FER〜I
FAKE NEWS
RISK MITIGATOR

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Leading author(s):

Surname	First name	Beneficiary
Paciaroni	Alessandro	The Lisbon Council
Meyer	Stella	The Lisbon Council
Beli	Aikaterini	The Lisbon Council

Contributing partner(s):

Surname	First name	Beneficiary
Vrotsou	Christina	Convergence
Kandilioti	Maria	Convergence
Provopoulou	Vasiliki- Eleni	Netcompany- Intrasoft

Peer reviewer(s):

Surname	First name	Beneficiary
Lo Giudice	Michael Victor	UCSC - TRANSCRIME
Rieckmann	Johannes	BIGS

Ethics reviewer:

Surname	First name	Beneficiary
Fikenscher	Sven-Eric	BPA

Security reviewer:

Surname	First name	Beneficiary
Mattes	Tobias	BPA

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1.0	29 Mar 2024	Monitoring and reporting input from partners added/ Final version ready for submission	LC

Executive summary

This deliverable provides a comprehensive report on the activities and key performance indicators (KPIs) of the Horizon Europe project FERMI. It includes an assessment of the project's current status and an update of the strategy based on previous elements. The report details the progress made in implementing various activities outlined in the project plan, including outreach efforts, stakeholder engagement, and communication initiatives. It highlights key achievements and milestones reached during the reporting period, along with a detailed analysis of the KPIs that measure the effectiveness of these activities. Furthermore, the assessment of the project's status offers insights into challenges encountered, lessons learned, and areas for improvement. It provides stakeholders with a clear understanding of the project's trajectory and any adjustments needed to ensure its successful completion. Based on the analysis of activities, KPIs, and the project's current status, the report presents an updated strategy to guide future efforts. This includes refining outreach approaches, adjusting communication tactics, and optimizing stakeholder engagement strategies to align with project goals and objectives. Overall, this deliverable serves as a valuable resource for stakeholders, providing transparency regarding project progress, performance metrics, and strategic updates necessary to drive FERMI towards its intended outcomes.

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Abbreviations

AI: Artificial intelligence

CDES: Communication and Dissemination, Exploitation and Sustainability

CTA: Call to Action

Dx.y: Deliverable x.y

EU: European Union

GA: General Agreement

KPI: Key Performance Indicators

LEA: Law Enforcement Agency

Mxy: Month xy

NGO: Non-governmental organisation

SEO: Search Engine Optimisation

TRL: Technology Readiness Level

Tx.y: Task x.y

1   Introduction

This deliverable encompasses the second version of "The FERMI outreach management facilitators package," which includes an update of the project's communication and dissemination, strategy and a glimpse of the exploitation and sustainability strategy (CDES).

This deliverable reports the components of the CDES that are necessary and essential for the assessment of the strategy; namely, objectives and implementation steps and key performance indicators (KPI) - while avoiding the unnecessary repetition of those elements that remain unchanged from the first version of this deliverable; namely, consortium roles, communication channels and templates, tools and resources, target audience and personas - with a few notable exceptions. Both the risk table and the dissemination plan remain unchanged but are deemed relevant in this deliverable. The former to state that the risks remain unchanged and the latter because it is functional to a further specification of the implementation plan of the CDES. Additionally, this deliverable contains those components of the CDES that are part of the update of the latter – namely: the ecosystem mapping for dissemination and exploitation activities, a timeline for the dissemination activities, the FERMI community and the communication plan, including the social media strategy, and the exploitation planning.

This deliverable is structured as follows: chapter 2 synthesises the broad objectives of the CDES and the key implementation steps; chapter 3 provides an overview of the KPI with a status update at M17; chapter 4 delves deeper into the dissemination plan offering an overview of the ecosystem mapping and a short description of the most important activities; chapter 5 provides an overview and an update on the communication strategy; chapter 6 presents the exploitation activities at a glance. The deliverable is closed with the conclusions with the notable exception of the annexes which consist of a list of (potential) stakeholders, a list of events and a list of avenues for publication.

2   Objectives and Key Implementation Steps

The FERMI CDES is meticulously designed to achieve multifaceted objectives while adhering to strategic implementation steps. Firstly, it emphasizes the development of a robust online presence through social media platforms and an engaging website. This initiative aims to foster awareness not only about the project itself but also about the pertinent topics it addresses, thereby nurturing a vibrant community of interest. Secondly, the strategy focuses on driving traffic to the project's website and newsletter, facilitating community building through active participation in events and the publication of project outcomes. Lastly, an integral aspect of the strategy involves consolidating relationships, forging strategic business partnerships, and providing valuable inputs for further research and policymaking endeavours. By integrating these objectives and implementation steps, the dissemination and communication strategy of FERMI endeavours to maximise its impact and outreach within and outside the Horizon Europe ecosystem for long-term impact and the exploitation of the project results.

Whereas the KPI are meant to measure the performance, the objectives and key implementation steps, rather, provide a guidance framework. In the latter, the project status can be assessed based on whether the objectives have been achieved or not. Importantly objectives and key implementation steps are somewhat interchangeable, establishing online presence by opening social media accounts and creating a website is an objective in itself and it is also an implementation step toward the objective of raising awareness on the project. With regard to this, as it will be further proved by the measurement of KPI, FERMI established a solid online presence and raised awareness on the project and the topic at hand. Traffic is being consistently channelled to the website and the newsletter. A community of interest was created by grasping the interests of existing communities like digital media, content moderation, disinformation, criminology, law enforcement, and geopolitics. Nonetheless, it is noted here that the consortium shall keep the momentum high by engaging with stakeholders and solidifying the relationships built so far. FERMI shall continue a consistent exchange with the various stakeholders and the communities to effectively achieve the creation of a sustainable community of interest. Practically speaking, it is highlighted that the consortium shall continue to organise and attend events and shape the conversation around the key objectives of the project. In this way the creation of a community of interest will prove itself to be sustainable over time and it will pave the way for the long-term impact of the project.

3 Monitoring and Key Performance Indicators

Measure	KPI	Objective	Phase 1	Phase 2	Phase 3	Total	Gap
Website	N° of visitors	680	2250	1873		4123	3443
Website	N° of accesses	3000	2603	2153		4756	1756
Website	N° downloads of material	1020	66	177		243	-777
Social Media Network	N° of push announcements (publications)	340	205	767		972	632
Social Media Network	N° of followers	340	264	255		519	179
Social Media Network	N° of reposts	640	737	433		1170	530
Social Media Network	N° of social media profile views	1360	4225	3545		7770	6410
Social Media Network	N° of tweets and posts	1020	191	209		400	-620
Newsletter	N° of newsletters distributed	12	2	2		4	-8
Communication starter pack		1	1			1	1
Update of CDES	N° of versions	3	1	1		1	1
Synergies	N° of similarly themed projects identified	3	3			3	0
Synergies	N° of workshops jointly organised with similarly themed projects	1		1		1	0
Publications	N° of publication in internationally referenced journals	6		7[1]		7[2]	1
Publications	N° of journal special issues	2				0	-2
Publications	N° of publications in international magazines	6		1		0	-5

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[1] Including articles that have been submitted but not published yet.
[2] Including articles that have been submitted but not published yet.

Publications	N° of presentation in conference	12	1	5		6	-6
Online discussion	N° of downloads of HQ e-brochures	1000				0	-1000
Online discussion	N° of new discussions on LinkedIn per month	1020	833	918		1751	731
Website	N° of videos downloaded	30 per month				0	
Website	N° of cumulative views of videos	1000	521			521	-479
Events	N° of small events organised (<25 participants)	5	1	1		2	-3
Events	N° of big events organised (25-100 participants)	3		2		2	-1
Events	Conversion rate in each event	40%				0	-40%
Events	N° of final conferences organised	1				0	-1
Events	N° of INFO days/technology showcase organised	3	1	1		2	-1
Public policy engagement	N° of events organised	5		2		2	-3
Public policy engagement	N° of hard copies of material for policymakers distributed per event	50		10		10	-40
Public policy engagement	N° of policy making bodies engaged	2		3		3	1
Presentation of results	N° of events attended	10	8	5		13	3
Presentation of results	N° of events organised (100 participants)	2				0	-2
Presentation of results	Participants engaged for further activities	20%				0	-20%
Internal outreach	N° of internal emails sent	15	12	7		19	4

Monitoring of CDES	N° of reports published with CDES KPIs	4		1		0	-3
Training	N° of internal training workshop organised	1		1		1	0
Partnerships with businesses	N° of partnerships with businesses	1				0	-1

Table 1 - KPI at M17

Table 1 reports the KPI on CDES activities at M17, thus it reflects the status measured midway through phase 2. Overall, the CDES activities are well under way and, in some areas, the KPIs have already been met or exceeded. It remains unclear what is meant by LinkedIn discussions, but this seems to be aimed at measuring the project's presence and activity on the platform. Engagement with the project's social media content; for example, likes, shares, comments and views, might better be suited to gauge its online visibility and popularity. For this indicator, the approximate number of likes, shares and comments per month was calculated.

Further, the number of push notifications cannot be measured as it is technically and legally impossible to send push notifications to users and subsequently track people's mobile settings and app notifications. To calculate the approximate number of push notifications regarding the project with which user interact on social media, the following methodology was followed. According to research[3], the median click rate for push notifications is 7.8%, while overall 60% of users opt-in to receiving push notifications[4]. Considering that there are no indications about the number of notifications a platform sends about social media posts from a page, we are going to assume that around 10% of the posts were boosted this way, leading to the following equation:

$$successful\ push\ notifications \approx\ 60\%followers\ x\ 10\%posts\ x\ conversion\ rate\ (= 0.078)$$

This equation leads to the conclusion that approximate 972 push notifications in total were successfully sent to the social media followers during both phases.

Another indicator that required approximation is the number of views of videos. While this indicator can partially be measured with 100% accuracy (views online) there is a portion of views that remains unaccounted for when the videos are displayed on screen during certain events and expo. This is the case of the European Big Data Value Forum 2023, for instance. For this reason, the number of online views (306) was complemented with an estimate of roughly 1/3 of the number of participants (650) at the aforementioned event, resulting in an addition of 215 views.

Some measures required a certain degree of preparation, for instance events, videos, e-brochures and other materials, which has been completed in the first phase. Now that the groundwork has been laid, the KPIs of these respective measures are expected to grow exponentially. While the number of publications may seem low, they are within the norm given that publications require first results and involve a rigid and timely submission and review process, before anything is published. Project partners are already working on future publications so that the project is on track in this regard as well. Other measures such as the presentation of results will likely be completed at a later stage in the project if not towards the end.

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[3] Lindner, J. (2023, December 20). *Push Notification Statistics: Market Report & Data*. Gitnux. https://gitnux.org/push-notification-statistics/
[4] Dogtiev, A. (2024, February 6). *Push Notifications Statistics (2023)*. Bussiness of apps. https://www.businessofapps.com/marketplace/push-notifications/research/push-notifications-statistics/

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3.1 Dissemination and Communication Timeline for the Second Year

In the second year, the focus will be on producing high-quality content that is closely related to the core elements of the FERMI project. With the mapping of relevant stakeholders, events and publication outlets complete, additional efforts will be put on promoting the FERMI project among stakeholders and at events. This includes writing articles, attending events, presenting the project and elements of it at conferences and publishing scientific articles. Additionally, emphasis is placed on meaningful growth across all social media channels and the project's newsletter.

Main Activities	M13	M14	M15	M16	M17	M18	M19	M20	M21	M22	M23	M24
Social media campaign	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Social media analysis & strategy adjustments			▓									
Stakeholder mapping	▓	▓	▓	▓	▓							
Mapping of events	▓	▓	▓									
Mapping of publication outlets	▓	▓	▓									
Website maintenance	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Website content	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
YouTube videos	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Workshops & Webinars	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Newsletter	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Drafting and submission of scientific articles	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Publication of a scientific poster	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Publication of a scientific article	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Participation in EU and national events	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓

Table 2 - Timeline of the main activities for the second year

3.2 Risks and Mitigating Actions

The following risks and their respective ratings and mitigation actions have not changed as they relate to later stages of the project or the overall delivery of the project.

Risk	Rating	Mitigation Action

The project results do not achieve sufficient relevance in the security and intelligence sector. The project will not achieve the planned impact and subsequent exploitation	High	All partners are interested in gaining new business based on the results and thus direct the project to impact creation. To achieve that, several actions are planned, which range from scientific dissemination to more industrial, more driven one, organization of workshops and training sessions with the industry, as well as setting up informal focus groups for discussion and to gather feedback on FERMI's measurable outputs.
Partners do not agree with the licensing model for the final results of FERMI. The project will not achieve the planned impact and subsequent exploitation	Medium	Detailed licensing indications were included in the Consortium Agreement before the beginning of the project. An initial version of the licensing model has already been addressed in Section 2, where the freemium licensing schema for FERMI results is presented.
The dissemination of the project results is not sufficient to create an impact. The project will not achieve the planned impact and subsequent exploitation	Low	The dissemination plan will catch users as project sentinels to contribute to the dissemination of the results, emphasizing the planned impact.
Business plan failing to exploit market opportunities	Low	The development of the FERMI business plan will be led by an experienced and professional team under T6.3. Nevertheless, opportunities may be identified by other partners in the domain, or later on in the project, but within its lifecycle. Should this happen, the business plan development leaders will evaluate the opportunities, and try to re-formulate/ modify/ customise the business plan accordingly in its final iteration to facilitate the exploitation of these opportunities.

Table 3 - Risk mitigation actions

4 Dissemination

A successful dissemination and communication strategy serves as the linchpin in ensuring that valuable knowledge and project outcomes reach stakeholders effectively. It is paramount to recognize that the significance of dissemination transcends mere information sharing; it encompasses catering to the needs and interests of both the project and its stakeholders. Achieving this symbiosis demands a strategic alignment between the project's overarching vision and the varied needs and interests of stakeholders. Thus, a comprehensive understanding of the ecosystem becomes imperative. Employing an ecosystem mapping approach unravels the intricate web of relationships among diverse actors, thereby furnishing stakeholders with invaluable insights. Such an approach not only enhances stakeholder engagement but also facilitates more informed dissemination practices, fostering a deeper resonance between the project and its broader ecosystem.

This section provides an overview of the updated analysis concerning the dissemination plan of FERMI. Specifically, it outlines the ecosystem identified for the project and it reports its main actors at a glance. In this sense it must be duly noted the interdependency between the ecosystem mapping – and its actors - with the target audiences and personas identified in the early stages of the project and reported in the first version of this deliverable. Generally speaking, the actors identified within the ecosystem can be reconciled within the various personas which consist of a personification of the target audiences identified in the GA. The added value of the description of stakeholders in the form of ecosystem actors is the synthesis of personas and target audiences. As it will be evident in the following paragraphs of this section, ecosystem actors' "cards" strike a balance between the macro and micro analysis of the environment surrounding FERMI. They do so by providing both a wider look at their position in the broader ecosystem and a glimpse into their needs and interests related to the activities of FERMI – as actor of the ecosystem.

4.1 Plans for dissemination

At the moment of writing, there is no need for an update of the plans for dissemination outlined in the first version of this deliverable as to what activities should be conducted in the different phases of the project. Importantly, the update of the dissemination strategy object of this section is tailored to its the implementation. More specifically, this update consists of a more detailed understanding of the ecosystem surrounding FERMI and it is meant to support the FERMI outreach in three ways. First, by providing an overall understanding of where FERMI stands in the landscape of media and security, as well as in the broader society in Europe. Second, by supporting partners in the identification of key stakeholders to engage – updated list in Annex A. Third, by guiding the stakeholder's engagement through the identification of the needs and interests of the various actors.

Table 4 reports the activities foreseen per each persona in each phase of the project's duration. Notably they include Search Engine Optimisation (SEO) by the dissemination manager, to improve the visibility of the webpage and call to action (CTA) for stakeholders.

