

Appendix № 1  
to Decision № 1319-L  
of the RA Prime Minister

**THE CONCEPT OF THE STRUGGLE AGAINST DISINFORMATION  
2024-2026**

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## List of Abbreviations

BO - beneficial owner

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

**Proactive transparency** - transparency based on one's own initiative

**Multilateral communication** - establishing communication at different levels to ensure the creation of a partnership environment and communication system

**Hybrid information attack** - a 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 should comply 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 the private sector

**Persuasive content** - any type of 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 guarantees the operation of that system in various situations

## Objective

Disinformation is an always existing, constantly circulating and spreading threat that can cause serious problems to the state and society, depending on the volume of disinformation, target audience, goals of the person spreading disinformation, etc. Disinformation is also a security challenge for the Republic of Armenia, which has been facing the most complex crises in recent years. At the same time, it threatens all ongoing and newly initiated reforms and developments in the country.

Disinformation causes serious damage to all strata of society, the organization of economic activity, and the process of policy implementation. It is directly related to the daily life of citizens, society, government, business environment. Public harm includes the threat to democratic processes and values, the well-being and security of the citizens of the Republic of Armenia.

The actors behind disinformation can be internal or external, including state (sponsored by various governments) and non-state actors. According to various studies,<sup>1</sup> more than 30 states use disinformation tools in their own countries. Disinformation campaigns are regular, sometimes coordinated and financed, forming part of a large-scale hybrid threat and using a variety of tools and levers by the involvement of non-state actors as well.<sup>2</sup>

Political actors also use false information about the activities of CSOs, foreign donor organizations, and their supposed political goals. This allows to carry out targeted information campaigns to exacerbate societal divide and hinder democratic processes.<sup>3</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, contribute to the polarization of the public, making it difficult to control false information flows. False alarms can also contribute to the spread of disinformation, 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 media platforms have become the main medium for spreading disinformation. A recent study suggests that private messaging services are increasingly used to disseminate

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<sup>1</sup> See Freedom House, 2017, <https://freedomhouse.org/report/freedom-net>

<sup>2</sup> See “The Mapping of the Media in Armenia in the Context of the Struggle Against Disinformation,” Freedom of Information Center, <https://foi.am/researches/4622>

<sup>3</sup> See “The Mapping of the Media in Armenia in the Context of the Struggle Against Disinformation,” Freedom of Information Center, 2021, <https://foi.am/researches/4622>

disinformation.<sup>4</sup> The four techniques are: distribution of manipulative information (including fake documents), videos (deep fakes) with the use of automated Internet software applications (bots), internet harassment (trolling) on social media profiles.

According to another study,<sup>5</sup> it was found that false narratives are also disseminated through influential social media users (influencers), groups and channels, as well as semi-entertaining and semi-informative online news outlets that do not create original content, but rather copy news. Local fact-checking platforms have disclosed that social media influencers who are associated with specific political groups have become a source of disinformation.

Although disinformation is comprehensive and is interpreted in different ways, it can be defined as the intentional or unintentional dissemination of false or incomplete information for the purposes of propaganda, generating public opinion, and misleading the public. Once reaching the general public or the target it pursues, disinformation goes a certain way. First, disinformation is created, then it is turned into a media product and finally the message is promoted and spread. Highlighting and analyzing these stages is important, because oftentimes, the creator of disinformation and, for example, the disseminator, can be different circles. Therefore, such division and analysis are important for the struggle against disinformation, as it will enable a more targeted struggle. In this context, the 2017 report of the Council of Europe on the development of the policy against disinformation is significant, wherein the types of disinformation are clearly defined.<sup>6</sup> Three types of disinformation are distinguished: disinformation, misinformation, and malinformation.

- **Disinformation** is information that is false and intentionally created to harm a person, any social group, organization or country.
- **Misinformation** is information that, while false, is not intentionally created to cause harm.
- **Malinformation** is information that, although not false, is used to harm someone or some group.

One of the greatest challenges is also the dissemination of false narratives both internally and externally. In the first case, it can be a serious threat to society, individual groups of society, structures and organizations, including both public and private sectors. In addition, especially in foreign media, the spread of false narratives about the given country and its public can cause serious damage to the authority of the given state among the international

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<sup>4</sup> See Page 4 of the 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)

<sup>5</sup> See “The Patterns of Disseminating Disinformation in the Armenian Online Media,” Media Initiatives Center, 2021, <https://media.am/hy/lab/2021/03/12/26664/>

<sup>6</sup> See <https://rm.coe.int/information-disorder-report-version-august-2018/16808c9c77>

community, causing negative and wrong perceptions and leading to negative consequences for the given state and the public. In this regard, it is essential to develop cooperation with international partners of the RA at the political, technological, and professional levels in the struggle against disinformation, by forming mechanisms to disseminate accurate information on foreign information platforms about the RA state policy, strengthening RA-Diaspora ties in terms of information operations, carrying out media campaigns aimed to raise the reputation of the RA, developing and implementing effective mechanisms to foster the cooperation with the bodies responsible for information countermeasures of partner countries, defining measures aimed at weakening the reputation of the enemy in peace and war, and participating in conferences related to the field.

