APC submission in response to the call for inputs to the forthcoming report entitled

"Freedom of Expression and Elections in the Digital Age"

by the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

JANUARY 2025

The Association for Progressive Communications (APC) welcomes the call by the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression for written contributions to inform her forthcoming report on "Freedom of Expression and Elections in the Digital Age", which will be presented to the Human Rights Council in June 2025. APC is an international network organisation dedicated to empowering and supporting people working for peace, human rights, development and protection of the environment, through the strategic use of information and communication technologies (ICTs). The APC network has 74 organisational members and 41 associates active in 74 countries, mostly in the global South. We work to build a world in which all people have easy, equal and affordable access to the creative potential of ICTs to improve their lives and create more democratic and egalitarian societies.

The following submission draws on the election-related work and observations of APC staff, its members and associates. Acknowledging the specific sets of questions provided by the Special Rapporteur in the call, this submission uses these as a guide to offer considerations in five areas:

- Disinformation campaigns and information disorder during election periods in countries in the global South
- Gendered disinformation and online attacks
- The disengagement of platforms
- Freedom of thought and manipulation of voter perception
- Legislative environments that impact on freedom of expression during election periods in countries in the global South.

In doing so, it responds primarily to the following sets of questions included in the call:

- What have been the key trends, threats or challenges to freedom of expression in the context of elections in your country or in countries where you work?

- What laws, policies or other measures have i) governments, ii) digital and social media companies, iii) media companies and iv) electoral and regulatory bodies taken to uphold and safeguard freedom of expression and access to information in the context of elections in your country or in countries where you work? What has been the impact of these measures?

- What are the key challenges, threats and restrictions faced by journalists during elections in your country or in countries where you work?

- What policies, practices and measures have social media platforms taken to address online threats and challenges to freedom of expression during elections in your country or in countries where you work? How effective have they been?

- What role has disinformation, misinformation or hate speech, online and offline, played during elections in your country or in countries where you work?

- What legal or policy measures exist or have been introduced in your country or in countries where you work to address disinformation, misinformation or "hate speech"? How effective have they been to address such practices during elections?

A set of recommendations are also provided at the end of this submission.

Disinformation campaigns and information disorder during election periods in countries in the global South

Activists in the global South have noted the increasingly negative impact of disinformation campaigns on elections in fragile democracies, as well as the more sophisticated use of generative artificial intelligence (AI) in attempts to undermine election processes. Gendered disinformation campaigns and attacks have also been used to dissuade women leaders from participating in politics and to silence women journalists. States have drawn on vaguely worded disinformation laws and other laws to threaten free speech and to intimidate journalists and other media workers, as well as civil society actors. Internet shutdowns are a feature of election periods in countries and regions across the global South. Platforms, meanwhile, have shown little institutional will or jurisdictional responsibility to engage media rights organisations in some countries to collaboratively address the threat of disinformation and online attacks during election periods.

Models of how disinformation operates during election times in different countries in the global South have started to emerge. For example, recent research has shown that a key objective of disinformation campaigns in elections in South Africa,[1] Nigeria[2] and Kenya[3] was to undermine the credibility of the election results.[4] This potentially created fertile ground for political parties to challenge or reject the results and public support for any challenge to the election outcome. Disinformation also drew on what the study called "fault lines" in those countries, including existing religious and ethnic tensions and the fear of conflict, to "build narratives that fuelled

---

[1] In May 2024.

[2] In February and March 2023.

[3] In August 2022.

[4] Finlay, A. et al. (2024). *Testing the fault lines*: *A sample analysis of election-related fake content in South Africa, Kenya, Nigeria and Senegal and an account of the perceptions, behaviours, attitudes and beliefs of media studies students in the four countries*. Africa Check. Publication pending.

an environment of uncertainty, suspicion, and public alarm during the election periods, while also skewing perceptions of support (or lack of support) for particular parties or candidates."[5] Not all political parties were the subject of disinformation attacks or false claims of support in those countries. Typically, a contestation was set up between two parties, with the energy of the contestation drawing on the specific fault lines evident in each country, or what others have called "contextual variations".[6]

In an analysis of disinformation campaigns during the same elections in Kenya and South Africa, as well as in the Democratic Republic of Congo[7] and Ethiopia,[8] researchers noted that the consequences of these campaigns can be particularly severe in fragile democracies when the election process is undermined and the potential for conflict is fuelled by the campaigns. They also noted the increased sophistication of these campaigns including through the use of generative AI.