Persona	1 – Raise awareness	2 – Transfer knowledge	3 – Deliver impact	4 – Accelerate sustainability
User	LinkedIn posts, on-page SEO, blog posts, landing pages, events, newsletters	CTA on LinkedIn, website and landing pages	Tailored newsletter and marketing automation	International exhibitions and business events, demos

Researcher	Research articles, LinkedIn articles, LinkedIn posts, social media posts, events, newsletters	CTA on research articles and LinkedIn articles/posts	Tailored newsletter and marketing automation	Special issues and open lectures
Policy maker	Social media posts, on-page SEO, press releases, blog posts, events	CTA links on social media and website	Tailored newsletter and marketing automation	Policy briefs and key notes in high profile events
Watchdog	Social media posts, on-page SEO, blog posts, landing pages, workshops	CTA on the website, links on social media and landing pages	Tailored newsletter and marketing automation	Social media campaigns
Business partner	LinkedIn posts, on-page SEO, blog posts, landing pages, events, newsletters	CTA on LinkedIn, website and landing pages	Tailored newsletter and marketing automation	International exhibitions and business events, demos

Table 4 - Plans for dissemination for different personas per project phase

4.2 Ecosystem mapping

Ecosystem mapping, within the realm of dissemination, communication, and policy advocacy, is a strategic tool used to visualise and understand the intricate network of relationships among various stakeholders, entities, and components within a given ecosystem. Its importance is underscored by the GA's requirement (in T6.2, to be exact) that "[a] multi-actor collaboration framework will be developed and rolled out based on open innovation, combining knowledge and experience of different actors in the FERMI ecosystem."[5] At its core, ecosystem mapping serves to elucidate the dynamics of interactions and dependencies within a complex system. Its primary purpose is to provide a comprehensive overview that facilitates effective dissemination, communication, and policy advocacy efforts. The main elements of ecosystem mapping typically include identifying key actors, which encompass ecosystem initiators who catalyse activities, peer producers who contribute content or resources, peer consumers who utilize or benefit from these contributions, and external actors who interact with the ecosystem but operate outside its core dynamics.[6] These elements are interrelated in a cohesive framework that allows stakeholders to navigate and comprehend the ecosystem's intricacies, thereby informing targeted dissemination, communication, and advocacy strategies.

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[5] Grant Agreement: Project 101073980 – FERMI – HORIZON-CL3-2021-FCT-01,' European Research Executive Agency, 2021, Part A, p.14.
[6] https://oecd-opsi.org/toolkits/ecosystem-mapping/

4.2.1   Ecosystem Initiators

Social media platforms	
Power	High
Interest	Low
Attitude	Ambivalent
Motivations/Gains	Public acceptance and trust
Capabilities/Resources	Gatekeeping and data

Table 5 - Social media platform profile

The key message to deliver revolves around the following idea: an open and fair data sharing ecosystem enables the creation of products and services like FERMI that greatly benefit digital trust because they foster real life crime prevention.

Policy makers	
Power	High
Interest	High
Attitude	Positive
Motivations/Gains	Trust, safety, resilience
Capabilities/Resources	Political commitment, funding

Table 6 - Policy makers profile

The key message to deliver revolves around the following idea: support to initiatives like FERMI ensures a continuous effort to make Europe a safer democracy. FERMI improves the understanding of disinformation and its impact on real-life crime, and it supports society and communities in improving their resilience.

4.2.2   Peer producers

Civil liberties and advocacy groups	
Power	Medium
Interest	High
Attitude	Negative
Motivations/Gains	civil rights, guarantees, oversight
Capabilities/Resources	Awareness and advocacy influence

Table 7 - Civil liberties and advocacy groups profile

The key message to deliver revolves around the following idea: FERMI is compliant with the applicable legislation, and it upholds to the highest ethical standards.

Open Source Intelligence (OSINT)	
Power	Low
Interest	High
Attitude	Positive
Motivations/Gains	safety, security, intrinsic motivation
Capabilities/Resources	community

Table 8 - Open Source Intelligence (OSINT) profile

The key message to deliver revolves around the following idea: FERMI services platform is an ally for intelligence practitioners and everyone who wants to contribute investigate interferences on democratic elections, terrorist groups operations and others.

Software developers	
Power	Low
Interest	Medium
Attitude	Neutral
Motivations/Gains	business
Capabilities/Resources	Know-how, know-what

Table 9 - Software developers profile

The key message to deliver revolves around the following idea: FERMI services platform offers various solutions and the backbone for more services and products to be created and/or plugged in.

Digital literacy and democracy NGOs	
Power	Low
Interest	High
Attitude	Ambivalent
Motivations/Gains	Civil rights, guarantees
Capabilities/Resources	Awareness and advocacy influence

Table 10 - Digital literacy and democracy NGOs profile

The key message to deliver revolves around the following idea: FERMI provides an array of instruments and resources for the safety of democracy by supporting researchers and practitioners in understanding the phenomenon of disinformation and managing risks related to it.

4.2.3 Peer consumers

End-users (LEA)	
Power	High
Interest	Medium
Attitude	Positive
Motivations/Gains	Better preparedness
Capabilities/Resources	Consortium support

Table 11 - End-users' (LEA) profile

The key message to deliver revolves around the following idea: FERMI provides tools and support to gear up on crime prevention and to counter disinformation more effectively, overall improving the preparedness against today's hybrid threats.

Consumer protection agencies	
Power	Low
Interest	Medium
Attitude	Positive
Motivations/Gains	Fair commercialization
Capabilities/Resources	Policy network

Table 12 - Consumer protection agencies' profile

The key message to deliver revolves around the following idea: disinformation can damage consumers safety and wellbeing, FERMI offers a suite of services that can help reporting disinformation campaigns.

Researchers	
Power	Medium
Interest	Low
Attitude	Positive
Motivations/Gains	Scientific improvements
Capabilities/Resources	Knowledge network

Table 13 - Researchers' profile

The key message to deliver revolves around the following idea: FERMI provides unique insights on the correlation between disinformation campaigns and real-life crime and it helps pinpointing risk factors and more broadly it enhances the tools for risk management. Additionally, the FERMI services platform offers an instrument for researchers who seek to deepen our understanding of the phenomena related to disinformation and its real-life consequences.

Legal experts	
Power	Low
Interest	Medium
Attitude	Ambivalent
Motivations/Gains	Lawfulness and fight against crime
Capabilities/Resources	Legal expertise

Table 14 - Legal experts' profile

The key message to deliver revolves around the following idea: FERMI services offer the possibility to report disinformation campaigns and it provides tools to assess their impact on society thereby providing (supporting) evidence for legal proceedings.

Security analysts	
Power	Low
Interest	Medium
Attitude	Positive
Motivations/Gains	Safety and security
Capabilities/Resources	Access to intelligence

Table 15 - Security analysts' profile

The key message to deliver revolves around the following idea: FERMI services platform is an ally for security analysts that seek to follow disinformation campaigns (also as part of broader operations) and gather evidence on crime.

Digital media	
Power	Medium
Interest	High
Attitude	Ambivalent
Motivations/Gains	Safer and fairer platforms
Capabilities/Resources	Media and news network

Table 16 - Digital media's profile

The key message to deliver revolves around the following idea: FERMI services platform can be used by media to follow leads on potential stories related to disinformation as well as to support fact checking and/or content moderation.

4.2.4 External actors

External actors will not be engaged as of yet and a further analysis will be conducted perhaps through intermediaries (e.g., civil society representatives for the citizens). Hence the missing fields and messages.

Cybersecurity Experts	
Power	Low
Interest	Medium
Attitude	Neutral
Motivations/Gains	/
Capabilities/Resources	/

Table 17 - Cybersecurity experts' profile

Citizens	
Power	Low
Interest	Low
Attitude	Negative
Motivations/Gains	/
Capabilities/Resources	/

Table 18 - Citizens' profile

4.3 Short report on the dissemination for policymakers

FERMI's dissemination endeavours have been strategically directed towards engaging policymakers through various high-level forums and events. Firstly, FERMI organised an expert roundtable focusing on the intersection of AI and disinformation, bringing together representatives from industry, the European Commission External Action Service, and the FERMI consortium. During this discussion, the innovative use of privacy-preserving techniques in AI training within FERMI was highlighted, demonstrating the consortium's commitment to cutting-edge research and collaboration. Secondly, a high-level roundtable was convened to explore the role of education in enhancing societal resilience, featuring representatives from industry, the European Commission, and the FERMI consortium. Here, the utility of FERMI in assessing policy impact on societal resilience to disinformation at the community and regional levels was showcased, emphasising its potential for informed decision-making. Additionally, FERMI organised webinars in local languages to ensure broader accessibility and engagement, further amplifying the reach and impact of dissemination efforts. Through these initiatives, FERMI has successfully fostered meaningful dialogue and collaboration with policymakers, advancing collective efforts towards addressing the challenges of disinformation in today's society.

4.4 Short report on the scientific and technical dissemination

In FERMI's endeavours to disseminate scientific and technical advancements, FERMI actively participates in globally significant conferences, particularly within the fields of disinformation and criminology. These conferences provide valuable platforms for sharing FERMI's research findings and insights, facilitating dialogue, and networking with experts and stakeholders. Furthermore, FERMI's dedication to advancing scientific knowledge is evident in FERMI's contributions to research studies on disinformation, crime, risk management, and decision science. By presenting scientific papers at esteemed conferences in these areas, FERMI aims to make meaningful contributions to scholarly discussions and address contemporary challenges. Additionally, FERMI extends its influence to organisational studies and design science, investigating the intersections of technology, society, and policy through thorough research and publication endeavours. Through these scientific and technical dissemination activities, which include the development and training of artificial intelligence models, FERMI endeavours to expand the frontiers of knowledge and effect positive change in these crucial fields.

4.5 Short report on the dissemination for the private sector

FERMI consortium dissemination for the private sector is mostly oriented at the second half of the project, when the technological solution will have reached sufficient maturity. Nonetheless, FERMI's endeavour in raising the awareness on the project and creating a baseline for further stakeholder engagement consisted of participation to industry related conferences on AI and big data (such as EBDVF 2023) of European relevance.

4.6 Short report on the dissemination to the general public

FERMI's activities for the general public are thoroughly explained in chapter 4.8

4.7 Synergies with other initiatives and projects

FERMI is promoting the formation of a project cluster, aimed at strengthening collaboration in the ecosystem for societal resilience against disinformation and disinformation-fuelled crime. The vision set behind this cluster proposal is to improve the European Union's and like-minded countries' societal resilience against disinformation, misinformation, and hybrid threats; for example, disinformation-fuelled crime. This vision should be transformed into concrete milestones such as: the collaboration within the media and platforms ecosystem and relevant stakeholders alike is strengthened through shared activities promoted by the consortium. The envisioned cluster proposes to conduct activities and pursue the following objectives:

1. knowledge sharing between different stakeholders;
2. upskilling on recent and multifaceted threats and approaches to counter them (like hybrid threats and certain new approaches to disinformation as well as the use of technology and various other measures to counter them);
3. alignment of agendas between different stakeholders for a positive multiplier effect.

4.8 Training activities

In the context of T6.3, training activities for all are being organised with the purpose of increasing understanding and digital trust. In particular, "the task foresees the planning and development of training activities and materials focusing on raising awareness for the general public and the EU citizens. Training activities to be carried out in the task include the planning and implementation of several internal and/or

external workshops. An external workshop will be carried out on the results of the study conducted in T2.2. while an internal workshop could present the recommendations on[…] the legal and ethical requirements stemming from […] [D1.4].[7] Apart from that, FERMI will produce a set of training packages that will be freely available in the project platform for download[8]". Working towards this direction by M18 two training activities have been concluded: (a) one external workshop, specifically a webinar on the societal landscape of disinformation and in particular of FERMI and (b) one internal workshop on the legal and ethical requirements of FERMI. In accordance with the goals set out in T6.3, by M36, at least two more external workshops will be organised and respective training material produced and made available on FERMI's website. The organisational process followed for these external workshops will be similar to the process described below in section 4.8.1, especially regarding informed consent proceedings, General Data Protection Regulation (GDPR) and all relevant matters to ensure ethics and data protection compliance.

In the following section a brief overview of the first external workshop/webinar is presented followed by the overview of the internal workshop on the legal and ethical requirements of FERMI.

4.8.1   External Workshop - Webinar on the societal landscape of Disinformation

During late February, 2024, (23/02/2024) a FERMI webinar for the general public entitled: "A dive into the societal landscape of disinformation - Balancing between Law Enforcement and Fundamental Rights to Increase Digital Trust-" was successfully completed.

4.8.1.1   The registration process

To coordinate this training activity/webinar the organisational process involved was carefully designed to ensure ethics and data compliance in all relevant cycles of the activity. In particular, the registration process was carried out through an online form. Through this form, interested participants were (a) provided with an information sheet which included all relevant information regarding: (1) the project, (2) the entirety of the training activity/webinar and its purpose, (3) the recording including data collection, processing and confidentiality issues, (4) respective contact details and (b) a relevant consent form which they had to fill in/sign. All participants followed this procedure, including consortium members and the guest speakers. During the webinar, participants could not see each other's display names or any contact details (e.g., emails).

4.8.1.2   The content of the webinar

The aim of the training activity/webinar was to increase understanding of disinformation and digital trust. Two esteemed guest speakers presented their insightful views and research. The first guest speaker[9] focused on her legal research, conducted on the EU's legal framework for disinformation and the main fundamental rights challenges when adopting and enforcing counter-measures (for more details see D2.1). The topic was further enriched by the second guest speaker[10], as a communication, security, and geopolitics expert, they went beyond

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[7] The Grant Agreement mentions D1.5 instead of D1.4, which, however, seems to be a typo. D1.5 is the "FERMI Project management playbook" and delineates the project management plan, whereas D1.4 ("FERMI Data Management Plan") includes "legal and ethical requirements" the task description requires to be addressed. More specifically, D1.4 includes "the Ethics & Legal protocol and framework." See Grant Agreement: Project 101073980 – FERMI – HORIZON-CL3-2021-FCT-01,' *European Research Executive Agency*, 2021, Part A, p.20-21.

[8] Grant Agreement: Project 101073980 – FERMI – HORIZON-CL3-2021-FCT-01,' *European Research Executive Agency*, 2021, Part A, p.13-14

[9] Flavia Giglio: Legal Researcher in IT law, cybercrime and fundamental rights at the KU Leuven Center for IT & IP Law (CiTiP)

[10] Carme Colomina: Senior Research Fellow on European Union, disinformation and global politics at CIDOB (Barcelona Centre for International Affairs)

the FERMI context to the broader spectrum of the societal landscape of disinformation. 50 minutes were dedicated to the qualified speakers, 20 minutes for Q&A, and 20 minutes devoted for feedback/surveys (see below "collecting feedback and evaluating impact" for more details).

The FERMI webinar offered an insightful exploration into the complexities of disinformation, highlighting the multifaceted nature of the challenges and its profound impacts on society. The discussion underlined the complex interplay between security measures and the preservation of civil liberties. The guest speakers described the intricate interplay of enforcing laws against disinformation while upholding the fundamental rights that underpin democratic societies. Furthermore, they analysed the intricacies of defining disinformation within the EU framework, highlighting the absence of consensus among member states and the diverse tactics employed to distort information. Discussions emphasised the critical role of digitalisation in transforming the media landscape, advocating for a comprehensive societal approach to enhance media literacy and resilience against disinformation. Guest speakers illustrated the need for re-evaluating concepts of trust and reliability in information consumption, suggesting a nuanced understanding of disinformation's broader societal implications and the imperative for collaborative efforts to safeguard democratic processes and societal well-being. The dynamic Q&A session allowed participants to engage directly with the speakers and other participants, posing thought-provoking questions that ranged from the technical nuances of artificial intelligence in detecting disinformation to the ethical considerations of censorship. This interaction enriched the webinar, offering personalised insights and emphasising the collective responsibility to safeguard digital dialogue. A recap of the webinar can be found on FERMI's website here.

4.8.1.3 Collecting feedback and evaluating impact

In accordance with the respective KPI (> 80% of participants to the training sessions of FERMI framework show better understanding of D&FN (measured before and after the training activities) and to properly evaluate the impact that the webinar had and to track learning and understanding of participants, two live surveys were conducted. One survey was conducted at the beginning of the webinar and another after completion of the sessions/presentations, at the end of the webinar. The goal of demonstrating that more than 80% of webinar participants showed an improved understanding of the topics discussed was successfully achieved. On a general note, the webinar proved to be exceptionally impactful and highly effective in achieving its goals. Examining the mean of all weighted average across all questions to estimate the understanding of participants on disinformation and fake news and digital trust, it demonstrates a resounding consensus regarding the efficacy of the webinar. In particular, the overall average indicates a significant increase of 106.5%, effectively illustrating a twofold raise in participants' knowledge after attending the webinar. More information on the survey results can be found in section "Annex D" of this deliverable where some specific key results from the surveys are presented.

