



CONSEIL SUPÉRIEUR DE L'AUDIOVISUEL

# THÉMA



Summary

## The fight against the manipulation of information on online platforms

*Review of measures implemented in 2020*

September 2021

Les collections CSA





## Introduction

For the second year, eleven online platform operators subject to the duty of cooperation established under Title III of the law of December 22th 2018 on combating the manipulation of information have undertaken the exercise of making a declaration to the CSA on the methods implemented in their fight against the dissemination of false information: Dailymotion, Facebook, Google (Google Search and YouTube), LinkedIn, Microsoft (Bing and Microsoft Advertising), Snapchat, Twitter, Unify (Doctissimo) Webedia (Jeuxvideo.com), the Wikimedia Foundation (Wikipedia) and Verizon Media (Yahoo Search).

The level of responses remains very disparate, with [Verizon Media](#) standing out with its particularly poor declaration. The Council nevertheless emphasises the **progress made in terms of quantity and quality of declared information** compared to the previous year. This positive step reflects the growing awareness of the importance of these issues. The Council wishes to salute the spirit of cooperation and availability shown by the vast majority of operators, as well as the richness of the dialogue.

However, the Council calls for more cooperation in certain key areas, such as the operation of algorithmic recommendation and moderation systems, the fight against the manipulation of information in the advertising field, and also on the provision of quantified data required for a better understanding of the issues surrounding the phenomena in question and the effectiveness of the methods implemented.

Subject to these reservations, the declarations attest the efforts made by the operators in response to an **overabundance of false information linked to the health crisis**. While special attention was paid this year to the measures taken in response to this extraordinary situation, the Council also notes the **implementation of some of the recommendations** that it formulated last year, and encourages platforms to continue to work this way in the future.



## General Council remarks

Transparency is one of the cornerstones of the mechanism for combating the manipulation of information. The objective assigned by the legislator to the operators of online platforms goes beyond the mere relationship that those operators have with the regulator; it is aimed at the general public.

For this reason, the Council urges the operators to improve the transparency of the measures taken and their impacts thereafter. To this end, it deems necessary to provide more precise and easily accessible information on the methods implemented to fight against the manipulation of information:

- clear, concise and intelligible information should be made easily accessible to all users for the service, in a context-sensitive and/or proactive manner where appropriate;
- a full set of more detailed publishable information enabling the analysis of the impact these platforms have in the dynamics of dissemination and structuring of the information space should be made available to individuals and to civil society as a whole (journalists, associations, public officials, associations, academic ecosystem, etc.);
- operators are required to provide the regulator with all information enabling the best possible understanding of the measures deployed and their effectiveness. In any event, the law<sup>1</sup> gives the Council the authority to collect all the information it requires to ensure compliance with the obligations imposed on operators.

In line with the same concern for public information, the CSA is engaging its own efforts in the fight against the manipulation of information as part of a process of enhanced transparency. With a desire in particular to enable users to understand the mechanisms implemented for services that they sometimes use on a daily basis, it ensures that they have everything they need to take an active role in the fight against the manipulation of information. To this end, the Council publishes not only an assessment of the measures implemented by the operators but also the declarations produced by the operators for the preparation of this assessment<sup>2</sup>.

---

<sup>1</sup> Article 19 of the law of September 30, 1986 on freedom of communication, applicable to online platform operators in accordance with article 58 of the same law.

<sup>2</sup> It does this while respecting legally protected information, that each operator can report to it as “confidential” at the time of its declaration, with provision of the necessary supporting evidence, and without revealing – upon request by the operator – information which would enable the tools used in the fight against disinformation to be circumvented. However, it notes that certain stakeholders have resorted to this option to a great extent ([Dailymotion](#) and [Snapchat](#) in particular).



## Measures implemented by operators

FIGURES FOR THE 2020 FINANCIAL YEAR <sup>3</sup>	
<b>Dailymotion</b>	473 reports for false information, 10 items of content identified as such (0 commercial communications).
<b>Facebook</b>	Deleted 12 million content items since March 2020 on <a href="#">Facebook</a> and <a href="#">Instagram</a> linked to the health crisis; About 5.8 billion fake accounts deleted in 2020.
<b>Google</b>	<a href="#">YouTube</a> : deleted 9.3 million videos linked to the health crisis in 1 <sup>st</sup> quarter of 2020; removed 2 million channels and 906 million comments in the year 2020. <a href="#">Google</a> : blocked 9.6 million advertisements linked to Covid-19 and 1,500 URLs in France.
<b>LinkedIn</b>	24,919 reports for false information and moderation of 8,703 content items in France.
<b>Microsoft</b>	<a href="#">Microsoft Advertising</a> : removed 1.6 billion advertisements, removed 270,000 sites and suspension of 300,000 accounts.
<b>Snapchat</b>	4 content items considered to be "fake news" (the rest of the figures are declared confidentially)
<b>Twitter</b>	168,709 reports in France for false information that could alter a poll or disturb public order, and measures taken with regard to 54,254 accounts worldwide.
<b>Unify</b>	4,789 reports for false information, deleted 1,845 content items in France (0 commercial communications) on <a href="#">Doctissimo</a> .
<b>Verizon Media</b>	No data supplied.
<b>Webedia</b>	At most, about 50,000 items of fake information identified in France (assessment).
<b>Wikimedia Foundation</b>	The operator declares that given its cooperative model, <a href="#">Wikipedia</a> is not covered by this type of moderation.

The **reporting mechanism** has been introduced by all operators (with the exception of [The Wikimedia Foundation](#)). Its accessibility and visibility nevertheless remain patchy, especially on search engines. The Council believes that this situation must be remedied.

