

***Independent Australia* response to the Global Disinformation Report -2021**

A set of plainly invalid scores given to *Independent Australia* by an England-based media ratings agency has pointed up problems with its concept and methodology.

The Global Disinformation Index (GDI) sets out to judge social media products of 34 Australian media outlets in two evaluative categories, their Content and Operations, with a view to advantage or penalise them by reporting to online advertisers on their 'performance' in the field of disinformation. This response consults the [GDI report on Australian media](#), a [media release](#) promoting it, and [documents produced by the GDI in England](#).

Several criticisms can be levelled at the GDI, as applied in this country, if not globally, not least:

- (a) Appearing to skip a crucial aspect of its assessment scheme: an audience survey by an external polling company able to provide a necessary control on its own 'qualitative' data gathering. We thought that an initial, generic cross-countries survey was possibly being proffered to somehow cover this requirement, but other explanations in the documentation indicate there should be a survey for the Australian market. There was a reference to the "market average" being 79, which is assumed to be an averaging of the scores produced for the outlets one-by-one, not from a collective survey.
- (b) Distorting and skewing its overall rating assessment for *Independent Australia* by producing an erroneous treatment of *IA's* practices in three fields: 'attribution', 'assuring accuracy' and 'policies on comment'.
- (c) The report dissents from received understanding in the Australian market where News Corp publications, in both news and commentary, are widely recognised as being openly and egregiously partisan. It rates them as being very safe risks against disinformation, a determination that should warrant a forensic and persuasive defence in the text – such justification not there to see. The overall classification purports to define *Independent Australia* as a Moderate risk for disinformation, with the News Corp stable – *Courier Mail*, *Sydney Telegraph* and *Herald Sun* – rated as Minimal risk. Those outlets are also rated in places well ahead of the ABC and SBS, which are both committed to transparent policy guidelines and statutory injunctions against partisanship, News Corp being represented as much less of a disinformation risk than them on the measure called "Content".

This response raises objections to the conduct of the appraisal, which *inter alia* relies on a “manual” process, possibly most vulnerable to error, for converting the content of articles and of house notices published on the sites, into a schedule of ratings.

Construction of the Global Disinformation Index was provoked by concern over abusive material on social media being used by members of the public as news, on the part of the GDI [founder group](#), persons with relevant expertise in fields like business analytics. There is a physicist working on cyber crime and security issues, a data analyst with background running a ratings agency, and an activist from the not-for-profit sector versed in “ed-tech” and “fin-tech”. The scheme focuses on an understanding of [disinformation](#) as activity prone to be intentionally misleading, with the GDI asserting that it [also means](#) “adversarial narratives that create real world harm”, as opposed to misinformation that may be just [wrong information](#). It sets out to identify perpetrators of disinformation and to harm them by telling tech-ad companies they should not get business. The “global” project has been extended from the United Kingdom, with aims to cover “at least 20 major online advertising markets”, funding received to date for four former ‘British’ countries, Australia, Canada, Malaysia and Nigeria, as well as Brazil, Italy, Mexico and Spain.

There is some confusion about what it is meant to study. The research problem is to do with social depredations of social media, for example GDI being recognised in [Forbes magazine](#) as an agency that “tracks disinformation, hate speech, and fake news sites”. Its report on media in Australia states: “The number and scope of online disinformation campaigns have remained a concerning trend over the last few years in Australia and the world ...”. So the research objective, such as it might be, relates to perceived harm done by social media being used as news; whereas the exercise then appears to have shifted a few paces, to reduce the scope, reviewing only the social media extensions of standing media outlets; and then a few paces more to impose a judgment on the news outlets’ home mastheads, those outlets being provided by professional journalists -- no disclaimers offered that might have separated a ‘home’ outlet like a newspaper and its social media off-shoots. A media release promoting the Australian study makes actual news sites the target, not delinquent “fake news” domains, with its heading: “Can we trust our news sites?” The GDI is interested in sites that spread disinformation and receive revenue through advertising, but looks for them among publications that are well organised and least likely to cause outrage. This hardly engages the problem posed to society by proliferating social media turned out by random

individuals or special-interest groups. (A prominent recent instance of official concern over “disinformation”, in the uproarious online free-for-all of bigotry and deception, as opposed to the work of actual media organisations, is the alarm [raised by the Australian Federal Police](#) over the formation of radicalised mobs; another, [action in the European Parliament](#) to get a hard definition and appropriate regulatory response.)

