



Hellenic Republic  
**National Commission  
for Bioethics & Technoethics**

**RECOMMENDATION\***  
on combatting disinformation during the Covid-19 health crisis

**February 2022**

**NATIONAL COMMISSION FOR BIOETHICS & TECHNOETHICS**

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*\*this is not an official translation*

This document details further the Recommendation of the National Commission for Bioethics & Technoethics (NCBT) “On the mandatory vaccination of certain professional groups in the health sector” [14.06.2021]. That Recommendation addresses the problem of disinformation, inaccurate information (misinformation), fake news, and the problem of malicious information (malinformation) as dynamic obstacles to the development of the population’s vaccination against the Covid-19 pandemic. These obstacles, known as 'information disorders'<sup>1</sup>, are likely to interfere with further preventive public health measures. Indeed, distorted perceptions and misconceptions, combined with the complex and changing environment of information on the internet, continue to 'create enemies' and encourage hate speech<sup>2</sup> and disbelief towards science and the health system<sup>3</sup>, creating a toxic climate of insecurity, particularly in regard to the issue of vaccination<sup>4</sup>.

According to a World Health Organization (WHO) study, disinformation has direct and measurable consequences. Specifically, in the first three months of 2020, 6000 people worldwide were hospitalized due to disinformation on Covid-19 (infodemic), and at least 800 passed away, even though the consequences of the disease could have been prevented in time<sup>5</sup>. As the pandemic progresses, these figures appear to be increasing dramatically. In general, there is a now proven negative correlation between the adoption of falsified/misleading news or conspiracy narratives about Covid-19 and taking the appropriate measures to protect public health<sup>6</sup>. According to a recent nationwide survey<sup>7</sup>, one out of five citizens who decided not to vaccinate declared that they were influenced by what they had read or heard.

The Covid-19 health crisis has highlighted the importance of proper information, citizens’ awareness, and education on the issues of disinformation and misinformation (information disorders in general). These conditions are particularly reinforced by the use of new technological tools such as Artificial Intelligence, but also by the potential

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1 See <https://fakenews.publicdatalab.org/>

2 Velasquez, N. et al. (2021). Online hate network spreads malicious COVID-19 content outside the control of individual social media platforms. *Scientific Reports*, 11(1), 1-8.

3 <https://med.stanford.edu/news/all-news/2021/09/infodemic-covid-19.html>

4 As appears in the case of Italy, disinformation increasingly targets the experts, the scientific community, the vaccines and the vaccination campaigns. See <https://www.disinfo.eu/publications/the-disinformation-blame-game-whom-do-covid-19-hoaxes-attack-in-italy/>

5 Fighting misinformation in the time of COVID-19, one click at a time, World Health Organization (WHO), <https://www.who.int/news-room/feature-stories/detail/fighting-misinformation-in-the-timeof-covid-19-one-click-at-a-time>

6 E.g., see Allington, D., Duffy, B., Wessely, S., Dhavan, N., & Rubin, J. (2021). Health-protective behaviour, social media usage and conspiracy belief during the COVID-19 public health emergency. *Psychological Medicine*, 51(10), 1763-1769.

7 <https://www.dianeosis.org/2021/11/oi-ellines-meta-apo-20-mines-pandimias/>

for a personalized approach and communication with citizens through popular digital platforms. At the same time, empirical research<sup>8</sup> has shown that Greece is one of the countries with the lowest rates of citizens' trust in the mass media (mainly television channels), which reinforces the tendency of distrust and negative attitude towards information and proposed measures coming from official sources. Individual beliefs and practices, conditions of ideological or emotional polarization, and the broader cultural context can also influence the exposure to misinformation. It should be noted that Greece has a high degree of susceptibility to digital misinformation<sup>9</sup>. Therefore, arises the need for ethical consideration in relevance, which includes at the same time the ethics of public health, the ethics of the internet, and the ethics of public information<sup>10</sup>.

As the issue of misinformation on the internet is particularly complex and with many components, addressing it through public policies requires special attention on many levels. In the past few years, there have been presented various recommendations to address the issue by different institutions, such as the European Commission<sup>11</sup>, the OECD<sup>12</sup>, UNESCO<sup>13</sup> and the United Nations<sup>14</sup>.