The CSA notes a considerable increase in the amount of information provided by certain operators in respect of **transparency of algorithms**. Nevertheless, the Council notes in

<sup>3</sup> Unless otherwise stated, figures are declared globally.



certain cases a lack of transparency towards users with regard to the functioning of the algorithms used on their services, and their consequences. In addition, the Council would like to obtain additional information on the ethical issues surrounding the use of automated systems, particularly in respect of the fight against bias. Furthermore, although the Council notes a clear improvement, it believes that in certain cases, there remains a lack of details on the exhaustiveness of the information declared, in particular as regards algorithmic content recommendation systems. This is despite the fact that such systems are central to the phenomena of information manipulation and the operation of operator services in general. The Council thus urges operators to supply **more information (confidential if applicable) on their algorithms**, including algorithmic content recommendation systems.

With regard to the **promotion of content from companies and press agencies and audiovisual communication services**, the new measures declared are directly relevant to the context of the health crisis, and relate mainly to the identification of sources. In this regard, the Council acknowledges the meaningful work undertaken in highlighting authoritative sources and the partnerships entered into in this regard, and encourages the platforms to adopt them in the long term.

New initiatives have been taken by some operators against **accounts spreading massive amounts of false information** and coordinated influence operations. Nevertheless, the CSA notes the lack of information passed on to users on the resulting risks, and would like to see increased collaborative work between the actors to fight against this type of practice.

The Council notes a slight improvement in the methods implemented in the **fight against commercial communications that carry false information**, in particular in the establishment of advertising libraries. However, it points out a lack of cooperation between platforms regarding this issue and calls for more quantified data to be provided for a better understanding of the risks involved.

More **media and information education** initiatives have been declared, and there have been noteworthy efforts by certain operators in terms of collaborations established with **the world of research**, in particular on the move towards open data and the implementation of tools to fight against the manipulation of information. The Council welcomes the creation of collaborations between the operators themselves, and encourages them to step up these efforts.

Lastly, although all operators claim to be committed to freedom of expression, they have differing perceptions of the link between that freedom and the fight against the manipulation of information. In connection with the health crisis, which required increased moderation of **content**, the Council emphasises that users' individual freedoms must be upheld.



Because of this, and because of **2022 electoral deadlines**, the Council will pay particular attention to measures deployed by operators to prevent and, where appropriate, counter these risks of massive manipulation of information, while maintaining freedom of speech and of communication.

The Council will also endeavour, in its next report, to assess to what extent **recommendations from this report have been taken into account**. It is calling on operators to be more transparent in this area and with regard to users, especially in connection with exhaustive figures.



## Summary of the Council's recommendations

### On transparency in general

- **Recommendation No.1: on the platform, proactively provide users with clear and accessible explanations, if possible in a personalized and contextual manner, on the measures implemented to deal with the risks associated with the manipulation of information.**
- **Recommendation No.2: demonstrate greater transparency towards the public by providing more precise figures and contextualised information, in particular in declarations, and supply all information, even confidential, to the Council, enabling a better understanding of the measures taken and their impact.**

### On the reporting system

- **Recommendation No.3: for search engines (Google Search, Yahoo Search and Bing), improve the visibility and ease of use of their reporting system.**
- **Recommendation No.4: better inform flaggers, and users who have posted flagged content, of progress made in procedures for processing the reports, and notify them of the outcome within a reasonable period of time.** In addition, it is vitally important to **find better ways of explaining existing remedy options to users.**
- **Recommendation No.5: with the exception of the fight against certain practices that can be easily detected automatically, maintain human intervention in the decision-making process for an action with regard to content or an account.**

### Regarding the transparency of algorithms

- **Recommendation No. 6: provide users with features that enable them to understand the effects of algorithmic recommendation and moderation systems, in a personalised and context-driven way if possible.**
- **Recommendation No.7: declare all information demonstrating how the fight against bias is practically implemented on their services: dedicated resources, tools, subsequent modifications, results.**

### Regarding the promotion of content from companies, media agencies and audiovisual communication services

- **Recommendation No.8: retain an element of human intervention in the process of verifying the information provided about the press organs in cases where they are the subject of a special identification.**



- **Recommendation No.9: develop initiatives and partnerships such as those entered into in relation to the health crisis** (in cooperation with public authorities, associations, researchers, etc.) while ensuring, where appropriate, that government sources are identified, for the purposes of transparency with regard to users.

#### **Regarding the fight against accounts that spread false information on a massive scale**

- **Recommendation No.10: give users more information about coordinated influencing practices and the resulting risks**, especially during election periods.
- **Recommendation No.11: show more transparency, at least on the part of the regulator, on the potential advertising revenue generated by accounts that massively propagate false information.**

#### **Regarding measures to combat false information with respect to business communications and the promotion of information content relating to discussions of widespread interest**

- **Recommendation No.12: make advertising policies accessible in French and ensure that they include a section relating to the manipulation of information.**
- **Recommendation No.13: provide tools that are easy to access and use, and enable users to understand why they have been targeted in a given situation and to configure their advertising preferences.**
- **Recommendation No.14: provide the Council (at the very least) with quantified data to provide an understanding of the extent of the financial links between the manipulation of information and commercial communications on the platforms.**

#### **Regarding media and information education, and relations with the world of research**

- **Recommendation No.15: assess the impact of actions in media and information literacy on user behaviour**, and report to the public and the regulator.
- **Recommendation No.16: strengthen partnerships with the research sector, in particular by implementing conditions that will ensure the widespread availability and use of data.**