4.8.1.4 Training material

In the effort of maximising the impact of such training activities, training package material for each training activity, organised in the context of T6.3, are being setup. In particular, from the content and the material generated from this specific external training activity (i.e., the webinar), the training package material is comprised of the following: (a) the recording of the webinar and (b) a guidebook entitled *"Navigating Disinformation: A Comprehensive Guide"*. Following the important insights gained through the FERMI webinar, this document/guidebook along with the recording compile a comprehensive package that provide important content and in-depth knowledge, foster understanding, and encourage critical engagement with the topic of disinformation. These are available on the FERMI website and can also be found in "Annex E".

4.8.2 Internal Workshop on legal and ethical requirements

During March, specifically during our in-person consortium meeting of FERMI (21/03/2024), an internal workshop for consortium partners on the legal and ethical requirements of FERMI (stemming from D.1.4 - *FERMI's Data Management Plan*) was successfully completed. The workshop examined the ethical and legal requirements necessary for compliance with applicable legislation. The purpose of the workshop was to familiarise consortium members with the legal and ethical framework related to the project's scope but also offered a comprehensive look in the general status quo of the research and innovation (especially in Horizon Europe) landscape regarding ethical considerations/procedures. During the workshop what was presented was the importance of ethics in research, tools for assessing ethical risks, the ethics appraisal procedure, major ethical requirements and rights, and compliance with EU's legal frameworks; furthermore, following the general overview the focus shifted to the particular application of these principles in the FERMI context. Throughout the activity there was emphasis placed on the needs for continuous monitoring, reporting, and communication of ethics-related concerns.

4.8.2.1 Collecting feedback and evaluating impact

Following the same feedback process as in the external workshop/webinar, in accordance with the respective KPI (> 80% of participants to the training sessions of FERMI framework show better understanding of D&FN (measurement before and after the training activities) and to properly evaluate the impact of the internal workshop and to track learning and understanding of participants, two live surveys were conducted. One survey was conducted at the beginning of the workshop and one after completion of the session/presentation- at the end of the workshop. The goal of demonstrating that more than 80% of participants showed an improved understanding of the topics discussed was successfully achieved. The data from the surveys illustrates a positive trend, indicating a substantial increase in awareness levels among consortium members participated. This suggests that the workshop effectively succeeded in raising awareness and educating participants on legal and ethical requirements. In particular, the overall average indicates a significant increase of 536.8%, effectively illustrating an overwhelming raise in participants' knowledge after attending the workshop. More information on the survey results can be found in section "Annex D" of this deliverable where some specific key results from the surveys are presented.

4.8.2.2 Training material

Provided that the legal and ethical requirements of FERMI and any EU-funded Research and Innovation (R&I) proposal/project are of vital importance, the training material produced to complement this internal workshop is a toolkit entitled "Ethics Assessment Toolkit". By offering some basic steps, this document assists FERMI consortium members and further interested stakeholders in assessing their ethics stance and status, and contribute towards ensuring that the FERMI project adheres to the highest ethical standards. The aim of this toolkit is to assist towards identifying potential ethical issues in research activities as early as possible and ensuring compliance with European Commission guidelines thought the project lifecycle i.e., from proposal submission to project execution and project completion. The "Ethics Assessment Toolkit" is available on FERMI's website for download and can also be found in "Annex E".

5 Communication

Communication aims to raise awareness on the project, spark interest and attract potential users, investors, contributors, generate demand, engage with stakeholders and promote the successes of FERMI and the European research and innovation at large. For this reason, a plan for communication is set forth, along with specific guidance on the creation and sustainable development of a community of interest and a more specific overview of the social media strategy.

The following table presents an overview of the activities regarding each communication mechanism distributed over the different phases of the project's duration, including the actions completed during the first year of the project.

Communication mechanism	1 – Raise awareness	2 – Transfer knowledge	3 – Deliver impact	4 – Accelerate sustainability
Social media	Establishment of presence in social media completed. Reproduce relevant content and monitor relevant hashtags; upload public material; follow influencers of the domain; engage with other projects and initiatives.	Promote project's outcomes and events; develop and implement informative communication campaigns on relevant themes; interact with followers to get feedback; answer on comments and private messages on the various channels; upload public material; reproduce relevant content and use relevant hashtags.	Promote project's outcomes and events; develop and implement informative communication campaigns on relevant themes; interact with followers to get feedback; answer on comments and private messages on the various channels; upload public material; reproduce relevant content (more sporadically).	Publish material such as project's recap. Share tools and instruments used to prepare future steps. Develop online partnerships with relevant stakeholders.
Project's website	Website completed; search engine ptimization completed.	Regular update; web analytics monitoring; provide content of impact.	Regular update; web analytics monitoring; provide content of impact.	Regular update; web analytics monitoring; provide content of impact.
Project's blog	Deployment project's blog completed.	Provide frequent blog posts to initiate discussions on specific issues	Publish frequent blog posts to demonstrate and	Publish blog posts to attract and advertise successful

	Provide blog posts related to project's positioning and technologies.	relevant to the project to receive feedback.	promote project's results.	partnerships and/or growing user base.
Communication material	Project branding and visual identity, communications starter pack completed.	Prepare revised communications pack and frequent releases of e-Newsletter; publish blogs/news in EU dissemination instruments (e.g. Cordis News, research EU magazines etc.).	Prepare final communications starter pack and frequent releases of e-Newsletters and video demonstrators; publish blogs/news in EU dissemination instruments.	N/A
Traditional communication	Press release to announce the project's launch completed. Presentations at events and conferences.	Press releases to announce the significant events/results.	Press releases to promote the business case of the project's results.	Press releases to promote (new) partnerships and acknowledge successful collaborations; promote growing user base.

Table 19 - Communication mechanism for each communication channel per project phases

5.1   FERMI Community

The main aim of the strategic communication plan is to foster the growth of the FERMI community. This is being achieved by providing open access to all content that is disseminated, tailored to reach different target groups. Examples of this content include the website, social media profiles, dedicated social media campaigns, webinars, press and media initiatives, a scientific poster, newsletters as well as participation in conferences.

In the effort to build a "community of interest", the FERMI project uses a variety of communication initiatives and activities that activate all online and offline tools in its disposal. Outreach efforts directed towards the project's target groups as the above mentioned are being used, aiming to increase understanding and recognition of the project's findings and their implications.

Following the initial set-up phase during the first year of the project, that ensure that the right people are reached, thanks to the support of reposts and likes and the identification of the audience to follow, in collaboration also with partners, including key opinion leaders (KOL), institutions, non-governmental organisations (NGO), companies, the next two years of the strategic communication plan will be focused on strengthening the FERMI community with consistent and timely initiatives and amplifying its reach to new audiences by remaining relevant to current developments in the field.

FERMI finds a potentially antagonistic audience as the project involves the use of technology in law enforcement. Specific risks associated with the success of the project's impact are addressed elsewhere, nonetheless it is deemed that this should be affirmed here as well. As for the creation of a FERMI community of interest, it is vital to acknowledge that there will be actors that will be rightfully interested in ensuring that FERMI is compliant with all the regulations and does not exceed its scope and purpose. It is therefore important to include especially said actors in a proficient collaboration so as to meaningfully address their concerns and interests. Amongst other things, this will be ensured by emphasising FERMI's compliance with legal and ethics standards, which will be subject to an internal workshop that can help the partners streamline their communication on this topic (see chapter 3).

5.2 FERMI social media strategy

During the first year of the project the social media accounts were used to establish the online presence of the FERMI project and its position within the ecosystem of other projects with similar goals. A planned editorial calendar on social media has been used to manage the social media dissemination of FERMI, as well as a method designed for the planning of social media content development over the 3-year life of FERMI.

The four pages on different social media channels used to disseminate the project are:

TWITTER: https://twitter.com/fermi_project

MASTODON: https://mastodon.social/@fakenewsriskmitigator

LINKEDIN: https://www.linkedin.com/company/fermi-project/

YOUTUBE: https://www.youtube.com/@fermi-project

The username for all platforms is "FERMI EU" to ensure consistency across the four channels and to show the connection of the project with the Horizon Europe programme.

The multi-channel strategy allows to reach different target clusters on the different platforms. In fact, social media is chosen for its strategic function, specific functionality and target audience. In this way, the choice of these channels relates to their nature as tools for public debate. The use of specific hashtags supports the dissemination of information towards influential people in the sector.

During the first year of the project, synergies between social media accounts of all project partners and the project channels were activated. Actions, such as following among other profiles involved in the project, sharing or retweeting specific and consistent content, tagging and mentioning the FERMI

pages across different platforms and consistently using the project's dedicated hashtags, are the basis of dissemination throughout the life of the project. These actions ensured the exposure of new audiences, those of the project partners, to the FERMI project.

The cohesion and project recognisability across the different dissemination platforms has been ensured by encompassing the brand identity of the website in the social channels and the materials used to created individual posts. Furthermore, all channels contain the official logo and make a clear reference to the home page of the site by means of a button.

The construction of navigation paths from the site to the social networks through the social bar (bar that summarises the entire social presence of the project) and vice versa, that is, from the posts to the site through the specific link is central part of ensuring the communication aims of the project.

The main objective of FERMI's social media presence is to disseminate, inform and engage people interested in the proposed topics. The social media pages are mainly used to drive traffic to the website, where in-depth content is provided in the blog pages and the info materials.

The idea is that social channels will help push people who are not familiar with the project, but work in the relevant sector, to become promoters of the initiative and members of the online Fermi community. The use of communication campaigns (see chapter 6.2.1) can multiple this. Moreover, as explained above, social media posts are tailored specifically towards each persona's interests and needs to appeal to all relevant target audiences.

After strategic dissemination, monitoring takes place through the analysis of insight data on proprietary platforms and aggregated in a document to make it easier to track the results of interaction and engagement on social media, according to the KPIs as defined in the GA (see chapter 3).

Each post written by the FERMI profile contains the dedicated project hashtags (Official Hashtag: #FermiEU), thematic hashtags and links to the website. This will help social-media users to discover the website-by improving its ranking in search engines.

At the same time, each FERMI project partner is encouraged to repost the contents published on official social networks, mentioning and using the official hashtag. This inner work method generates views and allows social profiles to increase well targeted followers.

5.2.1 Communication Campaigns

Communication campaigns in social media are considered a great tool to promote specific messages to target audience about one or multiple related topics. They ensure constancy, that is important for achieving KPIs, such as impressions (reach of the content) and engagement (a measure of how much of the audience actively engaged with the content). Furthermore, a timely campaign can place a project within the ecosystem of a current trend, allowing for bigger exposure to new audiences. Campaigns are considered a great tool in the sustainable creation and maintenance of online communities, therefore are central part of the overall communication strategy of the FERMI project.

The first FERMI project campaign on "AI and Disinformation" ran between the months of October and December 2023, for a period of approximately 75 days, mainly across the two main social media platforms of the project, LinkedIn and X, with promotion also taking place on Mastodon. The materials used for the posts followed the guidelines presented in previous chapters. The campaign also included the promotion of the high-level webinar "Joining Forces: How Artificial Intelligence Helps in the Fight Against Disinformation", a core element of the campaign, which took place online, in December 2023.

Some KPIs that validate the success of the campaign in LinkedIn include:

- 330.4% increase in page followers (99 new followers; from 175 to 274 in 75 days);
- 37.5% increase in page views;
- 75% increase in unique page visitors;
- 55.6% increase in post reactions;
- 600% increase in post comments.

Some KPIs of the campaign in X include:

- Approximately 3.2K impressions (approx. 43 impressions per day); 34% increase compared to the previous 75 days;
- An average of 12.6% engagement rate per day;
- 152 post likes;
- 46 retweets;
- 45 link clicks.

The success of the campaign validates their importance in engaging with the targeted audiences and increasing the project's exposure. Therefore, in the social media communication strategy of the project a series of targeted campaigns, each one with a specific topic, are to be included. Each campaign will run for approximately six to eight weeks and most of them will include an in-person event or webinar, as to capitalise on the exposure and buzz created. Considering that for campaigns to continue have impact, to avoid audience fatigue and to ensure that other aspects of the projects continue to be promoted through social media, the communication strategy of FERMI project includes a maximum of three campaigns per year.

6 Exploitation planning at a glance

This section aims to outline the methodology that fall under the scope of the exploitation of the FERMI project. More specific, we describe the objectives of the Exploitation Plan, the Exploitation strategy and the Exploitation activities conducted so far.

The primary objectives of the Exploitation Plan are the following:

• Describing the **exploitation strategy** and outlining its principal steps.
• Identifying the **exploitable results (ERs)** and distinguishing the **key exploitable results (KERs)** portfolio derived from the project.
• Implementing a **market analysis** by creating a sustainability roadmap.
• Defining the **value proposition** for each KER.
• Identifying the **business modeling** for the exploitation of FERMI project.
• Facilitating the integration of the FERMI project into the market.

6.1 Exploitation Strategy

We present hereby the updated methodological approach we have used (and will continue to be using) to effectively implement the FERMI exploitation activities and ensure the proper utilisation of the FERMI innovations in further commercial and/or research activities after the end of the project. The Exploitation Strategy of FERMI is illustrated in figure 1.

Phase 1 - Innovation Management: In this phase, we identify and update the KER of FERMI. The exploitation team analyses the features, technology readiness level (TRL), target market, and other business-related characteristics of the KERs. This phase also includes an analysis of intellectual property (IP) and licensing options. To facilitate the business and exploitation activities of this phase, in the frame of T6.4, INTRA has created and continuously manages the FERMI **Innovation Management Log**, an .xlsx template that will be used to track and manage KERs along with their features, TRL, target markets, licenses, and other several exploitation-related aspects. Given the dynamic nature of the project's technical activities, the Innovation Management Log will be a living document that will be adjusted by the WPLs regularly (every 3 months – via emails as well as during dedicated telcos) to capture the most up to date progress of the project's KERs.

The initial version of the FERMI innovation management log was created by INTRA as of M15 of the project and it was shared with partners along with tailored guidelines on how to complete it. It is a living document uploaded on the project's cloud repository. With the contribution of each partner, an initial version of the innovation management log was consolidated and fuelled the development of the current deliverable. Based on the project developments and partners' views, the next set of inputs will be reported in D6.4.

Phase 2 - Market Analysis: We conduct market research using various sources such as market reports, databases, surveys, and technology papers. The market is segmented, and target audiences are defined for the FERMI innovations, also analysing the competitive landscape, identifying market trends, challenges, and

opportunities. The exploitation team will also assess the potential demand for the FERMI innovations in the market.

Phase 3 - Value Proposition: The exploitation team will define the value proposition for each KER and each market segment, will identify and analyse the benefits of the FERMI KERs for each market segment, and will also evaluate the pricing strategy for the KERs and service bundles.

Phase 4 - Visibility of results: The project partners will select means for dissemination of results and utilise EC services to maximise project impact. Key results will be proposed for submission to Horizon Results Platform and Innovation Radar. These platforms will increase visibility of innovations to potential customers/investors and search for synergies related to the project.

Phase 5 - Business Models: In this phase, we will define the business model(s) that best fits the FERMI product and market, as well as it will evaluate and compare different business models, such as subscription-based, pay-per-use, or freemium, identify the revenue streams and cost structure for each business model. By the end of the project, we will have determined the most prominent business model for the FERMI KERs.

Phase 6 - Route to Market: By the end of the project, the exploitation team will pinpoint the most effective and efficient routes to market for the FERMI KERs and develop a go-to-market plan that includes target markets, channels, and messaging. At this phase, the exploitation team will also design tailored individual and/or joint exploitation paths per KER and per FERMI KERs.

Figure 1: The FERMI Exploitation Strategy

6.1.1 The upcoming exploitation activities

Until February 2024, the following activities of the exploitation strategy were completed after wrapping up the first step of the Exploitation Paths exercise:

(i) innovation management log setup

(ii) update of ERs to 12

(iii) identification of the KERs

(iv) pinpoint the stakeholders and target markets per ER

(v) recognize the initial ownership status per ER

(vi) determine the exploitation paths per KER

The input collected from the Consortium has been aggregated and will be analysed in D6.4. This process has returned valuable insights into the description of the ERs, their background, envisioned exploitation paths, exploitation options, potential users and the associated stakeholders too.

Launching in March 2024 an exploitation survey focusing on the Marketing and Commercialization strategy that will be shared to the Consortium Partners. The outcomes of this survey will be described in detail in D6.4, along with the Business Modelling section.

