Introduction

1. International Media Support (IMS) welcomes the opportunity to respond to the Foreign Affairs Committee's inquiry on “The Foreign and Commonwealth Office and global media freedom”. IMS is a global non-profit organisation working to promote public interest journalism in order to strengthen democracy, ensure development and reduce conflict.

2. We acknowledge the FCO efforts, including its special focus on disinformation and restrictions on media freedom.

3. Our submission focuses on points included in the Terms of Reference i.e.:
   - the threats to global media freedom, and how they are evolving;
   - the reputation and capabilities of the UK in promoting global media freedom, and combating disinformation;
   - the role of the FCO in supporting those individuals and groups – both in the UK and abroad – that serve these goals;
   - the best priorities and approaches for the FCO in this field; and the impact of the UK's support for global media freedom abroad.

Global Trends

4. Journalism and justice continue to be (arguably) the two most fundamental pillars underlying a country’s ability to make progress toward accountable governance.

5. The rise of China is presenting the postwar western liberal democratic order with a challenge far more serious than the one communism mounted fifty years ago. Part and parcel of China’s spectacular forty-year development run is its successful “information management” policies, which have emboldened Russia to roll back several decades of progress toward freedom of access to information; dozens of other middle-to-lower-income countries are now also faltering in their commitment to media freedom.

6. If the 1990s saw relatively substantial progress, globally, toward more media freedom due both to the fall of communism and the rise of the internet, the 2000s produced several new challenges, beginning with increasing legal constraints on journalism (especially the use of insult and defamation regulation to chill speech) and then, as countries reacted to increasing internet penetration, cybercensorship.

7. The 2010s have brought at least three more challenges facing journalism, all connected to the rise of new online services:
i. because the internet has “flattened” the earth, making more of everything accessible to more people, the quality of professional information gathering and editing has nosedived creating the supposed but erroneous conclusion that the number of journalists the world needs has dramatically declined, thus reducing demand for many working journalists;  

ii. because major online services can profile users and thus deliver more-targeted advertising, a quarter to a half of the ad revenue which used to sustain conventional journalism has “disappeared” from media’s coffers; and  

iii. the combination of …

• the rise of user-generated content (including social media and messaging apps),  
• “ad tech,”  
• humans’ vulnerability to the sensational, and  
• mobile connectivity

… has given purveyors of disinformation a dramatic advantage in their efforts to foster fear, promote populism, cultivate conflict, and stoke distrust in truth-focused media. Disinformation involves a broad range of “producers” ranging from inflammatory statements and hate speech spread by the Burmese military to false information and incendiary images on Facebook in Nigeria, conduits (aka platforms/publishers) and consumers. Revealing the key figures and operational goals that link these three connected groups remains the challenge at hand.

Positive actions and way forward.

8. Not all is gloom and doom, though; the adoption of ever-stronger whistleblower protection policies (of which, the current draft EC Whistleblower Protection Directive is the most dramatic example) is good news for journalists’ ability to continue to depend on confidential sources to uncover misbehavior.

9. The financial support of the UK’s “democracy & governance” aid money is of critical importance to bolstering the work of brave journalists and media workers in developing countries who struggle to live up to the aspirations of the fourth estate. Although the US provides a plurality of the global media development budget, the UK punches far above its weight in comparison to all other big donors, especially the EC, France, Germany, and Japan.

10. Potential media aid could include support for a coalition building approach that uses multi-pronged/multi-stakeholder strategies involving actors ranging from the media to individual government ministries. This approach focuses on leveraging investigative journalism strategies to shine a light on how information is being purposely misused in a range of countries where disinformation distorts democratic principles (Nigeria,
Myanmar, etc.) moving seamlessly from producers to conduits to consumers. Here the media can work with governments and the private sector to reveal who the intellectual authors are and why and how they operate linked to specific socio-political contexts in each country.

11. Within these socio-political settings, a growing trend needs to be reigned in, namely the use of political campaigns in a range of countries across the globe, from Mexico to Myanmar, which are using disinformation as a tactic during elections to gain an unfair and borderline illegal advantage. Cases are increasing whereby political candidates know that they can use disinformation as a weapon and their strategists use social networks (e.g. Facebook) for these purposes. Independent media must be supported and empowered to investigate the levers behind these undemocratic movements.

12. Further to this, significant lines of increased funding both public and philanthropic needs to be pooled into:

i. new forms of production and distribution of journalistic content online into/onto new mediums — obviously Facebook, Yandex. News, WeChat but now Insta, Snap, WhatsApp, possibly yet newer platforms such as TikTok—both in terms of ensuring content is there where citizens’ attention is, and also to exploit cutting-edge ways of monetizing good journalism;

ii. ongoing training of those who make good journalism happen (not least because of the natural brain drain of talent out of the industry, thus requiring constant replenishment).

iii. fact-checking, to fight disinformation (and, of course, the operationalization of fact-checkers’ output e.g. demotion (in end users’ feeds) of “bad” content via those same algorithms which promote “engagement” (often the most sensationalist content));

iv. creation of tagged corpora of bad content (hate speech, disinformation) in “smaller” languages (e.g. Tagalog, Swahili, Sinhala) which can be used to train machine-learning algorithms which can, in turn, contribute to demoting bad content;

v. internet freedom, to improve the chances of quality journalism being made available online (circumventing the barriers to consumption presented by states’ control over broadcast frequency licenses and the costs of transmission or printing and distribution)—
   • the deployment of cyber circumvention tools and methods (so that netizens can evade cybercensorship),
   • the availability of cybersecurity tools which enable safe communication, civic organizing, and the work of key individuals such as journalists and rights activists, and
   • the adoption and enforcement of policies (such as net neutrality) which contribute to making the internet more available and freer for content to flow;

13. Donor funding will remain key for tried-and-true media development projects, especially including …

i. creation and strengthening of domestic constituencies which can defend media freedom, e.g. associations of publishers, broadcasters, journalists;
ii. advocacy (by *inter alia* those same domestic constituencies) of a **regulatory environment supportive of journalistic freedom**, e.g.

- constraining the bases for defamation action to only the most egregious violations (and, concomitantly, support for public figure doctrine),
- journalist shield laws,
- avoiding regulation of media *qua* media (e.g. requiring any producer of content with over 1000 views to “register”), etc.; and

Finally, there are contributions to other countries’ media freedom which the FCO can make, itself:

i. prioritise forcefully **advocating inter-governmentally** for the principle (in other countries) of allowing journalists to do their work, and for threats to journalists to be aggressively deterred and/or prosecuted;

ii. **indirectly financially support** other countries’ independent media/journalists, e.g. by paying for their content, advertising with them, etc.; and

iii. improve the **UK’s own ability** to live up to the vaunted good principles of the fourth estate at home, so as to continue to provide, as a the “shining light on the hill,” a beacon for other countries to strive toward—e.g.

- reduce the ease of defamation prosecution in the UK,
- pull back from aggressive security services’ attempts to reduce citizens’ ability to communicate safely/securely, and
- keep strengthening the wall/barrier/protection between public media’s funding and the current government’s political priorities, etc.

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