Recently, Meta said it had intervened in some 20 "covert influence operations" during elections in countries across the world in 2024, but added that the potential of AI to disrupt elections does not seem to have fully materialised.[9] Nevertheless, generative AI is likely to have an increasingly stronger impact on information disorder during elections across regions in the global South. Although the use of AI has been relatively low in recent elections in Africa, and while instances of shallow fakes were easily identifiable as fakes,[10] more worrying was the circulation of deep fake voice recordings, which have impacted election narratives, and which even fact checkers have found almost impossible to verify.[11] For example, in recent elections in Nigeria, a voice recording that was purported to be evidence of a plot to "rig" the elections was widely shared on social media, with experienced fact checkers unable to determine its authenticity using sophisticated technology, despite some claims that it was false.[12] Given that disinformation works by providing forms of "evidence" to a false claim, the negation of the disinformation depends on the ability of journalists and fact checkers, among others, to disprove the evidence provided. This is often achieved through recourse to institutional statements of correction, reference to websites and other forms of reliable online information, and the use of access to

---

[5] Ibid.

[6] Timcke, S., Orembo, L., & Hlomani, H. (2023). *Information disorders in Africa: An annotated bibliography of selected countries*. Research ICT Africa. https://researchictafrica.net/research/information-disorders-in-africa-an-annotated-bibliography-of-selected-countries

[7] On 20 December 2023.

[8] On 7 October 2024.

[9] Booth, R. (2024, 3 December). Meta says it has taken down about 20 covert influence operations in 2024. *The Guardian*. https://www.theguardian.com/technology/2024/dec/03/meta-says-it-has-taken-down-about-20-covert-influence-operations-in-2024

[10] See, for example, https://africacheck.org/fact-checks/meta-programme-fact-checks/no-former-us-president-donald-trump-has-not-backed-south and https://africacheck.org/fact-checks/meta-programme-fact-checks/us-president-joe-biden-did-not-warn-south-african-sanctions

[11] Finlay, A. et al. (2024). Op. cit. See also Shibayan, D. (2023, 24 February). FACT CHECK: Viral audio of Atiku, Tambuwal and Okowa plotting to rig election is doctored. *TheCable*. https://www.thecable.ng/fact-check-viral-audio-of-atiku-tambuwal-and-okowa-plotting-to-rig-election-is-doctored

[12] Ibid.

information requests, among other tools available to journalists and fact checkers. However, in instances such as the circulation of the voice recording in Nigeria, generative AI has been used in a way that makes it nearly impossible to disprove the "evidence" that is produced. This kind of use of AI therefore poses a serious threat to free and fair elections in Africa and elsewhere in the global South in the future.

The Asia-Pacific region reportedly saw a 1,530% increase in AI-driven deepfakes[13] from 2022 to 2023.[14] However, the extent of use of AI in the region to undermine election processes appears to be mixed. The use of AI in disinformation campaigns was reported to be low in the recent election Bangladesh,[15] but was reported to be more widespread in Indonesia.[16] Given the different levels of digitalisation between regions such as Africa, Latin America and Southeast Asia, comparisons are also difficult to make. However, specific legislative frameworks for AI in many countries in South and Southeast Asia, like elsewhere in the global South, appear to be mostly lacking. In Bangladesh, for example, no law existed that governs AI,[17] and the country's copyright laws did not sufficiently deal with the complexities of the new uses of the technology.[18] Similar legal lacunas have been observed in countries across Africa.[19]