Item ID	Name	Description	Owner	Envisioned Exploitation Path	Do you consider this as KER? (Y/N)
ER1	Swarm Learning Module	Module for training AI algorithms in a distributed learning approach keeping the privacy of the LEAs data.	ATOS	R	Yes
ER2	Sentiment Analysis module	Module for further analysis of fake news based on the BERT model (Bidirectional Encoder Representations from Transformers) with a wide variety of Natural Language Processing (NLP) tasks.	ITML	R	Yes
ER3	D&FN Offline Crime Analysis	AI-based time-series estimation algorithm, focusing on the spatiotemporal evolution of D&FN's impact on offline crimes, and bigdata-based profiling of authors and victims of D&FN-induced and D&FN enabled.	UCSC	R	No
ER4	Disinformation, sources, spread & impact analyser	Set of tools for analysing in depth the sources of disinformation and the potential spread of the D&FN, as well as the potential impact of these spreads.	INTRA	L, R, G	Yes
ER5	Community Resilience Management Modeler	The module will deliver models able to facilitate the accurate prediction of the resilience levels of communities with different specifications and characteristics, to the spread of fake news and disinformation.	INOV	R, S	Yes
ER6	Behaviour Profiler & Socioeconomic Analyser	Module analyzes behaviour in terms of media literacy and creates country profiles based on secondary literature analysis.	BIGS	I, R	Yes

		Technically, the Behaviour Profiler is also represented by the crime forecasts in terms of likelihood of crimes occurring due to D&FN. The Socioeconomic Analyzer examines the relationship between (politically motivated) crime occurring due to D&FN spread and economic costs.			
ER7	FERMI integrated platform	Integrated FERMI platform for disinformation and fake news (WP4)	INTRA	M, L, I, R, G	Yes
ER8	FERMI Socioeconomic Disinformation Watch	FERMI will create training material and deploy relevant sessions focusing on risk and threats analysis and the identification and implementation of cost-effective security measures	INOV	R,S	Yes
ER9	Impact assessment methodology and lessons learned	Methodology for the assessment of the use of the solution in the pilot cases, and lessons learned from the evaluation.	IANUS	R	Yes
ER10	Dynamic Flows Modeler – Crimes Impact Predictor	AI-based time-series estimation algorithm, focusing on the spatiotemporal evolution of D&FN's impact on offline crimes.	UCSC	R	Yes
ER11	The FERMI training methodology, tools and curricula	The delivery of analyses and trainings towards skilled development (up- and re-skilling) for security officers and LEAs	PUCF	S	Yes
ER12	FERMI societal landscape: Setting the baseline of Societal readiness and digital trust (D2.1, T2.2)	Findings from legal research conducted by KUL with regard to the challenges of legally defining disinformation and the main fundamental rights principles to be met in order to achieve e balance between LEAs' needs to fight disinformation and the safeguard of freedom of expression, privacy and data protection	KUL	R,G	Yes

Table 20 - Envisioned exploitation paths for FERMIs ERs

Apart from updating the FERMI ERs list per partner, the consortium partners also shared their insights regarding their intention for their envisioned Exploitation Paths. This information is detailed in the table above.

With regard to the envisioned Exploitation Path, partners were requested to select one or more of the following distinguished exploitation paths, emphasizing that these paths are not mutually exclusive. Below the envisioned exploitation paths are presented in detail.

• **M – Potentially new service/ product in the market** (i.e., Sell, Technical Creation, Assembly, Production – common for industrial partners/ technology providers): Partner to be producing the asset as a new product or service in the market and selling it by using pre-existing sales' channels. (Ownership of the asset is not necessary, since the partner may request permission to sell through license agreement from another partner who owns the asset).

• **L – Licensing to 3rd parties in the EU**: Partner wishes to consider opportunities to license/assign their rights or knowledge on the result, to 3rd party entities that wish to exploit it, for an agreed fee (this option is common for universities without established sales force).

• **I – Use internal in the production processes** (common for pilot end-users): Partner foresees opportunities for internal use and expansion or replication in the future (typical for pilots, demonstrators, factories etc.), as well as for adoption in the company's production lines.

• **R – Use in further research activities (internal) and projects (international):** Partner aims to use the result either in further internal research activities (like internal R&D) so as to further develop and mature the solution, in academic research activities (like Journal/Conference Publications), or in other research projects in the EU (e.g., further maturing the solution via an EU-funded project).

• **D - Dataset:** Partner can exploit datasets of the particular asset through online marketplaces, for experiments, further research, consulting services etc.

• **S – Exploitation via consulting services and training:** Partner willing to provide Services (complementing the asset) such as Consulting, Lectures, Technical Integration, Support, Maintenance, other Added Value Services around the main asset. Partner might also wish to produce Training Material and/or offer Training Services/ Methods (e.g., online test, webinar) related to the result.

• **G - Governmental:** Partner has links and can promote Asset to Governmental /EC Policy Recommendations.

• **ST – Standardisation:** Partner aims to make contributions to Standardization Bodies and Associations.

Table 20 analysis reveals that the envisioned exploitation paths for FERMIs ERs align with six out of eight distinct categories. These categories, presented in descending order of frequency on the following table and include Research, Governmental, Consulting Services and Training, Licensing, Internal use, and the potential of new service/ product in the Market. Research emerges as the top choice, met in 11 out of the 12 ERs. Following are Governmental and exploitation via consulting services and training of ERs. In the 4th and 5th positions, the inclination towards exploiting an ER through internal use is noted, along with the option of

licensing the ER to third parties within the European Union. Last but not least, the potential that a new service/ product in the market emerges is encountered only once, specifically with ER7 - FERMI integrated platform.

Figure 2: Envisioned Exploitation Paths
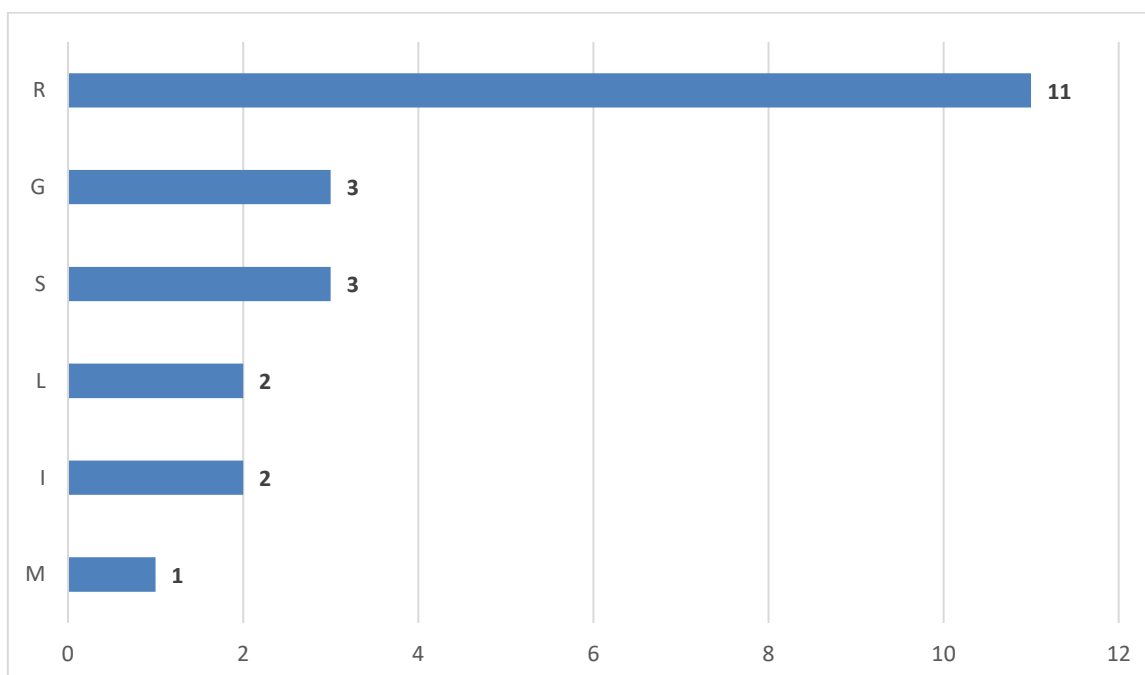
This process has returned valuable insights into the description of the ERs, their envisioned exploitation paths, exploitation options, potential users too.

Launching in March 2024 an exploitation survey focusing on the Marketing and Commercialisation strategy will be shared with the Consortium Partners. The outcomes of this survey will be described in detail in D6.4, along with the Business Modelling section.

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7   Conclusions

This deliverable encompasses the update of "The FERMI outreach management facilitators package". In summary, this deliverable provides a thorough overview of FERMI's activities, KPIs, project status assessment, and revised strategy. Through meticulous evaluation and adaptation, we have refined our approach to ensure alignment with project goals. Leveraging these insights, we are poised to enhance our outreach, stakeholder engagement, and communication efforts, advancing towards our objective of bolstering Europe's digital resilience. This report serves as a roadmap for optimizing our actions, guiding us towards impactful contributions throughout the project's duration.

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Annex A   List of Stakeholders

Stakeholder's name	Stakeholder's type
SENTINEL	F – Initiative
ROXANNE	F – Initiative
MARVEL	F – Initiative
OSiMa	F – Initiative
WISIND	F – Initiative
ENSURESEC	F – Initiative
Policy Cloud	F – Initiative
Cyber-TNOC	F – Initiative
DATACORS	F – Initiative
EUNOMIA	F – Initiative
Medi@4sec	F – Initiative
MediaWijse	F – Initiative
Media literacy Ireland	F – Initiative
All Digital	F – Initiative
Europeans Safe Online Initiative	F – Initiative
PROTECTOR	F – Initiative
Central European Digital Media Observatory (CEDMO)	F – Initiative
Belgian and Luxembourgish hub for research on digital media and disinformation (EDMO BELUX)	B – Research organisation
CEP (Counter Extremism Project)	F – Initiative
STARLIGHT project (Sustainable Autonomy and Resilience for LEAs using AI against High priority Threats)	F – Initiative
CEPOL's Law Enforcement Education platform (LEEd)	F – Initiative
Lie Detectors	G – General public
Permanent Representation of Belgium to the European Union	C – Regulators
United Nations Educational, Scientific and Cultural Organization (UNESCO)	C – Regulators
Permanent Representation of the Netherlands to the European Union	C – Regulators
European Commission	C – Regulators

Organisation for Economic Co-operation and Development (OECD)	C – Regulators
Permanent Representation of Poland to the European Union	C – Regulators
Publications Office of the European Union	C – Regulators
European Network for Science Centres and Museums (Ecsite)	G – General public
European Parliament	C - Regulators
European School Heads Association	G – General public
Meta Platforms, Inc.	E - Industry
Radicalisation Awareness Network (RAN)	F – Initiative
Junge Union Bayern	C – Regulators
Die Grünen (Green Party) Bayern	C – Regulators
Verkehrspolizeiinspektion Amberg	A - LEA
PP Schwaben-Nord	A - LEA
Junge Union Ingolstadt	C – Regulators
CSU	C – Regulators
Grüne Jugend (Green Youth) Bayern	C – Regulators
PP München	A - LEA
Committee on domestic security (Bavarian parliament)	C – Regulators
GAIA-X	F – Initiative
ADRA	F – Initiative
BDVA	F – Initiative
IDSA	F – Initiative
AIOTI	F – Initiative
COBWEBS - CELEBRITE	E - Industry
Counter Extremism Project	F – Initiative
Bundeskriminalamt/motra	A - LEA
Landespolizeien (Brandenburg, Berlin, Niedersachsen)	A - LEA
Candid	G – General public
Universität der Bundeswehr München	B – Research organisation
Friedrich Naumann Stiftung	G – General public
Konrad Adenauer Stiftung	G – General public
Bundesministerium des Innern und für Heimat	C – Regulators
ISDC	B – Research organisation

Stiftung Neue Verantwortung	B – Research organisation
Hybrid CoE	F – Initiative
FaktaBaari	G – General public
Mediapooli	G – General public
Polícia Judiciária	A - LEA
IST	B – Research organisation
ISCTE	B – Research organisation
Centro Nacional de Cibersegurança (CNCS)	D – Subject experts
Assembleia da República (AR)	C – Regulators
Hellenic Police	A - LEA
KEMEA	B – Research organisation
Leibniz University of Hannover	B – Research organisation
King's College London	B – Research organisation
LUISS Guido Carli	B – Research organisation
University of Trento	B – Research organisation
University of Florence	B – Research organisation
Queen Mary University of London	B – Research organisation
University of Amsterdam	B – Research organisation
Aristotle University of Thessaloniki	B – Research organisation
University Politehnica of Bucharest	B – Research organisation
Institute of Criminology and legal policy	B – Research organisation
The European Institute for Crime Prevention and Control, affliliated with the United Nations	B – Research organisation
European union agency for law enforcement training	C – Regulators
Victim support Finland	G – General public
Anti-racist forum	G – General public

Table 21– List of FERMI Stakeholders

Annex B   List of Events

Name	Type	Audience
Policing Insight	Online magazine	Scientific community
International Centre for Counter-Terrorism Journal	Academic Journal	Scientific community
European Law Enforcement Research Bulletin	Academic Journal	Industry
IEEE Transactions on Machine Learning in Communications and Networking	Conference proceeding	Scientific community
IEEE Transactions on Neural Networks and Learning Systems	Conference proceeding	Scientific community
BIGS Policy Paper	Online magazine	Industry
Centre for IT & IP Law Blog	Online blog	Scientific community
European Journal on Criminal Policy and Research	Academic Journal	Scientific community
European Journal for Security Research	Academic Journal	Scientific community
Euvsdisinfo.eu	Online blog	General public
International Journal of Critical Infrastructures Protection	Academic Journal	Scientific community

Table 22 – List of Events

Annex C   Publication Outlets

Name	Type	Date
#Disinfo2023	Conference	2023
European Intelligence and Security Informatics Conference	Scientific Conference	2023
Intelligence Support Systems for Electronic Surveillance, Social Media/DarkNet Monitoring and Cyber Threat Detection	Scientific Conference	2023
The 23rd Annual Conference of the ESC (EUROCRIM)	Scientific Conference	2023
Valtakunnallinen turvallisuustapahtuma	National Summit	2023
LAIR - Conference on Law, AI and Regulation of the Erasmus School of Law of Rotterdam	Scientific Conference	2023
PLSC - Privacy Law Scholars Conference in Lousanne	Scientific Conference	2023
CPDP - Computer, Privacy and Data Protection in Brussels	Scientific Conference	2023
Beyond Disinformation – EU Responses to the Threat of Foreign Information Manipulation	Conference	2023
Disinformation - Definition and Classification (Alfarabi Project)	Seminar	2023
European Big Data Value Forum	Conference	2023
Data Week 2023	Workshop	2023
Security Research Event	Conference	2023
MOTRA-K#24	Conference	2024

Table 23 – Publication Outlets

Annex D   Key Survey Results from Training Activities

Key Results from External Workshop - Webinar on the societal landscape of Disinformation

Before the webinar only 8.3% were 'very familiar' with the term disinformation, while 12.50% were 'not at all familiar'. Additionally, 25% of participants were 'moderately familiar' with the term, while 33.3% were 'familiar'. After the webinar, the percentage of participants who were 'familiar' and 'very familiar' increased, reflecting the impact of the webinar on participants' familiarity with the concept. Particularly, the percentage of participants who were 'familiar' increased by 26.42%, while the percentage of responders who were 'very familiar' increased significantly (about 471%), indicating a substantial rise in awareness (Figure 3).

Figure 3: Familiarity with the term/concept Disinformation

Regarding participants' attitudes and concerns about the impact of disinformation on society, it appears that after the webinar 42% were 'concerned' and 58% were 'very concerned'. This suggests a notable increase in concern levels compared to pre-webinar responses. Particularly, those who were 'concerned' increased by 44.8%, while those who were 'very concerned' increased by 26.1% after attending the webinar (Figure 4).

