



# **NATIONAL STRATEGY AGAINST DISINFORMATION**

**Freedom of Information Center of Armenia**

# NATIONAL STRATEGY AGAINST DISINFORMATION 2022-2024

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## List of abbreviations

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CSO - civil society organization

FOI - freedom of information

FOICA - Freedom of Information Center of Armenia

MESCS - Ministry of Education, Science, Culture and Sports

MFA - Ministry of Foreign Affairs

MIC - Media Initiatives Center

PPS - Pre-primary school

TA - Freedom of information

Proactive publicity – Publicity based on own initiative

Multilateral communication – Establishment of communication at different levels to ensure partnership environment and formation of communication system

Hybrid information attack - Simultaneous external and internal informational attack

Updated Standard of Official Websites – A set of up-to-date standards that any existing/developing governmental/official website must match with

Timely published information – Publication of information within the period specified by the Law on Freedom of Information

Private sector mobilization – Involvement and activation of private sector

Persuasive content - Content that propels an action, creates an opinion, influences decision-making. One of the tools of soft power.

Communication protocol - A system of rules to ensure effective communication, that will lead the operation of that system in various situations.

## Background

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Disinformation is a constantly existing, constantly circulating and spreading threat that can cause serious threat to the state and society, depending on the volume of disinformation, target audience, goals of the spreading the disinformation, etc. Last years disinformation has also become a security challenge especially for Armenia, facing its exceedingly difficult crises over the last three years. Meanwhile, it is threatening all ongoing and recently initiated reforms and developments in the country.

Roleplayers behind disinformation can be internal or external, including state (sponsored by governments) and non-state roleplayers. According to various studies<sup>1</sup>, more than 30 countries use disinformation tools within their own country. Disinformation campaigns are regular, systematic and well-funded, forming part of a large-scale hybrid threat and employing a variety of tools, leverages, as well as engaging non-state actors<sup>2</sup>.

Disinformation causes serious damage to the society, government, and citizens. Public harm includes threats to democratic processes and values, as well as to the common good, health and safety of the citizens of Armenia.

According to another study, the main sources of disinformation in Armenia have been the media outlets related to the former authorities, platforms of ideological groups<sup>3</sup>. The study found that false narratives are also disseminated through influential users of social media (influencers), groups, and channels; so-called “mushroom media”, which are semi-entertaining and semi-informative websites that do not create original content, but rather amplify; as well as TV and online news outlets associated with the former political regime and other political interests. Local fact-checking platforms have disclosed that social media influencers who are associated with specific political groups have spread disinformation.

Political actors keep using false information about activities of CSOs, foreign donors, and their alleged political goals. This allows for targeted fake information campaigns to be used for exploiting societal divisions, undermining the trust in civil society, and questioning democracy<sup>4</sup>.

During emergency situations, war operations, as well as other crisis situations, the volume of disinformation dissemination increases significantly, which can lead to panic among the public, lead

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<sup>1</sup> See in particular: <https://freedomhouse.org/report/freedom-net/freedom-net-2017>.

<sup>2</sup> The Mapping of the Media in Armenia in the Context of the Fight Against Disinformation, Freedom of Information Center, <http://www.foi.am/hy/research/item/2183/>.

<sup>3</sup> The Patterns of Disseminating Disinformation in the Armenian Online Media, Media Initiatives Center, 2021, <https://media.am/en/laboratory/2021/03/12/26670/>.

<sup>4</sup> The Mapping of the Media in Armenia in the Context of the Fight Against Dis/Misinformation, Freedom of Information Center, <http://www.foi.am/hy/research/item/2183/>.

to the polarization of the public, making it difficult to control false information flows. False alarms can also contribute to the spread of misinformation, which can cause panic among the population and disrupt the smooth functioning of state bodies and organizations. As a result, citizens expecting help may be deprived of prompt and timely service.

Social platforms have become a main setting for spreading disinformation. Recent research suggests that private messaging services are increasingly used to disseminate disinformation<sup>5</sup>. Means include video manipulation techniques (deep fakes) and falsification of official documents, the use of automated Internet software applications (bots) to spread and generate debates on social media, trolling attacks on social media profiles and information theft. The tools and means used change and develop rapidly. The response must be developed proportionately.

Once reaching the society or persuaded target, disinformation undergoes a certain way. First, disinformation is created, then it generates into media product and finally the message is promoted and spread. Bringing up and analyzing these stages is important, as the creator of disinformation and, disseminator can be different circles. Therefore, such division and analysis are important for the fight against disinformation, as it will enable a more targeted fight. In this context, the report of Council of Europe of 2017 on disinformation, a policy aid to combating disinformation, where clearly the types of disinformation were defined. Three types of disinformation are distinguished: disinformation, Mis-information and Malinformation. The first of them (Dis-information) is information that is false and intentionally created to harm a person, social group, organization or country. Next (Mis-information) is information that, although false, still is not intentionally created to cause harm. The last type (Malinformation) is information that, even though is not false, but is used to harm someone or some group.

According to the 2021 "Disinformation and misinformation in Armenia" study<sup>6</sup> by Freedom House, the slow, uncoordinated, contradictory information provided by state institutions greatly contributes to the disinformation and misconceptions spread in the information field of Armenia, there are shortcomings observed due to the lack of strategic communication in responding to journalists' inquiries, lack of procedures and mechanisms for responding to the information circulated in the public domain.

Another study of 2019<sup>7</sup> also suggests that government officials need to improve their skills in addressing disinformation: substantively, according to experts, not only has there been no positive change over the last two years, but due to the COVID-19 pandemic and the Artsakh war, these issues have further deepened, while managing information, preventing disinformation and

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<sup>5</sup> EU Action Plan Against Disinformation, [https://www.eeas.europa.eu/sites/default/files/action\\_plan\\_against\\_disinformation.pdf](https://www.eeas.europa.eu/sites/default/files/action_plan_against_disinformation.pdf), p. 4.

<sup>6</sup> Freedom House, Disinformation and Misinformation in Armenia, [https://freedomhouse.org/sites/default/files/2021-06/Disinformation-in-Armenia\\_En-v3.pdf](https://freedomhouse.org/sites/default/files/2021-06/Disinformation-in-Armenia_En-v3.pdf).