It is important to note that AI has also been used transparently and innovatively in election campaigns in Southeast Asia, including to attract disaffected young voters to the polling booths in countries such as Indonesia.[20] Activists say that in India,[21] political parties are also increasingly using generative AI tools in their campaigns.[22] In Pakistan, a jailed opposition leader held a "virtual rally" in 2023, which included an AI-generated speech that was based on notes apparently sent to his political party via his lawyers. Reports also say the internet was disrupted soon after the virtual rally went live.[23]

[13] Sumsub. (2023, 28 November). APAC Deepfake Incidents Surge 1530% in the Past Year Amidst Evolving Global Fraud Landscape. *PR Newswire*. https://www.prnewswire.com/apac/news-releases/apac-deepfake-incidents-surge-1530-in-the-past-year-amidst-evolving-global-fraud-landscape-301999070.html

[14] Rathi, A., & Kirindigoda, M. (2024, 7 August). The 2024 tech-influenced elections, through the youth's eyes. *EngageMedia*. https://engagemedia.org/2024/elections-technology-youth

[15] Islam, R. (2024, 9 August). For Bangladesh youth, 2024 is the year of election – and revolution. *EngageMedia*. https://www.engagemedia.org/2024/bangladesh-youth-election-revolution

[16] Elections held on 14 February 2024.

[17] In 2024 the Bangladeshi government announced plans to draft new legislation by September 2024 to check misuse of AI.

[18] Islam, R. (2024, 9 August). Op. cit.

[19] See the work of Research ICT Africa: https://researchictafrica.net/project/africa-just-ai

[20] Islam, R. (2024, 12 August). "Real or Not Real?" The Youth of Indonesia Fights for Credible Information in the 2024 General Election. *EngageMedia*. https://www.engagemedia.org/2024/indonesia-youth-elections

[21] Elections were held from 19 April to 1 June 2024 in seven phases.

[22] See the work done by SFLC.in to track the use of AI by political parties in India: https://sflc.in/tracking-use-of-ai-by-political-parties-in-india

[23] Shahid, U. (2024, 7 March). Pakistan elections 2024: A dramatic episode of defiance and uncertainty. *APC*. https://www.apc.org/en/node/39257

As in this instance in Pakistan, internet shutdowns are a regular feature of election periods in a number of countries in the global South. For example, in Indonesia, internet shutdowns, alongside a strong military and police presence, are used to quell government opposition in the province of West Papua.[24] In Bangladesh, several news websites were blocked on 6 and 7 January during its recent election, in addition to Facebook and Messenger being throttled on voting day. Activists reported that internet shutdowns in the country had been ongoing since July 2024 in response to student protests that resulted in a call for the resignation of the country's prime minister.[25] Internet shutdowns were also experienced in the Democratic Republic of Congo in its 2023 elections.[26]

However, shutdowns of services are not always negatively received. Many activists welcomed the blocking of X (formerly Twitter) in Brazil by the country's courts in August 2024, even if it was temporary. They said this was decisive in reducing attacks on journalists.[27]

Gendered disinformation and online attacks

Gender-based disinformation campaigns targeting women politicians and online attacks on women journalists are a feature of election periods in numerous countries in the global South. These have been shown to negatively impact the participation of women politicians in democracies in countries across regions and threaten the freedom of women journalists to do their work of reporting on elections in a critical way and, in some cases, with a gender lens. In Kenya, some 18% of female political candidates are said to have encountered various types of online violence, and in Uganda, anecdotal accounts from one female politician suggest as many as one out of 10 women politicians in that country are likely to have been subjected to gendered disinformation and attacks.[28] A well-known example in Uganda is the case of Winnie Kiiza, who was the leader of the opposition in the Ugandan parliament from May 2016 to August 2018. She constantly had to deal with coordinated disinformation campaigns that focused less on her political competence and more on her "appearance and personal lifestyle." These attacks were said to have "pushed her

[24] Islam, R. (2024, 12 August). Op. cit.

[25] Islam, R. (2024, 9 August). Op. cit.