The greatest harm of misinformation and disinformation is perhaps the undermining of trust between the citizens and the state, because a group of false narratives, according to research, is aimed at diminishing the legitimacy of state bodies, processes, and proposals in the eyes of the public.<sup>7</sup>

Despite the wide spread of disinformation, Armenia lacks a systematic, strategic approach to struggle against disinformation; no strategic document has been developed yet. Due to the lack of systematic and institutional counteraction to disinformation, the Armenian society remains unaware and vulnerable to false narratives that fill the information vacuum.<sup>8</sup>

Until now, the Government's steps towards increasing media literacy have been fragmented, as a result of which not all strata of society have been involved in the formation and development of media literacy. Matters of public interest by state bodies in some cases have a time gap and problems related to accessibility, which cause an information gap that is either filled with false and manipulative information, or remains empty, undermining public trust in official information.

The Government and the National Assembly occasionally have come up with different legislative initiatives, trying to create a framework of certain regulations to struggle against disinformation and reduce the volume of hate speech and illegal content. However, these legislative initiatives were mostly of a sectoral nature. On the one hand, there is a prejudiced attitude towards the profession of a journalist among the public, which greatly hinders the development of professional journalism, on the other hand, there are frequent cases of violation of journalistic ethics, and there is a noticeable lack of conscientiousness in the journalistic environment.

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<sup>7</sup> Ibid. p. 46

<sup>8</sup> See Freedom House, Disinformation and Misinformation in Armenia. Countering False Narratives, 2021, Page 14, [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)

Overcoming disinformation requires continuous, unified, and complex efforts, coordinated response, relevant actors, vectors, tools, methods, priority targets, and impact.<sup>9</sup>

This document is the Concept of the RA Government, which consolidates the efforts of the government, civil society, and citizens to struggle against disinformation. The Concept envisages the scope, purpose, modern methods, and tools to struggle against disinformation. The document defines the directions of the Concept to struggle against disinformation, whereby the RA Government should be guided when communicating with society, media, and civil society. It envisages a set of urgent and high-priority actions to protect the Republic of Armenia, its institutions, and citizens from disinformation.

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<sup>9</sup> See Page 3 of the 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)

## Goal

The main goal of the Concept is to ensure a proper response to disinformation in the Republic of Armenia by preventing, reducing, and neutralizing the risks of disinformation.

The sub-goals of the Concept are:

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

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

- **Contribute to the accessibility of official information and proactive accountability.**

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

- **Create effective mechanisms to prevent/counter and reduce disinformation, hybrid information attacks/campaigns, taking into account, implementing, and localizing international best practices.**

This goal requires distinct innovative and effective mechanisms. The active cooperation with the private sector also plays a key role in this matter.

- **Strengthen the capacity of the RA state agencies to prevent, detect, and analyze disinformation through capacity building programs.**

One of the effective tools to struggle against disinformation is the development of the communications specialists' skills and abilities to work with information. It is necessary to improve the strategic communication of state agencies and strengthen the human, financial, and technical resources of communications departments.



## Expected Results

- Developing and implementing a state policy aimed at the goals and directions of this Concept;
- Developing the knowledge and skills of citizens regarding media freedoms, which will contribute to managing disinformation risks and reducing the dissemination of disinformation;
- Developing and adopting the concept and action plan of media literacy, based thereon, creating guidelines and educational programs to integrate media literacy into general education, and teaching by qualified specialists;
- Implementing more transparent, accountability-oriented formats and platforms of state agencies and improving the existing resources;
- Improving the work of communications specialists in state agencies and developing media literacy and fact-checking skills;
- Ensuring the active cooperation between the state and the private sector in the struggle against disinformation and improving the transparency and accountability of the private sector.

