



**FuJo**

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**FuJo Submission to the public consultation on An Coimisiún Toghcháin's first draft research programme.**

**12th Jan 2024**

**1. What is your view on the five proposed research strands? Are there amendments or additions you would suggest?**

Overall, we welcome the introduction of this draft research programme and approve of the five proposed research strands in principle. Based on our experience in studying the political and communication media ecosystem, we emphasise the critical importance of ensuring the information integrity of messages received by voters. This entails knowing what kind of information (including disinformation) voters are exposed to and closely monitoring the media environment to understand its evolving dynamics and trends. It also entails fostering voters' digital media literacy to ensure they understand the context for the information they encounter and know how to access reliable information. By extension, official information should be clear and accessible and all advertising should be transparent. Maintaining civility in the conduct of political campaigns is also, we suggest, an important factor that underpins key concerns around information integrity, electoral integrity, and public engagement and inclusion. The proposed research strands should positively contribute to our understanding of these issues.

**2. Which of the research questions under section 4 would you consider most important and why?**

**Strand A:**

The National Election and Democracy Study (NEDS) will provide vital information. The NEDS should be designed in a way that makes it compatible with inclusion in the Comparative Study of Electoral Systems (CSES). We recommend including the full battery of media usage questions from the CSES, particularly online news and social media usage as well as the questions regarding trust in traditional media

(Q07f.) and social media (Q07g.). Q03, which assesses how much respondents feel they understand the political issues of the country, may be useful to include as it comes closest to capturing how informed respondents feel.

In addition to the NEDS batteries, which cover much standard ground regarding election studies, we suggest including additional questions on the following topics:

- **Disinformation:** It can be hard to assess mis/disinformation in surveys as asking respondents if they have seen false information relies on their own self perception which is not an accurate gauge. However, there are other potential avenues such as asking respondents if they have seen a piece of information which has subsequently been debunked by fact-checkers.
- **Social media usage:** While the CSES asks about the frequency of social media usage for news about parties and candidates, it may be useful to understand which particular social media platforms are used for these purposes. This is important as the range of available platforms has increased and the Reuters Digital News Report highlights vast differences in the social media platform used by various groups, especially different age groups. Similar data for elections could be extremely useful in understanding the media ecosystem in Ireland and its impact.
- **Avoidance:** There are growing concerns about news avoidance and the implications for informed electorates. In recent years the Reuters Digital News Report has included questions relating to the avoidance of news. Political news is one of the most avoided topics. It could be useful to include a question which asks respondents about their level of avoidance of election-related information or content. Identifying demographic differences in avoidance would allow An Coimisiún to diversify their approach or increase research priorities towards understanding those demographics.
- **Trust in An Coimisiún Toghcháin:** Due to its role in overseeing elections, public trust in An Coimisiún is extremely important and attempts to undermine democracy in Ireland may focus on eroding trust or confidence in the Coimisiún. For this reason, including a question which focuses on trust would be useful and could be used in combination with other questions to identify any demographic trends or other correlations.

The existing CSES questions as well as those we have proposed all underpin issues relating to the integrity of electoral events and education, public engagement and inclusion in strand C and D.

Finally, we would strongly recommend that the approach taken with NEDS should be a pre- and post- campaign panel survey which focuses on both voters and non-voters. Referendum campaigns should also be subject to analysis as they bring up different dynamics and challenges within the information environment as second order elections, particularly regarding the specific rules relating to balance in issue coverage.

## **STRAND B:**

Within Strand B we recommend prioritising research into the use of posters. Election posters are particularly beneficial to first-time or independent candidates who do not have the same degree of individual or party recognition among the public compared to more established candidates. In the interests of a free and open election process, it is essential to understand more about the role of election posters and to fully consider the repercussions that any limitations to the use of posters might have.

We recommend including political advertising more generally as a topic. Political advertising online is covered within Strand C, while the use of posters is already included within Strand B. However, other forms of political advertising such as traditional or broadcasting media should be included within this strand as it forms a part of the communications infrastructure which impacts elections.

## **Strand C**

### Post Electoral Reviews

Within the Post Electoral Event Reviews, we reiterate the importance of including non-voters; examining how people access information; and examining the public perceptions of An Coimisiún Toghcháin and its role within the election process. Additionally, in the case that An Coimisiún incorporates a public reporting mechanism into its process for monitoring electoral disinformation, we stress that some details about this should be included in the review, such as the amount of reports made, topics concerned, and percentage that were actioned.

### Online Electoral Interference

When it comes to protecting Ireland's democracy and electoral events, combating online electoral interference is of the utmost importance. We note that electoral interference may be interpreted in different ways: as foreign interference and as domestic manipulation or hijacking of the information environment. In some instances, the two kinds of actors may be related.

The online environment is ever-changing with new platforms, practices, and trends emerging in quick succession. Moreover, Ireland is highly influenced by international trends, which quickly spread here. Therefore, it is essential to treat electoral integrity as an ongoing issue of concern and not simply an issue that emerges in the weeks preceding an electoral event. At a minimum, we suggest it is necessary to maintain an understanding of the dynamics of the online environment at all times. Attention should be given to the appropriate resources - personnel, software, etc. - required for

such monitoring during non-election periods and the potential need to upscale during election periods. Furthermore, this monitoring should be done in cooperation with international collaborative networks such as EDMO, the OECD, StratCom, and the European Centre of Excellence for Countering Hybrid Threats. Such cooperation will aid in understanding best practice as well as understanding emerging threats and issues.