Figure 4: Concern about the Impact of Disinformation on Society
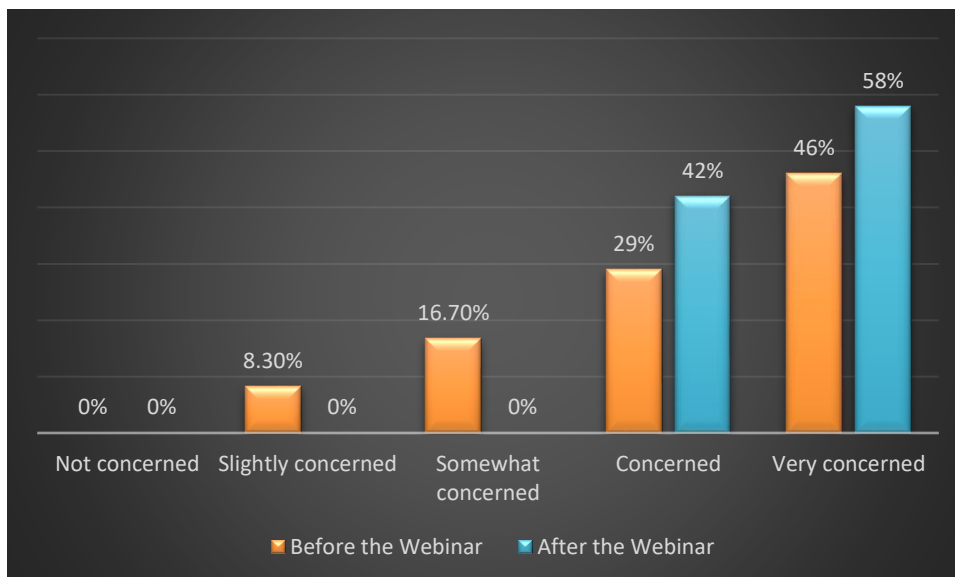
Before the webinar, 36% of responders rated their understanding of the EU's approach to combating disinformation as 'poor', while 36% rated as 'moderate'. After the webinar, 47.4% rated their understanding as 'good' and 42.1% as 'very good'. The weighted average after the webinar increased by 129.9% (Figure 5).

Figure 5: Rating of Understanding the EU's Approach to Combating Disinformation
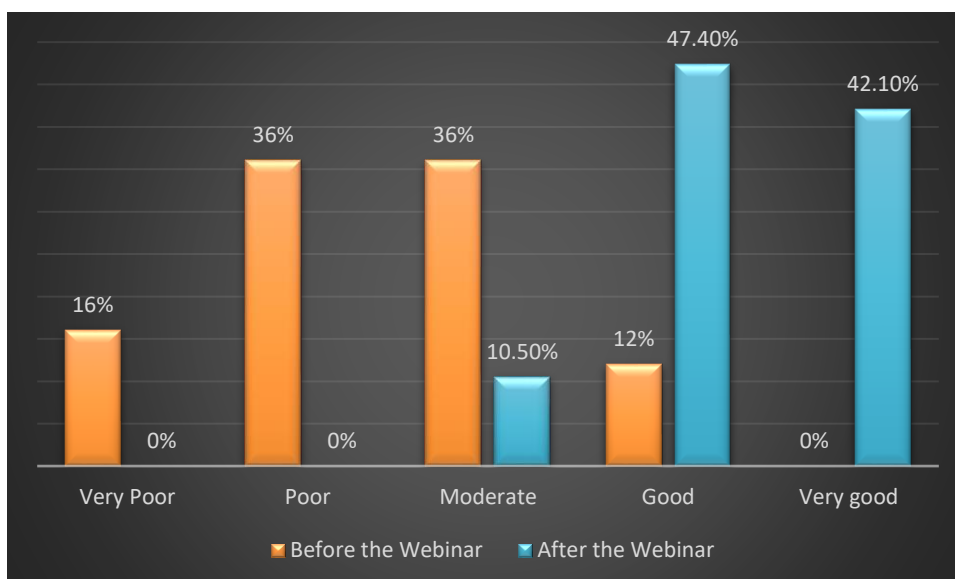
Before the webinar, most participants (40%) rated their familiarity with the role of media in identifying and countering disinformation as 'slightly familiar'. However, after the webinar, the majority (52.6%) declared themselves as 'familiar,' suggesting a notable increase in familiarity levels. Examining the total change of weighted average, there is an approximate 103.7% increase, indicating a shift towards familiarity among responders (Figure 6).

Figure 6: Familiarity with the Role of Media in Identifying and Countering Disinformation
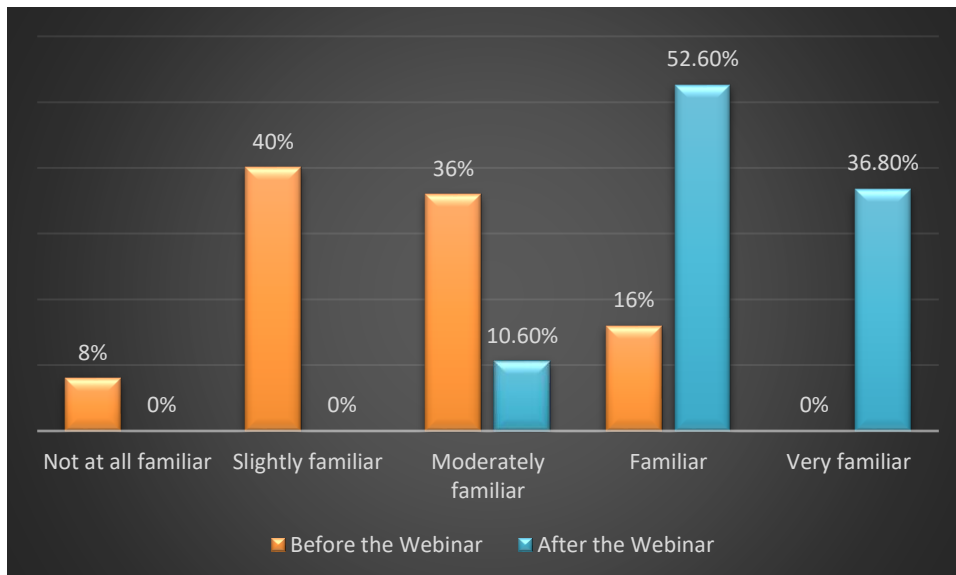
Participants' self-assessment on their understanding of the legal challenges posed by disinformation increased, after attending the webinar. Most participants (44%) rated their understanding as 'poor' before the webinar. After the webinar, 52.6% of responders declared their understanding as 'good' and 31.6% as 'very good', indicating the positive impact of the webinar upon comprehension of legal challenges related to disinformation. Regarding the swift in participants' attitude (based on total change of weighted average), there is an approximate 181.2% increase (Figure 7).

Figure 7: Rating the Understanding on Legal Challenges Posed by Disinformation

Before the webinar, 36% of respondents indicated they were 'unaware' of the impact of disinformation on law enforcement activities, while 32% were 'slightly aware'. After the webinar, 63.1% rated themselves as 'aware'

and 26.3% as 'very aware'. The percentage of participants who were 'aware' increased by 215.5%, while the relevant percentage of those who were 'very aware' by 557.5% (Figure 8).

Figure 8: Awareness of the Impact of Disinformation on Law Enforcement Activities
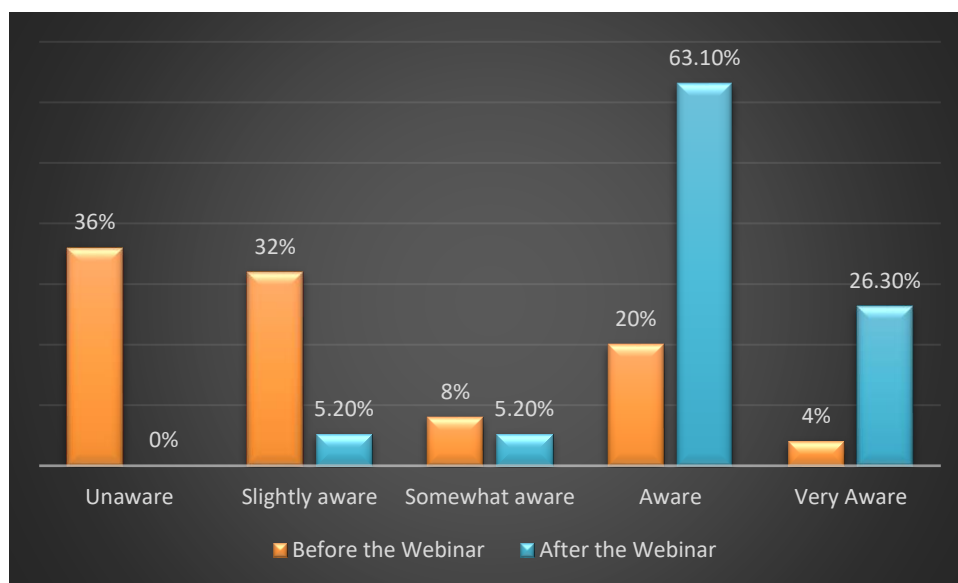

Examining the total change of weighted average, it appears that the change in participants' awareness on fundamental rights and democratic values challenged by measures to combat disinformation has increased. Particularly, the average of participants before the webinar declared themselves as 'slightly aware' while after the webinar as 'aware'. There is an approximate 161% increase, indicating a shift towards awareness among responders (Figure 9).

Figure 9: Awareness of Fundamental Rights and Democratic Values challenged by Measures to Combat Disinformation

Funded by the European Union
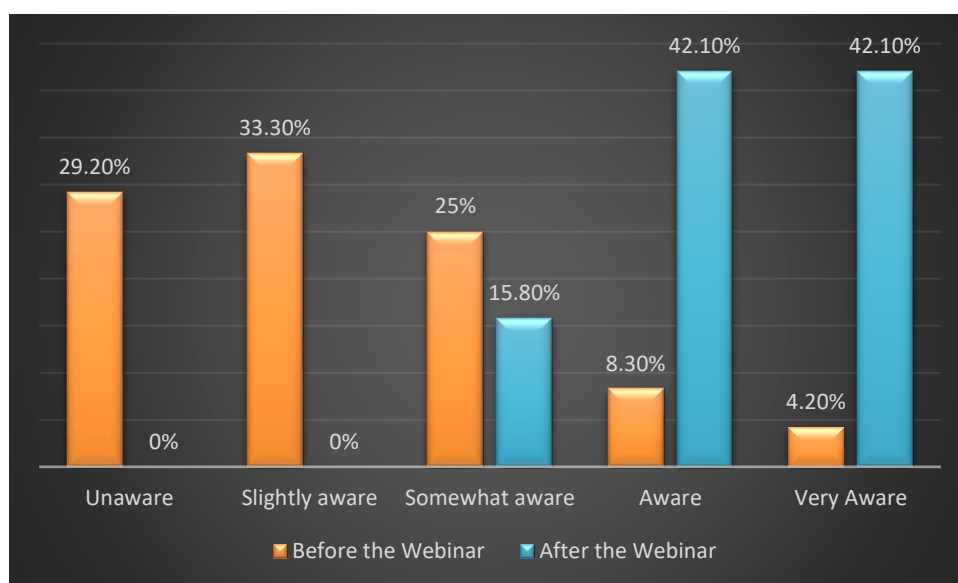
Regarding participants intentions on application of knowledge gained about disinformation during the webinar in their personal or professional life, overwhelmingly (58%) declared that is 'very likely' while 32% that is 'likely' (Figure 10).

Figure 10: Likelihood of Applying Knowledge on Disinformation in Personal or Professional Life
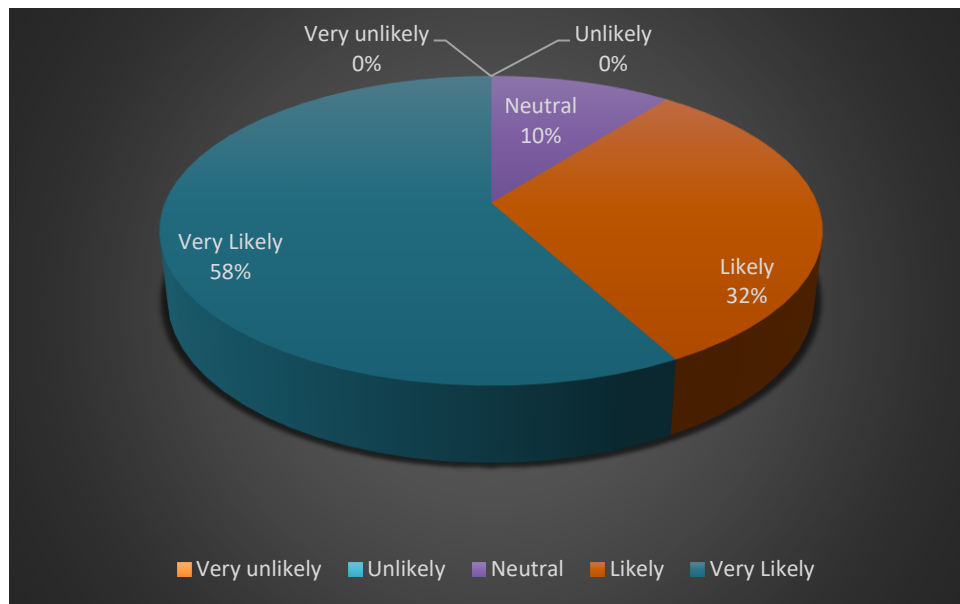
Key Results from Internal Workshop on Ethics

Before the workshop, a notable percentage of consortium members participating in the survey (52.6%) expressed being 'unaware' of any specific tools used for assessing ethical risks in research. Additionally, only a small percentage (5.3%) were 'very aware' before the workshop. However, after the workshop, there was a significant shift in awareness levels, with 38.9% of participants indicating being 'very aware' (Figure 11).

Figure 11: Awareness of Tools for Accessing Ethical Risks in Research
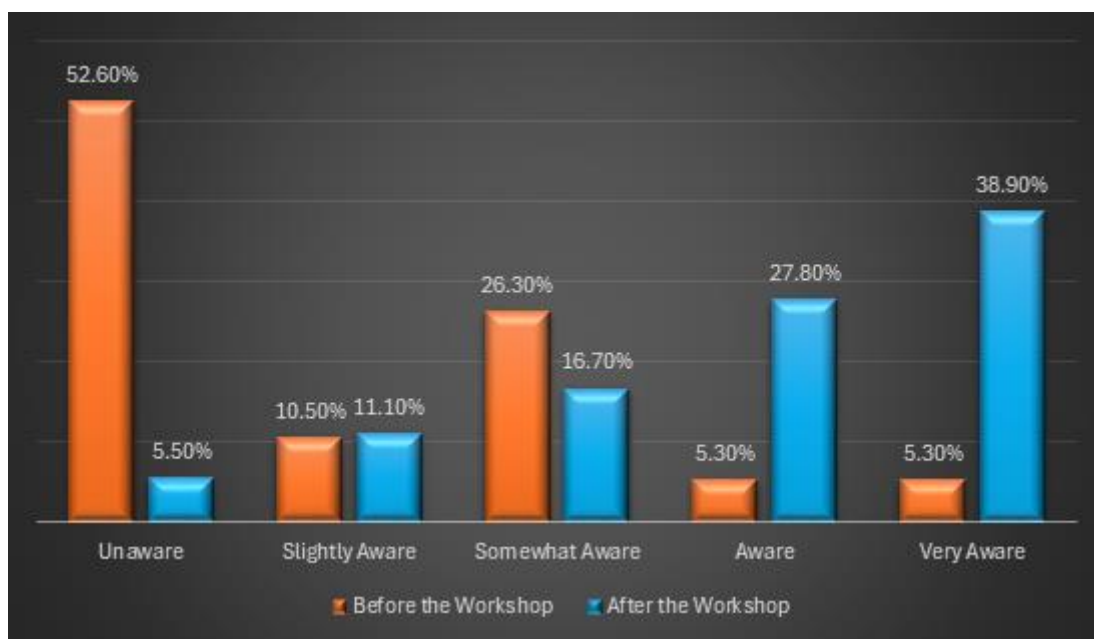
Before the workshop, the majority of consortium members rated their familiarity with the Ethics Appraisal Procedure under Horizon Europe as 'not at all familiar' (35%) and 'slightly familiar' (35%). However, after the workshop, a significant portion of consortium members (33.3%) declared themselves as 'familiar', suggesting a notable increase in familiarity levels. Upon examining the total change of weighted average, there is an approximate 86.4% increase, indicating a clear shift towards familiarity among responders (Figure 12).

