



A Review of Anti-Misinformation/ Disinformation Measures and Actions Taken by Governments and Mainstream Social Media Platforms

Xue Zhang, Dymphles Leong, and Sean Tan

WP348



Table of Contents

Abstract.....	1
Introduction	2
A Review of Governments’ Counter-misinformation/disinformation Measures..	2
1. China	3
2. United States (US)	4
4. United Kingdom (UK)	8
6. Other Jurisdictions	11
A Review of Mainstream Social Media Platforms’ Counter-misinformation/ disinformation Measures.....	11
Counter-misinformation/disinformation Actions	14
1. Governments’ counter-misinformation/disinformation actions	14
2. Mainstream social media platforms’ counter- misinformation/disinformation actions	16
Factors Contributing to the Persistence of Misinformation/Disinformation	20
Implications for Singapore: Ways to Strengthen the Effectiveness of POFMA ..	21
1. Communicating with the public more explicitly and consistently through more communication channels	21
2. Raising public knowledge of fact-checking by weaving media and information literacy into education	21
Conclusion	23
About the Authors	24
About the S. Rajaratnam School of International Studies.....	24
<i>RSIS Working Paper Series</i>	26
Appendix: Other jurisdictions’ counter-misinformation/disinformation measures	28

Abstract

As misinformation/disinformation continues to proliferate across online platforms, governments and social media companies have introduced various countermeasures. Despite ongoing efforts, online falsehoods persist. This study investigated the reasons behind this anomaly through a comparative analysis of counter-misinformation/disinformation legislation across several countries and a review of the measures adopted by social media companies. Using Singapore as a case study, this study also proposed ways to further strengthen the effectiveness of its legislation.

The study found that governments' counter-misinformation/disinformation measures mainly fell into three categories: (i) legislation/regulation, (ii) task force, and (iii) public education. Furthermore, additional counter-misinformation/disinformation actions were adopted by governments and platforms during public health emergencies, election campaigns, and international conflicts – events where misinformation/disinformation tends to surge, carrying greater political and social risks.

Regarding Singapore's efforts to counter misinformation/disinformation, communicating with the public more explicitly and consistently across multiple channels, as well as raising public knowledge of fact-checking by weaving media and information literacy into education, can be considered.

Introduction

Ever since the generation and dissemination of falsehoods gained global attention over the last five years, countries have been exercising greater governance over the Internet for content regulation. A two-pronged approach has generally been used to manage the generation and spread of misinformation: (i) governments' use of legislation and other initiatives, and (ii) self-policing/management by social media companies. Despite such efforts, the rise and proliferation of falsehoods in online spaces have not been contained. This study seeks to examine reasons for this outcome via a comparative analysis of several countries' legislation/approaches, as well as a review of social media companies' efforts.

It is acknowledged that many countries have enacted legislation and implemented policies officially aimed at fighting disinformation and correcting falsehoods. However, critics contend that such measures have also been used to suppress free speech, promote their own disinformation for censorship of truth, and advance propaganda.¹ This report reviews different countermeasures and actions that have been taken so far; the merits or critiques of any country's use of legislation are beyond the scope of this report.

A Review of Governments' Counter-misinformation/disinformation Measures

This section provides an overview of the counter-misinformation/disinformation measures implemented by key global jurisdictions, including China, the European Union (EU), the United Kingdom (UK), and the United States (US).² We also included Malaysia as part of the review, as it was the first Southeast Asian country to introduce a fake news law, even though its Anti-Fake News Act 2018 had a relatively short existence, given the decision to repeal it. A brief summary of measures implemented in other countries is presented in Appendix A.

Based on our review, the counter-misinformation/disinformation measures mainly fell into three aspects: (i) legislation/regulation, (ii) task force, and (iii) public education. The review aims to explore the current and evolving regulatory landscape

¹ Janjira Sombatpoonsiri and Dien Nguyen An Luong, "Justifying Digital Repression Via 'Fighting Fake News'", ISEAS – Yusof Ishak Institute, Accessed 3 September 2025, https://www.iseas.edu.sg/wp-content/uploads/2022/06/TRS11_22.pdf; Andrea E. Kozinowski, "EU's Fight Against Disinformation – Who Owns the Truth?", MediaLaws, 10 July 2025, <https://www.medialaws.eu/eus-fight-against-disinformation-who-owns-the-truth>.

² There have been several attempts to review the counter-misinformation/disinformation measures adopted by various countries. For example, the Poynter Institute for Media Studies, Inc. has created a guide on existing global attempts to legislate against online falsehoods. Although Poynter claims that its content is being updated on an ongoing basis, it was found that some new developments were not covered, such as the UK's Online Safety Act, and the repeal of Malaysia's Anti-Fake News Act 2018. See Daniel Funke and Daniela Flamini, "A Guide to Anti-Misinformation Actions around the World", Poynter, Last modified 2019, <https://www.poynter.org/ifcn/anti-misinformation-actions/>.

for dealing with disinformation and misinformation and draw implications for further improving the effectiveness of the Protection from Online Falsehoods and Manipulation Act (POFMA).

1. China

Legislation

China appears to have the strictest misinformation laws in the world.³ These are derived from three categories of laws and regulations:⁴

- i. The Supreme Law - Constitution of the People's Republic of China
- ii. General Laws - e.g., Criminal Law, Civil Code, Law on Penalties for Administration of Public Security
- iii. Internet Laws and Regulations - e.g., Cybersecurity Law, Administrative Measures for the Internet Information Services, Provisions on the Administration of Deep Synthesis Internet Information Services.

In addition, the Xinjiang Uygur Autonomous Region adopted extra regulations known as Xinjiang Regulations on Preventing and Punishing the Online Transmission of False Information, which was “formulated on the basis of relevant laws and regulations, together with actual conditions in the autonomous region”.⁵

Task Force - Cyberspace Administration of China

The Cyberspace Administration of China (CAC), established in May 2011, is the enforcement agency for the Internet content provision sector, overseeing Internet content regulation and cyberspace security.⁶

The CAC has investigated social media companies for facilitating the spread of rumours. For example, in 2017, the CAC investigated top social media sites such as Weibo and WeChat for failing to comply with cyber laws regarding the circulation of content containing online harms, including rumours.⁷ In 2023, the CAC issued a notice on strengthening the management of “self-media”.⁸ Some of the 13 rules relate to

³ Daniel Funke and Daniela Flamini, “A Guide to Anti-misinformation Actions around the World - China”, Poynter, Last modified 2019, <https://www.poynter.org/ifcn/anti-misinformation-actions/#china>.

⁴ 梁迎修, “法律治理网络谣言, 如何提高威慑力”, *新华访谈*, 7 February 2022, <http://www.xinhuanet.com/talking/character/2022020702.htm>.

⁵ China Law Translate, “Xinjiang Regulations on Preventing and Punishing the Online Transmission of False Information”, 7 December 2016, <https://www.chinalawtranslate.com/en/xinjiang-regulations-on-preventing-and-punishing-the-online-transmission-of-false-information/>.

⁶ Cyberspace Administration of China, “国家互联网信息办公室”, Last modified 1 August 2014, https://www.cac.gov.cn/2014-08/01/c_1111903999.htm.

⁷ Cate Cadell, “China Investigates Top Local Social Media Sites in Push to Control Content”, *Reuters*, 11 August 2017, <https://www.reuters.com/article/us-china-cyber-idUSKBN1AR07K>.

⁸ Cyberspace Administration of China, “关于加强‘自媒体’管理的通知”, Last modified 10 July 2023, http://www.cac.gov.cn/2023-07/10/c_1690638496047430.htm.

countering misinformation.⁹ On 29 August 2018, in collaboration with *Xinhuanet*, the CAC's Illegal and Harmful Information Reporting Centre established the China Internet Joint Rumour Debunking Platform (<https://www.pi Yao.org.cn/>) to provide the general public with an authoritative platform for identifying and reporting rumours.¹⁰ Social media accounts have been set up for more effective and efficient communication with the public, with "Today's Debunking of Rumours" published almost daily.¹¹ "Today's Science Popularisation" and "Today's Reminder" are also published frequently on the WeChat accounts.

Public Education

In 2004, the Ministry of Education issued the National Educational Technology Standards for Primary and Middle School Teachers guidelines, which stressed the importance of media and information literacy (MIL) education to integrate information and communication technologies into the curriculum.¹² In April 2022, the Ministry of Education promulgated the Compulsory Education Information Technology Curriculum Standards (2022 Edition).¹³ The curriculum emphasises core literacies (including digital literacy), improving students' information awareness and fostering a sense of responsibility in the information society.¹⁴

2. United States (US)

Legislation - Countering Foreign Propaganda and Disinformation Act

The 2016 Countering Foreign Propaganda and Disinformation Act enables US government agencies to coordinate information-sharing activities regarding foreign information operations and warfare.¹⁵ The Act also provides funding for journalist training and for "grants and contracts" to specialists in foreign disinformation.¹⁶

⁹ Ibid

¹⁰ 施雨岑, "中国互联网联合辟谣平台正式上线", *新华网*, 29 August 2018, http://www.xinhuanet.com/politics/2018-08/29/c_1123350023.htm.

¹¹ 中国网信办举报中心, 新浪微博, Accessed 28 December 2023, https://weibo.com/12377jbzx?refer_flag=1005055014.

¹² Ministry of Education of the People's Republic of China, 教育部关于印发《中小学教师教育技术能力标准（试行）》的通知. Last modified 11 December 2023. http://www.moe.gov.cn/srcsite/A10/s6991/200412/t20041215_145623.html.

¹³ Ministry of Education of the People's Republic of China, 义务教育信息科技课程标准(2022年版), Last modified 8 April 2022. http://www.moe.gov.cn/srcsite/A26/s8001/202204/t20220420_619921.html.

¹⁴ 新华网, "信息素养专家谈 | 陈庆贵: 开展信息素养教育 培养具有数字素养与技能的公民", *新华网*, 25 August 2023, <http://www.news.cn/science/20230825/4c64e905877e4a7ea307f9ff46fab3a/c.html>.

¹⁵ Congress.gov, "S.3274 - Countering Foreign Propaganda and Disinformation Act", Accessed 22 October 2024, <https://www.congress.gov/bill/114th-congress/senate-bill/3274>.

¹⁶ U.S. Senator Chris Murphy, "Senate Passes Major Murphy-Portman Counter-Propaganda Bill as Part of NDAA", Press Release, 8 December 2016, <https://www.murphy.senate.gov/newsroom/press-releases/senate-passes-major-murphy-portman-counter-propaganda-bill-as-part-of-ndaa>.

Legislation - Proposed Federal Law: Honest Ads Act

The Honest Ads Act was proposed in October 2017 in response to Russia buying and placing political ads on social media during the 2016 US presidential election.¹⁷ This proposed legislation aims to close a loophole in current campaign finance laws that permits foreign entities to purchase online ads mentioning candidates.¹⁸ While not designed specifically to address misinformation per se, the Act's proposed transparency mechanisms are intended to deal with the problem of opaque or "anonymous" overseas disinformation campaigns,¹⁹ and hence attempts to combat disinformation originating from sponsored or monetised political speech.