## Key Performance Indicators of the Concept

The key performance indicators of the Concept are:

Goal	Indicator	Data Source	Expected Result
<p><b>Strengthen the capacities of the RA institutions to detect disinformation, limit its spread, properly inform the public about disinformation, and analyze the results of the implemented works.</b></p>	<p>At least 50% of the employees of the communications departments of state agencies have practical knowledge and skills in combating disinformation.</p>	<p>Research on performance evaluation.</p>	<p>Creating a unified structure of communications departments of state agencies.</p>
	<p>60% of the needs of communications departments of state bodies are met.</p>	<p>Research by CSO and international partners, results of the monitoring.</p>	<p>Implementing more transparent, accountability-oriented formats and platforms of state agencies and improving the existing resources.</p>
	<p>The guidelines and advisory procedures have been developed and adopted.</p>		<p>Developing and adopting the Government's general communication strategy.</p>
	<p>The notions and regulations to form the strategic communication department have been clarified.</p>		<p>Developing and adopting standard operating procedures for communication protocols in different situations.</p>
	<p>The monitoring on the implementation of the communication strategy and the rules of conduct on social media platforms and cyber</p>		<p>Carrying out regular professional trainings and developing the communication skills of the staff.</p>

	<p>security guidelines has been carried out. A mechanism has been introduced to eliminate inconsistency.</p>		<p>Adopting different visuals based on “One Government” brand, brandbook. Branding is used in all means of government communication.</p>
<p><b>Contribute to the accessibility of official information and proactive accountability.</b></p>	<p>Developing and adopting a unified and updated standard for official websites.</p> <p>70% of the official websites have been adapted to the unified standard.</p> <p>The unified statistics on freedom of information are published by all state administration bodies in accordance with the unified format.</p> <p>Self-assessment and assessment systems of transparency and accountability of state agencies have been introduced.</p>	<p>Public opinion survey - once a year (baseline and endline).</p> <p>Monitoring results of the official websites.</p> <p>Freedom of information monitoring results.</p> <p>Official annual statistics of state agencies on freedom of information.</p> <p>Annual reports of the Personal Data Protection Agency.</p> <p>Annual reports of state agencies managing information.</p> <p>Observation results of specialized CSOs.</p>	<p>Developing and implementing a state policy aimed at the goals and directions of this Concept.</p> <p>Implementing more transparent, accountability-oriented formats and platforms of state agencies and improving the existing resources.</p> <p>Reforming the unified standard for official websites.</p> <p>Ensuring the compilation and publication of annual statistics on freedom of information by state administration bodies.</p>
<p><b>Create effective mechanisms to</b></p>	<p>For the purpose of cooperation, forming</p>	<p>Research on measuring the</p>	<p>Creating cooperation platforms necessary</p>

<p><b>prevent/counter and reduce disinformation, hybrid information attacks/campaigns, taking into account, implementing, and localizing international best practices.</b></p>	<p>a stable dialogue platform with the involvement and participation of the private sector.</p> <p>Promoting accountability and transparency of the private sector.</p> <p>Funding and initiating programs by the private sector that offer a technological solution to struggle against disinformation.</p> <p>Increasing public awareness of media self-regulation and extrajudicial bodies.</p> <p>Creating direct dialogue channels between the state and social platforms.</p>	<p>effectiveness of the work of cooperation group.</p> <p>Media monitoring.</p> <p>Public opinion survey (baseline and endline).</p> <p>Number of applications addressed to extrajudicial bodies and aimed at solving informational disputes.</p> <p>Reduction in the number of cases aimed at solving informational disputes.</p>	<p>for the implementation of the Concept, mapping the resources, and approving the tools.</p> <p>Adopting the Concept of the development of media self-regulation.</p> <p>Expanding the scope of powers of the independent regulatory body (Television and Radio Commission) by including the development of media literacy as a mandatory component.</p> <p>Implementing 6 awareness campaigns carried out by the regulatory body and aimed at raising public awareness regarding the role and mission of the media, the role and functions of regulatory and self-regulatory bodies, as well as the importance and</p>
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			<p>regulations of beneficial ownership transparency of the media.</p> <p>Implementing 3 innovative ideas that received funding in the public administration system.</p> <p>Introducing incentive mechanisms for private companies.</p> <p>Implementing at least 10 researches per year in prestigious international scientific centers and universities on the basis of cooperation memoranda.</p>
<p><b>Form appropriate public response to disinformation through national civic education programs.</b></p>	<p>Creating a coordination group for media literacy programs.</p> <p>Developing and adopting the media literacy concept and action plan.</p> <p>Implementing the educational module of media literacy in general education.</p>	<p>Research measuring the effectiveness of educational programs.</p> <p>Monitoring of course attendance.</p> <p>Public opinion survey - once a year (baseline and endline).</p>	<p>Developing and adopting the concept and action plan of media literacy, based thereon, creating guidelines and educational programs to integrate media literacy into general education, and teaching by qualified specialists.</p>