[26] On 20 December 2023. Rudi International. (2023, 14 December). The 2023 edition of HakiConf looks at preserving digital rights during the election period. *APC*. https://www.apc.org/en/node/40270

[27] Intervozes. (2024, 19 September). Período eleitoral expõe agressões à imprensa de apoiadores da extrema direita. https://intervozes.org.br/periodo-eleitoral-expoe-agressoes-a-imprensa-de-apoiadores-da-extrema-direita

[28] Uiras, M. J. (2024, 17 May). Why gendered disinformation is dangerous for African democracy. *APC*. https://www.apc.org/index.php/en/node/40188

out of the system such that there was no way for her to run for office again."[29] Today, Kiiza works outside the mainstream political arena, but still organises online, and is outspoken on issues of justice, human dignity and good governance. Gendered disinformation and attacks on the continent are also said not only to affect women politicians and journalists, but also extend to other key players in the electoral process such as judiciary officials.[30]

A feature of some elections in Latin America are online attacks on journalists by openly right-wing and often anti-democratic groups, where misogyny, homophobia, xenophobia and racism are often evident. Recent municipal elections held in Brazil[31] showed that X in particular was used by groups to foment attacks on journalists, which were reduced when the platform was blocked in the country.[32] Activists say these attacks go hand-in-hand with anti-media and anti-democratic positions taken by political candidates.[33]

In Paraguay,[34] research identified eight types of technology-facilitated gender-based violence used against women politicians in election times, including coordinated online harassment, doxxing, disinformation, the non-consensual dissemination of intimate images, monitoring or surveillance, defamation and hate speech. Twelve different categories of perpetrators of the violence were also identified. These included politicians and political parties, state authorities, anti-rights groups, the media, influencers, attacks using anonymous profiles, trolls and organised crime.[35]

In South Africa's recent election in May 2024, the majority of the attacks faced by journalists were online, with only one major incident of journalists being assaulted while covering the elections during fieldwork reported.[36] Attacks in that country were also focused on particular journalists, with 1,025 online attacks reported on a small sample group of primarily 10 journalists during the elections.[37] While both male and female journalists were attacked, the gendered nature of these attacks, as elsewhere in the world, is a distinct feature when female journalists are involved.

---

[29] Finlay, A. (2024). Roundtable report. *Gender approaches to cybersecurity: Integrating policy, research and technical standards discussions*. APC. https://www.apc.org/sites/default/files/genderapproaches-cyber.pdf

[30] Uiras, M. J. (2024, 17 May). Op. cit.

[31] On 6 October 2024.

[32] Intervozes. (2024, 19 September). Op. cit.

[33] Ibid.

[34] Elections held on 30 April 2023.

[35] Cuevas, M., & Sequera, M. (2024). *Violencia de género facilitada por la tecnología a mujeres políticas en Paraguay*. TEDIC. https://www.tedic.org/violencia-de-genero-facilitada-por-la-tecnologia-a-mujeres-politicas-en-paraguay

[36] Hunter, Q. (2024). Journalists under fire online. In A. Finlay (Ed.), *State of the Newsroom*. Wits Centre for Journalism. https://journalism.co.za/resources/state-of-the-newsroom

[37] Media Monitoring Africa. (2024). *Media Performance Review: National and Provincial Elections 2024*. https://www.mediamonitoringafrica.org/wp-content/uploads/2024/07/MPR_Report_120724.pdf

There and in other countries in Africa, substantial gaps persist in understanding the nuanced dynamics of gendered disinformation within electoral contexts, which are said to be challenging for women journalists to work in given the heightened level of threats they receive. "Offline" gender-based assaults are also often reported.[38]

In South Asia, activists have recorded how women journalists and transgender individuals in Pakistan, for instance, face a higher risk of attacks, which often threaten their physical safety. Harassment, abuse and gendered disinformation campaigns are said to be frequently used to target women and marginalised groups online.[39]

The disengagement of platforms

While activists in Africa say that there is a need for platform accountability models specifically designed for the African context,[40] the recent moves by Meta to disband its fact-checking division and scrap its diversity policies is likely to make this less feasible. Even before this announcement by Meta, platforms have been reported to be largely unresponsive when approached by media organisations to deal with online threats faced by journalists, as well as election-related disinformation. For example, in the recent election in South Africa, platforms were unwilling to cooperate with media organisations in dealing with online threats.[41] This is in contrast to their public statements on elections in the United States and the European Union.[42]