<sup>7</sup> Shushan Doydoyan, Freedom of Information and Government-Media communication in Armenia, <http://www.foi.am/en/articles/item/1772/>.

addressing it has turned out to be additionally complicated for the state. In general, trust in state and official structures and sources has decreased.<sup>8</sup>

Despite the prevalence of disinformation, no strategic document aimed at combating it has been developed in Armenia yet. Due to the lack of against disinformation strategy, **Armenian society remains uninformed and vulnerable to false narratives that are filling the information vacuums**<sup>9</sup>.

One of the greatest challenges is the false narratives spread among both internal and external audience. For the first option, it can be a serious threat to society, individual groups of society, structures and organizations, including both public and private ones. In addition, especially in private foreign media field, the spread of false stories about the certain country's society can cause serious damage to the authority of the given state among the international community, causing negative and wrong perceptions and leading to negative consequences for the given state and the public. From this perspective, it is very important to develop cooperation with international partners of RA at the political, technological and professional levels in the fight against disinformation, by forming mechanisms for the dissemination of accurate information on foreign informational platforms about RA state policy, strengthening RA-Diaspora ties in terms of informational operations, covering media campaigns aimed to raise the reputation of RA, developing and implementing effective mechanisms aimed at developing cooperation with the bodies responsible for information countermeasures of partner countries, defining measures aimed at weakening the reputation of the enemy during peace and war, participating in conferences related to the field.

**One of the greatest victims of disinformation and misinformation in Armenia has been the trust between citizens and the state**, as a cluster of misleading narratives have aimed at eroding the legitimacy of government bodies, processes, and proposals in the eyes of the public<sup>10</sup>.

**The government does not carry out any media literacy campaigns** aimed at shaping and developing media literacy of all segments of society.

**Issues of public interest are not clarified by the state bodies in a timely and accessible manner**, creating an information vacuum, which is either filled with fake and manipulative information, or remains void, compromising public trust towards official information.

Every once in a while, the Government and the National Assembly suggested various legislative initiatives in an attempt to create a framework of regulations to combat disinformation and reduce hate speech and illegal content. However, these legislative initiatives were predominantly of a fragmental nature. Meanwhile, these attempts were generally perceived by the media community as unnecessary restrictions on freedom of speech and the press. On the other hand, there is a

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<sup>8</sup> Public Opinion Survey: Residents of Armenia, 2021, IRI, [https://www.iri.org/wp-content/uploads/2021/05/armenia\\_ppt\\_final.pdf](https://www.iri.org/wp-content/uploads/2021/05/armenia_ppt_final.pdf).

<sup>9</sup> Freedom House, Disinformation and Misinformation in Armenia, [https://freedomhouse.org/sites/default/files/2021-06/Disinformation-in-Armenia\\_En-v3.pdf](https://freedomhouse.org/sites/default/files/2021-06/Disinformation-in-Armenia_En-v3.pdf), p. 14.

<sup>10</sup> Ibid, p. 37.

prejudiced attitude towards the profession of journalism in the society, which greatly hinders the development of professional journalism. At the same time, cases of violation of journalistic ethics are quite frequent too. There is a lack of integrity in the media field.

Disinformation is an evolving threat which requires continuous efforts to address the relevant actors, vectors, tools, methods, prioritised targets and impact<sup>11</sup>.

**This document is the strategy of the Government of the Republic of Armenia**, which unites the efforts of the government, civil society and citizens to combat disinformation. The national strategy envisages the scope, purpose, modern methods and tools of combating disinformation.

**The document defines the strategic directions of combating disinformation**, which the Government of Armenia should be guided by in communicating with the public, media and civil society. It envisages a complex of urgent and immediate actions to protect the Republic of Armenia, its institutions and citizens from disinformation.

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<sup>11</sup> EU Action Plan Against Disinformation,  
[https://www.eeas.europa.eu/sites/default/files/action\\_plan\\_against\\_disinformation.pdf](https://www.eeas.europa.eu/sites/default/files/action_plan_against_disinformation.pdf), p. 3.

## Goal of the strategy

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The main goal of the strategy is to ensure the proper response of the Government of Armenia by preventing, reducing and neutralizing the risks of disinformation.

The following are the sub-goals of the strategy:

- **Form appropriate public response over disinformation through national civic education programs.**

This goal implies the formation of negative public attitude regarding disinformation and the sources spreading it. It includes raising awareness and education level on media freedoms and media literacy, creating a public resilience to disinformation. Fostering media literacy will give citizens the ability to differentiate disinformation, develop analytical and critical attitude towards information.

- **Contribute to access to official information and proactive accountability as a means of combating fake news.**

Proactive and multimodal communication is one of the most effective means of combating disinformation.

- **Establish effective mechanisms for preventing and countering/reducing disinformation, considering and applying international best practices.**

This requires distinct mechanisms - innovative and effective. Active cooperation with the private sector is key in this task.

- **Strengthen the capacity of state institutions of Armenia in order to prevent, detect and analyze disinformation through capacity building programs.**

One of the efficient tools in combating disinformation is the development of the skills of communication specialists and empowering the knowledge on working with information: It is necessary to improve the strategic communication of government agencies, strengthen the human, financial and technical resources of the communication subdivisions.



## Expected results

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- Development and implementation of state policy based on the goals and directions presented in the strategy;
  - Raising the level of awareness of media freedoms and media literacy of citizens which will lead to a reduction in the management and dissemination of disinformation risks;
  - Development of a media literacy concept and an action plan, and, based thereon, development and teaching of guidelines for media literacy integration in general education system by qualified specialists;
  - Generating formats and platforms aimed at fostering government state bodies transparency and accountability, improvement of existing resources;
  - Active engagement of the private sector and improvement of its transparency and accountability;
  - Adoption of regulations towards the fight against disinformation and increasing the efficiency of their implementation;
  - Improvement of the work delivered by communication specialists of the government, development of their media literacy and fact-checking skills.
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## Strategy success indicators