Figure 12: Familiarity with the Ethics Appraisal Procedure under Horizon Europe
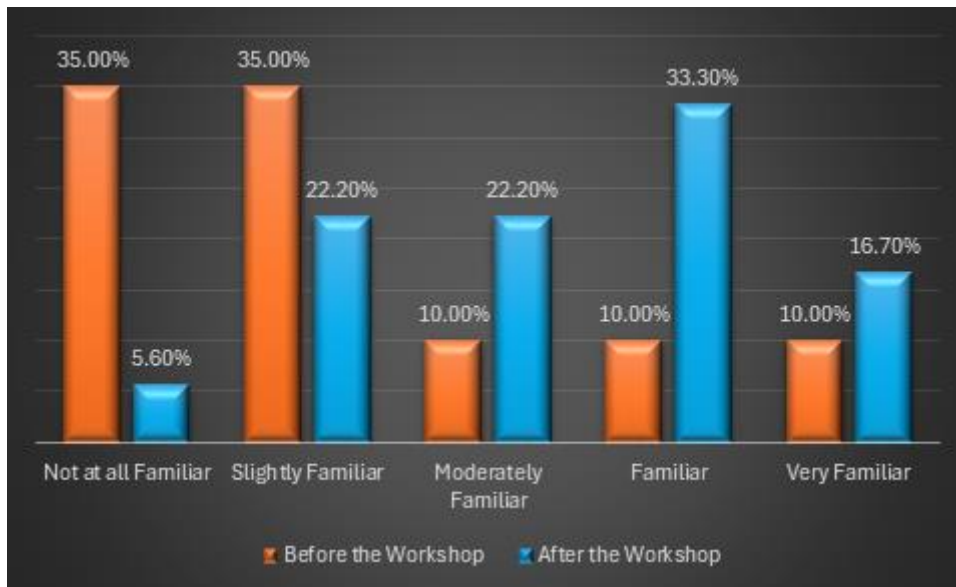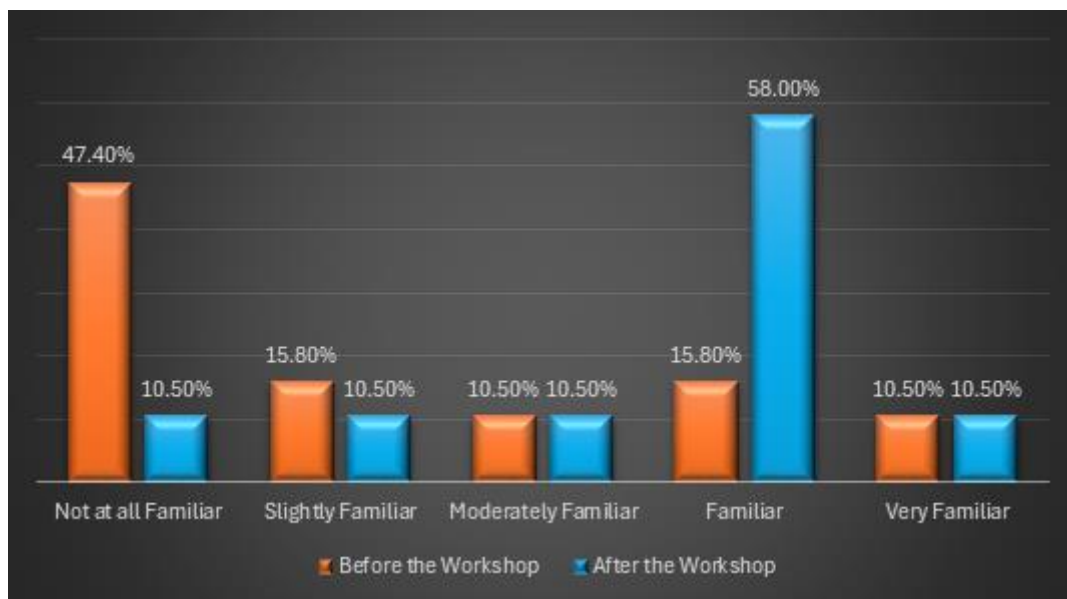

Regarding participants' familiarity with the Ethics Self-Assessment Process, it appears that after the workshop the weighted average increased from 'not at all familiar' to 'moderate familiar'. Specifically, before the workshop 63.20% of respondents were 'not at all familiar', while 5.3% were 'moderate familiar' and none of them was 'familiar'. After the workshop, this percentage ('familiar') increased to 47.4%, reflecting a significant rise in familiarity (Figure 13).

Figure 13: Familiarity with the Ethics Self-Assessment Process
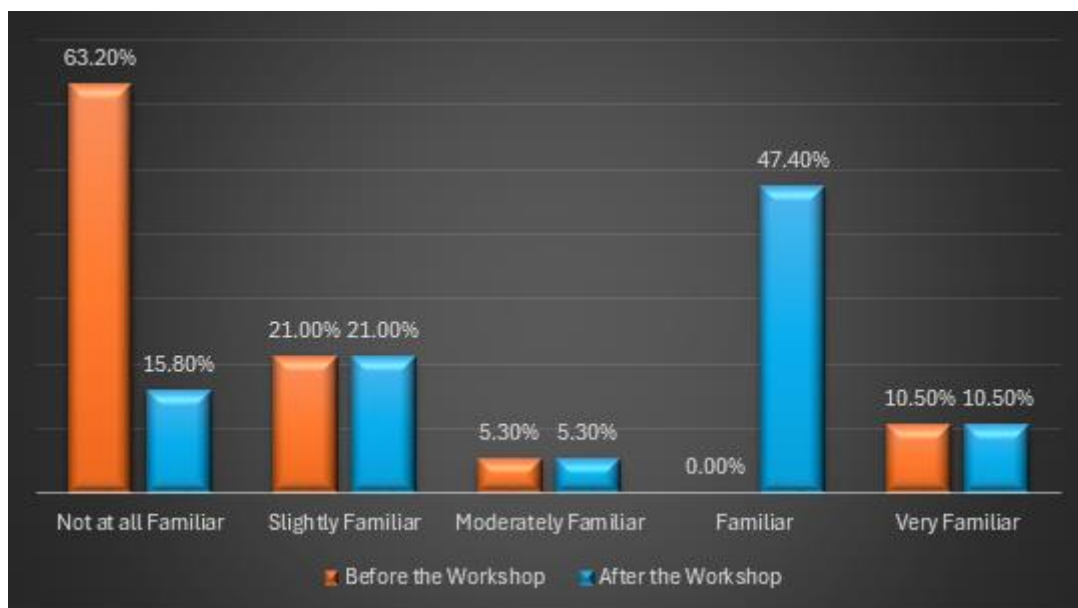
Examining the total change of weighted average, it is evident participants' familiarity with the Principles of the European Code of Conduct for research integrity has increased. Particularly, the percentage of participants who rated themselves as 'familiar' increased from 15.8% before the workshop to 58% after the workshop. Additionally, the percentage of respondents who indicated being 'not at all familiar' decreased substantially, from 47.4% before the workshop to 10.5% after the workshop (Figure 14).

Figure 14: Familiarity with the Principles of the European Code of Conduct for Research Integrity

Before the workshop, the majority of participants (90%) rated their familiarity with the European Commission's Ethics Issues Table as 'not at all familiar'. However, after the workshop 31.6% declared themselves as 'familiar' and 15.8% as 'very familiar' (Figure 15).

Figure 15: Familiarity with the European Commission's Ethics Issues Table
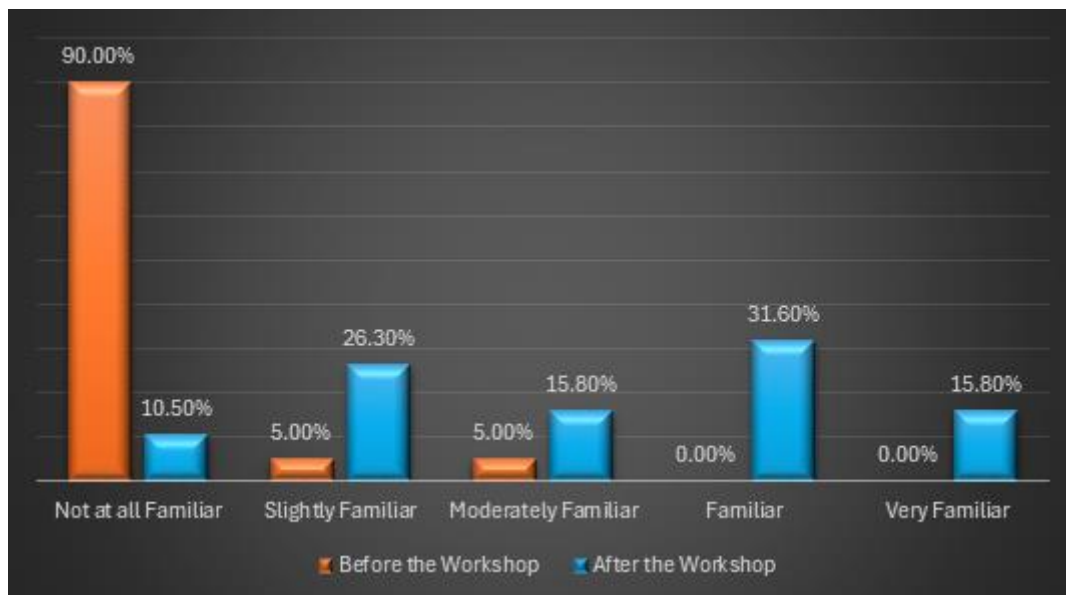
Regarding participants frequency and intention to consult/utilize the European Commission's Ethics Issues Table, after the workshop 21% declared that will consult it 'always' and 31.6% 'occasionally'. In contrast, before the workshop 94.8% of participants stated that they 'never' consult/utilize the European Commission's Ethics Issues Table (Figure 16).

Figure 16: Frequency of Consulting/Utilizing the European Commission's Ethics Issues Table
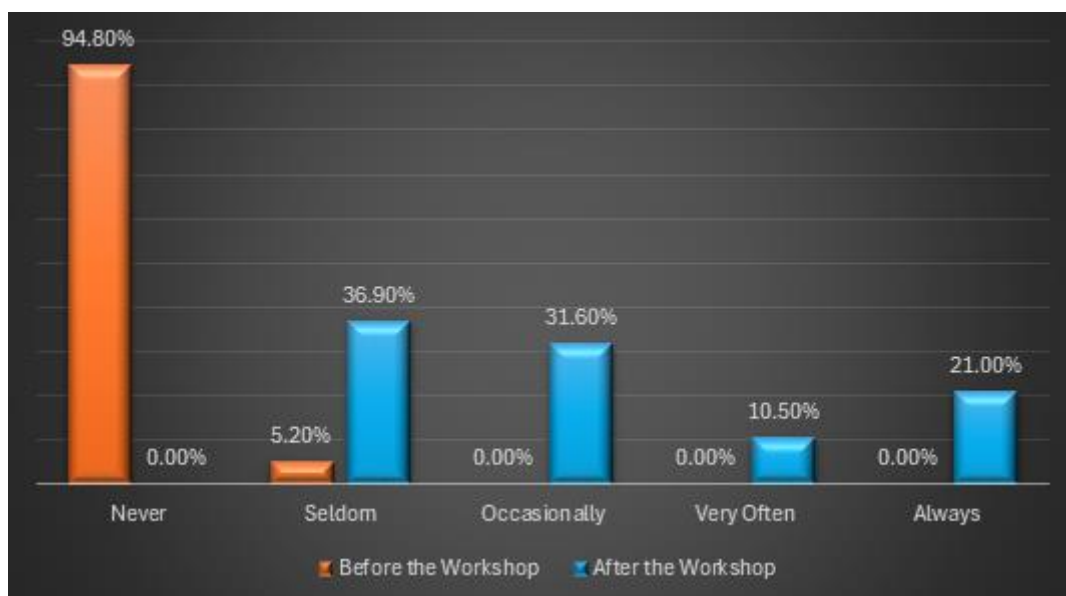
Examining the total change of weighted average, it appears that familiarity among consortium members with the role/application of GDPR in the context of FERMI has increased by 39.4%. Particularly, the average of

participants before the workshop declared themselves as 'moderate familiar' while after the workshop as 'familiar'. Additionally, the most significant shift occurred in the 'very familiar' category with participants increased from 15.8% before the workshop to 42.1% after the workshop (Figure 17).

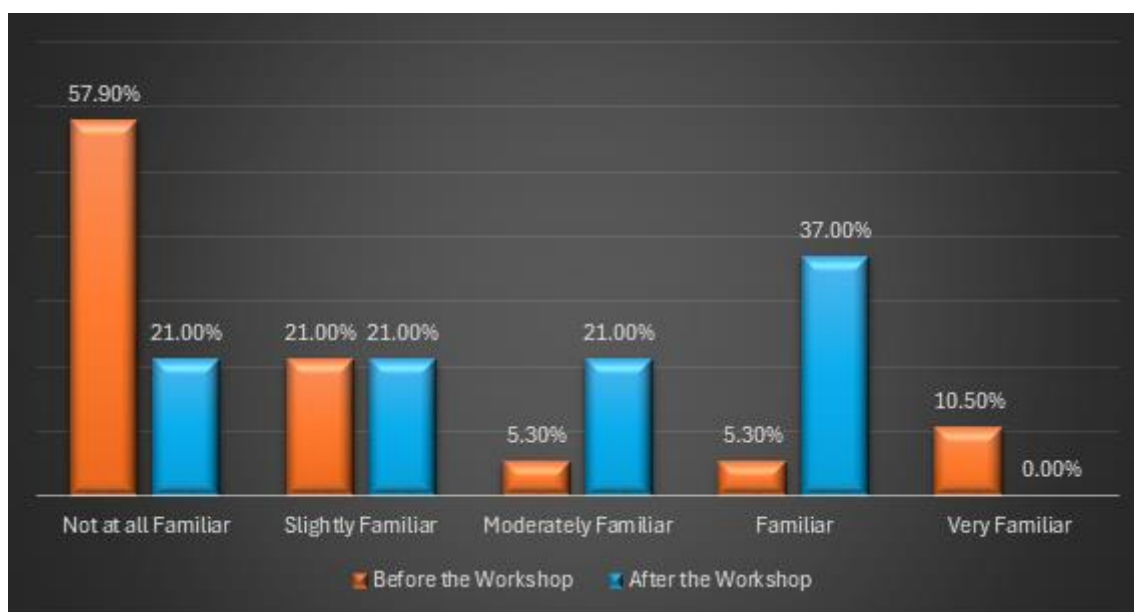**Figure 17: Familiarity with the Role/Application of GDPR in the context of FERMI**

Before the workshop, most participants (57.9%) rated their familiarity with the role/application of Law Enforcement Directive in the context of FERMI as 'not at all familiar'. However, after the workshop, the majority (37%) declared themselves as 'familiar,' suggesting a notable increase in familiarity levels.

Examining the total change of weighted average, there is an approximate 94.3% increase, indicating a shift towards familiarity among consortium (Figure 18).

Figure 18: Familiarity with the Role/Application of Law Enforcement Directive in the context of FERMI


The workshop proved to be highly effective in improving participants' familiarity with the role and application of the e-Privacy Directive in the context of FERMI. Notably, an impressive 78.9% of respondents indicated

being 'not at all familiar' with the e-Privacy Directive before the workshop. However, after the workshop, consortium members reported being 'moderately familiar' by 36.9% and 'familiar' by 36.1% (Figure 19).