	<p>Introducing the subject of media literacy for students of all majors in at least 5 universities.</p> <p>Developing the abilities and skills of pre-primary school teachers, school teachers, and university lecturers.</p> <p>Establishing media centers in libraries (public and school).</p> <p>Creating an accessible online educational resource for adults that brings together educational resources developed by various organizations.</p>		<p>Integrating media literacy into general education in accordance with the new standard.</p> <p>Integration guidelines have been developed for PPSs and are implemented.</p> <p>PPSs and schools are equipped with the necessary equipment for media consumption and media creation (30% of institutions).</p> <p>Cyber security guidelines and mechanisms have been developed for PPSs and schools; safe and quality internet is provided (in at least 50% of institutions).</p> <p>An elective subject of media literacy has been introduced in all state universities, and it has also been recommended to private universities.</p> <p>Implementing awareness</p>
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			<p>campaigns to spread media literacy among the general public.</p> <p>The unified platform of media literacy resources is available to all interested parties, structures, and the general public.</p> <p>Developing the knowledge and skills of citizens regarding media freedoms, which will contribute to managing disinformation risks and reducing the dissemination of disinformation.</p>
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## Target Groups of the Concept

The target group of the Concept is quite comprehensive, taking into account the working group's function of developing actions and monitoring results. As a final result, it is planned to directly or indirectly include at least 70% of the RA population, with the involvement of targets of different age thresholds and social strata, because the success of the Concept directly depends on the inclusiveness of its actions.

However, it is important to single out some primary targets, which with their direct participation can play a big role in increasing media literacy:

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

As a result of working with the mentioned primary targets, it is possible to influence the secondary target groups and the whole society.



## Concept Directions

The RA Government Concept of the struggle against disinformation includes 3 strategic directions with a corresponding complex of 12 actions.

Direction	Action
<p><b>(1) Strengthen the capacity of state institutions of the Republic of Armenia to prevent, detect, and analyze disinformation.</b></p>	<p>1.1 Improve the strategic communication of state agencies and strengthen the human, financial, and technical resources of communications departments.</p> <p>1.2 Improve the proactive transparency of state agencies.</p> <p>1.3 Introduce a system to assess the transparency and accountability of state agencies.</p>
<p><b>(2) Improve cooperation and mobilize the private sector.</b></p>	<p>2.1 Improve cooperation and dialogue.</p> <p>2.2 Cooperate with fact-checking platforms.</p> <p>2.3 Cooperate to promote media co-regulation and self-regulation.</p> <p>2.4 Engage and mobilize the private sector.</p>
<p><b>(3) Increase the level of knowledge and media literacy about media freedoms, forming a public resistance to disinformation.</b></p>	<p>3.1 Develop and adopt media literacy concept, action plan or budget programs in an inclusive format.</p> <p>3.2 Integrate media literacy into education.</p> <p>3.3 Work with groups excluded from the general education system.</p> <p>3.4 Carry out trainings and develop the skills of public servants (including also community servants).</p>

## **Direction 1: Strengthen the Capacity of State Institutions of the Republic of Armenia to Prevent, Detect, and Analyze Disinformation**

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

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

The effectiveness of the struggle against disinformation and related educational programs substantially depends on the awareness of target groups and the general public.

To increase the efficiency of communication with state agencies, it is required to take the following steps:

- **Establishing a unified framework of communications departments of state agencies and replenishing them with human, financial, and technical resources;**
- **Carrying out regular professional trainings and developing the skills of the staff;**
- **Developing and adopting guidelines and advisory procedures;**
- **Reorganizing the work of communications departments;**
- **Developing a general communication strategy and communication protocols for the Government.**

#### **Establishing a unified framework of communications departments of state agencies and replenishing them with human, financial, and technical resources**

The communications departments of state agencies differ from each other in structure. They have varying rosters, and there is no systematic and unified approach.

It is necessary to map and analyze the current situation, which will allow to exclude the repetition of several similar positions in the newly-developed structure and come up with a unified structure of departments that, depending on the characteristics of the state department, may be subject to certain changes. These departments will also be provided with a position of a specialist dealing with strategic communication.

#### **Carrying out regular professional trainings and developing the skills of the staff**

Communication is a rapidly developing field. New tools and directions of information dissemination and bilateral communication are constantly appearing. Employees in the communications departments of state agencies should undergo regular training, which can cover the following topics: social media management, design, the struggle against disinformation, strategic communication, behavioral science, etc.

### **Reorganizing the work of communications departments**

Dissemination of information by state departments should have 2 major directions: proactive dissemination of their own content and struggle against fake news/negation of fake news.