The platforms' own efforts at limiting the circulation of disinformation during election periods have also been shown to have mixed effect in some countries in the global South. For example, in a transparency report, Meta said that in the first quarter of 2024 in Bangladesh it had deleted 50 Facebook accounts and 98 Facebook pages it said were spreading misleading information about the opposition.[43] Meanwhile, TikTok said 2,358 accounts in the country were removed in January 2024 for "attempting to manipulate the election discourse by posting skewed narratives."[44] However, a 2023 study also showed that political advertisements circulated on

[38] Uiras, M. J. (2024, 17 May). Op. cit.

[39] Nizami, M., & Rizvi, M. (2023). *Resource pack: Journalists Guide to Ethical Election Reporting*. Media Matters for Democracy. https://mediamatters.pk/wp-content/uploads/2023/12/Resource-Pack-Journalists-Guide-to-Ethical-Election-Reporting.pdf

[40] Uiras, M. J. (2024, 17 May). Op. cit.

[41] Finlay, A. (2024). *A Need for Vigilance: The State of Free Expression in South Africa 2024*. Campaign for Free Expression. https://freeexpression.org.za/wp-content/uploads/2024/10/State-of-FoE-in-SA-2024.pdf

[42] SANEF. (2024, 3 April). SANEF is Disappointed at Being Ghosted by Some Big Tech Companies and Parliament. https://sanef.org.za/sanef-is-disappointed-at-being-ghosted-by-some-big-tech-companies-and-parliament

[43] Islam, R. (2024, 9 August). Op. cit.

[44] Ibid.

Facebook in the country without the necessary disclaimers, despite these advertisements clearly displaying party names, symbols or photos of political leaders.[45] Another report said that candidates and parties were "subjected to offensive discourse and intimidation" on Facebook.[46]

Part of the lack of cooperation from platforms appears to relate to institutional will, and part to their sense of legislative obligation. Despite having staff and offices in countries in the global South, platforms are offshore companies and believe they are not subject to many local laws. For example, in South Africa, the Campaign for Free Expression wrote to the main platforms operating in the country with several detailed questions on their election preparations ahead of the country's elections in 2024.[47] Responses received repeated information that was in the public domain only. Applications were then served on the platforms in terms of the country's Promotion of Access to Information Act. To this, the platforms responded that because their headquarters were not in South Africa, and their data was not held in the country, the law did not apply.

---

[45] Ibid.

[46] Ibid.

[47] Harber, A. (2024, 28 February). Questions for the social media giants. *Campaign for Free Expression*. https://freeexpression.org.za/in-the-media/questions-for-the-social-media-giants

Freedom of thought and manipulation of voter perception

Targeted ads allow political actors to exploit individuals' personal data to deliver highly tailored messages that play on fears, biases or emotions. Manipulation undermines the informed decision-making process that is central to democratic participation.

Algorithm manipulation may encourage filter bubbles (ways in which information is filtered before reaching an internet user) and echo chambers (individuals seem to preferentially interact with people who are interested in the same topics and who share similar opinions). This has an impact on pluralism and diversity, which are critical for political debate in democratic contexts; voters may not be exposed to diverse viewpoints, limiting their ability to form balanced opinions.

There are also serious transparency concerns often related to political ads. They are frequently opaque about their sponsors, funding sources and targeting criteria. Micro-targeting enables messages to be shown only to specific audiences, avoiding broader public scrutiny or fact checking.

Targeted ads can also facilitate more efficient dissemination of false or misleading information to susceptible groups. And because algorithms often prioritise sensational or divisive content to maximise engagement, they can compound the spread of disinformation with the use of hatred narratives, fomenting polarisation or even violence.