Some European countries<sup>15</sup> have set up specialized services to combat disinformation, while the most coordinated action so far is carried out by the European Digital Media Observatory (EDMO)<sup>16</sup>. Already eight national EDMO hubs have already launched their operations in autumn 2021<sup>17</sup>, while a pilot establishment of structures is expected, with the prospect of further support from the EU Member State governments. A common guideline of the European Commission for these hubs is their independence

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8 E.g., see <https://www.digitalnewsreport.org/survey/2020/>

9 Humprecht, E., Esser, F., & Van Aelst, P. (2020). Resilience to online disinformation: A framework for cross-national comparative research. *The International Journal of Press/Politics*, 25(3), 493-516. See also, [https://read.oecd-ilibrary.org/science-and-technology/how-s-life-in-the-digital-age\\_9789264311800-en#page149](https://read.oecd-ilibrary.org/science-and-technology/how-s-life-in-the-digital-age_9789264311800-en#page149)

10 See <https://en.unesco.org/themes/information-ethics>

11 <https://digital-strategy.ec.europa.eu/en/news/commission-appoints-members-high-level-expert-group-fake-news-and-online-disinformation>

12 Matasick, C., Alfonsi, C., & Bellantoni, A. (2020). Governance responses to disinformation: How open government principles can inform policy options (OECD Working Papers on Public Governance No. 39). Paris: OECD.

13 <https://www.broadbandcommission.org/publication/balancing-act-counteracting-digital-disinformation/>

14 Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Irene Khan on "Disinformation and freedom of opinion and expression", Human Rights Council (2021), <https://undocs.org/A/HRC/47/25>

15 See, for instance the case of Sweden ([www.mpf.se/en/](http://www.mpf.se/en/)) and of the U.K. (<https://gcs.civilservice.gov.uk/blog/how-we-are-fighting-the-spread-of-false-coronavirus-information-online/>).

16 <https://edmo.eu/>

17 <https://edmo.eu/2021/05/26/national-edmo-hubs-announced/>

from national governments, which can advise and contribute, but not control, in part or completely, the function and conclusions of the disinformation observatories.

Having thoroughly studied and assessed the current situation, and following a process of hearings with relevant stakeholders<sup>18</sup>, the NCBT has come to a brief classification of the proposed policies around three main pillars: a) developing services of verification of allegations and news, b) improving the skills, knowledge and media literacy of the public, and empowering stakeholders (citizens, journalists, private and public institutions), (c) improving transparency and promoting a code of ethics and conduct.

### **a. Developing services of allegations and news verification**

An essential and immediately applicable approach to effectively address the problem of disinformation is the promotion and enhancement of collaborative initiatives to cross-check, ascertain and verify (confirm or deny) verifiable allegations and news, circulated by any source within the contemporary digital environment<sup>19</sup>.

Recent studies have shown that, particularly in the health sector, false or misleading allegations should not be disregarded on the grounds that they are not reproduced in the mainstream media. In this case, the correct response consists of the immediate refutation based on sound research and objective evidence and arguments<sup>20</sup>, emphasizing on the widest possible publicity, as soon as possible after the incident's emergence. This response should include the use of appropriate technological tools

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18 The following persons were invited to attend the hearings held on 3 and 4 February 2022

1) Emiliios Perdikaris (Athens News Agency - Macedonian Press Agency), 2) Nikos Sarris (EDMO), 3) Elpida (Elpida).

(Homo Digitalis), 4) Dimitris Alikakos (Ellinika Hoaxes), 5) Theocharis Filippopoulos (ENED), 6) Giorgos Plios (Dept. of Communication

& Media Studies, UoA), 7) Anastasios Economou (ERT), 8) Yannis Emiris (EK

Athens), Manolis Plionis (EAA), & Nikos Demertzis (EKKE), as a delegation of the Session of the

9) Nikos Panagiotou & Andreas Veglis (Department of Journalism & Mass Communications, Aristotle University of Thessaloniki), 10) Betty

Tsakarestou (Department of Communication, Media & Culture, Panteion University), 11) Clementine Clementine Diakomanoli (Delegation of the European Commission in Greece), 12) Athanasios Koutromanos & Georgios Anagnostaras (National Council for Radio and Television), 13) Vassilis Vassilopoulos (Civic Information Office).

A relevant invitation was also sent to ΕΣΗΕΑ.

19 <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/digital-transformation-news-media-and-rise-disinformation-and-fake-news>

20 <https://www.niemanlab.org/2021/11/address-dont-sidestep-health-misinformation-to-debunk-falsehoods-study-finds/>

to help detect and classify/evaluate (verifiable) allegations and news, but final decisions should be made in collaboration with qualified scientists/researchers<sup>21</sup>.

The establishment of an independent **National Disinformation Observatory** would serve this purpose. However, the Observatory should be at the top of the pyramid of a broader institution (ecosystem) of interdisciplinary networking, with experts offering their services, each regarding their own field when needed. Such a 'multilateral' institution should link researchers, journalists, scientists from different sectors (technology, natural studies, humanities, and social sciences), political representatives, and even representatives of civil society and social networking platforms. Its mission shall be to consult, ensure the data disclosure, and manage the guidelines that are being developed, but also to support any particular initiatives against misinformation.