Goal	Indicator	Measurement system	Expected result
<p><b>Form appropriate public response over disinformation through national civic education programs.</b></p>	<ul style="list-style-type: none"> <li>● Introduction of media literacy module in the school social sciences curriculum</li> <li>● Introduction of media literacy subject in at least 5 universities, at least as a selective subject</li> <li>● Creating an accessible online educational resource for the elderly that combines online lessons, materials / resources developed by various organizations</li> <li>● Formation of a negative attitude towards disinformation in the society</li> <li>● Adoption of a concept of media literacy</li> </ul>	<ul style="list-style-type: none"> <li>● Research measuring the efficacy of educational programs</li> <li>● Monitoring of course attendance</li> <li>● Public opinion survey once a year (baseline and endline)</li> </ul>	<ul style="list-style-type: none"> <li>● Development and implementation of state policies meeting goals and directions of this strategy</li> <li>● Development and adoption of the concept and action plan of media literacy, based on it, creation and teaching of guidelines and educational programs for the integration of media literacy in general education via qualified specialists</li> </ul>
<p><b>Contribute to the access to official information and proactive accountability</b></p>	<ul style="list-style-type: none"> <li>● The official websites are updated in accordance with the general standard, including adapted for the needs of disabled, the published information correspond to the</li> </ul>	<ul style="list-style-type: none"> <li>● Public poll once a year (baseline and endline) Results of monitoring of official websites</li> <li>● Monitoring results of official websites</li> </ul>	<ul style="list-style-type: none"> <li>● Development and implementation of state policies meeting goals and directions of this strategy</li> <li>● Upscale knowledge and skills on media freedoms, which will lead to the management of</li> </ul>

	<p>open data format, containing complete and timely information.</p> <ul style="list-style-type: none"> <li>• At least a 30% increase in the number of visits to official websites.</li> <li>• The number of satisfied requests for information is 85%.</li> <li>• The unified statistics on freedom of information are published by the authorities.</li> <li>• Systems of self-evaluation and evaluation of transparency and accountability of government institutions have been introduced.</li> </ul>	<ul style="list-style-type: none"> <li>• Official statistics on FOI published</li> <li>• Annual report of the Personal Data Protection Agency</li> <li>• Annual reports of state agencies</li> </ul>	<p>disinformation risks and the reduction of the spread of disinformation.</p> <ul style="list-style-type: none"> <li>• Implementation of more transparent, accountable work-oriented formats and platforms of state institutions and improvement of existing resources</li> </ul>
<p><b>Establish effective mechanisms for preventing and countering disinformation, considering and applying international best practices.</b></p>	<ul style="list-style-type: none"> <li>• Meetings of the Working group set up for cooperation at least once a month</li> <li>• Funding of projects to provide technological solutions for combating disinformation offered by the private sector</li> <li>• High public awareness on media self-regulation and extrajudicial bodies and increase of their</li> </ul>	<ul style="list-style-type: none"> <li>• Research on measuring the efficiency of performance of the working group</li> <li>• Monitoring of official websites</li> <li>• Media monitoring</li> <li>• Public opinion polls</li> <li>• Number of applications for resolving information disputes addressed to self-</li> </ul>	

	efficiency by at least 30%.	regulation bodies	
<b>Strengthen the capacity of state institutions of Armenia to prevent, detect and analyze disinformation through capacity building programs.</b>	<ul style="list-style-type: none"> <li>● Trainings for employees of communication departments of state agencies at least once a year</li> <li>● Formation of strategic communications unit</li> </ul>	<ul style="list-style-type: none"> <li>● Work evaluation survey</li> </ul>	

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## Strategy targets

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The target group of the strategy is quite comprehensive, taking into consideration the working group multifunction of developing actions and monitoring results. As a result, it is planned to directly or indirectly cover at least 70% of the RA population, including targets of different age groups and social statuses, because the success of the strategy directly depends on the inclusiveness of its actions.

However, let's identify some primary targets, that via their direct participation can play impose on increasing media literacy:

- Teachers
- Youth (students, beneficiaries of youth organizations)
- School-aged children
- Parents
- Employees of government agencies, including those responsible for communication and human resources management
- Adults outside the general formal education system (30-65 years old)
- Private sector representatives (NGOs, independent experts, analysts, etc.)
- External audience

As a result of working with the mentioned primary targets, the possibility to influence the secondary target groups and the whole society comes also.

## Strategic directions

The strategy of the Government of Armenia against disinformation incorporates 3 strategic directions with a corresponding set of 12 actions.

Direction	Action
(i) Strengthen the capabilities of state institutions of Armenia to prevent, detect and analyse disinformation.	1.1 Improve the strategic communication in the government agencies, strengthen the human, financial and technical resources of the communication subdivisions 1.2 Improve the proactive transparency of government agencies. 1.3 Introduce a self assessment and evaluation system of transparency and accountability of the government agencies.
(ii) Improving cooperation and mobilizing the private sector to tackle disinformation.	2.1 Establish a cooperation working group 2.2 Foster the cooperation with fact-checking platforms 2.3 Form a cooperation to promote co-regulation and self-regulation in the media field 2.4 Engagement and mobilization of private sector
(iii) Raising awareness and level of education on media freedoms and media literacy by constituting societal resilience towards disinformation	3.1 Development of a state strategy for media literacy and coordination of works 3.2 Integration of media literacy in general education 3.3 Trainings for teachers 3.4 Working with groups excluded from general education 3.5 Training and capacity building for public and community employees

## **Direction 1: Strengthen the capabilities of state institutions of Armenia to prevent, detect and analyse disinformation**

### **1.1 Improve the strategic communication of government agencies and strengthen resources**

Communication is one of the essential directions in the toolkit of combating disinformation. When an information vacuum occurs, it is quickly filled with disinformation, and consequently, timely and exhaustive communication can significantly reduce that vacuum.

The effectiveness of combating disinformation and related education programs depends substantially on the awareness of target groups and public at large.

To increase the efficiency of communication with government institutions, it appears necessary to take the following steps:

- Establishment of a unified framework of communication subdivisions of government institutions and replenishment with human, financial and technical resources;
- Regular technical trainings and capacity building for staff;
- Reorganization of the work for communication departments;
- Development of a general communication strategy and communication guide (protocol) for the government.

#### **Establishment of a unified structure of government institutions, replenishment of communication departments with human, financial and technical resources.**

The communication departments of government institutions differ from each other in structure. They have varying rosters, and there is no systematic and unified approach.

