rates, or deeper behavioral insights.	Labels misleading posts; Very limited data on feedback or iterative improvement processes with fact-checkers. No user-level feedback metrics shared.	Limited access through ICPSR (University of Michigan), CrowdTangle discontinued; No member-state breakdown.	Works with IFCN and selected universities (not EU wide representativity)	Limited transparency Mentions CASD pilot and EDMO involvement, but no public evaluation of pilots, participating teams, or outcomes.	Lists EFCSN recognition and fact-checking partners (29 in EU), covers 23 languages and 26 countries. Lacks info on integration impact, formats, and frequency of cooperation. Does not disclose funding or support per organization. No breakdown of agreements per Member State/language.
Instagram	Influencer campaigns, in-app prompts	"False Information" overlays and warnings	No independent access beyond Facebook tools	Minimal direct partnerships	Limited transparency	Third-party fact-checkers are provided minimal direct support
TikTok	Listed initiatives: MediaWise partnership, educational initiatives for the EU elections; localized efforts for Ukraine, climate, and national elections; partnerships with Logically Facts, AFP	Fact-checking labels, redirects to credible sources (no constant metrics on volume or impact)	Selective and criticized transparency	Expanding collaboration declared; transparency issues persist	Research API, Virtual Compute Environment (VCE), and Commercial Content Library are reported available but unclear application process	Fact-checkers in 23 languages have advisory-only role. Content is tagged, but users may not know fact-checkers were involved; No country granularity Some metrics are available; number of videos fact-checked, removed, unverified labels used. Low removal rates after fact-checking suggest limited effect. Fact-checkers get a dashboard with some data (task numbers, ratings, review time), but no deeper data access or decision feedback loops
Microsoft LinkedIn	Listed initiatives: NewsGuard, Defending Democracy Program	AI-driven detection of fake accounts (no metrics)	Open-source AI research, cybersecurity reports (not accessible to researchers)	Strong cybersecurity internal research support (not available for third party researchers)	Active in AI governance, strict professional moderation on LinkedIn; no governance in place for access to data for research	NewsGuard integration, AI-driven fact-checking efforts (no details on concrete collaborations with third party fact-checkers and integration of their work)

Platform	**Commitment 17:** *Media literacy initiatives*	**Commitment 21:** *Tools to help users identify disinformation*	**Commitment 26:** *Access to data for researchers*	**Commitment 28:** *Cooperation with researchers*	**Commitment 27:** *Governance for data access*	**Commitments 30, 31, 32:** *Fact-Checking Initiatives and Support*
Microsoft Bing	Listed initiatives: NewsGuard	AI-tools for detection (no specific details on availability or effectiveness)	Participates in data sharing programs (MS MARCO, ORCAS, Open Datasets). Offers datasets e.g., Bing Coronavirus Query Dataset	Collaborates through the Qualified Researcher Program	No specification on APIs access for researchers; procedures are missing or unavailable	Commercial agreements with AFP and NewsGuard, but criticized for lack of genuine partnerships Missing detailed reporting on resources, quantitative impact (reach/impressions), and repository contributions. Information found vague with limited EU Member State breakdown.
Google YouTube	Google News Initiative, Fact Check Explorer, Be Internet Awesome	Fact-check panels under videos, algorithm adjustments (no metrics on effectiveness); Moderation is a critical aspect	Jigsaw projects, research grants without specific details	Funds independent research through grants (€25M to EMIF over 5 years)	Eligibility and access terms not transparent Barriers remain due to access restrictions and poor clarity.	Fact Check Explorer, demonetization of misinformation channels (no metrics and no details on national level collaborations with fact-checkers
Google Search	“More About This Page” in 40 languages; No country-level engagement data; no detailed user exposure metrics; vague methodology.	Fact-check panels, ClaimReview markup, warning labels.Partnerships with AFP and others; fact-check labels integrated in search.No impact studies; missing ratio data; no third-party verification.	Access barriers to Google Research Program due to vetting; Google Trends limited availability	Via EMIF: 87 projects in 25 countries; workshops via Trust & Safety; No disinfo-specific data catalog	APIs and reports available but not centralized. Programs exist, but clearer public-facing documentation is needed. Lacks clarity in allocation governance.	No data per platform/state/language; unclear compensation mechanisms; limited impact metrics; aggregated data obscures granularity.

Annex C: Effectiveness of VLOPSE Initiatives and Actions on Selected CoPD Commitments – Survey Questions

Annex C. Effectiveness of VLOPSE Initiatives and Actions on Selected CoPD Commitments – Survey Questions

Section 1: About You (non personal information)

- Please specify your role.
- Please select the type of institution you work for.
  - Academia
  - News agency/Media outlet
  - Fact-checking Organisation
  - Media Literacy Organisation
  - Civil Society Organization
  - NGO
  - Other (please specify)
- Please specify the country in which you operate.
- If applicable, please select the Hub you work for.
- Please choose one or more section among the below for which you will be answering YOU DO NOT NEED TO RESPOND TO ALL SECTIONS. PLEASE RESPOND ONLY TO THE SECTION WHICH IS RELATED TO YOUR EXPERTISE.
  - Media Literacy/Empowering Users (Commitment 17,21)
  - Research/Empowering the research community (Commitment 26,27,28)
  - Fact-checking/Empowering the fact-checking community (Commitment 30,31,32)

Section 2: Media Literacy/Empowering Users

Commitment 17: Enhancing Media Literacy (actions reported)

- Please list any tools, activities or partnership of [name of VLOPSE's service] with media and information literacy (MIL) experts in your country and assess the effectiveness of each listed tools, activities, and partnerships. Very poor, poor, fair, good, excellent
- Please explain the reasons for your assessment for tools, activities and partnerships, ideally using the EDMO guidelines as a reference for your assessment.
- Please insert any comments you would like to share regarding the tools, activities, and partnerships implemented in your country.