**b) Cultivation and acquisition of media literacy and digital skills by everyone (citizens, journalists, private and public stakeholders)**

In this context, it is important to develop coordinated, targeted, and multi-level educational campaigns on the use of digital multimedia and tools, both in schools and universities and in lifelong learning applications (skills and literacy in information, data, and algorithms, technological and digital literacy, media literacy).<sup>22</sup> This kind of education should help digital users to assess the quality of their digital information sources and manage their role as potential misinformation carriers.

In general, it is necessary to take measures to promote a culture of truth-seeking and the development of critical thinking among digital media users. It is very important to train people to identify the source of information, question its reliability, check its validity, and cross-check different sources on the same subject,<sup>23</sup> especially during the uncertain times of the health care system crisis. In addition, digital education must be accessible to the most vulnerable populations, especially young and elderly people, as an integral part of a forward-looking approach to lifelong learning.

As far as journalists are concerned, empowerment is linked to ensuring adequate resources and conditions of professional autonomy, as well as the needed knowledge and skills/multiliteracies, to exercise their profession effectively and provide high quality news in an online environment that is already overloaded with misinformation.

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21 The need for procedures of professionalization and certification of fact-checkers is highlighted, as well as the need to provide the researchers with increased access to data. See, [https://ec.europa.eu/info/strategy/priorities-2019-2024/new-push-european-democracy/european-democracy-action-plan/strengthening-eu-code-practice-disinformation\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/new-push-european-democracy/european-democracy-action-plan/strengthening-eu-code-practice-disinformation_en)

22 See <https://digital-strategy.ec.europa.eu/en/policies/media-literacy>

23 See, e.g., <https://repository.ifla.org/handle/123456789/167> , [https://ec.europa.eu/info/live-worktravel-eu/coronavirus-response/fighting-disinformation/identifying-conspiracy-theories\\_](https://ec.europa.eu/info/live-worktravel-eu/coronavirus-response/fighting-disinformation/identifying-conspiracy-theories_)

### **c) Techno-ethical challenges. Enhancement of transparency and promotion of a code of ethics**

The enhancement of transparency and accountability of the overall media ecosystem, digital or traditional, is fundamental to effectively combat misinformation. Tools for content verification and report of false, distorted, or misleading news in the digital environment, empower citizens by making it possible for them to assess the accuracy of news and the credibility of sources. They also empower society by providing the means and the data to understand the various ways misinformation spreads.

From a techno-ethical point of view, the no-harm principle to the information recipients is fundamental, and in general, the protection of their fundamental rights, including the right to accurate information, have a primary place. Deception and misleading of users, the manipulation of content transmitted either digitally or by conventional means, are ethically and morally unacceptable. They offend the recipients' personhood, undermining the fundamental principle of autonomy. They may cause harm to individuals, threatening their physical and psychological well-being, but also undermine public goods, such as health (see the dissemination of false or distorted news in connection with the pandemic, vaccination, protective measures, etc.). Freedom of speech for every person is a general concept for the protection of a range of actions in communication ethics. Still, freedom of speech (which concerns persons) and the different, in its normative meaning, freedom of the press/media (which concerns the recognition of pluralism and the protection of media - conventional and digital - against censorship) are not absolute concepts. They are limited by the rights of the information recipients not to be subject to deception, misleading, or manipulation.

The harmonization of traditional and new digital media with codes/principles/criteria for informed ethical behavior is essential to combat misinformation and to enhance the citizens' trust in the press and electronic news portals/platforms. The combat against misinformation has to be carried out in the light of the principles of necessity and proportionality and on the basis of achieving a balance between freedom of speech (through the posting of online content) and the right to safe and accurate information, and also between the right of access to public information and the requirement of protection from misleading and malicious news.

To this end, the State, the platforms, the media and the fact-checking organizations should work together with the relevant professional associations to protect the above-mentioned rights, and to adopt clear, responsible, fair, and widely accepted rules of conduct and operation in the new, technologically advanced environment. This can be achieved in two ways:

- by adopting a self-regulatory approach that allows journalists and platforms to define their own codes and rules, and monitor their implementation,

- by applying a commonly agreed regulation/code of ethics in media and platforms and monitoring compliance through the establishment of competent independent authorities, highlighting good practices and publicizing cases of misrepresentation or misleading news and headlines. The contribution of independent authorities, such as the National Council for Radio and Television (NCRTV) and the Hellenic Data Protection Authority, within the framework of their responsibilities and on the basis of good practices developed at the European and international levels, can be important in this regard.