It is necessary to carry out a mapping and analysis of the current status, which will allow to exclude the duplication of several similar posts in the newly-established structure and to come up with a unified structure of subdivisions, which, depending on the specifics of the state department, may be subject to certain changes. These subdivisions will also be provided with a position of a specialist dealing with strategic communication.

#### **Regular technical trainings and capacity building for staff.**

Communication is a rapidly developing area. New tools and directions for information dissemination and bilateral communication are constantly emerging. At least once a year, employees of communication subdivisions of state agencies should be trained on social media management, design, combating disinformation, strategic communication, behavioral science, and more.

### **Reorganization of the work for communication departments.**

Dissemination of information by state departments should have two major focuses: proactive dissemination of own content and fight against fake news/ negation of fake news.

The anti-disinformation communication strategy needs to have more intensive, repetitive and nudge content in order to complement other areas of the toolkit.

It seems necessary to produce a clear mechanism/ protocol for reacting to / denying fake news, which will include the following steps:

- Have one person in communication departments who will be in charge of monitoring and quickly identifying false information related to the field.
- Evaluation of the scale or risk of disseminating false information, on the basis of which the level and platform of responding to disinformation should be determined (Comment on social media, press release, interview of the head of the corresponding subdivision, interview of the head of the state department).
- Development of content refuting false information, which should be accurate from a professional point of view and easily comprehensible by the public as well.
- Development of guidelines / resources.

### **Development of a general communication strategy and communication guide (protocol) for the government.**

All government entities work towards the realization of a common vision of the government and it is essential to develop a single communication strategy on the components of that vision, which will be localized by each department according to its mandate.

In addition, it is necessary to develop communication guidelines and protocols for the joint representation of the government, striving to increase the reputation of the established "Government brand".

### **Confronting disinformation must become one of the components of a unified communication strategy, the goals of which are:**

- Widespread public disclosure regarding the risks associated with the dissemination of disinformation
- Introduction to anti-disinformation toolkit and provision of public support for its implementation
- Make publicly available steps and knowledge necessary to detect and prevent dissemination of disinformation
- Promotion fact checking platform.

**The communication strategy is coordinated and implemented by the following entities:**



Public Relations and Information Center SNCO is the coordinating body for communication strategy.

The entities implementing the strategy are:

- National Assembly of the Republic of Armenia,
- Public administration bodies of the Republic of Armenia, represented by information and public relations departments,
- International organizations operating in the field of communication,
- NGOs operating in the field of communication.

**Targets of the communication strategy involve:**

- Teachers
- Parents
- Young people
- People over middle age
- Lecturers
- Reporters
- People of influence
- State agency employees
- Business employees

Sub-components of the Strategic Communication of combating disinformation are presented in Appendix 1.

## **1.2 Improve the proactive transparency of government institutions**

Provision has been made to improve the level of proactive transparency in the government system as a means to make the struggle against disinformation more efficient. The essence of proactive transparency is that, on their own initiative, government institutions publish information regarding their activities based on the principles of accessibility, timeliness, objectivity and integrity.

Government agencies should undertake ambitious steps to fully publicize official documents of public interest, both upon their own initiative and on the basis of inquiries, in order to promote open and efficient governance and prevent the release of false information.

The purpose of proactive transparency is not only to spread anti-propaganda, but also to deliver the facts to the public as a fully disclosed open data in a timely manner in order to present the "other side of the story" to form as a countermeasure, which citizens must comprehend before encountering false information.

The following steps should be taken for this purpose:

### **1.2.1 Development of a common standard for official websites**

It is necessary to develop a general policy for the setup and development of official websites, a common and up-to-date standard for website development and a positive sample for an official website. If necessary, review the existing legal regulations and adapt them to modern trends.

The unified structure and design of official website will foster the information retrieval process for citizens, makes citizen-government communication productive, and consequently reduces the flow of disinformation.

It is also necessary to make appropriate changes in the legal regulations on the standardization of official websites, which will be effective, applicable and will meet the current requirements of technology development.

### **1.2.2 Criteria for official websites**

Official websites should be adapted to the needs of people with disabilities. Pieces of information liable to mandatory publication by law, as well as the changes made in them, must be published in a timely and complete manner. Information on the official websites should be published in an open data format, accessible and available to everyone.

## **1.3 Introduce a system for assessing the transparency and accountability of government institutions**

In order to ensure the essential level of transparency and accountability in government institutions, it is necessary to increase the impact of control over the legislation for freedom of information by introducing a system of evaluation of bodies. The practice of responding requests for information and ensuring proactive transparency should be subject to regular evaluations in order to identify gaps and issues and to manage them in a timely manner.

When developing a system for assessing freedom of information and publicity, it is necessary to take into account the openness by design approach<sup>12</sup>, which aims to encourage holders of information to act on their own initiative in accordance with the law. This approach is directly in line with the direction of ensuring proactive publicity of the strategy.

The evaluation system of freedom of Information and transparency consists of two main subsystems.

- External evaluation - this component sets forth the vision for the overall FOI assessment: which agency at what frequency and on what criteria will conduct the overall FOI assessment.
- Self-assessment (internal assessment) - This component includes the information holder's self-assessment methodology, the criteria to be considered by the information holder, and advisory

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<sup>12</sup> Openness by Design, The information commissioner's strategic plan 2019/2020-2021/2022, p. 4  
[https://ico.org.uk/media/about-the-ico/documents/2615190/openness\\_by\\_design\\_strategy\\_201906.pdf](https://ico.org.uk/media/about-the-ico/documents/2615190/openness_by_design_strategy_201906.pdf).

guidance on the key FOI functions that the holder is required to perform prior to the FOI self-assessment.

The main purpose of the assessment is to generate reliable data on the current state of publicity and freedom of information in a specific institution, to identify problems in the field of practice and legislation, to alert them, enabling the competent authorities and civil society to be consistent in solving these problems promptly and quickly.

The following issues are subject to evaluation/ self-evaluation:

- ✓ **Reactive provision of Freedom of Information. Processing FOI requests,**
- ✓ **Provide grounds for denial from and procedure for obtaining information,**
- ✓ **Proactive provision for freedom of information,**
- ✓ **The institute of the official responsible for the FOI,**
- ✓ **Performing the obligation of maintaining and publishing statistics,**
- ✓ **Sources for the development of official statistics on requested information,**
- ✓ **Effectiveness of appeals against infringements of the right to information,**
- ✓ **Common platform for electronic requests.**

Self-assessment must be implemented at least once a year.