The effectiveness of the proposed Act has been questioned. The Senate Select Committee on Intelligence determined that "paid advertisements were not key" to Russian influence efforts.²⁰ It was found that in states where similar restrictions had been implemented, the imposed liability had prevented social media platforms from hosting political advertising. Therefore, if the Act were passed at the federal level, online political speech would have been significantly reduced.²¹

Legislation - Media Literacy Education Laws

At the state level, many media literacy education bills have been passed or are pending. As of March 2023, 17 states have implemented media literacy legislative solutions. For example, New Jersey and Delaware require both K–12 media literacy instruction and standards; Texas mandates K–12 instruction without specifying standards; while Minnesota requires standards only in certain subjects or grade levels.²²

Task Force

To counter disinformation from Russia and misleading information targeted at migrants, the Department of Homeland Security (DHS) announced the establishment of the Disinformation Governance Board on 27 April 2022.²³ The board was intended to standardise and streamline the DHS's efforts to respond to disinformation that may be

¹⁷ Natasha Bertrand, "Senators Have a New Plan to Fix a Major Loophole That Let Russia Take Advantage of Facebook and Tech Giants", *Insider*, 20 October 2017, <https://www.businessinsider.com/honest-ads-act-facebook-google-twitter-russia-2017-10>.

¹⁸ Tim Lau, "The Honest Ads Act Explained", Brennan Centre for Justice, 17 January 2020, <https://www.brennancenter.org/our-work/research-reports/honest-ads-act-explained>.

¹⁹ Evan Ottenfeld, "Here's What the Honest Ads Act Would and Would Not Do", Issue One, 10 April 2018, <https://issueone.org/articles/heres-what-the-honest-ads-act-would-and-would-not-do/>.

²⁰ Select Committee on Intelligence (United States Senate), *Russian Active Measures, Campaigns and Interference in the 2016 U.S. Election Volume 2: Russia's Use of Social Media with Additional Views*, Accessed 8 December 23, https://www.intelligence.senate.gov/sites/default/files/documents/Report_Volume2.pdf.

²¹ Wall Street Journal, "Honest Ads Act Is False Advertising", *Wall Street Journal*, 13 October 2019, <https://www.wsj.com/articles/honest-ads-act-is-false-advertising-11570995764>.

²² Media Literacy Now, "Putting Media Literacy on the Public Policy Agenda", Accessed 8 December 2023, <https://medialiteracynow.org/impact/current-policy/>.

²³ Amanda Seitz, "Disinformation Board to Tackle Russia, Migrant Smugglers", *Associated Press*, 28 April 2022, <https://apnews.com/article/russia-ukraine-immigration-media-europe-misinformation-4e873389889bb1d9e2ad8659d9975e9d>.

linked to threats of violence against the US.²⁴ Following a recommendation from the Homeland Security Advisory Council, DHS terminated the Disinformation Governance Board on 24 August 2022.²⁵

On 23 September 2022, the Foreign Malign Influence Centre was activated as the government's main body for analysing and consolidating intelligence on foreign malicious influence, effectively serving as a "disinformation office".²⁶

Public Education

Media literacy education in the US predates the term itself, rooted in critical pedagogy and frameworks from media and cultural studies.²⁷ MIL initiatives emphasise individual responsibility to think critically.²⁸ In addition to incorporating media literacy into school curricula, the Department of Education's national leadership initiative – the Literacy Information and Communication System – has also collaborated with the National Association for Media Literacy Education to promote media literacy for adults.²⁹

3. European Union (EU)

The European Commission has started various initiatives to tackle online disinformation and misinformation.³⁰

Self-Regulatory Standards

In 2018, industry players agreed on self-regulatory standards to combat disinformation through the Code of Practice on Disinformation.³¹ During the pandemic, signatories to the Code of Practice on Disinformation carried out a COVID-19 Disinformation Monitoring Programme to provide the public with information and updates about the

²⁴ Nicole Sganga, "What Is DHS' Disinformation Governance Board and Why Is Everyone So Mad about It?", CBS News, 6 May 2022, <https://www.cbsnews.com/news/what-is-dhs-disinformation-governance-board-and-why-is-everyone-so-mad-about-it/>.

²⁵ Homeland Security, "Following HSAC Recommendation, DHS Terminates Disinformation Governance Board", 24 August 2022, <https://www.dhs.gov/news/2022/08/24/following-hsac-recommendation-dhs-terminates-disinformation-governance-board>.

²⁶ Office of the Director of National Intelligence, "The National Counterterrorism Centre – Organisation", Accessed 18 January 2024, <https://www.dni.gov/index.php/nctc-who-we-are/organization/340-about/organization/foreign-malign-influence-center>; Ken Klippenstein, "The Government Created A New Disinformation Office to Oversee All the Other Ones", *The Intercept*, 5 May 2023, <https://theintercept.com/2023/05/05/foreign-malign-influence-center-disinformation/>.

²⁷ Centre for Media Literacy, "Media Literacy in the USA", Accessed 13 September 2023, <https://www.medialit.org/reading-room/media-literacy-usa>; Renee Hobbs and Amy Jensen, "The Past, Present, and Future of Media Literacy Education", *Journal of Media Literacy Education* 1 (2009): 1–11.

²⁸ Renee Hobbs and Sandra McGee, "Teaching about Propaganda: An Examination of the Historical Roots of Media Literacy", *Journal of Media Literacy* 6 (2014): 56–67, <https://digitalcommons.uri.edu/jmle/vol6/iss2/5/>.

²⁹ Michael Cruse, "Exploring Media Literacy for Adult Learners", LINCS, 6 November 2019, <https://community.lincs.ed.gov/group/27/bulletin/exploring-media-literacy-adult-learners>.

³⁰ European Commission, "Tackling Online Disinformation", Accessed 23 November 2023, <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation>.

³¹ European Commission, "The 2022 Code of Practice on Disinformation", Accessed 23 November 2023, <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>.

virus and vaccines.³² The 2022 Strengthened Code of Practice on Disinformation introduced more ambitious measures and commitments for industry players, including demonetising misinformation dissemination, ensuring transparency in political advertising, strengthening collaboration with fact-checkers, and facilitating researchers' access to data.³³

Legislation – Digital Service Act

On 16 November 2022, the Digital Service Act (DSA) came into force.³⁴ The DSA holds online platforms accountable for risks such as disinformation and electoral manipulation by requiring large platforms to conduct annual risk assessments and mitigation measures, while distinguishing harmful but legal content from illegal content to protect free speech.³⁵

Additionally, the EU's Artificial Intelligence (AI) Act officially became effective on 1 August 2024, which sets transparency requirements for generative AI tools.³⁶ The Act also contains specific provisions for AI systems used for deepfakes, e.g., the Act labels AI tools designed to influence elections as "high risk", and highlights concerns about certain AI tools' potential "specific risks" for impersonation and deception.³⁷

Task Force - East Stratcom Task Force

The East Stratcom Task Force, established in March 2015 within the Strategic Communications and Information Analysis Division of the European External Action Service, combats Russia's disinformation campaigns by exposing false narratives, analysing and reporting disinformation trends, and raising public awareness of their harmful effects.³⁸

Public Education

The media literacy landscape in Europe is highly fragmented, with some countries like Belgium, France, and Finland having government-supported programmes that coordinate initiatives nationally and represent their countries internationally. Others

³² European Commission, "COVID-19 Disinformation Monitoring Programme", Accessed 23 November 2023, <https://digital-strategy.ec.europa.eu/en/policies/covid-19-disinformation-monitoring>.

³³ European Commission, "2022 Strengthened Code of Practice on Disinformation", 16 June 2022, <https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation>.

³⁴ European Commission, "Digital Services Act: EU's Landmark Rules for Online Platforms Enter into Force", 16 November 2022, https://ec.europa.eu/commission/presscorner/detail/en/IP_22_6906.

³⁵ European Commission, "Questions and Answers: Digital Services Act", 19 December 2023, https://ec.europa.eu/commission/presscorner/detail/en/QANDA_20_2348.

³⁶ European Parliament, "EU AI Act: First Regulation on Artificial Intelligence", European Parliament- Topics, 8 June 2023, <https://www.europarl.europa.eu/topics/en/article/20230601STO93804/eu-ai-act-first-regulation-on-artificial-intelligence>.

³⁷ Felipe Romero Moreno, "Generative AI and Deepfakes: A Human Rights Approach to Tackling Harmful Content", *International Review of Law, Computers & Technology* 2024:1–30, Accessed 15 August 2024, <https://doi.org/10.1080/13600869.2024.2324540>.

³⁸ European Union External Action, "Countering Disinformation: Questions and Answers about the East StratCom Task Force", 27 October 2021, https://www.eeas.europa.eu/eeas/questions-and-answers-about-east-stratcom-task-force_en.

like Ireland, Portugal, and Sweden rely on strong national associations, while countries such as Greece and Poland have active organisations but lack clear representative bodies.³⁹

To address this, the European Democracy Action Plan aims to empower citizens and bolster more resilient democracies across the EU through “promoting free and fair elections”, “strengthening media freedom”, and “countering disinformation”.⁴⁰ The EU-funded European Digital Media Observatory project, which began on 1 June 2020, brought together academic researchers, media literacy experts, and fact-checkers to understand and analyse disinformation.⁴¹

4. United Kingdom (UK)

Legislation – Online Safety Act

After years of debate, the UK’s Online Safety Act 2023 (OSA) became law on 26 October 2023, which aims to safeguard both adults and children online and hold social media companies accountable for their users’ safety.⁴² Regarding provisions on falsehoods specifically, under Part 7, Chapter 7 of the OSA, as part of counter-disinformation and misinformation measures, Ofcom (the UK’s telecommunications regulator) must establish and maintain an advisory committee on disinformation and misinformation. Under Part 7, Chapter 8, Ofcom will be tasked to improve the general public’s media literacy with guidance from the Secretary of State.⁴³ Moreover, “sending false information intended to cause non-trivial harm” was introduced as one of the criminal offences by the Act and implemented on 31 January 2024.⁴⁴

Task Force: National Security Communications Team

In January 2018, the government announced the establishment of the National Security Communications Team (NSCT), a dedicated unit focused on tackling disinformation and fake news.⁴⁵ Through the NSCT’s strategic communication,

³⁹ Media & Learning EU, “Overview of Media Literacy Initiatives in EU Available”, Accessed 13 August 2024, <https://media-and-learning.eu/type/news/overview-of-media-literacy-initiatives-in-eu-available/>.

⁴⁰ European Commission, “Protecting Democracy”, Accessed 11 January 2024, https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy_en.

⁴¹ European University Institute, “European Digital Media Observatory Launched”, 2 June 2020, <https://www.eui.eu/STG/News/2020/European-Digital-Media-Observatory-launched>.

⁴² UK Parliament, “Online Safety Act 2023”, Accessed 23 November 2023, <https://bills.parliament.uk/bills/3137>; GOV.UK, “A Guide to Online Safety Bill”, Last modified 16 December 2022, <https://www.gov.uk/guidance/a-guide-to-the-online-safety-bill>.