Commitment 17: Enhancing Media Literacy (Measure 17.3)

- Has [name of VLOPSE's service] engaged with media literacy experts in your organization for designing, implementing, and measuring the impact of tools and activities aimed at improving media literacy and critical thinking?
- If yes or partially, please provide a short description of the collaboration or the partnership you engaged in.
- Please assess the effectiveness of the collaboration. Very poor, poor, fair, good, excellent
- Please insert below any other comments you might have.

Commitment 21: Better Equipping Users to Identify Disinformation (Measure 21.3)

- Has [name of VLOPSE's service] consulted media literacy experts in your organization to conduct research and testing on warnings or updates targeted to users who interacted with content that violated the platform's policies? Yes, No
- If yes, please provide a short description of the nature of such consultations.
- Please assess the effectiveness of such consultations. Very poor, poor, fair, good, excellent

Commitment 21: Better Equipping Users to Identify Disinformation (Measure 21.3)

- Has [name of VLOPSE's service] provided feedback on how they take scientific evidence and users' needs into account when developing and deploying labeling and warning systems? Yes, no
- If yes, please provide a short description of the feedback you received.
- Please insert below any other comments you might have.

Section 3: Empowering the research community

Commitment 26: Empowering the Research Community (Measure 26.1)

- Is [name of VLOPSE's service] providing tools and processes for public access to non-personal data and anonymised, aggregated and manifestly-made public data pertinent to undertaking research on disinformation? Yes, partially, no
- Have you or your organization used any of the publicly available tools and procedures for disinformation research? Yes, no
- If yes, please list any publicly available tools and assess the usefulness of each listed tool. Not useful at all, not useful, fair, useful, very useful
- If relevant, please provide a short explanation to underpin your reply.

Commitment 26: Empowering the Research Community (Measure 26.2)

- Have you obtained access to real-time, machine-readable data (e.g. API) for research purposes?
- Please provide additional information on the process and any issues you might have encountered.
- If yes, please rate the usability of the (API) data accessed for your research. Very poor, poor, fair, good, excellent
- If yes, please rate the usefulness of the data accessed. Not useful at all, not useful, fair, useful, very useful
- Was the application process cumbersome in your case? Yes, partially, no
- Was the response time appropriate in your case? Yes, no
- Is the platform's definition of manifestly-made public data appropriate for research? Yes, no
- Please provide a short explanation to underpin your reply.
- Is the data available in real-time? Yes, no

Commitment 26: Empowering the Research Community (Measure 26.3)

- Do you have experience with reporting malfunctions, and if so, were the procedures adequate?
- Please insert any comments you would like to share regarding the tools, and procedures implemented in your country.

Commitment 27: Governance Structure for Access to Data for Research Purposes Requiring Additional Scrutiny (Measure 27.4)

- Have you participated in any pilot programs for data sharing? Yes, no
- If yes, please rate the below. Very poor, poor, fair, good, excellent
  - Your overall experience
  - The utility for your research
- Please insert below any other comments you might have.

Commitment 28: Cooperation with Researchers (Measure 28.1)

- Do you have experience with any of the resources and/or processes deployed by Facebook to facilitate research and engage with the research community, (e.g. dedicated teams, tools, help centres, programs, or events)? Yes, no
- If yes, please list any relevant resources and/or processes and assess the usefulness of each for your research. Not useful at all, not useful, fair, useful, very useful, N/A

Commitment 28: Cooperation with Researchers (Measure 28.3)

- Have you or anyone in your research organization been prohibited or discouraged from conducting research? Yes, no
- If yes, please provide a short explanation to underpin your reply.
- Are you aware of any researchers in your country who had such an experience?
- Have you or your research organization been the recipient of financial resources supporting research on disinformation, made available by [name of VLOPSE's service]? Yes, no
- If yes, please explain any mechanisms and procedures that have been put in place to ensure the resources are independently managed.
- Please insert below any other comments you might have.

Section 4: Empowering the fact-checking community

Commitment 30: Cooperation with Fact-Checkers

- If your organisation currently has an agreement/contract with [name of VLOPSE's service], could you please assess the below.
  - Your overall experience. Very poor, poor, fair, good, excellent
  - The quality of the cooperation framework with respect to the requirements for Commitment 30. Very poor, poor, fair, good, excellent
- Please insert below any other comments you might have.

Commitment 31: Fact-Checking Integration in Services (Measure 31.1)

- If your organisation currently has an agreement/contract with [name of VLOPSE's service], could you please assess the below.
  - The use and integration of your work in the platform's products. Very poor, poor, fair, good, excellent
- Please insert below any other comments you might have.

Commitment 32: Access to Relevant Information for Fact-Checkers (Measure 32.1)

- Could you please assess the availability and relevance of the data provided by [name of VLOPSE's service] on the impact of fact-checking activities?
  - Availability. Very poor, poor, fair, good, excellent
  - Relevance. Very poor, poor, fair, good, excellent
- Please insert below any other comments you might have.

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