Based on the questionnaire and methodology of the self-assessment of freedom of information, self-assessment should be performed by the holder of processed data.

The self-assessment questionnaire includes 80 questions-criteria on the process of setting information requests in motion, grounds for rejection, proactive provision of accessibility, responsible individuals for FOI, maintenance of FOI statistics, publishing, sources for production of statistics and a common electronic inquiry platform, with possible answer options to each question. Questionnaire-criteria include the reactive provisions of FOI (practice of addressing the requests), rejections and bases for rejection, assurance mechanisms for proactive publicity, institute of the officer in charge of FOI, performing the duty of maintaining and publishing FOI statistics and sources for statistics maintenance, as well as the use of a common platform for electronic inquiries.

The results obtained through the self-assessment system should be correlated with the results of the external assessment. As a result of the evaluation, public administration bodies will be indexed according to the level of publicity in their institutions.

## Direction 2: Improving cooperation and mobilizing the private sector

The efficiency of combating disinformation relies heavily on the cooperation with beneficiaries, the establishment of common principles and systematic control over their consistency. The uncoordinated, not agreed upon, and sometimes even chaotic behavior of government entities, organizations operating in the areas of information and law, journalists and industry experts can lead to both non-compliance with relevant legislation and reduced effectiveness of educational programs.

Thus, **the main goal of the cooperation direction is to ensure effective cooperation with all beneficiary groups and individuals during the implementation of the national strategy to combat disinformation.**

Sub-goals are presented below:

- Identify the organizations and bodies necessary for the effective implementation of the National Strategy for Combating Disinformation, including the private sector, and establish a format for cooperation;
- Define the directions for collaboration and identify opportunities;
- Establish the necessary mechanisms for collaboration.

Combating disinformation and propaganda requires the cooperation of all social actors and stakeholders, from businesses, media outlets and political parties to educational institutions and non-governmental organizations.

Within the scope of this strategy, the following mechanisms and directions for cooperation in the framework of combating disinformation are proposed:

### 2.1 Establishment of a working group

Establishment of a working group by appropriate specialists of the cooperating bodies (heads of Information and Public Relations departments, editors, journalists, public relations professionals, presidents of non-governmental organizations, etc.) coordinated by the Public Relations and Information Center SNCO. The goals of the working group are:

- Discussion and finalization of the National Strategy against Disinformation;
- Effective distribution of roles for strategy implementation;
- Monitoring of strategy implementation;
- Development of new tools and platforms for combating disinformation, involving several authorities;

- Distribution of available resources and fundraising, if necessary;
- Use of own platforms for public awareness.

Details of activities of the working group (frequency of meetings, venue, agenda, sequence of actions) should be discussed during the opening session of the working group. The establishment of the working group is initiated by the Public Relations and Information Center SNCO, notifying the organizations in the field and other stakeholders of the establishment of the working group.

Combating disinformation requires introduction of speedy response mechanisms, both on individual department and systemic levels. In this context, development of an online communication platform will provide an opportunity to inform partners about the latest updates, and ensure rapid consolidation and response when necessary.

The choice of an online communication platform should be made by the working group (mail communications, social media groups, etc.) and include both the members of the working group and other stakeholders and officials in the field.

The Ministry of Foreign Affairs of RA, in cooperation with other state institutions of Armenia, should undertake the organizing function of the activities carried out outside the territory of RA within the framework of the fight against disinformation spreading against the state, the public or the nation on international platforms. To fight against spreading disinformation via historical falsifications and anti-scientific theses, it is also necessary to ensure the involvement of relevant specialists of the RA National Academy of Sciences.

## **2.2 Cooperation with fact checking platforms**

An active cooperation framework will be formed with independent fact checking platforms. Regular discussions will be organized for discussing current developments and trends in the field and exchanging information.

The government will also cooperate with these platforms by providing complete and timely data so that fact checking platforms may fully perform their functions.

In particular, collaborative formats will be actively pursued to reduce the flow of political disinformation during electoral periods.

## **2.3 Cooperation to promote media co-regulation and self-regulation**

The agenda of combating disinformation also includes ensuring the media beneficial ownership and funding transparency, as well as promoting and strengthening self-regulation and co-regulation mechanisms for media outlets<sup>13</sup>.

The process of identifying the beneficial owners of media commenced in September 2021. BO transparency arrangements are in place, and the primary axis within this strategy is the complete implementation of legal provisions for BO transparency. Data on beneficial owners of media should be broadly accessible and available to the public through an open public register.

Self-regulation and co-regulation mechanisms are essential in combating disinformation. Recently published documents by the Council of Europe specifically underline that member states have clear commitments in regards to self-regulation, by providing adequate funding and legal assistance to self-regulation and co-regulation mechanisms ensuring independence and financial stability<sup>14</sup>.

Some work has already been done towards self-regulation. In particular, as stated in the amendments to the RA Law on Audiovisual Media in 2020, professional ethics code and self-regulation mechanisms have become mandatory for broadcasters participating in licensing competitions, although the practice of using these tools is still insufficient. It is planned to keep on establishing generally favorable environments and ensure a sufficient level of public awareness of the potential role of self-regulation mechanisms, such as the Media Ethics Observatory<sup>15</sup> and the Information Disputes Council<sup>16</sup>, which can increase media commitment to content quality control.

Main directions of the government's activities to promote self-regulation are presented in the 2022 Self-Regulation Development Concept. Media membership and active involvement in the process is a matter of priority for the shaped mechanisms of self-regulation.

Regulations to develop and adopt a code of ethics will simultaneously be made for public television and radio.

The scope of mandate of the independent regulatory body (National Commission on Television and Radio) will be expanded to include the mandatory media literacy component.

The regulatory body will ensure public awareness on the role and mission of the media, the role and functions of regulatory and self-regulatory bodies, as well as the relevance of transparency, financial accountability and regulations of beneficial owners of media.

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<sup>13</sup> Declaration by the Committee of Ministers on the financial sustainability of quality journalism in the digital age - Decl(13/02/2019)2, [https://search.coe.int/cm/pages/result\\_details.aspx?objectid=090000168092dd4d](https://search.coe.int/cm/pages/result_details.aspx?objectid=090000168092dd4d).