⁴³ Legislation.gov.uk, “Online Safety Act 2023”, Accessed 11 January 2024, <https://www.legislation.gov.uk/ukpga/2023/50/enacted>.

⁴⁴ GOV.UK, “Guidance - Online Safety Act: Explainer”, Last modified 24 April 2025, <https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer>.

⁴⁵ Peter Walker, “New National Security Unit Set up to Tackle Fake News in UK”, *The Guardian*, 23 January 2018, <https://www.theguardian.com/politics/2018/jan/23/new-national-security-unit-will-tackle-spread-of-fake-news-in-uk>.

the UK government, with the support of the Conflict, Stability and Security Fund, can effectively respond to national security threats.⁴⁶

Public Education

The UK has a long tradition of integrating media education into the formal curriculum of schools and colleges and is currently very well-placed to provide media literacy education.⁴⁷ Further, to empower citizens to make informed decisions and remain safe online, the UK government has been working closely with various organisations on multiple initiatives. For example, the “online media literacy resources” page provides information about online media literacy events and resources.⁴⁸ With support from the Media Literacy Programme Fund, the Online Media Literacy Strategy and its accompanying action plan form part of the government’s blueprint to empower citizens to stay safe online and coordinate media and information literacy education.⁴⁹ A Media Literacy Train-the-Trainer Grant Scheme has also been introduced to provide enhanced media literacy support for children and individuals with special needs.⁵⁰

5. Malaysia

Legislation – Anti-Fake News Act 2018 (Repealed)

The Anti-Fake News Act 2018 came into force on 11 April 2018, following its publication in the Federal Gazette of Malaysia,⁵¹ making it the first Southeast Asian country to criminalise misinformation sharing.⁵² The Act penalises both the creators and disseminators of fake news, while holding online service providers responsible for third-party content. Its scope of prosecution extends to fake news originating outside the country, if it affects Malaysia or Malaysians.⁵³

Following the May 2018 elections, a new government took office and efforts to repeal the Anti-Fake News Act began. Although the lower house initially endorsed the

⁴⁶ GOV.UK, “National Security Communications Team Programme”, Accessed 23 November 2023, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/842737/National_Security_Communications_Team_Programme.odt.

GOV.UK, “About Us - Conflict, Stability and Security Fund”, Accessed 23 November 2023, <https://www.gov.uk/government/organisations/conflict-stability-and-security-fund/about>.

⁴⁷ Julian McDougall and Sonia Livingstone, “Media and Information Literacy Policies in the UK”, Accessed 7 December 2023, <https://eprints.lse.ac.uk/57103/>.

⁴⁸ GOV.UK, “Online Media Literacy Resources”, Last modified 30 September 2021, <https://www.gov.uk/guidance/online-media-literacy-resources>.

⁴⁹ GOV.UK, “Online Media Literacy Strategy”, Last modified 10 August 2021, <https://www.gov.uk/government/publications/online-media-literacy-strategy>.

⁵⁰ GOV.UK, “Media Literacy Train-the-Trainer Grant Scheme”, Last modified 10 November 2021, <https://www.gov.uk/guidance/media-literacy-train-the-trainer-grant-scheme>.

⁵¹ Library of Congress, “Malaysia: Anti-Fake News Act Comes into Force”, 19 April 2018, <https://www.loc.gov/item/global-legal-monitor/2018-04-19/malaysia-anti-fake-news-act-comes-into-force/>.

⁵² Poynter, “A Guide to Anti-misinformation Actions around the World - Malaysia”, Last modified 2019, <https://www.poynter.org/ifcn/anti-misinformation-actions/#malaysia>.

⁵³ Hannah Beech, “As Malaysia Moves to Ban ‘Fake News,’ Worries About Who Decides the Truth”, *The New York Times*, 2 April 2018, <https://www.nytimes.com/2018/04/02/world/asia/malaysia-fake-news-law.html>.

repeal in August 2018, the upper house successfully opposed it.⁵⁴ On its second attempt, however, the Anti-Fake News (Repeal) Bill 2019 was passed by the lower house on 9 October 2019,⁵⁵ and subsequently by the Senate on 19 December 2019.⁵⁶

On 16 November 2020, the Malaysian Parliament discussed a proposal to revive the Anti-Fake News Act 2018 in light of the widespread dissemination of misinformation, particularly on COVID-19.⁵⁷ On 12 March 2021, the Malaysian government issued the Emergency (Essential Powers) (No. 2) Ordinance 2021, which criminalises the spreading of false information concerning COVID-19 and includes provisions that temporarily suspend certain standard legal protections.⁵⁸ It was viewed as an intensified version of the Anti-Fake News Act 2018.⁵⁹ In September 2023, Communications Minister Fahmi Fadzil said the government (at that point in time) had no intentions to reinstate the Anti-Fake News Act 2018.⁶⁰

Task Force

In November 2022, prior to the 15th general election, the Communications and Multimedia Ministry (K-KOMM) formed a dedicated task force comprising over 100 members from the Malaysian Communications and Multimedia Commission and the Royal Malaysia Police to monitor fake news circulating on social media.⁶¹ To enable immediate action, the task force was empowered to swiftly remove identified fake news without waiting for a report.⁶²

Public Education

Launched in early 2021, Media Education For All, Malaysia's pioneer national media literacy movement, aims to counter misinformation and disinformation by training educators to teach media literacy to their students.⁶³ The project aimed to recruit 100

⁵⁴ Library of Congress, "Malaysia: Bill to Repeal Anti-Fake News Act Passed", 24 October 2019, <https://www.loc.gov/item/global-legal-monitor/2019-10-24/malaysia-bill-to-repeal-anti-fake-news-act-passed/>.

⁵⁵ The Straits Times, "Malaysia Parliament Passes Law to Scrap Anti-Fake News Bill Again, Abolishing It within the Year", *The Straits Times*, 10 October 2019, <https://www.straitstimes.com/asia/se-asia/malaysia-parliament-passes-law-to-scrap-anti-fake-news-law-again-abolishing-it-end-of>.

⁵⁶ FMT Reporters, "Malaysia Finally Scraps Anti-Fake News Act", *Free Malaysia Today (FMT)*, 19 December 2019, <https://www.freemalaysiatoday.com/category/nation/2019/12/19/malaysia-finally-scraps-anti-fake-news-act/>.

⁵⁷ The Straits Times, "Malaysia to Discuss the Revival of Anti-Fake News Act in Parliament", *The Straits Times*, Accessed 12 January 2024, <https://www.straitstimes.com/asia/se-asia/malaysia-to-discuss-the-revival-of-anti-fake-news-act-at-parliament>.

⁵⁸ Mohd Azizuddin Mohd Sani, "Could Malaysia's Fake News Ordinance Stifle Public Debate?", *East Asia Forum*, Last modified 21 April 2021, from <https://www.eastasiaforum.org/2021/04/21/could-malysias-fake-news-ordinance-stifle-public-debate/>.

⁵⁹ Lasse Schuldt, "The Rebirth of Malaysia's Fake News Law – and What the NetzDG Has to Do with It", *Verfassungsblog*, 13 April 2021, <https://verfassungsblog.de/malaysia-fake-news/>.

⁶⁰ The Star, "Govt Has No Plans to Reinstate Anti-Fake News Act, Says Comms Minister", *The Star*, 27 September 2023, <https://www.thestar.com.my/news/nation/2023/09/27/govt-has-no-plans-to-reinstate-anti-fake-news-act-says-comms-minister>.

⁶¹ MalayMail, "Communications and Multimedia Ministry Sets Up Task Force to Combat Fake News during GE15", *MalayMail*, 10 November 2022, <https://www.malaymail.com/news/malaysia/2022/11/10/communications-and-multimedia-ministry-sets-up-task-force-to-combat-fake-news-during-ge15/38844>.

⁶² Ibid.

⁶³ ME4A, "Media Education for All", Accessed 15 January 2024, <https://me4a.arus.cc/>; see also Newsstreamasia, "Malaysian Media Literacy Campaign Developed by Educators Bags Gold in Asian Award", *Newsstreamasia*, 13

new members for the registered association by the end of 2021 and reach 3,000 educators by January 2022 through the Media Education Academy.⁶⁴

The Digital Education Policy, approved by the Cabinet on 26 May 2023 and effective from 2023 to 2030, aims to equip all students with fundamental digital skills by emphasising the integration of digital technology into the learning environment, thereby cultivating a digitally literate generation.⁶⁵

6. Other Jurisdictions

Appendix A provides a brief overview of anti-misinformation/disinformation actions taken by some other countries around the world. Due to language barriers, the information presented is based on our best interpretation of the latest accessible English sources. New developments may arise after the date of retrieval.

A Review of Mainstream Social Media Platforms' Counter-misinformation/ disinformation Measures

Social media platforms continue to grapple with the pervasive problem of misinformation and disinformation. In response to this ongoing and escalating issue, they have implemented various strategies such as fact-checking programmes and content moderation algorithms. Nonetheless, the effectiveness of these approaches is uncertain and remains a subject of debate, as the complex nature of misinformation presents ongoing challenges that often surpass the platforms' endeavours. The question persists as to whether they can combat the proliferation of falsehoods on their platforms, particularly during crucial periods such as public health emergencies and election campaigns.

Beyond Singapore, social media platforms have found themselves under increasing pressure to regulate the spread of misinformation and disinformation. Approaches to regulating such content include:

- i. Direct regulation (via legal measures)
- ii. Voluntary self-regulation on the part of online platforms
- iii. Co-regulation⁶⁶

September 2021, <https://newstreamasia.com/general/education/malaysian-media-literacy-campaign-developed-by-educators-bags-gold-in-asian-award/>.

⁶⁴ ARUS, "Media Education For All (ME4A)", Accessed 15 January 2024, <https://arusacademy.org.my/web/media-education-for-all/>.

⁶⁵ The Star, "New Education Policy Will Help Foster Digital Savvy Students, Says Fadhlina", *The Star*, 28 November 2023, <https://www.thestar.com.my/news/nation/2023/11/28/new-education-policy-will-help-foster-digital-savvy-students-says-fadhlina>.

⁶⁶ Corinne Tan, "Regulating Disinformation on Twitter and Facebook", *Griffith Law Review* 31 (2022): 513–36. <https://www.tandfonline.com/doi/full/10.1080/10383441.2022.2138140>.

In the case of direct regulation, legal obligations for social media platforms and service providers are implemented and enforced by relevant authorities. Platforms may be directed to comply not only with correction or takedown notices, but also with transparency, due diligence, and reporting obligations - with penalties for non-compliance. While some of these obligations featured in the legislation specifically target misinformation, disinformation, and online falsehoods, others may form part of broader legal frameworks to combat harmful online content more generally. Examples include Germany's Network Enforcement Act, the EU's Digital Services Act (DSA), and Australia's Online Safety Act 2021.⁶⁷

Voluntary regulation measures may exist either in lieu of legal obligations (e.g., in New Zealand, where a voluntary code of practice exists but is not legally binding) or as supporting regulatory mechanisms to legal measures (e.g., voluntary codes of practice that complement the DSA and the Australian Code of Practice on Disinformation). Platforms which adopt these voluntary codes of practice commit to a range of safety measures designed to mitigate harms that may arise from mis/disinformation.