Figure 19: Familiarity with the Role/Application of e-Privacy Directive in the context of FERMI
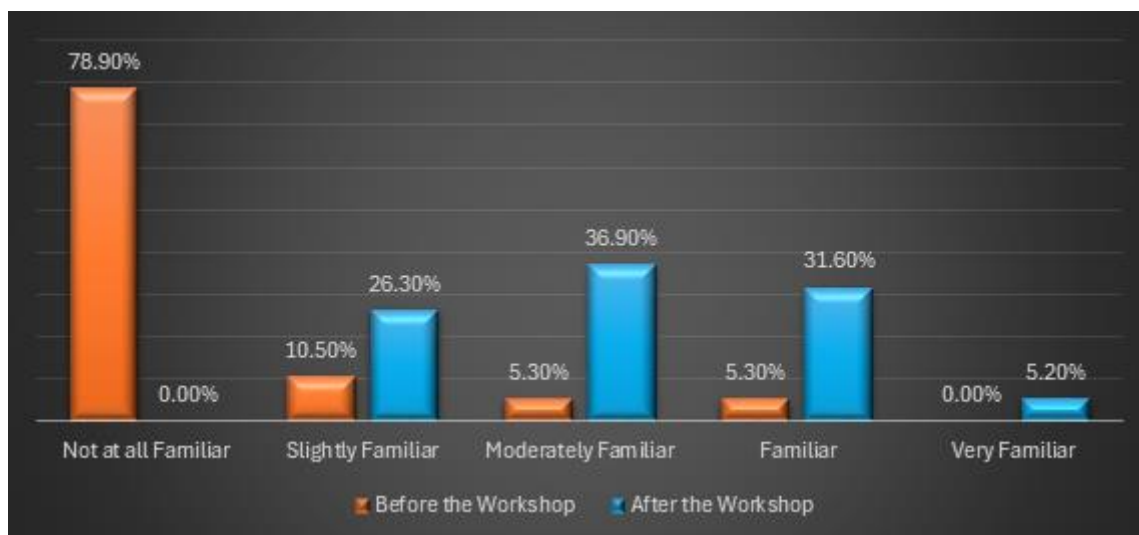
Participants' self-assessment on their understanding of EU Legislative Framework on FERMI's content moderation increased, after participating in the workshop. Most participants (42.1%) rated their understanding as 'poor' before the workshop. After the workshop, 42.1% of responders declared their understanding as 'moderate' and 26.3% as 'good', indicating the positive impact of the workshop. Regarding the swift in participants' attitude (based on total change of weighted average), there is an approximate 181% increase (Figure 20).

Figure 20: Rating the Understanding on the EU Legislative Framework on FERMI's Content Moderation

Annex E   Training Material

In the effort of maximising the impact of FERMI's training activities, training package material for each training activity, organised in the context of T6.3, are being setup. The first document of this section is a guidebook entitled *"Navigating Disinformation: A Comprehensive Guide"* followed by a second document, which is a toolkit, entitled "Ethics Assessment Toolkit".

Navigating Disinformation: A Comprehensive Guide

This guidebook has been designed in the context of FERMI (Fake nEws Risk MItigator) [Project 101073980], a Horizon Europe project that studies and attempts to counter the root causes, spread and implications of disinformation and fake news. This guidebook is inspired and derived primarily from the insights shared during the FERMI webinar "A dive into the societal landscape of disinformation - Balancing between Law Enforcement and Fundamental Rights to Increase Digital Trust" which took place on 23/02/2024.

The aim is to equip the reader with some basic knowledge and resources to navigate the murky waters of disinformation. This guidebook should ideally be read before or after viewing the webinar recording (found on the FERMI website) thus offering a comprehensive package that provides in-depth knowledge, fosters understanding, and encourages critical engagement with the topic of disinformation.

UNDERSTANDING DISINFORMATION

Disinformation is a complex phenomenon, its complexity lies not only in challenges to properly define it but also in the way it manifests and impacts the social fabrics of any society. Disinformation is not a new phenomenon, however the digital technology involved in online disinformation has recently arisen and this has contributed to exponentially increasing the impact that disinformation has. From the propaganda techniques to the algorithm-driven amplification of false narratives on social media platforms, the strategies and reach of disinformation campaigns have been significantly evolving. In the digital society we live in, the intricate web of disinformation, misinformation, and malinformation further complicates the landscape of accessible information. Emphasis should be placed on the intention behind the spread of false information since this can be the differentiating factor.

There are subtle distinctions among these concepts, focusing on the intent behind the spread. Misinformation, unlike disinformation, is spread without a malicious intent, often stemming from misunderstanding or miscommunication. Malinformation, on the other hand, involves the dissemination of truthful information with the intent to harm. Understanding these distinctions and the respective challenges in defining and tracing disinformation is key to developing effective strategies to mitigate their impact and guide the efforts of individuals, organisations, and governments in safeguarding the integrity of information.

THE LEGAL LANDSCAPE OF DISINFORMATION

Defining disinformation within the European Union and beyond is burdened with challenges. Despite several policy documents and attempts at creating a common understanding, there is no universal agreement on what constitutes disinformation.

What has been produced are a number of policy documents, in one of these key documents we can find a commonly used definition of disinformation which is being used in the policy making environment. Therein, "Disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm"[1]. This lack of consensus not only complicates legal and regulatory efforts but can also impede international cooperation in combating its spread.
By briefly analysing this commonly used definition of disinformation one can see the nuances of disinformation and the difficulties in tracing it and distinguishing it from other forms of false or misleading content.

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[1] European Commission, *Action Plan against Disinformation* (Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, 2018),p. 1. Available at: https://eur-lex.europa.eu/legal-content/GA/TXT/?uri=CELEX:52018JC0036

CHALLENGES IN LEGALLY DEFINING DISINFORMATION

Disinformation, unlike other types of illegal or harmful content, is more likely to be confused with legal content so there is risk of spill-over effect. Furthermore, the intention to gain economic profit or deceive the public is challenging to evaluate and a distinction must be made between malicious disinformation actors and individuals who accidentally share false information. In addition, because in most of the cases these actions/intentions cannot be traced back to one single actor, but to a multitude of actors.

The actions of assessing the potential for causing public harm in advance, such as negatively affecting democratic processes, is really challenging. Identifying what is false (or misleading) requires a careful assessment of context and circumstances (this can be particularly challenging online).

Additionally, determining the falseness or misleading nature of information demands a meticulous evaluation of the context and circumstances, a task that becomes especially difficult in the online environment. These complexities and the lack of consensus, in defining the phenomenon poses substantial difficulties in appointing standardised legal measures to battle/tackle disinformation. In combating disinformation, the protection of fundamental rights and democratic values should be at the core of these efforts.

Article 51.1 of the EU Charter of Fundamental Rights mandates that any restrictions on rights and freedoms recognised by the Charter must be legally established, essential, and proportionate, respecting the core of those rights. Such limitations are permissible only if they are necessary to achieve objectives of general interest recognised by the EU or to safeguard the rights and freedoms of others. According to the Court of Justice of the European Union (CJEU) and the European Court of Human Rights (ECtHR) case law, laws imposing restrictions must be accessible, clear, and non-discriminatory, ensuring that any limitation on fundamental rights is predictable and justified by a legitimate public interest, such as national security or crime prevention.

EU POLICIES ON DISINFORMATION

The European Union has recognised the threat posed by disinformation, leading to the development of several strategies to counter it. Notable initiatives include the "European Action Plan against Disinformation", which aims to enhance the EU's capability to identify and counteract disinformation, encourage cooperation and joint responses, while also mobilise the private sector to fulfil commitments against disinformation, and improve societal resilience. "The Code of Practice on Disinformation", has a more targeted approach, it enlists tech companies in efforts to reduce the spread of disinformation. It is specifically aimed at online platforms and the advertising industry. This can be viewed as a self-regulatory framework, with commitments to fight disinformation through various measures such as increasing transparency, promoting trustworthy content, and empowering users.

RISKS IN REGULATING DISINFORMATION – IMPACT ON FUNDAMENTAL RIGHTS

Crafting legislation that effectively counters disinformation without infringing on freedoms poses significant challenges. Legal debates within the EU often centre on identifying the threshold where regulatory measures become necessary to protect public interests without overstepping into censorship or violating rights.

Disinformation can be considered a form of expression, albeit potentially harmful. The need to regulate disinformation, intersects with fundamental freedoms and privacy concerns. Restricting disinformation under the European Convention on Human Rights (ECHR) and the EU Charter of Fundamental Rights (EUCFR) requires a delicate balance to avoid invading on the right to freedom of expression, only permissible for legitimate public interests. However, these attempts bear significant risks, including the potential for broad or vague definitions that unduly restrict lawful speech, leading to a chilling effect where individuals self-censor out of fear of sanctions. Furthermore, law enforcement agencies' efforts to detect disinformation actors for crime prevention or investigation can impact privacy and data protection rights. The EU strongly protects these rights under the General Data Protection Regulation (GDPR) and the Law Enforcement Directive, raising concerns about mass surveillance and disproportionate data access and retention. This surveillance risk, particularly when involving sensitive information like political opinions or religious beliefs, further compounds the chilling effect on freedom of expression, underscoring the complex interplay between safeguarding public interests and protecting individual rights.

BALANCING ACT: NAVIGATING DISINFORMATION MITIGATION AND FUNDAMENTAL RIGHTS

While EU law does not regulate disinformation directly, the Digital Services Act (DSA) aims to mitigate it through collaboration between online platforms, search engines, and public authorities. Very Large Online Platforms (VLOPs) and Very Large Search Engines (VLOSEs) are mandated to assess systemic risks, especially those affecting civic discourse and public security, and implement necessary risk mitigation measures. This includes prioritising responses to "trusted flaggers," who may be LEAs. However, there are challenges such as, as aforementioned, the lack of a uniform EU definition of disinformation, leaving VLOPs and VLOSEs with considerable discretion in adopting mitigation measures and employing automated moderation tools. This in turn raises concerns about fundamental rights, including the necessity and proportionality of measures that might limit these rights. The regulation of content moderation between public and private entities must ensure respect for fundamental rights, incorporating transparency and fairness in takedown measures. Additionally, what is essential is to establish an independent oversight mechanism to balance the cooperation on content moderation and safeguard against the infringement of fundamental rights.

Law enforcement agencies should approach disinformation within the bounds of the law, while upholding fundamental rights and democratic values. Enhanced protection of sensitive personal data is a crucial step given the intrusive potential of surveillance technologies. Any measure to combat disinformation must be clear and predictable to prevent overreach, with an established, albeit indirect, link to the legitimate objectives they aim to fulfil, ensuring proportionality relative to the severity of the threat

THE BROADER SOCIETAL IMPACT OF DISINFORMATION

As analysed above, one of the main challenges we face with the phenomenon of disinformation starts from the outset, i.e., establishing a uniform definition of disinformation. This difficulty in defining disinformation stems from the various methods through which information can be distorted to misinform, beyond the content itself. Thus, a more nuanced understanding of disinformation is required. Disinformation is a formidable force which is contributing to what is increasingly known as 'information disorder'. Information disorder encompasses a range of complications related to how information is created, shared, and received particularly in the digital age. It is characterised by the spread of misinformation, disinformation, and malinformation.

Information disorder is not just a technical issue but also a societal issue which involves the exploitation of emotional and psychological vulnerabilities. The essence of disinformation lies in the intent to weaken the information space by various means, not limited to the spread of false content but also through the things left unreported. Disinformation's negative impact on society is not necessarily the content or the lie itself but the ability to spread and become embedded in public discourse.

Disinformation's reach extends into the realm of journalism, where media manipulation and editorial omissions can shape narratives and, consequently, public opinion. The impact of disinformation is profound because is not restricted to the immediate impact of false narratives but includes the long-term erosion of societal trust. If societies are repeatedly exposed to manipulated content, the very basis of informed dialogue is undermined, which can have a ripple effect on public consensus/ perceptions. Disinformation can pose direct threats to democracy by for instance manipulating electoral processes, spreading false narratives about public figures, and influencing citizens' perception in governments. Indirectly, it could lead to public safety issues by spreading false information about health crises or stimulating violent actions/behaviours.

JOURNALISM, MEDIA AND THE PUBLIC DISCOURSE

The digital age has severely impacted journalism and media consumption. We observe a shift to social media as the basic news source and this in turn has led to a crisis in traditional media business models leading to a precarious state for many media outlets. This rise of social media as a primary news source has led to increased competition for audience attention and this often comes at the expense of journalistic integrity. In response, journalists and media organisations are adopting new strategies to combat disinformation, including fact-checking services and investigative journalism. Furthermore, what has been reported is a growing trend of news avoidance, indicating societal exhaustion with the current state of information overload. This avoidance is disturbing and poses challenges not only to journalism but also to the very fabric of democratic engagement and political participation.

COUNTERING DISINFORMATION: A MULTIFACETED APPROACH

The legal and societal framework for addressing disinformation is an evolving landscape, it reflects the ongoing struggle to navigate the intersection of technology, law, fundamental rights and democratic values in the digital era. The environment in which disinformation flourishes is intricate and exploits the underlying vulnerabilities within societies. Disinformation does not exist in a vacuum, disinformation strategies are tailored to identify and magnify societal vulnerabilities/gaps, be they political, economic, cultural and so on. By echoing and exacerbating pre-existing biases and inequalities, disinformation finds fertile ground. There is an interplay between offline and online vulnerabilities thus any combating efforts must address both realms to be effective.

COLLABORATIVE EFFORTS AND FUTURE DIRECTIONS

Technology indeed facilitates the spread of disinformation but it also offers tools to combat it. Artificial intelligence and machine learning algorithms can detect and flag various forms of disinformation with increasing accuracy. However, the reliance on technology to filter content raises ethical concerns about censorship and the potential for bias in algorithmic decision-making. Effective approaches to counter disinformation, therefore, must operate at the intersection of digital and societal resilience. This suggests that the need for media literacy and critical thinking skills and also fact-checking initiatives are paramount in building discerning and informed digital citizenry. Addressing the complexity of disinformation requires a multi-faceted approach. It calls for a 'whole society approach' where concerted efforts come from various levels of society and from both the public and private sphere, including government, tech companies, civil society, and the media. The call for identification and awareness-raising measures, conceptual clarity around trust and reliability, and tailored responses to various aspects of the disinformation challenge is only growing. In parallel, although regulation is vital, there should be a fine balance between implementing regulatory measures to combat disinformation and ensuring such measures do not supress freedom of expression and/or lead to excessive government control over media and information. We have to rely on collaborative and intersectional efforts which place at the forefront education, robust journalism and media literacy, and ethically oriented legal frameworks if we wish to foster a resilient information ecosystem within our societies.

CHARTING THE PATH FORWARD

The challenging landscape of disinformation will continue to evolve along with technological advancements. Therefore, investing in education as well as in innovation in detection, is crucial in the effort of mitigating the impact of disinformation. Addressing disinformation is an ongoing process which necessitates adaptability, reflection, collaboration, and an ongoing commitment to upholding fundamental rights and democratic values.

As we reflect on the collective journey through the insights from the FERMI webinar and this document, we can only underscore the importance of collaborative efforts to uphold the integrity of information. It's clear that building digital trust and combating disinformation requires a concerted effort at different levels and from all sectors of society. Understanding and combating disinformation does not only revolve around regulatory measures, it is also prominently about furthering an informed and critical public capable of discerning 'truth' in the age of information overload.

CLOSING NOTES

This document has been produced by Convergence as the assigned Social Sciences and Humanities (SSH) partner of FERMI and task leader of "Training activities for all: Increasing understanding and digital trust" and is part of the training package material which complement the respective training activities undertaken throughout the project. In particular, this document has been drafted following the FERMI webinar "A dive into the societal landscape of disinformation - Balancing between Law Enforcement and Fundamental Rights to Increase Digital Trust" which took place on 23/02/2024. The aim of the training activity/webinar was to increase understanding of disinformation and digital trust. Two esteemed guest speakers presented their insightful views and research. The first guest speaker, Flavia Giglio,[2] focused on her legal research conducted on the EU legal framework on disinformation and the main fundamental rights challenges when adopting and enforcing counter-measures to it. The topic was further enriched by the second guest speaker, Carme Colomina [3], as a communication, security and geopolitics expert, and went beyond the FERMI context to the broader spectrum of the societal landscape of disinformation.

This final version of the document has been edited by Convergence based on the information and material derived from the FERMI webinar "A dive into the societal landscape of disinformation - Balancing between Law Enforcement and Fundamental Rights to Increase Digital Trust".

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[2] Flavia Giglio: Legal Researcher in IT law, cybercrime and fundamental rights at the KU Leuven Center for IT & IP Law (CiTiP)
[3] Carme Colomina: Senior Research Fellow on European Union, disinformation and global politics at CIDOB (Barcelona Centre for International Affairs)

For Further Reading

This section can serve as a resourceful guide for individuals looking to expand their knowledge around the phenomenon of disinformation. Please note these are just a few suggestions/references from numerous, primarily drawn from the context of the FERMI webinar and relevant laws/initiatives/documents which comply and/or relate to the European Commission's guidelines.