<sup>14</sup> Declaration by the Committee of Ministers on the financial sustainability of quality journalism in the digital age - Decl(13/02/2019)2, [https://search.coe.int/cm/pages/result\\_details.aspx?objectid=090000168092dd4d](https://search.coe.int/cm/pages/result_details.aspx?objectid=090000168092dd4d).

<sup>15</sup> [www.ypc.am](http://www.ypc.am).

<sup>16</sup> [www.idcarmenia.am](http://www.idcarmenia.am).

## 2.4 Engagement and mobilization of private sector

The role of the private sector is also key in combating disinformation. Private companies involved in the information technology, communication, public relations, consulting sector can take on the role of developing mechanisms and innovative tools to combat misinformation in active cooperation with both the government and civil society.

Social media platforms, search engines and online advertising are widely used to spread disinformation. Advanced technologies can both contribute to the spread of disinformation and become a vital tool in the fight against it. Countries in Europe already have softwares based on artificial intelligence and machine learning (e.g. PHEME, WeVerify, InVID, ChekDesk, Veri.ly, Citizen Des, Emergent)<sup>17</sup>, which, although in need of subsequent development, can still be considered effective steps. These can be effectively used in combating disinformation through artificial intelligence.

Private companies can play a particularly important role in the development of useful tools through automated mechanisms and artificial intelligence for combating disinformation. Availability of state funding or grants from international organizations can motivate private tech companies to initiate effective programs for the local market.

In the meantime, it is necessary to promote cooperation between the state and social platforms by creating direct channels of dialogue to make it possible for them to directly interact on social platform algorithms, advertising and sponsored content on these platforms, content moderation, issues with fake accounts, framework of social responsibility, provision of personal data protection, impartiality and diversity and other vital points. The dialogue will also contribute to the introduction of co-regulation mechanisms on social platforms. These steps will make it possible to stand up to large-scale waves of disinformation on social platforms.

### **Direction 3: Raising awareness and levels of education on media freedom and media literacy by constituting public resistance towards disinformation**

The effectiveness of the efforts of media circles and professional fact-checking initiatives greatly depends on the level of media literacy in the society: to what extent do people understand the meaning and purpose of democracy and freedom of speech, understand the work of the media, its mechanisms of influence, distinguish between suspicious and reliable information, sources, are they able to double check information, control their online behavior, feelings and reactions when confronted with suspicious, false, and misleading information, are they protected from information attacks and online scams?

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<sup>17</sup> Automated tackling of disinformation, European Parliament, March 2019, [https://www.europarl.europa.eu/RegData/etudes/STUD/2019/624278/EPRS\\_STU\(2019\)624278\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2019/624278/EPRS_STU(2019)624278_EN.pdf)

57% of internet users in the world find fake news troubling<sup>18</sup>.

48% of people in Armenia encounter disinformation and misleading news every day, while 80% of the public do not take any measures when facing suspicious information<sup>19</sup>. People need to understand the infosphere in a better way, as well as to obtain the skills necessary for recognizing and double checking suspicious information.

[Directive](#) of the European Parliament on the provision of audiovisual media services defines media literacy as the set of skills, knowledge and understanding necessary for using the media effectively and safely: citizens should be able to access information, critically analyze it, create media content. The document also emphasizes that in addition to technological education, citizens should be "equipped with the critical thinking skills required to exercise judgment, analyze complex realities and recognize the difference between opinion and fact."<sup>20</sup>

Based on these approaches, many European countries have incorporated the capacity building of media literacy in the education system, guided by the approach that it is the responsibility of the state to develop strategies and programs and provide media education for its citizens<sup>21</sup>.

Teaching approaches are different in European countries: breaking down the process into programs of different subject, offering separate target school subjects (media literacy, media production, film literacy) or short 2-3-month modules, making media literacy an advanced course in high school, creating interest groups or clubs. . .

UNESCO is the international leader in the dissemination of media and information literacy and the development of guidelines. The new UNESCO guideline (Global Standards for Media and Information Literacy Curricula Development Guidelines) emphasizes that in addition to integrating media and information literacy into general education, the following should be undertaken in parallel:

- Non-formal education opportunities should be created (online resources, courses);
- Community initiatives should be done (groups, libraries);
- Professional trainings (policy makers, government officials, journalists, health workers, personnel from civil society organizations, etc.)<sup>22</sup>.

Many countries establish responsible bodies adjunct to the government and the Ministry of Education to coordinate the task of disseminating media literacy. For example, since the 1940s

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<sup>18</sup> World Risk Poll, Lloyds Register Foundation, 2020 <https://tinyurl.com/mksecjb6>.

<sup>19</sup> Media Initiative Center and CRRCArmenia, Media Consumption in Armenia, 2022, <https://media.am/en/laboratory/2022/01/26/31479/>.

<sup>20</sup> Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU (Audiovisual Media Services Directive), article 33, <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>.

<sup>21</sup> Global Standards for Media and Information Literacy Curricula Development Guidelines, p30, UNESCO, 2022, [https://www.unesco.org/sites/default/files/medias/files/2022/02/Global%20Standards%20for%20Media%20and%20Information%20Literacy%20Curricula%20Development%20Guidelines\\_EN.pdf](https://www.unesco.org/sites/default/files/medias/files/2022/02/Global%20Standards%20for%20Media%20and%20Information%20Literacy%20Curricula%20Development%20Guidelines_EN.pdf).

<sup>22</sup> National Audiovisual Institute, Finland, <https://kavi.fi/>.



Finland has had an Institute for national media education and audiovisual media, on the basis of which the regulatory body of media literacy, KAVI (National Audiovisual Institute)<sup>23</sup>, was formed, operating under the Finnish Ministry of Education. This structure also monitors the work of the media and the observance of the relevant legislation in the media from the perspective of protection of children's rights.

The Swedish Media Council has such functions as well: it disseminates media education, monitors the work of the media, classifies media products with age restrictions and corresponding notes<sup>24</sup>, as well as coordinates the work of the network of other media literacy institutions and organizations.