However, while many Very Large Online Platforms have signed up for voluntary codes of practice,⁶⁸ not all voluntary measures are equally drastic. Some platforms may choose to reduce user access to misinformation, either by means of content removal (which would prevent user access entirely), or by downranking content (e.g., via the use of algorithms). Other platforms may instead use 'soft moderation' techniques, such as warning labels.⁶⁹

Since 2018, social media platforms have made significant progress in detecting and removing misinformation. Counter-misinformation and disinformation interventions by social media platforms can be broadly categorised into three areas: (i) removal of content which violates community guidelines or policies, (ii) partnering with internationally accredited or third-party fact-checking organisations and initiatives, and (iii) ensuring transparency and upholding civic processes such as electoral integrity. The mainstream social media platforms included for discussion are Facebook, Instagram, YouTube, TikTok, and X (formerly known as Twitter).⁷⁰

⁶⁷ It is worth noting that Australia is currently also considering proposals to amend the 1992 Broadcasting and Services Act, which would specifically target online misinformation and disinformation. See Tess Mierendorff, George Psaltis, Elisa Wong, and Emily Hunyor, "Combatting Misinformation and Disinformation in Australia", Herbert Smith Freehills Kramer, 16 September 2024, <https://www.hsfkramer.com/insights/2024-09/combating-misinformation-and-disinformation-in-australia>.

⁶⁸ For instance, Meta, TikTok, Google, Amazon, and Twitter signed up to the New Zealand voluntary code of practice in 2022. See Eva Corlett, "Social Media Companies Promise to Reduce Harmful Content in New Zealand", *The Guardian*, 25 July 2022, <https://www.theguardian.com/world/2022/jul/25/social-media-companies-promise-to-reduce-harmful-content-in-new-zealand>.

⁶⁹ Emily Saltz, Soubhik Barari, Claire Leibowicz, and Claire Wardle, "Misinformation Interventions Are Common, Divisive, and Poorly Understood", *Misinformation Review* 2 (2021), <https://misinforeview.hks.harvard.edu/article/misinformation-interventions-are-common-divisive-and-poorly-understood/>.

⁷⁰ While social media companies have taken steps to enhance counter-misinformation measures, there have been recent setbacks. Countermeasures at social media company X have since been curtailed – e.g., restoration of banned accounts and changes to advertising revenue monetisation. In 2023, X dropped out of the European Union's voluntary disinformation code of practice, which other companies had supported. See Catherine Sanz and Catherine Thorbecke, "What Social Media Giants Are Doing to Counter Misinformation This Election", *ABC News*,

Criticism over Facebook's inaction to tackle misinformation on its platform in 2016, where its founder Mark Zuckerberg once dismissed the impact of electoral misinformation on the platform, has since led it taking measures to address disinformation and misinformation on Facebook and Instagram.

Platforms have worked collaboratively with accredited International Fact-Checking Network (IFCN) third-party fact-checkers to review false content.⁷¹ Content containing misinformation is also labelled with warnings across posts on Facebook. Misinformation that is likely to "directly contribute to the risk of imminent physical harm" or poses a risk to electoral integrity is also subject to removal.⁷² The distribution of posts and content labelled as false is significantly reduced, preventing misinformation from going viral.⁷³ Instagram has similar policies as Facebook, using a combination of technology and community to identify posts and accounts which contain misinformation.

YouTube addresses misinformation based on its principles of "4Rs", namely (i) removing content in violation of the platform's policies, (ii) reducing recommendations of content deemed to be borderline (i.e., may come close to a violation of platform policies), (iii) raising prominence of authoritative sources of news and information, and (iv) rewarding trusted creators.⁷⁴ Policy enforcement involves the use of machine learning tools, as well as content moderation teams.

TikTok has specific policies pertaining to various types of misinformation, e.g., climate change and elections. Enforcement actions against false content that infringes on Community Principles include content removal and reach reduction to diminish its virality. Other initiatives include partnering with IFCN fact-checking organisations and educational initiatives. The company has also updated its policies around government, political, and party accounts, banning all political advertising on the platform, e.g., in Thailand.⁷⁵

X has halted the enforcement of its COVID-19 misinformation policy. X has also enforced rules to guard against attempts at interference with civic processes, such as elections, banning attempts at misleading or false information that could potentially impact such processes. X launched its own crowdsourced fact-checking initiative, Community Notes, instead of partnering with third-party IFCN fact-checkers. The

18 October 2020, <https://www.abcnews.go.com/Technology/social-media-giants-counter-misinformation-election/story?id=73563997>.

⁷¹ Instagram, "Reducing the Spread of False Information on Instagram", Accessed 27 January 2024, <https://help.instagram.com/1735798276553028>.

⁷² Meta, "Misinformation", Accessed 26 January 2024, <https://transparency.fb.com/en-gb/policies/community-standards/misinformation/>.

⁷³ Meta, "Promoting Safety and Expression", Accessed 26 January 2024, <https://about.meta.com/actions/promoting-safety-and-expression/>.

⁷⁴ YouTube, "How does YouTube Address Misinformation?", Accessed 5 February 2024, <https://www.youtube.com/howyoutubeworks/our-commitments/fighting-misinformation/#removing-violative-misinformation>.

⁷⁵ The Straits Times, "TikTok Bans Political Advertising in Thailand", *The Straits Times*, 23 February 2023, <https://www.straitstimes.com/asia/se-asia/thai-politicians-banned-from-using-tiktok-to-woo-voters>.

visibility of Community Notes is limited, as the Notes must first obtain consensus from X users across various political spectrums for them to be pinned to Tweets.⁷⁶

Identity verification has also become an issue with social media platforms such as X, where users can pay a subscription fee for blue check marks next to their usernames, making it harder to credibly verify the identity of users online.⁷⁷ Other social media platforms have measures to verify the identities of users. For instance, Meta implements identity confirmation on advertisements relating to social issues, elections, or politics on Facebook and Instagram.

Counter-misinformation/disinformation Actions

This section presents counter-misinformation/disinformation enforcement actions and interventions taken by governments and mainstream social media platforms.

1. Governments' counter-misinformation/disinformation actions

Enforcement actions have been taken by governments under their counter-misinformation/disinformation legislation and regulations. Taking China as an example, the government launched a nationwide campaign in 2013 to combat online rumours by shutting down more than 20 accounts on Sina Weibo and sentencing rumour-creators to 5- or 10-day administrative detention.⁷⁸ In 2015, in response to rumours concerning major emergencies and important national events, China carried out special crackdowns and rectification operations, resulting in the punishment of 197 criminals who fabricated and spread rumours and the shut down of 165 online accounts.⁷⁹ In 2023, the Cyber Security Bureau of the Ministry of Public Security deployed a 100-day special campaign to combat and rectify online rumours.⁸⁰

As presented in Section 2, some countries adopted additional counter-misinformation/disinformation measures during election periods, the COVID-19 pandemic, and/or global conflicts. For example, Malaysia's Emergency (Essential Powers) (No. 2) Ordinance 2021 criminalises the spreading of false information concerning COVID-19. Also, prior to its 15th general election, a task force was formed by Malaysia's K-KOMM to tackle fake news on social media. Similarly, the Indonesian Commission on Elections formed a task force dedicated to combating disinformation and fake news to safeguard the integrity of the electoral process.

⁷⁶ Madison Czopek, "Why Twitter's Community Notes Feature Mostly Fails to Combat Misinformation", Poynter, 30 June 2023, <https://www.poynter.org/fact-checking/2023/why-twitters-community-notes-feature-mostly-fails-to-combat-misinformation/>.

⁷⁷ Sara Ruberg, "Israel-Hamas War Misinformation on Social Media Is Harder to Track, Researchers Say", NBC News, 16 October 2023, <https://www.nbcnews.com/tech/misinformation/israel-hamas-war-misinformation-social-media-harder-track-rcna120173>.

⁷⁸ 人民网, "国家互联网信息办部署打击网络谣言", 人民网, 3 May 2013, <http://politics.people.com.cn/n/2013/0503/c1001-21348755.html>.

⁷⁹ 中国日报网, "公安部部署专项打击整治网络谣言 关停网络账号165个", 中国日报网, 31 August 2015, https://cn.chinadaily.com.cn/2015-08/31/content_21742959.htm.

⁸⁰ 中华人民共和国中央人民政府, "公安部部署开展网络谣言打击整治专项行动", 14 April 2023, https://www.gov.cn/lianbo/2023-04/14/content_5751576.htm.

The Russia-Ukraine War, which started in February 2014, significantly heightened the pressing need to address the threats posed by disinformation campaigns. In response, the Ukrainian Centre on Countering Disinformation was founded in May 2021 to monitor and analyse information threats to national security, and it has been actively engaged in fact-checking and debunking efforts since the outbreak of war in February 2022.⁸¹

In Singapore, during the 2023 presidential election period (August to September 2023), there were eight Correction Directions, four Targeted Correction Directions, and one Access Blocking Order issued under POFMA. One Correction Direction, one Targeted Correction Direction, and the Access Blocking Order were subsequently removed on 22 September 2023.

Correction Direction recipients included opposition politician and Reform Party leader Kenneth Jeyaretnam (three occasions), TikTok user “dr.ishhaq.jay” (three occasions), the East Asia Forum, and Plan B (a podcast show broadcasted on Spotify and Instagram, which interviewed Mr James Raj Arokiasamy). The POFMA Office was subsequently also made aware of the fact that Mr James Raj had made several posts on TikTok containing further falsehoods and that his TikTok account was eventually banned.

In August 2023, Kenneth Jeyaretnam received multiple Correction Directions for false statements, mainly about cabinet ministers’ rentals of Ridout Road bungalows. TikTok user “dr.ishhaq.jay” was similarly issued Correction Directions regarding claims on housing policies and voter anonymity, while Plan B received one over various viral claims aired on its podcast.

Lastly, a Correction Direction was issued to the East Asia Forum in response to an 18 August 2023 article titled “A spate of scandals strikes Singapore”, which contained inaccuracies concerning (among other things) the Corrupt Practices Investigation Bureau’s independence and the Prime Minister’s handling of certain issues. This Correction Direction was later cancelled on 22 September 2023, following the removal of the article from all publication sites associated with the East Asia Forum at the request of the article’s author.

Targeted Correction Direction recipients included TikTok and Meta. While the East Asia Forum’s website was briefly blocked for non-compliance with the Correction Direction, these measures were lifted after the article was taken down and the author, Assistant Professor Chan Ying-Kit, issued a public apology.

This content analysis does not provide any further insights into the impact of POFMA on trust in public institutions and the effectiveness of POFMA. However, there are also no findings that contradict our previous analysis, which addressed the questions through a public survey.

⁸¹ OECD, “Disinformation and Russia’s War of Aggression against Ukraine: Threats and Governance Responses”, 3 November 2022, <https://www.oecd.org/ukraine-hub/policy-responses/disinformation-and-russia-s-war-of-aggression-against-ukraine-37186bde/>.