Targeted ads have been found to undermine electoral integrity. As stated by Bennett and Lyon, "Political micro-targeting, and the voter analytics upon which it is based, are essentially forms of surveillance."[48] Building on this idea, Evangelista and Bruno argue that the radicalisation of Brazilian politics, for example, could be partially explained as an effect of the use of political micro-targeting in a highly concentrated news media ecosystem, and zero-rating policies that fuel the popularity of WhatsApp, a platform with affordances that favour the spread of misinformation.[49]

---

[48] Bennett, C. J., & Lyon, D. (2019). Data-driven elections: implications and challenges for democratic societies. *Internet Policy Review, 8*(4). https://policyreview.info/data-driven-elections

[49] Evangelista, R. & Bruno, F. (2019). WhatsApp and political instability in Brazil: targeted messages and political radicalisation. *Internet Policy Review, 8*(4). https://policyreview.info/articles/analysis/whatsapp-and-political-instability-brazil-targeted-messages-and-political

Legislative environments that impact on freedom of expression during election periods in countries in the global South

Disinformation is typically governed by a basket of laws in countries, which include, among others, codes of conducts for political parties during election times, laws on defamation, criminal codes, privacy laws, and cyber regulation.[50] Few countries in the global South currently have specific laws that govern the use of AI. While researchers have found that many African countries lack comprehensive legal frameworks to combat disinformation effectively,[51] there is also disagreement on whether or not disinformation-specific laws are an effective way to deal with disinformation. Activists argue that disinformation legislation often has a chilling effect on freedom of expression and is misused by states to silence dissent, and many prefer broad-based media and information literacy interventions as a practical alternative to legislating against disinformation.[52] APC has collected reports from gender activists confirming the misuse of criminal provisions to silence them, including criminal disinformation laws.[53]

Researchers have found that in some African countries, existing laws are often outdated and poorly enforced, with negative impacts on free expression.[54] For example, in Cameroon, where laws are described as vague and disproportionate, journalists have been arrested for "spreading false news", and media organisations and activists intimidated for publishing "false" reports critical of the government.[55] The main factors for the rise of disinformation in Cameroon – which is also found in countries such as Kenya and Nigeria – are "political polarisation and partisan disinformation, ethnic and tribal manipulation, disinformation on electoral processes, and foreign influence or disinformation by external actors."[56] Others have argued that in Africa, the shortcomings of current legal approaches to deal with disinformation include their failure to meet international human rights standards, and their tendency

[50] Cunliffe-Jones, P. et al. (2021) *Misinformation Policy In Sub-Saharan Africa: From Laws and Regulations to Media Literacy.* University of Westminster Press. https://www.fulcrum.org/concern/monographs/bv73c331q

[51] CIPESA. (2024, 30 August). Report Highlights Collaborative Efforts to Counter Disinformation in Africa. https://cipesa.org/2024/08/report-highlights-collaborative-efforts-to-counter-disinformation-in-africa

[52] Amnesty International et al. (2022). *Joint submission by Amnesty International South Africa, Campaign for Free Expression, Committee to Protect Journalists, Media Monitoring Africa, and the South African National Editors' Forum.* https://www.amnesty.org/en/documents/afr53/5467/2022/en

[53] Martins, P. et al. (2024) *Placing "Gender" in Disinformation.* Association for Progressive Communications. https://www.apc.org/en/pubs/placing-gender-disinformation

[54] CIPESA. (2024, 30 August). Op. cit.

[55] Toussi, S. (2024, 20 September). Cameroon's 2025 Presidential Election: Equipping Actors to Address Disinformation. *CIPESA.* https://cipesa.org/2024/09/cameroons-2025-presidential-election-equipping-actors-to-address-disinformation

[56] Ibid.

to impose severe penalties and administrative procedures on journalists and online platforms.[57]

A characteristic of the legislation used to supress freedom of expression during elections is its vagueness of terminology, which gives states leeway to act against journalists and civil society activists. For example, in Bangladesh, the Digital Security Act (2018) defined a "threat" in general terms and allowed for the arrest of journalists and others based on the suspicion that a crime had been committed, and without a warrant. Although the Digital Security Act was replaced by the Cyber Security Act (2023), activists say the same threats remain. One report published in 2023 recorded the arrest of 56 journalists over a three-month period using these legislative mechanisms.[58]

In Pakistan, the Prevention of Electronic Crimes Act (2016), defamation laws and some sections of the Pakistan Penal Code, including sedition charges, have been used to initiate investigations against journalists.[59] Activists report that a month before the most recent elections in the country,[60] Pakistan's Federal Investigation Agency issued 47 notices to journalists accusing them of spreading disinformation against the judiciary. Some 18 notices were also sent to YouTubers and other media workers.[61]

Recommendations

- There is an urgent need for renewed commitments by platforms to support fact-checking initiatives in the global South.