The concept of communication against disinformation should have a more intense, repeated and nudge content to complement other directions of the toolkit.

It is necessary to create a clear mechanism/procedure to respond to/deny fake news, which will include the following steps:

- Have one person in communications departments who will be in charge of monitoring and promptly identifying false information related to the field;
- Assess the scale or risk of disseminating false information, on the basis of which the need, level, and platform of responding to disinformation should be determined (comment on social media, press release, interview with the head of the corresponding department, interview with the head of the state department);
- Develop content that denies false information, which should be accurate from a professional point of view and at the same time easily comprehensible by the public;
- Develop guidelines/resources.

### **Developing a general communication strategy and communication protocols for the Government**

All state agencies work towards the implementation of the unified vision of the government, and regarding the components of that vision, it is necessary to develop a unified communication strategy, which each department will localize according to its mandate.

In addition, it is necessary to develop the essential communication guidelines and protocol for the joint representation of the government, striving to increase the reputation of the established “Government Brand.”

The struggle against disinformation should become one of the components of the unified communication strategy, the goals of which are:

- Increase public awareness of the risks associated with the dissemination of disinformation;
- Present the toolkit for combating disinformation and ensure public support for its implementation;
- Make publicly available the steps and knowledge necessary to detect and prevent the dissemination of disinformation;
- Promote fact-checking platforms.

**The bodies coordinating and implementing the communication strategy are:**

The body coordinating the communication strategy is the “Public Relations and Information Center” SNCO operating under the Office of the Prime Minister of the Republic of Armenia.

**The bodies implementing the Concept are:**

- The RA state administration bodies, represented by information and public relations departments;
- Policy-making units in state departments responsible for public communication (MESCS, Ministry of Justice, National Assembly, MFA, the Office of the President of the Republic of Armenia, etc.);
- Representatives of mass media, the media sector;
- Non-governmental organizations operating in the field of communication.

**The bodies supporting the Concept are:**

- International organizations and regional associations operating in the field of communication;
- Local and foreign structures, donor organizations.

## 1.2 Improve the proactive transparency of state agencies

To make the struggle against disinformation more effective, it is planned to improve the level of proactive transparency in the management system.<sup>10</sup> The essence of proactive transparency is that state bodies publish information related to their activities on their own initiative, based on the principles of accessibility, relevance and completeness, and objectivity.

State agencies should take ambitious measures to fully disclose official documents of public interest both on their own initiative and upon request to promote open and efficient management and prevent the emergence of false information.

For this purpose, it is necessary to carry out the following actions:

### 1.2.1 Criteria for official websites

It is necessary to develop unified standards for websites and make sure that official websites are adapted to the needs of people with disabilities. The information subject to mandatory publication defined by the legislation and the changes made to them should be published in time and in full. Information should be published on official websites in an open data format, ensuring it is available and accessible to everyone.

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<sup>10</sup> See FOICA, “Freedom of Information in the RA,” Research, <https://foi.am/researches/4662>

### 1.3 Introduce a system to assess the transparency and accountability of state agencies

To ensure the required level of transparency and accountability of state agencies,<sup>11</sup> it is necessary to increase the influence of control over the legislation on freedom of information by introducing a system to assess the bodies. The practice of responding to requests for information and the provision of proactive transparency should undergo periodic assessments to identify the existing gaps and problems and manage them in a timely manner.

The assessment system of freedom of information and transparency consists of two main subsystems:

- External assessment - This component reveals the vision of the FOI general assessment. Particularly, how, by which body, at what intervals and on the basis of what criteria the FOI general assessment will be carried out.
- Self-assessment (internal assessment) - This component includes the methodology of self-assessment by the information holder, the criteria that must be taken into account by the information holder, as well as advisory instructions on the main FOI functions that the information holder is obliged to carry out before implementing the FOI self-assessment.

The main purpose of the assessment is to form reliable data on the current state of transparency and freedom of information in the given body, highlight the problems in the field of practice and the application of the legislation, alert about them, enabling the competent bodies and civil society to be persistent in solving these problems in a timely and quick manner.

The following are subject to assessment/self-assessment:

- Reactive provision of freedom of information, response to FOI requests;
- Grounds for refusal to provide information and order maintenance;
- Proactive provision of freedom of information;
- Institute of the FOI official;
- Fulfillment of the duty of maintaining and publishing FOI statistics;
- Sources of forming official statistics on requests for information;
- Effectiveness of appeals for violations of the right to receive information;
- Unified platform for electronic requests for information.

Self-assessment should be carried out at least once a year.

The self-assessment should be carried out by the information holder based on the freedom of information self-assessment questionnaire and methodology.