According to our survey conducted in January 2023, POFMA was found to be effective in earning public trust and preventing the creation and spread of online falsehoods.⁸² For each of the 10 presented POFMA cases in the report, more than 80% of the respondents chose to believe in the government's clarification instead of the original post. More than one-third of the respondents showed agreement or strong agreement on POFMA's effectiveness in preventing the creation of online falsehoods, and more than half of them showed agreement or strong agreement on POFMA's effectiveness in stopping the spread of falsehoods in Singapore.

2. Mainstream social media platforms' counter-misinformation/disinformation actions

Social media platforms' countering misinformation actions were also found to be most prominent during public health emergencies (COVID-19 pandemic), election campaigns, and international conflicts.

Public health emergencies

Social media platforms responded to misleading public health misinformation (particularly related to COVID-19) with various interventions. Notably, Facebook, Instagram, YouTube, and Twitter implemented misinformation policies specific to COVID-19. An example is the use of generic banners on Facebook, Instagram, and Twitter following user searches for COVID-19-related terms.⁸³

Government authorities around the world have also made requests for COVID-19 misinformation to be removed from social media platforms. For example, between March 2020 and February 2021, the Australian Department of Home Affairs made over 500 requests to digital stakeholders for such content to be removed (despite having no direct authority over social media platforms).⁸⁴ Around the same time, social media platforms were noted to have taken down a significant number of posts containing COVID-19 misinformation. Facebook took down two million pieces of such content from its platform between February and March 2021, while Twitter claimed to have removed 22,400 tweets between 2020 and March 2021.⁸⁵

⁸² Benjamin Ang and Xue Zhang, "How Effective Is POFMA in Battling Online Falsehoods?", S. Rajaratnam School of International Studies, 18 October 2024, <https://www.rsis.edu.sg/rsis-publication/rsis/how-effective-is-pofma-in-battling-online-falsehoods/>.

⁸³ Christine Geeng, Tiona Francisco, Jevin West, and Franziska Roesner, "Social Media Covid-19 Misinformation Interventions Viewed Positively, but Have Limited Impact", Federal Trade Commission, Last modified 2020, https://www.ftc.gov/system/files/documents/public_events/1582978/social_media_covid-19_misinformation_interventions_viewed_positively_but_have_limited_impact.pdf.

⁸⁴ Josh Taylor, "Australia's Department of Home Affairs Made Most Requests for Covid Misinformation Takedowns", *The Guardian*, 17 February 2021, <https://www.theguardian.com/australia-news/2021/feb/17/australias-department-of-home-affairs-made-most-requests-for-covid-misinformation-takedowns>.

⁸⁵ Hariz Baharudin and Min Zhang Lim, "Facebook, Twitter Remove Millions of Pieces of Fake News Content Related to Covid-19", *The Straits Times*, 23 March 2021, <https://www.straitstimes.com/tech/facebook-twitter-remove-millions-of-pieces-of-fake-news-content-related-to-covid-19>.

More specific interventions on social media platforms were driven by platforms' partnerships with government and public health authorities, and other organisations. Examples include the publication of non-pharmaceutical intervention videos (e.g., promoting practices such as using hand sanitiser and face masks) by public health organisations on Facebook in Nigeria and Benin;⁸⁶ and YouTube's partnership with third-party fact-checkers in the US to highlight fact-checked articles in response to certain COVID-19-related search results.⁸⁷ South Korean authorities also provided the general public with up-to-date health information by regularly posting on social media platforms.⁸⁸

Interventions were perhaps most significant on TikTok, highlighted for the particularly rapid spread of misinformation and trivialisation of serious health concerns.⁸⁹ In response, TikTok followed Facebook, Tencent, and Twitter in establishing a partnership with the World Health Organization (WHO) in 2020.⁹⁰ In its first 10 days, the WHO's TikTok account published five videos, which gained approximately 87 million views and attracted 250,000 followers.⁹¹ The public's rapid engagement with such content meant that the WHO was able to quickly share 'reliable' information and health advice on a viral social media platform.⁹²

Election campaigns

In the build-up to general elections in Southeast Asian countries (namely Indonesia, the Philippines, and Thailand) in 2019, most states' engagements with social media platforms were mainly led by civil society, journalists, and academics. Social media platforms introduced a range of election integrity interventions.

In Indonesia, Facebook worked with six third-party fact-checkers and took down networks of 'coordinated inauthentic behaviour'. In the Philippines, both Facebook and Twitter carried out similar takedowns (including three high-profile takedowns by

⁸⁶ Jimme Matyek, Sheba U. Tayo-Garbson, Benmun Paul, and Etumnu Emeka Williams, "Comparative Analysis of COVID-19 Non-pharmaceutical Intervention Videos on Facebook: Insights from Nigeria and Benin Republic", *Library Philosophy and Practice (e-journal)* 2023, <https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=15293&context=libphilprac>.

⁸⁷ Elizabeth Culliford, "YouTube Expands Fact-check Feature to U.S. Video Searches during COVID-19 Pandemic", *Reuters*, 29 April 2020, <https://www.reuters.com/article/idUSKCN22A2W9/>.

⁸⁸ Heidi Tworek and Yoojung Lee, "Lessons from South Korea's Approach to Tackling Disinformation", *Brookings*, 21 July 2021, <https://www.brookings.edu/articles/lessons-from-south-koreas-approach-to-tackling-disinformation/>.

⁸⁹ Fernando Beltran, "TikTok And Health: The Dance Of Medicine For Gen Z", *Forbes*, 5 September 2023, <https://www.forbes.com/sites/forbesagencycouncil/2023/09/05/tiktok-and-health-the-dance-of-medicine-for-gen-z/?sh=3567e4365bbc>.

⁹⁰ Karen Hao and Tanya Basu, "The Coronavirus Is the First True Social-Media 'Infodemic'", *MIT Technology Review*, 12 February 2020, <https://www.technologyreview.com/2020/02/12/844851/the-coronavirus-is-the-first-true-social-media-infodemic/>.

⁹¹ Harrison Mantas, "The WHO and Red Cross Rack up Big Numbers Talking Coronavirus on TikTok through Vastly Different Strategies", *Poynter*, 10 March 2020, <https://www.poynter.org/fact-checking/2020/the-who-and-red-cross-rack-up-big-numbers-talking-coronavirus-on-tiktok-through-vastly-different-strategies/>.

⁹² Dalvin Brown, "What's True about Coronavirus? World Health Organization Joins TikTok to Share 'Reliable' Information", *USA Today*, Last modified 2 March 2020, <https://www.usatoday.com/story/tech/2020/03/01/coronavirus-who-tiktok-reliable-and-timely-advice/4924049002/>.

Facebook); Facebook also worked with three third-party fact-checkers. In Thailand, Facebook worked with one third-party fact checker and introduced a ban on foreign political advertising.⁹³

Some platforms have launched in-app tools designed to ensure the prioritisation of reliable election information. Previously, Twitter had introduced a tool allowing users to report misinformation about national elections. This tool was made available in Australia, South Korea, and the US in 2021, before being introduced in Brazil, the Philippines, and Spain in 2022. However, the company disabled the feature after rebranding as X in 2023, sparking concern from academic and policy organisations alike.⁹⁴

The launch of in-app tools can also be paired with proactive content removal. For example, in addition to the launch of its aforementioned 'Election Centre' feature in the lead-up to the 2020 US presidential election, TikTok oversaw the removal of 340,000 videos for breaking election misinformation rules, as well as 1.75 million accounts for 'automation' during the 2020 election period.⁹⁵ Moreover, following criticism for insufficient efforts to stem the spread of online falsehoods during the 2022 Malaysian general election,⁹⁶ TikTok later clamped down on a network of inauthentic accounts that promoted narratives in support of the Perikatan Nasional political party - this network consisted of 53 accounts followed by 174,472 users.⁹⁷ Additionally, in the lead-up to the recent Taiwanese elections, TikTok removed 54 of 105 videos suspected of being election-based misinformation by the Taiwanese Central Election Commission.⁹⁸

Other specific interventions on social media regarding election campaign-related misinformation have been directly initiated by government authorities. In 2022, Brazilian lawmakers granted unilateral powers to the national election authority to force social media platforms to remove election-based misinformation within two hours of the content being posted.⁹⁹ Ahead of the Canadian 2024 general election, Elections Canada launched an online tool providing factual information to social media

⁹³ Jonathan C. Ong and Ross Tapsell, *Mitigating Disinformation in Southeast Asian Elections: Lessons from Indonesia, Philippines and Thailand*, NATO StratCom Centre of Excellence, 2020, https://stratcomcoe.org/cuploads/pfiles/nato_mitigating_disinformation_web_20may-1.pdf.

⁹⁴ Mariko Oi, "X Scraps Tool to Report Electoral Fake News – Researchers", *BBC News*, 28 September 2023, <https://www.bbc.com/news/business-66944123>.

⁹⁵ Makena Kelly, "TikTok Removed More Than 300,000 Videos for Election Misinformation", *The Verge*, 24 February 2021, <https://www.theverge.com/2021/2/24/22298024/tiktok-election-misinformation-disinformation-transparency-report>.

⁹⁶ The Economic Times, "Time Ticking for TikTok to Review Its Policy", *The Economic Times*, 27 June 2023, <https://economictimes.indiatimes.com/news/company/corporate-trends/time-ticking-for-tiktok-to-review-its-policy/articleshow/101275512.cms?from=mdr>.

⁹⁷ A'bidah Zaid Shirbeeni, "TikTok Removes 1.5 Million Malaysian Videos Violating Safety Guidelines", *Marketing Interactive*, 8 January 2024, <https://www.marketing-interactive.com/tiktok-malaysia-safety-guidelines>.

⁹⁸ Taipei Times, "TikTok Removed Over Half of Flagged Videos: CEC", *Taipei Times*, 22 January 2024, <https://www.taipeitimes.com/News/taiwan/archives/2024/01/22/2003812475>.

⁹⁹ Elizabeth Dwoskin, "How Facebook and TikTok Are Helping Push Stop the Steal in Brazil", *The Washington Post*, 29 October 2022 <https://www.washingtonpost.com/world/2022/10/29/facebook-tiktok-brazil-election-disinformation/>

platform users in response to the most common online falsehoods observed by Canadian authorities.¹⁰⁰

A more recent concern for social media platforms involves the use of generative AI in election campaigns and political advertising. In November 2023, Meta announced a global ban on political advertisers from using its generative AI tools in their election campaigns.¹⁰¹ While TikTok already has in place a ban on political advertising, and more recently announced new regulations for AI-generated content (reviewed in the previous section), the enforcement methods and overall effectiveness of these policies will likely only become clearer during future election cycles.