- Electoral authorities should promote codes of conduct that seek to commit signatories to work with fact checkers and cut financial incentives for spreading disinformation on their platforms. These codes should also compel companies to make it easier for users to recognise, understand and flag disinformation, alongside labelling political ads and analysing fake accounts, bots and malicious deepfakes that spread disinformation.

- States should work to enhance the accountability of digital platforms towards users by listening to the victims/targets of online harassment and setting up mechanisms to ensure the voices of women and girls are heard and that they participate in creating solutions.

---

[57] Uiras, M. J. (2024, 17 May). Op. cit.

[58] Islam, R. (2024, 9 August). Op. cit.

[59] Shahid, U. (2024, 7 March). Op. cit.

[60] In February 2024.

[61] Shahid, U. (2024, 7 March). Op. cit.

- A key approach in dealing with election-related disinformation and online threats is collaboration between different stakeholders, including the media, fact checkers, civil society activists, the government and the country's electoral body. To the extent that platforms are willing, they should also be part of this multistakeholder collaboration. Cross-country collaboration between institutions such as electoral bodies can also produce positive results. There are examples of these types of collaboration for regions and countries to draw on:

    o The first-ever Continental Conference for Election Management Bodies was held in South Africa in March 2020, which resulted in the Principles and Guidelines for the Use of Digital and Social Media in Elections in Africa.[62]

    o In Kenya, the National Coalition on Freedom of Expression and Content Moderation (FECoMo)[63] brought together more than 20 state, civil society and media organisations to ensure that content moderation practices protected freedom of expression.

    o Ahead of elections in South Africa, the South African National Editors' Forum (SANEF) worked with the country's electoral body and media rights organisations to run a series of nationwide training seminars for some 650 journalists, including to inform them of recent amendments to the country's Electoral Act.[64] SANEF also issued a Statement of Commitment on Media Freedom and the Protection of Journalists,[65] which it asked political parties and candidates to endorse.

    o In August 2024 in Cameroon, bloggers, journalists, activists, researchers, human rights defenders and civil society organisations developed the Yaounde Declaration on Electoral Disinformation.[66]

- Regulations should be implemented to ensure meaningful transparency in processes and data, including algorithms, and to develop tailored trust and safety solutions for women and girls, which are thoroughly tested beforehand.

- Regulations should also be adopted to address political advertising, mandating disclosure of funding sources, sponsors and targeting criteria for

---

[62] https://www.elections.org.za/pw/Elections-And-Results/Principles-and-Guidelines-for-the-use-of-the-Digital-and-Social-Media-in-Elections-in-Africa Principles and Guidelines for the Use of Digital and Social Media in Elections in Africa

[63] https://fecomo.org

[64] SANEF. (2023, 6 December). SANEF Applauds Successful Collaboration With the IEC on Voter Education Training of Journalists. https://sanef.org.za/sanef-applauds-successful-collaboration-with-the-iec-on-voter-education-training-of-journalists

[65] SANEF. (2024, 23 May). Statement of Commitment on Media Freedom and the Protection of Journalists. https://sanef.org.za/statement-of-commitment-on-media-freedom-and-the-protection-of-journalists

[66] https://cipesa.org/wp-content/files/documents/YAOUNDE_DECLARATION_ON_ELECTORAL_DISINFORMATION.docx.pdf

online political ads. Robust data protection regimes should be in place to protect voters' data.

- Electoral commissions should be equipped with tools to monitor, possibly in real time, and counter disinformation campaigns. They should also be supported to adopt crisis communication plans and other communication strategies to quickly address and correct false narratives.