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<sup>11</sup> See FOICA, "Freedom of Information in the RA," Research, <https://foi.am/researches/4662>

The self-assessment questionnaire includes 80 questions-criteria in regard to the processing of requests for information, grounds for refusal, proactive provision of accessibility, FOI official, FOI statistics management, publication, sources of statistics formation, and the unified platform for electronic requests for information and options for possible answers to each question. The questions-standards refer to the reactive provision of FOI (the practice of processing requests for information), refusals and grounds for refusal, mechanisms to ensure proactive transparency, the institute of the FOI official, the fulfillment of the duty to maintain and publish FOI statistics and the sources of statistics, as well as the use of a unified platform for electronic requests for information.

The results obtained due to the self-assessment system should be compared with the results of the external assessment. As a result of the assessment, the state administration bodies shall be indexed according to the level of transparency in their structure.

## Direction 2: Improve Cooperation and Mobilize the Private Sector

The effectiveness of the struggle against disinformation largely depends on the cooperation of the stakeholders, the establishment of common principles, and the systematic monitoring of their consistency. The uncoordinated and inconsistent behavior of state bodies, organizations operating in the information and legal sectors, journalists and experts in the field can lead to the non-application of relevant legislation and the reduction of the effectiveness of educational programs.

**Thus, the main goal of the cooperation direction during the implementation of the Concept of the struggle against disinformation is to ensure effective cooperation with all stakeholders.**

The sub-goals of this direction are:

- Form a format of cooperation with organizations, bodies, individuals, including the private sector, necessary for the effective implementation of the national Concept of the struggle against disinformation;
- Define the directions of cooperation and highlight opportunities;
- Create necessary mechanisms for cooperation.

The struggle against disinformation 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 Concept, the following mechanisms and directions for cooperation in regard to the struggle against disinformation are proposed:

### 2.1 Establish a working group

Establishing a working group by the relevant specialists of cooperating bodies (heads of the information and public relations department, editors, journalists, public relations specialists, representatives of non-governmental organizations, etc.) under the coordination of the “Public Relations and Information Center” SNCO. The working group shall also include the representatives of the interested state departments represented by MFA, MESCS, Ministry of Justice, NCEDI, Human Rights Defender, Ministry of Defense, etc., as well as representatives of private organizations operating in the field of communication.

The goals of the working group are:

- Discuss and finalize the national Concept against disinformation, develop the action plan;
- Effectively distribute the roles for Concept implementation;

- Monitor the Concept implementation;
- Develop new tools and platforms to struggle against disinformation, with the involvement of several authorities;
- Distribute the available resources and carry out fundraising activities, if necessary;
- Use their own platforms for public awareness campaigns.

The details of the 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, by notifying the relevant organizations and other stakeholders of the establishment of the working group.

The struggle against disinformation requires the introduction of prompt response mechanisms, both at individual department and systemic levels. In this context, the development of an online communication platform will provide an opportunity to inform the 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 and include both the members of the working group and other stakeholders and officials in the field.

The Ministry of Foreign Affairs of the Republic of Armenia, in cooperation with other state institutions of the Republic of Armenia, should undertake the organizational functions of the activities carried out outside the territory of the Republic of Armenia within the framework of the struggle against disinformation spreading against the state, the public or the nation on international platforms. When disinformation spreads through the use of 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 Cooperate with fact-checking platforms

An active cooperation framework shall be formed with independent fact-checking platforms. Regular discussions shall be organized to discuss the current developments and trends in the field and exchange information.

There shall also be cooperation with these platforms by providing complete and timely data so that fact-checking platforms are able to fully perform their functions.

## 2.3 Cooperate to promote media co-regulation and self-regulation



The agenda of the struggle against disinformation also includes the following: ensuring the transparency of beneficial owners of the media and funding, promoting and strengthening the self-regulation and coordination<sup>12</sup> mechanisms of the media.

The regulations to ensure the transparency of beneficial owners of the media have been in force since 2021, and the main focus within the framework of this Concept is the full implementation of the legal provisions ensuring the BO transparency. The data on the beneficial owners of the media should be available and accessible to the public through a public open register.

The mechanisms of self-regulation and coordination are essential in the struggle against disinformation. In recent documents published by the Council of Europe, it is clearly emphasized that the member states bear obligations related to self-regulation, providing adequate financing and legal support for self-regulation and coordination mechanisms to ensure independence and financial stability.<sup>13</sup>

Some work has already been done in the direction of self-regulation support. Particularly, according to the 2020 changes made to the Law “On Audiovisual Media,” the code of professional ethics and self-regulation mechanisms have become mandatory for the broadcasting media participating in licensing tenders, although the practice of applying these measures is still not sufficient. It is envisaged to continue creating a general favorable environment and ensuring a sufficient level of public awareness of the potential role of self-regulatory mechanisms, such as the Media Ethics Observatory<sup>14</sup> and the Information Disputes Council,<sup>15</sup> which can increase the media commitment to content quality control.