Russia-Ukraine War

Social media platforms, including Meta and TikTok, established specific task forces, mechanisms, and operations for combating misinformation related to the Russia-Ukraine war. At the beginning of the war, Meta set up a “special operations centre” overseen by native Russian and Ukrainian-speaking experts (responsible for responding to misinformation in real-time).¹⁰² Between 24 February and 31 March 2022, TikTok’s safety team dedicated to the conflict claimed to have removed 41,191 videos, as well as 321,784 inauthentic accounts in Russia and 46,298 inauthentic accounts in Ukraine.¹⁰³

Other platforms such as Twitter adopted new approaches to labelling state-affiliated media posts that may have contained misinformation. Between 28 February and 16 March 2022, Twitter claimed to have labelled over 910,175 tweets containing links to Russian state-affiliated media.¹⁰⁴ TikTok also expanded its labels for state-run media accounts (from Russia, Ukraine, and Belarus) to 40 additional markets in January 2023.¹⁰⁵ However, subsequent analysis has questioned the effectiveness of TikTok’s labelling policy, including suggestions that many popular Russian-state propaganda accounts were not labelled, and that labels have done little to prevent Russian exploitation of TikTok’s notoriously viral algorithms.¹⁰⁶ The conflict in Ukraine has also

¹⁰⁰ Peter Zimonjic, “Elections Canada Launches Online Disinformation Tool to Prepare Voters for Next Federal Election”, *CBC News*, 12 January 2024, <https://www.cbc.ca/news/politics/elections-canada-electofacts-disinformaton-1.7081902>.

¹⁰¹ Eileen Yu, “Meta Will Enforce Ban on AI-Powered Political Ads in Every Nation, No Exceptions”, *ZDNET*, 30 November 2023, https://www.zdnet.com/article/meta-will-enforce-ban-on-ai-powered-political-ads-in-every-nation-no-exceptions/#google_vignette.

¹⁰² Adam Smith, “Meta Launches ‘Special Operations Centre’ in Response to Russia’s ‘Devastating’ Invasion of Ukraine”, *The Independent*, 25 February 2022, <https://www.independent.co.uk/tech/meta-special-operations-centre-russia-s-ukraine-b2023468.html>.

¹⁰³ TikTok, “Bringing More Context to Content on TikTok”, 4 March 2022, <https://newsroom.tiktok.com/en-us/bringing-more-context-to-content-on-tiktok>.

¹⁰⁴ Sinéad McSweeney, “Our Ongoing Approach to the War in Ukraine”, *Twitter Blog*, 16 March 2022, https://blog.twitter.com/en_us/topics/company/2022/our-ongoing-approach-to-the-war-in-ukraine.

¹⁰⁵ Sarah Perez, “TikTok Rolls Out Its ‘State-controlled Media’ Label to 40 More Countries”, *TechCrunch*, 18 January 2023, <https://techcrunch.com/2023/01/18/tiktok-rolls-out-its-state-controlled-media-label-to-40-more-countries/>.

¹⁰⁶ David Klepper, “TikTok Propaganda Labels Fall Flat in ‘Huge Win’ for Russia”, *Associated Press*, 30 March 2023, <https://apnews.com/article/tiktok-russia-propaganda-labels-ukraine-kremlin-china-88ecd866a2c34218ebbaccb45e435c12>.

seen TikTok remove fake accounts spreading disinformation as part of its efforts to remove propaganda networks on the platform.¹⁰⁷

Israel-Hamas war

The Israel-Hamas war has also drawn increasing attention towards content moderation policies and misinformation interventions by social media platforms and companies, including Facebook. While misleading content on the conflict remains persistent on the platform, measures against misinformation remain in place in the face of the conflicts in Gaza and Ukraine.

TikTok has also responded to the Israel-Hamas conflict by removing content around hate speech, misinformation, and incitement to violence on its platform. The company mentioned that it has seen an uptick in fake engagement, alluding to the scale and scope of videos regarding the conflict. Since the outbreak of the war, it has taken down as many as 24 million fake accounts worldwide, along with more than 21 million in the month leading up to the conflict.¹⁰⁸

Factors Contributing to the Persistence of Misinformation/Disinformation

The preceding sections highlight substantial investments by governments and platforms to counter online falsehoods; nevertheless, misinformation and disinformation continue to proliferate. Several factors may account for this persistence.

First, the creation and spread of online falsehoods often outpace the response time of countermeasures. AI has facilitated the rapid generation of falsehoods, making them more persuasive and appealing. When packaged in formats such as memes or short videos, falsehoods can circulate rapidly and reach wide audiences before regulatory interventions take effect. By contrast, fact-checking and corrective notices are resource-intensive and usually take longer to reach audiences.

The second challenge lies in the scepticism of both the public and social media platforms toward anti-falsehood measures. The public may view such legislation as serving not only to safeguard public order but also to consolidate political control, thereby eroding trust in government interventions and reinforcing perceptions of censorship. For social media platforms, commercial incentives to maximise engagement and advertising revenue may clash with the task of moderating content. Engagement-driven algorithms tend to amplify viral content regardless of its veracity.

¹⁰⁷ Mark Cenite, "Commentary: TikTok Scores Points for Its Handling of Russia's Invasion of Ukraine", *Channel NewsAsia*, Last modified 26 March 2022, <https://www.channelnewsasia.com/commentary/tiktok-moderation-censorship-russia-ukraine-war-disinformation-facebook-2581171>.

¹⁰⁸ TikTok, "Our Continued Actions to Protect the TikTok Community during the Israel-Hamas War", Last modified 2 October 2024, <https://newsroom.tiktok.com/en-gb/protect-tiktok-community-israel-hamas-war>.

Third, online falsehoods are inherently transnational and adaptive. Domestic legislation has limited reach over content originating overseas, especially when deliberately disseminated through foreign influence operations. At the same time, purveyors of falsehoods continually adapt to enforcement, e.g., by migrating to different platforms or leveraging generative AI to scale their activities.

Implications for Singapore: Ways to Strengthen the Effectiveness of POFMA

Given these persistent challenges, we will use the example of Singapore and its POFMA legislation to consider ways to strengthen state-led countermeasures against misinformation/disinformation. The following non-mutually exclusive implications are drawn from the preceding review and content analysis of POFMA cases.

1. Communicating with the public more explicitly and consistently through more communication channels

We noted an inconsistency in communication through the content analysis of POFMA cases during the 2023 presidential election period. Based on publicly available information extracted from press releases on 18 and 20 Aug 2023, it was not mentioned explicitly that Targeted Correction Directions were issued to TikTok, which is typically the case when such directions are issued to platforms. Instead, it was stated that “TikTok Pte. Ltd. will also be required to communicate a correction notice to all end-users in Singapore that had accessed the TikTok Post.” A greater level of explicitness and consistency in communication can enhance public understanding of the actions undertaken by the POFMA Office.

Singapore might consider addressing a broader range of falsehoods and communicating to the public through more channels, including social media platforms. For example, the government initiative “Factually” may consider setting up social media accounts on Facebook and TikTok. In addition to sharing press releases, “Factually” could broaden its outreach by inviting experts in various areas (e.g., scientists, professors, and doctors) and influencers to explain the importance of fact-checking and to debunk misinformation/disinformation widely spread in Singapore. “Factually” may also collaborate with other government ministries, statutory boards, and agencies (e.g., the Ministry of Health, National Library Board, and Agency for Integrated Care) to conduct POFMA campaigns to raise public awareness and clarify misleading information and misconceptions.

2. Raising public knowledge of fact-checking by weaving media and information literacy into education

All the jurisdictions covered in our review have recognised the importance of media and information literacy (MIL), with MIL integrated into public education and/or school

curricula. Previous studies of MIL education have demonstrated advances in critical thinking skills and positive behaviour change in terms of the evaluation of information. Successful implementation of MIL led to critical thinking outcomes, including greater awareness of messaging, bias, and representation.¹⁰⁹

In Singapore, students and young adults learn and refine strategies through programmes and modules (e.g., cyber wellness) to critically evaluate online information – including evaluating the credibility of sources online. Other programmes include understanding the impacts of online falsehoods. MIL initiatives for adults are also implemented. The S.U.R.E. (Source, Understand, Research, Evaluate) campaign by the National Library Board aims to equip Singaporeans with the necessary skills, strategies, and tools to navigate the online information space confidently.¹¹⁰

S.U.R.E. has categorised resources for various segments of the population, including teachers, students, adults, and seniors. Tailored programmes and resources can help to deliver targeted efforts to a specific audience.¹¹¹ S.U.R.E. for Work equips working adults with strategies to parse reliable sources of information within their professional environment – these include fact-checking tools and tips. S.U.R.E. for Life is an educational effort aimed at educating the public on the impact and threats of deliberate online falsehoods and to equip and enhance the information literacy of Singaporeans.¹¹²

While existing MIL programmes in Singapore have been elevated by the S.U.R.E. campaign and its various initiatives, further enhancements can be undertaken. A cogent understanding of the media environment, both locally and internationally, is instrumental in mapping out a comprehensive media and information landscape. Crucially, it is important to note that accessing credible and high-quality information is not the sole responsibility of individuals in Singapore. A network of actors – including institutions, technology platforms, and nations – together with the public, assists the successful development and deployment of MIL initiatives. Deeper insights could be sought into how MIL training and education can be leveraged to enhance public media engagement with MIL initiatives. Considerations can also be made to monitor media effects on the public to ascertain the level of critical thinking skills.¹¹³

¹⁰⁹ Se-Hoon Jeong, Hyunyi Cho, and Yoori Hwang, “Media Literacy Interventions: A Meta-Analytic Review”, *Journal of Communication* 62 (2012): 454–72.

¹¹⁰ National Library Board, “Sure Elevated”, Accessed 13 August 2024, <https://www.nlb.gov.sg/main/site/sure-elevated>.

¹¹¹ National Library Board, “Resources for the Public”, Accessed 13 August 2024, <https://www.nlb.gov.sg/main/site/sure-elevated/for-the-public>.

¹¹² National Library Board, “Sure Elevated”, Accessed 13 August 2024, <https://www.nlb.gov.sg/main/site/sure-elevated>.

¹¹³ Michele Bulger and Pamela Davison, “The Promises, Challenges and Futures of Media Literacy”, *Journal of Media Literacy Education* 10 (2018): 1–21, https://digitalcommons.uri.edu/cgi/viewcontent.cgi?params=/context/jmle/article/1365/&path_info=Bulger_and_Davison_JMLE_10.1.pdf.

Conclusion

Through a comparative analysis of governments' and social media companies' counter-falsehood measures, the study highlights both the limitations of current interventions and the challenges inherent in regulating and mitigating online falsehoods. Several key factors contribute to the persistence of online falsehoods, including the speed, adaptability, and transnational nature of false content, public scepticism toward anti-falsehood legislation, and engagement-driven amplification by social media algorithms. Drawing on these insights, the study focuses on Singapore's use of POFMA legislation as an example to propose implications to enhance the effectiveness of countermeasures, emphasising the need for clearer and consistent public communication through multiple channels, and enhancing public awareness of fact-checking through MIL education.

More research can be done to further examine MIL and its role in responding to media messages and government clarifications. Evaluating the effectiveness of current interventions, both domestically and internationally, can help identify which MIL educational measures effectively influence public behaviour. The insights would also help to determine the strengths of MIL awareness and initiatives in Singapore, guiding enhancements to existing programmes.