In the UK, for example, [Ofcom](#) is responsible for media literacy. Ofcom is an independent media regulator body that collaborates closely with the government and follows the strategies of media literacy<sup>25</sup>.

Global best practices in media literacy suggest that this process should be based on in-depth research and data, have a detailed strategy and action plan, and be comprehensive, systematic and continuous<sup>26</sup>.

### 3.1 Integration of media literacy in general education

In order to institutionalize media education, the organizations work with the Ministry of Education, Science, Culture and Sports, universities and other educational institutions.

Since 2011, the Media Initiatives Center has been conducting trainings for teachers and instructors with materials from the first Armenian language handbook called "Media Literacy", endorsed by the Ministry of ESCS<sup>27</sup> (revised handbook will be ready in 2022). With the memorandum signed between the MIC and the Ministry in 2017, the state basically gave prominence to integration of media literacy in schools for the first time and assumed the commitment to support the cause.

For the last two years, the [Public Journalism Club](#) has been actively supporting the efforts to integrate media literacy into the pre-school education by training educators and developing and localizing teaching materials and suggestions.<sup>28</sup>

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<sup>23</sup> Swedish Media Council, <https://www.statensmedierad.se/>.

<sup>24</sup> Online Media Literacy Strategy, Department for Digital, Culture, Media and Sport, UK, 2021 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004233/DCMS\\_Media\\_Literacy\\_Report\\_Roll\\_Out\\_Accessible\\_PDF.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004233/DCMS_Media_Literacy_Report_Roll_Out_Accessible_PDF.pdf).

<sup>25</sup> Finnish Ministry of Education and Culture, 2019, Media Literacy in Finland: national media education policy <https://medialukutaitosuomessa.fi/mediaeducationpolicy.pdf>.

<sup>26</sup> "Media Literacy" educational-methodical study guide, Media Initiatives Center, 2013, <https://media.am/hy/lab/2020/04/16/17917/>.

<sup>27</sup> Government decree N136 on "Approving the State Standard for General Education", 2021, <https://www.arlis.am/documentview.aspx?docid=149788>

<sup>28</sup> "Media Literacy in Preschool Education", Public Journalism Club, 2021, <https://drive.google.com/file/d/1O3FYdRhX3r-pAQewdfiAc3wOOTscKskj/view>.

The [Media Education Center](#) actively cooperates with schools in the area of digital literacy.

The [Freedom of Information Center](#) seeks to develop the ability of young people to verify the facts by setting up fact checking laboratories in schools and universities. At the same time, the center regularly organizes trainings on fact checking for civil and community servants<sup>29</sup>.

Equipped with a multimedia laboratory, the Faculty of Primary Education of Yerevan State Pedagogical University actively works with primary school teachers; the teaching guide “Media education in the elementary school” was developed and trainings are carried out.

Over the past few years, with the state support, the Media Initiatives Center has been celebrating the [Media Literacy Week](#), a localization of the UNESCO Global Initiative: all high schools in Armenia, as well as numerous universities, kindergartens, educational and cultural centers and organizations, and media outlets join the week in late October or early November by organizing training courses, events and awareness campaigns.

Cooperation with the state has become especially active after the 2018 revolution. The new government speaks more often on the importance of media literacy, and the reorganized ministry (of Education, Science, Culture and Sports) has incorporated it into large-scale education reforms. In 2022, with the support of UNESCO, the Ministry of Foreign Affairs, in association with the MIC, developed and disseminated the "Media-literate citizen's guide" handbook in educational institutions<sup>30</sup>.

### 3.2 Directions of media literacy development

The [state standard for general education of the Republic of Armenia](#) (also the state standard for preschool education), approved in February 2021, identifies 8 competencies, one of which is **digital and media competency**, which, in practice, is a detailed description of media literacy formulated in cooperation with civil society organizations.

*Digital and media competency: learners master the rules and skills of media literacy: they comprehend the work and role of the media in a democratic society, are able to navigate information flows, find and disseminate information, critically analyze them, assess the impact of the media on their own and others' value perceptions, positions and actions.*

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<sup>29</sup> See Freedom of Information Center's "Fact checking for Officials" training program: [http://www.foi.am/u\\_files/file/%D5%88%D6%82%D5%BD%D5%B8%D6%82%D5%B4%D5%B6%D5%A1%D5%AF%D5%A1%D5%B6%20%D5%B6%D5%B5%D5%B8%D6%82%D5%A9%D5%A5%D6%80/%D5%93%D5%A1%D5%BD%D5%BF%D5%A5%D6%80%D5%AB%20%D5%BD%D5%BF%D5%B8%D6%82%D5%A3%D5%B8%D6%82%D5%B4%E2%80%A4%20%D5%A4%D5%A1%D5%BD%D5%A8%D5%B6%D5%A9%D5%A1%D6%81%D5%AB%20%D5%AE%D6%80%D5%A1%D5%A3%D5%AB%D6%80.pdf](http://www.foi.am/u_files/file/%D5%88%D6%82%D5%BD%D5%B8%D6%82%D5%B4%D5%B6%D5%A1%D5%AF%D5%A1%D5%B6%20%D5%B6%D5%B5%D5%B8%D6%82%D5%A9%D5%A5%D6%80/%D5%93%D5%A1%D5%BD%D5%BF%D5%A5%D6%80%D5%AB%20%D5%BD%D5%BF%D5%B8%D6%82%D5%A3%D5%B8%D6%82%D5%B4%E2%80%A4%20%D5%A4%D5%A1%D5%BD%D5%A8%D5%B6%D5%A9%D5%A1%D6%81%D5%AB%20%D5%AE%D6%80%D5%A1%D5%A3%D5%AB%D6%80.pdf).

<sup>30</sup> "Media-literate citizen's guide", MFA, 2022, <https://media.am/hy/lab/2022/05/02/32646/>.

*In addition to the opportunities of using digital media, they also recognize the risks associated with them, are able to evaluate and transform their behavior in the digital world from the standpoint of security, responsibility and ethics. They possess technical and creative skills for creating media products, as well as are able to effectively apply media tools for exercising civil rights and participating in democratic processes<sup>31</sup>.*

The state standards on pre-school and general education are the basis of new educational programs, and those who develop and teach them will abide by them.

The state standard for general education includes mandatory educational outcomes for all levels of general education (elementary, basic and secondary), including the development of critical thinking, media and digital literacy skills.