The main directions of the Government activity towards the promotion of self-regulation are presented in the self-regulation development Concept developed in 2022. The question of the membership of the media in the established mechanisms of self-regulation and active involvement in the process is primary.

At the same time, regulations shall be established to develop and adopt ethical codes of conduct for the Public Television and Radio.

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<sup>12</sup> Coordination includes media regulatory mechanisms and self-regulation tools. It is more inclusive, because the state, regulatory bodies, as well as the media, CSOs, and citizens are involved in the process.

<sup>13</sup> See Council of Europe, Declaration by the Committee of Ministers on the financial sustainability of quality journalism in the digital age - Decl(13/02/2019)2 (2019),

[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> See [www.ypc.am](http://www.ypc.am)

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

The scope of powers of the independent regulatory body (National Television and Radio Commission) shall be expanded, including the mandatory component of media literacy development.

The regulatory body shall ensure the increase in public awareness regarding the role and mission of the media, the role and functions of regulatory and self-regulatory bodies, as well as the importance and regulations of beneficial ownership transparency of the media.

## 2.4 Engage and mobilize the private sector

The role of the private sector is also pivotal in the struggle against 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 struggle against disinformation 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 struggle against it. There are already software based on artificial intelligence and machine learning (e.g. PHEME, WeVerify, InVID, ChekDesk, Veri.ly, Citizen Des, Emergent),<sup>16</sup> which, although in need of further development, can still be considered effective steps.

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

It is necessary to promote cooperation between the state and social platforms by creating channels of direct dialogue to make it possible for them to directly interact about the transparency of 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 topics. The dialogue shall also contribute to the introduction of co-regulation mechanisms on social platforms. These steps shall make it possible to struggle against large-scale waves of disinformation on social platforms.

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<sup>16</sup> See EPRS | European Parliamentary Research Service, Automated tackling of disinformation, 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)

The private sector should be actively involved in the struggle against disinformation within the framework of social responsibility.

In the struggle against disinformation, it is necessary to emphasize the improvement of the transparency and accountability of the private sector as a guarantee of public trust and security of the country's economic system.

## Direction 3: Increase the Level of Knowledge and Media Literacy about Media Freedoms, Forming a Public Resistance to Disinformation

The effectiveness of the efforts of the journalistic community and the professional fact-checking initiatives in the struggle against disinformation largely depends on the level of media literacy of the society: to what extent do people understand the meaning and purpose of democracy and freedom of speech, 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?

57% of internet users in the world find fake news troubling.<sup>17</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>18</sup> People need to understand the infosphere in a better way, as well as obtain the skills necessary for recognizing and double-checking suspicious information.

The directive of the European Parliament on the audiovisual media defines media literacy as the set of skills, knowledge, and understanding necessary for using the media effectively and safely; the citizens should be able to access information, critically analyze it, create media content. The document also emphasizes that in addition to technological education, the role of critical thinking is very important for making judgments, analyzing complex reality, and distinguishing between opinion and fact.<sup>19</sup>

Based on these approaches, many European countries have incorporated the development of media literacy skills in the education system, guided by the approach that it is the responsibility of the state to develop strategic documents and programs and ensure the citizens' media education.<sup>20</sup>

Teaching approaches are different in European countries: breaking down the process into programs of different subjects, offering separate target school subjects (media literacy, media

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<sup>17</sup> See Lloyds Register Foundation, World Risk Poll (Powered by Gallup), 2020, <https://tinyurl.com/mksecjb6>

<sup>18</sup> See Media Initiative Center and CRRC–Armenia, Media Consumption in Armenia, 2022, <https://media.am/hy/lab/2022/01/26/31473/>

<sup>19</sup> See 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 59, <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>

<sup>20</sup> See 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>

production, film literacy) or short modules with the duration of 2-3 months, 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<sup>21</sup> 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 (interest groups, libraries);
- Professional trainings should be carried out (policy makers, government officials, journalists, health workers, personnel from civil society organizations, etc.).

Many countries establish responsible bodies adjunct to the Government and the Ministry of Education to coordinate the task of disseminating media literacy.<sup>22</sup>

International 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>23</sup>

### 3.1 Steps taken to integrate media literacy into general education, directions of media literacy development

To institutionalize media education, some organizations have cooperated with the Ministry of Education, Science, Culture and Sports, universities, and other educational institutions.