About the Authors

Dr Xue Zhang is a Research Fellow at the Centre of Excellence for National Security (CENS), S. Rajaratnam School of International Studies (RSIS), Nanyang Technological University (NTU), Singapore. Her research interests include information, media and health literacy, information management, and counter-misinformation/disinformation measures. Her work has been published in *Health Communication*, *Journal of Information Science*, *Information Research*, *The Diplomat*, *Channel News Asia* etc. She has been invited to serve as a reviewer for many academic journals, such as *Information, Communication and Society*, *Health Communication*, *California Management Review*, etc.

Dr Zhang conferred her PhD from the Wee Kim Wee School of Communication and Information (WKWSCI), NTU. She obtained her MSc (Information Studies) from NTU and her BA (English and International Business Communication) from Nanjing University (China). Before joining RSIS, Dr Zhang worked as a Manager at the Agency for Integrated Care (AIC). She was also an Adjunct Lecturer at NTU and the Singapore University of Social Science (SUSS) and a Research Fellow at the National University of Singapore (NUS).

Dymples Leong is an Associate Research Fellow with the Centre of Excellence for National Security (CENS) at the S. Rajaratnam School of International Studies (RSIS), Nanyang Technological University, Singapore. Her research focuses on disinformation, influence campaigns, social media, strategic communications. Her work has been published in various academic and media outlets including Routledge, Channel NewsAsia, The Straits Times, TODAY, Reuters Institute for the Study of Journalism, The Diplomat, and East Asia Forum. She holds a Bachelor of Business majoring in Marketing and Management from the University of Newcastle Australia.

Sean Tan is a Senior Analyst for the Cyber and Homeland Defence Programme at CENS. He previously graduated with an MPhil in World History from the University of Cambridge. Prior to joining CENS, he had been based at the Centre for Information Integrity and the Internet (IN-cube), a centre that aims to help promote information integrity in online spaces. A one-time prospective historian with a keen interest in non-traditional security matters, Sean will be continuing work in this space, which includes Distortions Rumours Untruths Misinformation Smears (DRUMS), foreign interference and hybrid threats, and corporate censorship through algorithms.

About the S. Rajaratnam School of International Studies

The S. Rajaratnam School of International Studies (RSIS) is a global graduate school and think tank focusing on strategic studies and security affairs. Its five Research Centres and three Research Programmes, led by the Office of the Executive Deputy Chairman, and assisted by the Dean on the academic side, drive the School's research, education and networking activities.

The graduate school offers Master of Science Programmes in Strategic Studies, International Relations, International Political Economy and Asian Studies. As a school, RSIS fosters a nurturing environment to develop students into first-class scholars and practitioners.

As a think tank, RSIS conducts policy-relevant and forward-looking research in both national and international security, science and technology, society and economic and environmental sustainability. RSIS also produces academic research on security and international affairs. It publishes scholarly research in top-tier academic journals and leading university presses, and distributes policy research in a timely manner to a wide range of readers.

RSIS Working Paper Series

348	A Review of Anti-Misinformation/Disinformation Measures and Actions Taken by Governments and Mainstream Social Media Platforms	2025
347	Malaysia's Foreign Policy under Anwar Ibrahim: Rhetorical Shift, Strategic Continuity? <i>Ilango Karuppannan</i>	2025
346	Influencing Power: Civil Society, Political Mobilisation and the Pursuit of Reforms in Malaysia, 2018–2025 <i>Ooi Kok-Hin</i>	2025
345	Analysing ASEAN Chairmanships in Perspective: Malaysia in 2025 and Future Leadership Outlook Amid Vision 2045 <i>Prashanth Parameswaran</i>	2025
344	Public-Private Partnerships in Outer Space: Implications for the Defence and Security Sector <i>Wichuta Teeratanabodee</i>	2025
343	How Will Prime Minister Anwar Ibrahim Advance Malaysia's Belt and Road Cooperation with China? <i>Ngeow Chow Bing</i>	2025
342	Anwar Ibrahim in Power: A Historical Locating of the Limits for Change in Malaysia <i>Ooi Kee Beng</i>	2024
341	Institutional Challenges for China's Chip Industry <i>Manoj Harjani</i>	2024
340	How Doctrinal Differences Among Distinct Islamist Strands of Thought Influence Malay-Muslim Political Actors and Political Outcomes in Malaysia <i>Ahmad Fauzi Abdul Hamid and Che Hamdan Che Mohd Razali</i>	2023
339	Malaysia's Changed Electoral Landscape <i>Meredith L. Weiss</i>	2023
338	From Competition to Cooperation: The Global Palm Oil "Sustainability Turn" as a Turning Point for the Malaysia-Indonesia "Special Relationship" <i>Helena Varkkey</i>	2022

To access the full list of past RSIS Working Papers, click [here](#).

Please share this publication with your friends. They can subscribe to RSIS publications by scanning the QR Code below.



Appendix: Other jurisdictions' counter-misinformation/disinformation measures

Country	Legislation	Enacted Year	Reference	Task Force	Reference	Public Education	Reference
Japan	Current laws that could impact individuals spreading disinformation address the dissemination of false information within certain contexts	e.g., the Broadcasting Act of 1950, amended in 2014	ADTAC Disinformation Inventory, "Japan Policies Affecting Disinformation", Accessed 22 January 2024, https://inventory.adtac.ac/wiki/Japan_Policies_Affecting_Disinformation#cite_note-3 .	Is currently establishing a body within the Cabinet Secretariat to fight against disinformation	Takashi Narazaki, "Japan Setting Up Rapid-response Unit to Counter Disinformation", <i>The Asahi Shimbun</i> , 26 January 2023, https://www.asahi.com/jw/articles/14824434 .	Connecting Citizenship Education and Media Literacy	Jun Tsukada, "Media Education: Bridging the Intersection between Media Literacy and Citizenship Education in Japan", <i>Ejcs</i> 22, no. 2 (2022): Article 7, Accessed 22 January 2024, https://www.japanesestudies.org.uk/ejcs/vol22/iss2/tsukada.html .
South Korea	(Postponed in 2021) Bill on fake news legislation was shelved after criticism over freedom of press	Not enacted as bill was shelved	Sang-Hoon Choe, "South Korea Shelves 'Fake News' Bill Amid International Outcry", <i>New York Times</i> , 1 October 2021, https://www.nytimes.com/2021/10/01/world/asia/south-korea-fake-news-law.html .	Korea Communications Commission to propose regulations to address fake news and prevent it from manipulating public opinion	Ji-hyoung Son, "PM Orders Measures to Prevent Public Opinion Manipulation on Web Portals", <i>The Korean Herald</i> , 4 October 2023, https://www.koreaherald.com/view.php?ud=20231004000576 .	Teaching students about media literacy	D.M. Park, "Elementary School Students Learning to Distinguish Between Real and Fake News", <i>Korea Bizwire</i> , 22 April 2020, http://koreabizwire.com/elementary-school-students-learning-to-distinguish-between-real-and-fake-news/158239 .

Thailand	Computer-Related Crime Act 2007 and (No. 2) 2017 Section 14 (2) “computer data, with the knowledge that it is the computer data that is false”	2022	Saravuth Pitiyasak and Varaporn Vanaphituk (30 June 2022). Legal Measures to control Fake News on Social Media: Laws of Thailand and Singapore compared. Thaijo Modern Management Journal. Retrieved 19 January 2024 from https://so04.tci-thaijo.org/index.php/stou-sms-pr/article/view/250080	Anti-Fake News Centre was set up in 2019 to tackle fake news and disinformation.	Janjira Sombatpoonsiri (20 April 2022). Labelling Fake News: The Politics of Regulating Disinformation in Thailand. Fulcrum. Retrieved 19 January 2024 from https://fulcrum.sg/labelling-fake-news-the-politics-of-regulating-disinformation-in-thailand/	MIL incorporated into core curriculum of primary and secondary schools. Higher institutes of education such as universities offer MIL courses either on its own or combined with other disciplines.	Media and information literacy education in Asia: exploration of policies and practices in Japan, Thailand, Indonesia, Malaysia, and the Philippines (2020). Retrieved on 23 January 2024 from https://unesdoc.unesco.org/ark:/48223/pf0000374575
Indonesia	Second Amendment of Indonesia's Information and Electronic Transactions (IET) Law covers misinformation and hoaxes. criminal penalties for spreading false information leading to societal unrest	2016	Pizaro Gozali Idrus (12 May 2023). Indonesia tones down internet law that critics say curbs free speech. Bernama. Retrieved 19 January 2024 from https://www.benarnews.org/english/news/indonesian/internet-law-toned-down-slightly-12052023142818.html	Anti-hoax task force set up under Communication and Informatics (Kominfo) looking into hoaxes, especially salient during 2024 election year in Indonesia. The task force looks into political hoaxes.	Anti-hoax task force working more intensively: Minister. (2 November 2023). Antara News Agency. Retrieved 19 January 2024 from https://en.antaranews.com/news/297786/anti-hoax-task-force-working-more-intensively-minister	Fact-checking alliance Cekfata and MAFINDO are civic-level organisations with public education efforts on digital and media literacy for public outreach.	Mafindo (n.d.). EU Cyber Direct. Retrieved 19 January 2024 from https://eucyberdirect.eu/good-cyber-story/mafindo

Philippines	Article 154 of the Revised Penal Code any person who publishes false news to endanger the public order; Republic Act 10175 (Anti-Cybercrime Law) for offences of libel conducted through electronic means	Enacted 2012; revised in 2021	Christopher Lloyd Caliwan. (28 August 2022). PNP to fake news peddlers: 'We are watching you'. Philippine News Agency. Retrieved 22 January 2024 from https://www.pna.gov.ph/articles/1182359#:~:text=Under%20Article%20154%20of%20the,or%20cause%20damage%20to%20the	Elections-based task force formed by the Commission on Elections (Comelec)	Comelec forms task force vs fake news (6 April 2022). CNN Philippines. Retrieved 22 January 2024 from https://www.cnnphilippines.com/news/2022/4/6/Comelec-task-force-fake-news.html	Media and Information Literacy (MIL) to equip citizens, particularly youth, with critical thinking skills for media navigation	Jane Bautistia (15 August 2023). Gov't launches media, information literacy campaign. Philippine Daily Inquirer. Retrieved 22 January 2024 from https://newsinfo.inquirer.net/1816568/govt-launches-media-information-literacy-campaign
Vietnam	Cybersecurity Law ("Decree 53"). Decree 53 addresses takedown measures by local authorities concerning fake news in cyberspace. Local authorities can issue takedown requests against service providers.	Decree 53 enacted in 2022	Manh Hung Tran. (17 August 2022). Connect on Tech. Retrieved 22 January 2024 from https://www.connectontech.com/vietnam-issuance-of-decree-implementing-the-cybersecurity-law/	Unable to find	N.A.	A mix of private and public efforts including Ministry of Information and Communication-led community digital technology groups for MIL.	Vietnam promotes digital literacy (13 October 2022). Vietnamplus. Retrieved on 23 January 2024 from https://en.vietnamplus.vn/vietnam-promotes-digital-literacy/240021.vnp