The standard conducts the model of teaching media literacy; it must be integrated into the curriculum and teaching methods of different school subjects. Through social studies, digital literacy, mathematics, physics, and other subworkjects the learner must essentially learn to check sources, analyze information, apply critical thinking, devise his or her own ideas, and use media tools.

Projects elaborated under the new standard are currently in pilot stage. In 2021, ahead of the certification exams, intensive trainings for teachers were held. However, the share of media literacy in them has not been clarified yet, and the organizations conducting the trainings were choosing to include related topics on a voluntary basis and for an extremely limited period of time.

### **3.3 Necessary actions and solutions**

**Based on this Strategy, it is planned to develop an Action Plan-schedule within three months after the adoption of the Strategy by the Government.**

**Five main directions have been identified:**

#### **3.3.1 Development of a state concept for the dissemination of media literacy and coordination of activities.**

In order to facilitate this direction, it is necessary to:

- Conduct in-depth needs assessment, first and foremost among teachers, then also among students and general public.

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<sup>31</sup> Guidelines developed by the Swedish and British governments on this subject can serve as examples <https://3x7ip91ron4ju9ehf2unqrm1-wpengine.netdna-ssl.com/wp-content/uploads/2020/03/RESIST-Counter-Disinformation-Toolkit.pdf> and <https://www.msb.se/RibData/Filer/pdf/28698.pdf>

- Create a concept for the dissemination of media literacy based on research data, experience of the Armenian civil society, international best practices, and later an action plan as well in cooperation with active role-players in the journalistic and educational community, organizations and experts in the field.
- establish a governmental council, a body, to coordinate the work and activities and operating as independently as possible, composed of specialists in the field.

### **3.3.2 Integration of media literacy in general education**

**Steps have been taken in this direction as well both by non-governmental organizations, which have developed manuals and programs, and by the state, which has incorporated digital and media competencies into the state standard.**

- Selecting 1 to 2 courses for integration, in which topics and projects associated to media literacy will be introduced as deeply as possible, as well as in a form of a module ongoing several months. Best option would be introducing such a module in the syllabus of the social studies course, while integrating media literacy components into the syllabus of the Armenian (native) language for lower grades.
- Simultaneously suggesting a separate media literacy optional course in high schools, which will also become an opportunity for professional orientation for students.
- Considering the manner of turning libraries into centers for media education by digitizing and technically equipping them, enriching with relevant literature, games, and online resources.
- Developing quality educational media materials for schools, kindergartens and universities, including animated materials, explanatory films, audio-visual and multimedia materials on a variety of subjects and topics based on research and facts, made for different age groups.
- Media literacy is also included in the standard of pre-school education. It is also necessary to revise the pre-school education programs and develop new materials.
- Universities are more independent in making their curricula. Media literacy courses are included in the pedagogy and journalism departments of some universities; however, it is essential to make the subject accessible to all, regardless of specialization.

### **3.3.3 Trainings for teachers**

**Teaching media literacy is more about values, perceptions and principles rather than about knowledge itself. In this respect, long-term and consistent work with teachers is very important. As it is not possible to rapidly train all teachers, it is important to commence with the teachers of those subjects in which media literacy topics will be introduced.**

- *Reviewing and expanding the volume of media education in academic education of pedagogy, making sure that future teachers develop both technical skills for using media tools and critical thinking, and also understand the value of media, freedom of speech, modern trends and issues.*
- *Conducting training courses and summer schools for teachers (especially those teaching social studies and languages). Media Initiatives Center has developed a teacher training program: this program was endorsed by the ESCS Ministry as a part of the competitive tender for training courses for certifiable teachers. These and other similar programs can serve as basis for trainings.*
- *Combining online Armenian resources on media literacy, supplementing them when needed, making them available to teachers for continuous education. Various non-governmental organizations have such materials, in cooperation with which development of a valuable online database can be accomplished.*
- *Stimulating in-school and inter-school experience exchange, teacher workshops, lesson plans and project competitions.*
- *Creating similar training opportunities for lecturers and universities.*

### **3.3.4 Working with groups excluded from general education**

**Lifelong learning generally requires coordination. The following actions will be particularly effective in promoting media literacy.**

- Collaborating with media organizations, particularly the public media, by fostering the production of education programs on media literacy, as well as involving journalists in educational projects, making the work of the media more transparent and open to the public, supporting fact checking, formation and work of professional teams.
- Bringing high-grade explanatory, educational, and insightful content on political, social, health, and other relevant topics in public media to help people obtain fact-based, verified and reliable information.
- Working together with libraries, museums, cultural centers, as well as NGOs engaged in non-formal education for the development of media education (training staff and educators, new programs, grants, technical reequipment).
- Organizing continuous and successive trainings for the government employees, specifically for those responsible for information, more particularly on the topics of disinformation detection and response.
- Devoting special attention to parents as well: parents need a lot of support and learning in order to coordinate their own and especially their children's media consumption; however, they are rarely involved in educational programs. Kindergartens, schools, libraries and other educational institutions should also involve parents in media literacy programs and discussions.

### 3.3.5 Training and capacity building for public and community employees

There is a need for detailed and consecutive trainings on media literacy in the public administration and local self-government systems through empowering the capacity of public and community employees on the matter of fact checking and anti-disinformation tools.

The training programs will be included in the general mandatory training programs for public and community employees and will be implemented on a regular basis.

Educational and practical resources with anti-disinformation tips and skills will be developed and published as everyday work tools. The guide or manual will provide clear and practical advice on how officials should be able to identify, detect, and counter disinformation they may experience in their day-to-day work<sup>32</sup>. Public and community servants will be regularly trained for obtaining crisis communication skills as well.

Guidelines for communication and activeness on social platforms will be developed for employees involved in communication and information departments. The role of support and cooperation with specialized CSOs will be key in this component.

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<sup>32</sup> Guidelines developed by the governments of Sweden and United Kingdom on this topic can serve as an example: <https://3x7ip91ron4ju9ehf2unqrm1-wpengine.netdna-ssl.com/wp-content/uploads/2020/03/RESIST-Counter-Disinformation-Toolkit.pdf> and <https://www.msb.se/RibData/Filer/pdf/28698.pdf>.