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<sup>21</sup> See UNESCO, Global Standards for Media and Information Literacy Curricula Development Guidelines, 2022, Page 30,

[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> For example, since the 1940s 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), 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. See National Audiovisual Institute, Finland, <https://kavi.fi/>

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, as well as coordinates the work of the network of other media literacy institutions and organizations. See Swedish Media Council, <https://www.statensmedierad.se/>

In Great Britain, for example, "Ofcom" is responsible for media literacy. "Ofcom" is an independent media regulatory body that collaborates closely with the Government and follows the strategies of media literacy. See Department for Digital, Culture, Media and Sport, UK, Online Media Literacy Strategy, 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>23</sup> See Finnish Ministry of Education and Culture, Media Literacy in Finland: National Media Education Policy, 2019, <https://medialukutaitosuomessa.fi/mediaeducationpolicy.pdf>

Since 2011, the Media Initiatives Center has been conducting trainings for teachers and instructors, using materials from the first handbook in Armenian titled “Media Literacy” and endorsed by the MESCS.<sup>24</sup> With the memorandum signed between the MIC and the Ministry in 2017, for the first time the state basically gave prominence to the integration of media literacy into schools and assumed the commitment to support that initiative.

For the past two years, the [Public Journalism Club](#) has been actively supporting the efforts to integrate media literacy into the pre-school education system by training educators and developing and localizing teaching materials and recommendations.

The Media Education Center actively cooperates with schools in the field of digital literacy.

[The Freedom of Information Center of Armenia](#) seeks to develop the fact-checking skills of young people by establishing fact-checking laboratories in schools and universities. At the same time, the Center regularly organizes fact-checking trainings for civil and community servants, as well as business representatives.<sup>25</sup>

In recent years, Media Literacy Week has been celebrated by the Media Initiatives Center in Armenia with state support, which is the localization of UNESCO’s global initiative. All high schools in Armenia, as well as numerous universities, kindergartens, educational and cultural centers and organizations, and media outlets join the Media Literacy Week in late October or early November by organizing training courses, events, and awareness campaigns.

The cooperation with the state became especially active after the 2018 revolution. The Ministry of Education, Science, Culture and Sports has included media literacy in the large-scale reforms of education. In 2022, with the support of UNESCO, the MFA, in association with the MIC, developed and disseminated the “Media-literate Citizen’s Guide” handbook in educational institutions.<sup>26</sup>

The state standard<sup>27</sup> for general education of the Republic of Armenia (also the state standard for pre-school 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.

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<sup>24</sup> See “Media Literacy” educational-methodical handbook, Media Initiatives Center, 2013, <https://media.am/hy/lab/2020/04/16/17917/>

<sup>25</sup> See, for example, Freedom of Information Center, “Fact-checking for Officials” training program, 2021, <https://tinyurl.com/3k6zk4dz>

<sup>26</sup> See Media Initiatives Center, Ministry of Foreign Affairs of the Republic of Armenia, “Media-literate Citizen’s Guide,” 2022, <https://media.am/hy/lab/2022/05/02/32646/>

<sup>27</sup> See Government Decision N136 of 2021 “On Approving the State Standard for General Education,” <https://www.arlis.am/documentview.aspx?docid=149788>

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

**In addition to the opportunities of using digital media, the learners shall also recognize the risks associated with them; they shall be able to evaluate and transform their behavior in the digital world from the standpoint of security, responsibility, and ethics. The learners shall possess technical and creative skills to create media products; they shall also be able to effectively apply media tools for exercising civil rights and participating in democratic processes.**

The state standards for pre-school and general education are the basis of new educational programs, and those who develop and teach them shall 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 envisages the model of teaching media literacy: it should be integrated into the curricula and teaching methods of different school subjects. Through social studies, digital literacy, mathematics, physics, informatics, and other subjects, the learner should gain knowledge in checking sources, analyzing information, using critical thinking, formulating their own thoughts, and using media tools.

The programs elaborated under the new standard are currently in a pilot phase in Tavush Province. In 2021, ahead of the certification exams, intensive trainings for teachers were held.

An important direction for the development of media literacy is also the strengthening of scientific research ties by evaluating the impact of media literacy on politics. This shall only be possible through the close cooperation and exchange of experience with Armenian scientists, specialists in the field, experts with international reputation, and the scientific community.

CHIEF OF STAFF OF THE PRIME  
MINISTER OF THE REPUBLIC OF  
ARMENIA

28.12.2023

CONFIRMED  
BY ELECTRONIC  
SIGNATURE

A. HARUTYUNYAN