India	Laws to prevent social media platforms from hosting information that the government identifies as false	2021 (amended in 2023)	<p>The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 [updated as on 6.4.2023]. Ministry of Electronics and Information Technology India. Retrieved 22 January 2024 from https://www.meity.gov.in/writereaddata/files/Information%20Technology%20%28Intermediary%20Guidelines%20and%20Digital%20Media%20Ethics%20Code%29%20Rules%20C%202021%20%28updated%206.04.2023%29-.pdf</p>	At a regional level- the Tamil Nadu government recently passed an order to set up a fact-check unit to counter fake news, communal misinformation and hate speech related to the state government	<p>Chandrababu, D. (2 November 2023). Tamil Nadu to form fact-checking unit to tackle fake news against govt. Hindustan Times. Retrieved 22 January 2024 from https://www.hindustanimes.com/india-news/tamil-nadu-to-form-fact-checking-unit-to-tackle-fake-news-against-govt-101698865525439.html</p>	Media literacy programmes to teach senior citizens how to (among others) safeguard against online misinformation; comprehensive digital literacy training programmes at state level	<p>Mehta, D. (2023). Vishvas News Launches Media Literacy Campaign To Equip Senior Citizens to Combat Misinformation and Online Fraud. Vishvas News. Retrieved 30 January 2024 from https://www.vishvasnews.com/english/news/vishvas-news-launches-media-literacy-campaign-to-equip-senior-citizens-to-combat-misinformation-and-online-fraud/</p> <p>The Hindu Reporters (2024). Kerala to be made fully digitally literate by November 1. The Hindu. Retrieved 22 January 2024 from https://www.thehindu.com/news/national/kerala/kerala-to-be-made-fully-digitally-literate-by-november-1/article67765923.ece</p>
-------	---	------------------------	--	---	---	---	--

Canada	No	N.A.	<p>ADTAC Disinformation Inventory (n.d.). Canada Policies Affecting Disinformation. Retrieved 22 January 2024 from https://inventory.adt.ac/wiki/Canada_Policies_Affecting_Disinformation.</p> <p>Baylon, J. (10 October 2022) Why passing laws to curb online disinformation is so difficult, according to tech and legal experts. CBC. Retrieved 22 January 2024 from https://www.cbc.ca/news/canada/british-columbia/disinformation-challenges-social-media-1.6607925.</p>	Critical Election Incident Public Protocol overseen by five senior level non-political government officials	<p>Aiello, R. (30 January 2019). Feds unveil plan to tackle fake news, interference in 2019 election. CTV News. Retrieved 22 January 2024 from https://www.ctvnews.ca/politics/feds-unveil-plan-to-tackle-fake-news-interference-in-2019-election-1.4274273.</p>	<p>Media Smarts - Canada's Centre for Digital Media Literacy</p> <p>Association for Media Literacy</p>	<p>Media Smarts (n.d.). Canada's Centre for Digital Media Literacy. Retrieved 22 January 2024 from https://mediasmarts.ca/</p> <p>Association for Media Literacy (n.d.). Teaching media literacy. Retrieved 22 January 2024 from https://aml.ca/.</p>
--------	----	------	---	---	---	--	---

Brazil	Penalties for large firms and tech companies that fail to crack down on fake news; these include hefty fines	Passed in 2020 (not yet effective; still pending)	Paul, K. (3 May 2023). Brazil receives pushback from tech companies on 'fake news' bill. The Guardian. Retrieved 23 January 2024 from https://www.theguardian.com/world/2023/may/03/alphabet-google-fake-news-law#:~:text=Bill%202630%2C%20also%20known%20as,fake%20failures%20to%20do%20so	Official departments/work ing groups to fight online falsehoods	How Social Media Platforms Can Engage On Fighting Disinformation. (14 March 2023). Wilson Center. Retrieved 23 January 2024 from https://www.wilsoncenter.org/blog-post/how-social-media-platforms-can-engage-fighting-disinformation	Official government portal dedicated to identifying and reporting fake news (gov.br/brasil/contrafake)	Garcia, R. T. (5 May 2023). A Brazilian 'Ministry of Truth' is in the making. Al Jazeera. Retrieved 23 January 2024 from https://www.aljazeera.com/opinions/2023/5/5/a-brazilian-ministry-of-truth-is-in-the-making
Chile	No	N.A.	Chile: Senate finds Commission Against Misinformation unconstitutional. (20 July 2023). MercoPress. Retrieved 23 January 2024 from https://en.mercoPress.com/2023/07/20/chile-senate-finds-commission-against-disinformation-unconstitutional	Unable to find	N.A.	Fact checking organisations (however, the most prominent start-up, Fast Check CL, seems to be on a smaller scale compared to other countries)	Padilla, F. (1 September 2022). Chile: Lessons from years of disinformation. Context. Retrieved 23 January 2024 from https://www.context.news/digital-rights/opinion/chile-lessons-from-years-of-disinformation

Australia	Proposals to amend the 1992 Broadcasting and Services Act to combat online misinformation and disinformation. This amendment would provide authorities with enhanced powers for enforcement, as well as penalties for non-compliance (including imprisonment)	Broadcasting and Services Act of 1992 (proposed amendment in 2023; introduction delayed until 2024)	Taylor, J. (13 November 2023.) Labor to overhaul misinformation bill after objections over freedom of speech. The Guardian. Retrieved 22 January 2024 from https://www.theguardian.com/australia-news/2023/nov/13/labor-misinformation-bill-objections-freedom-of-speech-religious-freedom	An independent eSafety Commission which sets and enforces standards on key issues/online harms, including misinformation and disinformation	eSafety Commissioner. Fake news and misinformation. Retrieved 22 January 2024 from https://www.esafety.gov.au/key-issues/fake-news-and-misinformation	Media literacy is an official part of the national curriculum across different subjects	New Australian Curriculum Released. 18 July 2022. Retrieved 22 January 2024 from https://medialiteracy.org.au/new-australian-curriculum-released/
-----------	---	---	--	---	--	---	--

New Zealand	No	<p>Current regulatory regime is largely based on laws from the 1980s and 1990s (pre-Internet). A voluntary code of practice exists but it is not legally-binding.</p>	<p>Te Mana Whakaatu Classification Office. (December 2020). Rethinking the way we regulate media in the digital age. Retrieved 23 January 2024 from https://www.beehive.govt.nz/sites/default/files/2020-12/Classification%20Office-3.pdf</p> <p>Pullar-Strecker, T. (31 July 2022). NZ code to tackle disinformation: what have Google and Meta really agreed to do? Stuff. Retrieved 23 January 2024 from https://www.stuff.co.nz/business/opinion-analysis/129383116/nz-code-to-tackle-disinformation-what-have-google-and-meta-really-agreed-to-do</p>	<p>Government agencies involved in a 'whole of society' approach (involving support for civil society and community-led groups, and public research)</p>	<p>Department of the Prime Minister and Cabinet. (14 September 2023). Strengthening resilience to disinformation. Retrieved 23 January 2024 from https://www.stuff.co.nz/business/opinion-analysis/129383116/nz-code-to-tackle-disinformation-what-have-google-and-meta-really-agreed-to-do</p>	<p>Resources for students and teachers to identify misinformation in schools</p>	<p>McCulloch, G. (17 August 2023). New resource battles disinformation in Kiwi schools. Stuff. Retrieved 23 January 2024 from https://www.stuff.co.nz/national/education/300950772/new-resource-battles-disinformation-in-kiwi-schools</p>
-------------	----	---	---	--	--	--	---

Russia	Amendments to the criminal code making the spread of "fake" information an offence punishable with fines or jail terms	2022	Reuters (4 March 2022) Russia fights back in information war with jail warning. Retrieved 18 January 2024 from https://www.reuters.com/world/europe/russia-introduce-jail-terms-spreading-fake-information-about-army-2022-03-04/	Unable to find	N.A.	Media and Information Literate Citizens: Think Critically, Click Wisely	UNESCO Institute for Information Technologies in Education (15 June 2022). New UNESCO Curriculum on media and information literacy in Russian was presented in Almaty. Retrieved 18 January 2024 from https://iite.unesco.org/news/new-unesco-curriculum-on-media-and-information-literacy-in-russian-was-presented-in-almaty/
Ukraine	New media law called "On Media"	2023	Nilsson-Julien, E. & Federico, I. (3 May 2023). Ukraine: New media law sparks division. Euronews. Retrieved 18 January 2024 from https://www.euronews.com/2023/05/03/ukraine-new-media-law-sparks-division	Centre for Countering Disinformation (CCD)	Centre for Countering Disinformation (2024) Retrieved 18 January 2024 from https://cpd.gov.ua/en/golovna-storinka-czentro-protydyi-dezinformaciyi-pry-rnbo-english/	Learn to Discern in Education (L2D-Ed)	IREX (n.d.) Strengthening Media Literacy in the Ukrainian Education System. Retrieved 18 January 2024 from https://www.irex.org/project/strengthening-media-literacy-ukrainian-education-system

Nigeria	Protection from Internet Falsehood and Manipulations Bill 2019 also known as the Social Media Bill	Proposed in 2019, not passed yet	Mabika, V. & Ogu, E. C. (February 2022). Internet Impact Brief: Nigeria's Protection from Internet Falsehood and Manipulation Bill 2019. Internet Society. Retrieved 22 January 2024 from https://www.internetsociety.org/resources/2022/internet-impact-brief-nigerias-protection-from-internet-falsehood-and-manipulation-bill-2019/	Non-government fact-checkers: journalists and media organisations	Takambou, M. M. (20 July 2023). Nigeria takes steps to tackle 'rampant' disinformation. DW. Retrieved 22 January 2024 from https://www.dw.com/en/nigeria-takes-steps-to-tackle-rampant-disinformation/a-66297788	Media Literacy Education	Bamgbose, G. (17 March 2023) An exposition on media literacy education. Business Day. Retrieved 22 January 2024 from https://businessday.ng/columnist/article/an-exposition-on-media-literacy-education/
Kenya	Computer Misuse and Cybercrime Act	2018	National Computer and Cybercrimes Coordination Committee (n.d.) Computer Misuse and Cybercrime Act 2018. Retrieved 19 January 2024 from https://nc4.go.ke/the-computer-misuse-and-cybercrimes-act/	National Computer and Cybercrimes Coordination Committee, Media Council of Kenya (MCK)	ibid. Irungu, M. (2022). MCK Launches IVerify Network Of Fact-Checking Platform. Capital News. Retrieved 19 January 2024 from https://www.capitalfm.co.ke/news/2022/07/mck-launches-verify-network-of-fact-checking-platform/ .	Over the past few years, there has been a notable increase in awareness programs aimed at fostering media literacy among students and the general populace.	Antony, S. (18 November 2023). The Gradual Growth of Media Literacy in Kenyan Institutions. Medium. Retrieved 19 January 2024 from https://medium.com/@salimantony123/the-gradual-growth-of-media-literacy-in-kenya-969452a86990