As well as understanding common trends and techniques relating to electoral disinformation, there are critical decisions that An Coimisiún will make in the future, which should be informed by research. For instance, it is prudent to formulate risk assessments and to conduct scenario plans to inform decision making around when content requires action. This preliminary work could provide a framework, which will help guide decisions that may have to be made quickly during an election.

### Political Advertising

When applicable parts of the Act are enacted, there are multiple avenues of research that may take place around the Transparency Notice which should accompany online political advertising in the State. For instance, at a basic level research can examine whether transparency notices are complete and consistently applied while further research may make use of the publicly accessible archives of online political advertisements to ensure that they are functional and to conduct in depth analysis on the advertisements themselves, for instance, assessing trends relating to microtargeting or spending.

Aside from compliance with transparency notices, attempts to evade the regulations or otherwise manipulate users through techniques such as using fake accounts, the use of bots to amplify messages or foreign interference through funding paid for content are all potential risks to the integrity of elections relating to online advertisements. We would recommend that research priorities include work which seeks to establish the scale of this problem within Ireland and monitors for such issues during electoral periods.

A further issue concerns the definitions used. Some adverts, such as those placed on behalf of a candidate, are clearly political in nature, but others which are placed by civil society organisations or address issues such as immigration or abortion during an election period, may be harder to detect and identify. Additionally, other forms of paid for content, such as a partnership with an online influencer, may not be easily detectable. These grey area advertisements risk being unidentified by social media platforms and therefore not subject to the same policies and procedures but the scale and scope of this problem is relatively unexplored within Ireland. We recommend such exploratory work forms an immediate priority.

Some aspects of the Electoral Reform Act overlap with the requirements of the EU's Code of Practice on Disinformation particularly regarding labelling of advertising, verification of buyer identity and provision of real-time ad libraries. While the Code only applies to select platforms who have elected to become signatories, its remit and importance will strengthen if it becomes a code of conduct under the Digital Services Act as envisioned. As an ERGA member, Coimisiún na Meán contributes toward monitoring the code and the Broadcasting Authority of Ireland commissioned [FuJo to conduct research](#) into the Code and political advertising. Coimisiún na Meán is also the Digital Services Coordinator for the Digital Services Act and as such may have an additional interest in research relating to political advertising and systemic risk. The EU's proposal on the transparency and targeting of political advertising also covers topics such as transparency notices and when enacted it will require the designation of a competent authority within the State to enforce its provisions. For these reasons, we would recommend exploring the potential for research collaboration between An Coimisiún Toghcháin and Coimisiún na Meán on this topic.

## **Strand D**

Within Stand D we emphasise the growing importance of media literacy to the goal of democratic and electoral participation. Media literacy encompasses all the competencies relating to information literacy, media literacy and digital or technological literacy that are necessary to ensure people are fully equipped to participate in 21st-century life. Inequalities in media literacy may be linked to age and social marginalisation. These inequalities may limit participation in elections and access to reliable information and increase susceptibility to disinformation. Therefore, we recommend that media literacy is considered a key component of voter education and inclusion efforts.

It is essential that voters can clearly access and understand reliable information about the electoral process, such as eligibility to vote or registering as a voter, as well as reliable information relating to candidates and issues. This requires a thorough understanding of how voters across demographic groups access and process information, including what types of media and social media they consume, and their competencies around media. Such research can help to inform how official information is tailored and made accessible to different groups.

### **3. Are there additional research projects that you consider important to promote and enhance Ireland's democracy and electoral events? If yes, please specify?**

One of the common strands which runs throughout our response thus far is the need to prioritise information integrity, that is, the reliability, access and trustworthiness of

information. Whether this relates to transparency in advertising, monitoring the information environment for threats, promoting digital literacy or understanding the avenues by which Irish people find information, all are underpinned by the need to ensure that democratic participation is not hampered by attempts to mislead, harm or unduly influence others. We would encourage the addition of research projects which may not fall into the aforementioned categories but would serve to promote or protect information integrity of elections in Ireland.

Again, we emphasise that understanding how An Coimisiún is perceived and trusted by the public, media and politicians should be a research priority. While this may be included in things like the NEDS or post election reviews, it would also be reasonable to have standalone projects which seek to explore this topic once An Coimisiún's work is more established. This could also be incorporated into any candidate survey to gauge levels of trust from political candidates and parties.

**4. Are there any other comments or observations that you wish to make regarding An Coimisiún's research programme?**

We stress the importance of flexibility within the final research programme as the media environment is one which involves rapid change and accompanying challenges, such as seen with disinformation during the pandemic or the current rise of AI capabilities and technology. Overall, we commend An Coimisiún for presenting a comprehensive research programme. The establishment of An Coimisiún and its focus on research is a positive development and one which we look forward to participating towards with our own expertise and experience.