- Bontcheva, Kalina, et al. *Balancing act: Countering digital disinformation while respecting freedom of expression*. Geneva, Switzerland: United Nations Educational, Scientific and Cultural Organization (2020).
- Charter of Fundamental Rights of the European Union. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012P/TXT
- Colomina, Carme and Sánchez Margalef, Héctor, *Othering and Belonging in a Europe in crisis: narratives, identities, and the New-Old divide*. Democracy & Belonging Forum, 2022
- Colomina, Carme, et al., *The impact of disinformation on democratic processes and human rights in the world*. Brussels: European Parliament (2021): 1-19.
- Council of Europe, *Information Disorder: Toward an interdisciplinary framework for research and policymaking*, Available at: https://www.coe.int/en/web/freedom-expression/information-disorder
- Council of the European Union, Council conclusions on Complementary efforts to enhance resilience and counter hybrid threats, 14972/19, 2019. Available at: https://data.consilium.europa.eu/doc/document/ST-14972-2019-INIT/en/pdf
- Council of the European Union, Council conclusions on strengthening resilience and countering hybrid threats, including disinformation in the context of the COVID-19 pandemic, 14064/20, 2020. Available at: https://data.consilium.europa.eu/doc/document/ST-14064-2020-INIT/en/pdf
- Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA (Law Enforcement Directive).
- European Commission, Action Plan against Disinformation (Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, 2018).
- European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on Tackling online disinformation: a European Approach, COM/2018/236 final, 2018. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018DC0236

- European Commission, Directorate-General for Communication, (2019) Action Plan against disinformation : report on progress. Publications Office. Available at: https://data.europa.eu/doi/10.2775/18729

- European Commission, Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on Action Plan against Disinformation, JOIN(2018) 36 final, 2018. Available at: https://eeas.europa.eu/sites/default/files/action_plan_against_disinformation.pdf

- European Commission, Tackling online disinformation, 2021. Available at: https://ec.europa.eu/digital-single-market/en/tackling-online-disinformation

- European Convention of Human Rights (ECHR), Available at: https://www.echr.coe.int/documents/d/echr/convention_ENG

- European Union, *Charter of Fundamental Rights of the European Union,* Official Journal of the European Communities,2000. Available at: https://www.europarl.europa.eu/charter/pdf/text_en.pdf

- European Union, *The Strengthened Code of Practice on Disinformation* (European Union, 2022). Available at: https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation

- Flore, M., *Understanding Citizens' Vulnerabilities: From Disinformation to Hostile Narratives,* EUR 30029 EN, Publications Office of the European Union, Luxembourg, 2020, ISBN 978-92-76-14307-9, doi:10.2760/276141, JRC118914. Available at: https://publications.jrc.ec.europa.eu/repository/handle/JRC118914

- Giglio, Flavia. Moderation of illegal content and social media scraping. Privacy and data protection constraints in the processing of publicly available data by law enforcement authorities. i-Lex-Rivista di Scienze Giuridiche, Scienze Cognitive e Intelligenza Artificiale 16.2 (2024): 17-33.

- Kalina Bontcheva and Julie Posetti (eds). *Balancing Act: Countering Digital Disinformation While Respecting Freedom of Expression*. Broadband Commission Research Report on Freedom of Expression and Addressing Disinformation on the Internet 2020. Available at: https://www.broadbandcommission.org/Documents/working-groups/FoE_Disinfo_Report.pdf

- Proposal (COD) 2021/0106 for a Regulation of the European Parliament and of the Council laying down harmonised rules on artificial intelligence (Artificial Intelligence Act) and amending certain Union legislative acts. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52021PC0206

- Regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (GDPR). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679

- The European Commission has developed a number of initiatives to tackle disinformation:

  ➤ the Communication on 'tackling online disinformation: a European approach' is a collection of tools to tackle the spread of disinformation and ensure the protection of EU values;

  ➤ the Action plan on disinformation aims to strengthen EU capability and cooperation in the fight against disinformation;

  ➤ the European Democracy Action Plan develops guidelines for obligations and accountability of online platforms in the fight against disinformation;

  ➤ The 2018 Code of Practice on disinformation was the first time worldwide that industry has agreed, on a voluntary basis, to self-regulatory standards to fight disinformation. It aimed at achieving the objectives set out by the Commission's Communication presented in April 2018

  ➤ the COVID-19 disinformation monitoring programme, carried out by signatories of the Code of Practice, acted as a transparency measure to ensure online platforms' accountability in tackling disinformation.

  ➤ European Digital Media Observatory (EDMO) is an independent observatory bringing together fact-checkers and academic researchers with expertise in the field of online disinformation, social media platforms, journalist driven media and media literacy practitioners

  ➤ the Strengthened Code of Practice on Disinformation, signed on 16th June 2022, brings together a wide range of players to commit to a broad set of voluntary commitments to counter disinformation

ETHICS ASSESSMENT TOOLKIT

This toolkit is designed in the context of FERMI (Fake nEws Risk MItigator) [Project 101073980], a Horizon Europe project that studies and attempts to counter the root causes, spread and implications of disinformation and fake news. The purpose of this toolkit is to support FERMI consortium members in the process of conducting an ethics assessment. Ethical compliance is a prerequisite for all EU-funded projects. Since ethics issues can emerge at any stage of the research process, it is of vital importance to be informed and properly equipped to understand, identify and properly communicate/address these.

By offering some basic steps this document assists the reader in conducting an ethics self-check i.e., assessing respective project related actions, in terms of ethics stance and status, and offer some relevant direction to ensure that the FERMI project adheres to the highest ethical standards. Provided that ethical considerations are not static, meaning these do not end with proposal submission, the aim of this document is to assist towards identifying potential ethical issues in research activities and ensuring compliance with European Commission guidelines thought the project lifecycle i.e., from proposal submission to project execution and project completion.

STEP 1: UNDERSTANDING THE ETHICAL FRAMEWORK

The initial phase of this toolkit instructs you to start by reading some important documents to understand the ethical framework. The first step guides readers through familiarising themselves with essential documents and principles that underpin ethical conduct relevant for the project's scope. By comprehending these documents, readers will be equipped to align with legal requirements and to navigate the complex ethical landscapes of the project and work towards ensuring adherence to the highest standards of research integrity.

REVIEW KEY DOCUMENTS

- REGULATION 2021/695

The "Regulation (EU) 2021-695 of the European Parliament and of the Council of 28 April 2021"[1] is a critical document as it sets out the foundational legal and ethical framework establishing Horizon Europe i.e., European Union's flagship programme for research and innovation covering the period from 2021 to 2027). The regulation outlines the programme's objectives including strategic priorities, budget, funding eligibility and ethical standards rules for participation and dissemination, and outlines the structure for its implementation.

Articles 18 & 19 are of particular importance for this context.

! Article 18[2] "**Eligible actions and ethical principles"** underlines eligible actions for research and that all activities carried out under Horizon Europe must adhere to respective ethical principles and be compliant with applicable EU, national, and international laws.

! Article 19[3] "**Ethics"** outlines the ethical framework and compliance requirements for actions. Here you will find vital information regarding (a) ethical compliance and law adherence, (b) conducting ethics self-assessment, (c) processes of ethics screening and assessments, (d) processes of approval and documentation, (e) ethics checks and, (f) non-compliance consequences.

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[1] Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0695

[2] Idem, Article 18, p. 29

[3] Idem, Article 19, p. 29-30

- EUROPEAN CODE OF CONDUCT FOR RESEARCH INTEGRITY

The "**European Code of Conduct for Research Integrity**"[4] provides a self-regulatory framework which is applicable to research across all scientific and scholarly fields and has been acknowledged by the Commission as the reference document. Therein you will find principles and guidelines on how to uphold research integrity across all scientific and scholarly disciplines. Emphasis is placed on the importance of reliability, honesty, respect, and accountability in research practices.

- HOW TO COMPLETE YOUR ETHICS SELF-ASSESSMENT

The document "**How to Complete your Ethics Self-Assessment**"[5] is a comprehensive guide by the European Commission to assist applicants and beneficiaries of EU funded projects in ensuring their proposals comply with ethics. If there is a need to conduct an "Ethics Self-Assessment" (in FERMI this was needed), this is an essential part needed in the proposal evaluation process, the self-assessment is a preparatory step completed by researchers and is used in the broader evaluation entitled the *Ethics Appraisal Procedure* conducted by the European Commission (EC).

The aim of this document is to help identify and address potential ethics issues that may arise from projects while enhancing the selection process and contributing to the responsible implementation of projects. Herein you will also find European Commission's "Ethics Issues Table", which includes guidance for researchers/applicants during the preparation of project proposals, the table helps identify potential ethical issues that might arise from respective research activities. Ethic Topics included are enlisted below, FERMI's context requires special attention as it intersects with various topics (e.g. AI, Humans, Personal data).

Human embryonic stem cells (hESCs) and human embryos (hEs)	Non-EU countries
Humans	Environment, health and safety
Human cells or tissues	Artificial intelligence (AI)
Personal data	Other ethics issues
Animals	Crosscutting issue: potential misuse of results

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[4] ALLEA (2023) The European Code of Conduct for Research Integrity – Revised Edition 2023. Berlin. DOI 10.26356/ECOC. Available at: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/european-code-of-conduct-for-research-integrity_horizon_en.pdf

[5] European Commission (2021). How to Complete Your Ethics Self-Assessment, Version 2.0. European Commission. Published on 13 July 2021. Available at: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/how-to-complete-your-ethics-self-assessment_en.pdf

- THE EUROPEAN TEXTBOOK ON ETHICS IN RESEARCH

"**The European Textbook on Ethics in Research**"[6] is an educational resource produced by the European Commission, aiming to support training in research ethics. Herein you will find key issues related to research ethics, such as consent, the treatment of vulnerable subjects, privacy, balancing harms and benefits, and justice in research.

- ETHICS AND DATA PROTECTION

The document "**Ethics and Data Protection**[7]" is a guide by the European Commission which emphasises the intersection of ethics with data protection in EU research. Here you will find critical information such as, General Data Protection Regulation (GDPR)[8] compliance and the ethical handling of personal data within research activities, and ethical and legal data management approaches, including discussions on the ethical implications of research involving dual-use items, the potential for misuse of research findings, and other related issues particularly important for the FERMI context.

- FERMI DELIVERABLES & INTERNAL PROTOCOL ON ETHICAL PROCEDURES

Key documents produced within the context of FERMI that are of particular importance in providing input for the respective ethical framework are:

- ✓ "**D1.4 FERMI Data Management Plan**" which includes the "**Internal Protocol on Ethical Procedures**". The Protocol outlines the main ethical requirements and principles that need to be observed during the Project's execution. Its main purpose is to safeguard that the rights and freedoms of the research participants shall be respected throughout the research,
- ✓ "**D7.1 H - Requirement No. 1**", is the first ethics deliverable and concerns the involvement of human participants in the FERMI project's research activities,
- ✓ "**D7.2 POPD - Requirement No. 2**", is the second ethics deliverable, which addresses the handling of personal data and,
- ✓ "**D7.3 AI - Requirement No. 3**" which is the third ethics deliverable and addresses the role of artificial intelligence in FERMI.

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[6] European Commission, Directorate-General for Research and Innovation (2010), European textbook on ethics in research, Publications Office. Available at: https://data.europa.eu/doi/10.2777/51536

[7] European Commission (2021). Ethics and Data Protection. Brussels: European Commission. Available at: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/ethics-and-data-protection_he_en.pdf

[8] For a particular focus on GDPR regulation see: Regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (GDPR). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679

ETHICAL PRINCIPLES & REQUIREMENTS

Of particular importance in reviewing these key documents is to comprehend and utilise the core ethical principles and in turn requirements. The principles serve as the foundation for ethical research conduct, guiding researchers in making decisions that uphold the integrity and social responsibility of the work carried out. As analysed in the "European Code of Conduct for Research Integrity", the four core ethical principles are: Reliability, Honesty, Respect and Accountability[9]. While ethical principles are the foundation, ethical requirements translate ethical principles into actionable directives, which can provide clear expectations for behavior. Particularly analysed for/in the FERMI context can be found on chapter 3.2 "What are the main ethical requirements that need to be observed when conducting research?" of "D1.4 - FERMI Data Management Plan".

LEGAL COMPLIANCE

These key documents will assist you in building a basis towards understanding the EU legal framework, including but not limited to, fundamental rights, data protection, content moderation, as these apply to your research. Since the FERMI project aims to develop an AI tool to identify disinformation and fake news (D&FN), with the ultimate purpose of seeking a unified EU method for assessing risks from such sources, i.e., D&FN. One of the main concerns towards achieving its goals is to constantly protect fundamental rights and freedoms which may be affected by the implementation of measures to combat the spread of fake news. While at the same time, adhering to the EU's data protection framework, particularly the GDPR, is crucial. Additionally, the Law Enforcement Directive[10] is pertinent for the project's law enforcement aspects. The FERMI researchers must also particularly consider EU regulations on online content moderation, including the Terrorist Content Online Regulation and the Digital Services Act.

STEP 2: IDENTIFY POTENTIAL ETHICAL ISSUES

When conceptualising, designing, and implementing your respective research activities consult the documents enlisted in Step 1. Use the Commission's Ethics Issues Table: This tool will help in identifying common ethical issues related to human participants, personal data, AI, safety and environmental impact etc. In parallel, consider the project's context while reflecting on your research activities, goals and output, relevant methodologies, and data handling processes to identify unique ethical concerns. For the FERMI context these include all the internal documents enlisted under "FERMI Deliverables & Internal Protocol on Ethical Procedures".

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[9] ALLEA (2023) The European Code of Conduct for Research Integrity – Revised Edition 2023. Berlin. DOI 10.26356/ECOC. Available at: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/european-code-of-conduct-for-research-integrity_horizon_en.pdf.

[10] See: Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA (Law Enforcement Directive). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016L0680

STEP 3: COMPLETE THE ETHICS ASSESSMENT

Use the template provided below "Ethics Assessment Template" to record your research activities, potential ethical issue, mitigation strategy and review and monitoring procedures. Document the nature of the ethics concerns, how these apply to your research activities, and the steps you will take to mitigate the risk. Collaborate with your project team to review and refine accordingly, this stage can reveal overlooked ethical considerations.

STEP 4: CONTINUOUS MONITORING AND UPDATING

Ethical compliance is an ongoing process, you need to regularly review and update your ethics assessment to reflect any relevant changes in your research activities or trace any emerging ethical concern. Continuously consult FERMI's ethics and legal partners, including the Ethics Advisory Board, as a resource for advice and feedback on ethical concerns/matters.

ETHICS ASSESSMENT TEMPLATE

Research Activity Overview	*Describe the planned research activity, including the purpose and output, the methodology and tools, using as a basis how this is described in the Grant Agreement.*
Potential Ethical Issues Identified	*Describe any potential ethics issue which might arise as a result of the conceptualised research/project activity consulting the key documents enlisted herein and any additional relevant document/source.*
Mitigation Measures	*Describe your mitigation strategy by consulting key documents enlisted herein and any additional relevant document/source. Ensure respective ethical principles addressed and ethical requirements adhered.*
Review & Monitor	*Review and update according to relevant project partners, especially ethics and legal partners' feedback when/if necessary. Outline the plan for ongoing monitoring as described within key project documents, if not available and/or updated modify accordingly.*
Additional Notes	

CLOSING NOTES

This document has been produced by [Convergence](#) as the assigned Social Sciences and Humanities (SSH) partner of FERMI and task leader of "Training activities for all: Increasing understanding and digital trust" and is part of the training package material which complement the respective training activities undertaken throughout the project. In particular, this toolkit has been drafted following the internal workshop (for FERMI consortium members) on legal and ethical requirements which took place on 21/03/2024 at Brussels, presented by the assigned Ethics partner of FERMI, Vrije Universiteit Brussel (VUB), and specifically from Dimitra Markopoulou[11].

The information presented in the workshop was derived primarily from D1.4 (FERMI Data Management Plan) and in particular the parts of the deliverable relevant to the ethics and legal partners of FERMI (VUB & Katholieke Universiteit Leuven (KUL)) contributions. This final version of the document has been edited by Convergence based on the information and material derived from (a) the workshop, (b) respective deliverables and (c) relevant secondary literature (which has been critically evaluated regarding the quality, validity as well as the reliability of the data), all references can be found in footnotes. Although this toolkit has been drafted in the context of FERMI, it can be utilised as a guide for other EU funded R&I projects, provided that the reader carefully modifies the steps described herein to fit the context of respective proposals and projects.

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[11] Dimitra Markopoulou PhD, Research Group on Law, Science, Technology & Society (LSTS) Vrije Universiteit Brussel (VUB) | Faculty of Law and Criminology