The stated aim of GDI is to “disrupt, defund and down-rank disinformation sites”, so that, if they down-grade you in this process, they will try to wreck your standing, bankrupt your company and do you out of a job. In that light their down-grading mechanism ought to be very sound -- whereas it is indicated here that it is not really fit for such a declared purpose. The GDI states its schema has produced a voluntary code on disinformation, “which producers of social media platforms – Twitter, Google, Facebook, Microsoft, Redbubble, TikTok, Adobe and Apple – have adopted, and have started publishing annual reports on their self-assessment under the code”. Time has precluded more than a cursory search here, not as yet finding such reports published by those platforms, though it should be instructive to see them whenever available.

In the meantime the GDI seeks to co-opt the [Journalism Trust Initiative](#) (JTI) standard for use in its evaluations of media outlets. Whether or not this co-optation is an attempt to make-good any lack of expertise or knowledge of actual journalism, on the part of the GDI, the JTI standard was developed primarily to build on self-assessments by news media themselves -- journalists’ business. It was devised under the auspices of the European Union, which [proclaims that it upholds media freedom](#) as an item of European law, whereby it “defends journalists under threat”. The threat to journalists will include a malicious cacophony of social media seeking to generate irrational hatred of news media, and drown out journalistic attempts to establish facts and tell people the truth. As said by the Philippines journalist Maria Rossa, [accepting the 2021 Nobel Peace prize](#), social media has been “setting the stage for the rise of authoritarians and dictators around the world... [toxic sludge coursing through our information ecosystem](#), prioritised by American internet companies that make more money by spreading that hate”. In this era it can become insulting, with wrongful societal impacts, to hang the scourge of bad social media around the necks of journalists.

GDI draws a long bow, indicating a desire to set off a throttling of anti-social social media by undermining their advertising revenue; but essentially limiting

the effort to social media produced by legitimate media outlets, which in the main provide internal moderating for their products; and then letting the results pass off as an overall rating system for those media outlets. The GDI Executive Director, Clare Melford, says: “The GDI risk rating methodology is not an attempt to identify and label disinformation sites or trustworthy news sites. Its approach is based on the idea that a combined set of indicators can reflect a site’s overall risk of carrying disinformation”. Is that a meaningful or useful enough distinction, in the real world of publishing, especially where the evaluation process itself, where in error, may create some “real world harm”? The “combined set of indicators” needs due scrutiny itself. Has such a distinction – between making the accusation or just setting up the “indicators” - been achieved in the treatment of *Independent Australia* and other publications put under review in this country?

Australian project

The actual Australian job has been done by a department at Queensland University of Technology that studies internet or media activity, such as numbers attesting to get their news off social media, economics of media industries, internet mapping, or what networks are constructed on line, with accompanying commentary; there is no actual engagement in doing Australian journalism. The centre was noted over a decade ago for heralding the advent of social media as liberation for citizens, as “prod-users”, who would deliver a come-uppance for news media under the slogan “journalism is dead”; social media as a major social problem, as a widespread “prod-abuse”, might also have been anticipated at some subordinate level in this early and eager reckoning.

In such contexts there may be a practice of analytics or facsimile of same, where a data-set is obtained from extant material found on line to be given further treatment for an academic publication. Used as an element in research, in business, its prime habitat, an exercise in analytics will be validated by outcomes – from situational testing of its [descriptive, diagnostic, predictive or prescriptive capacity](#). The methodology section in the Australian report explains the rigour entailed in defining the risk categories intended for use in the national studies, making a dataset from 180 sites in six countries, standardised to fit a normal distribution, to determine the bands for each risk level. The evaluation process is outlined in information from the ‘home’ office of the GDI: an automated classifier is built from “site level structural signals as well as metadata tags assigned to the site by the classifier”. The automated

classifier is described as a binary rating system (high risk, low risk) “developed into a risk rating on a 0-100 scale”. Standardised scores from an original study were used to describe the five bands – Minimum through to Medium to Maximum risk. As explained elsewhere, information provided by the selected media site about itself is essential, as well as the content analysis, where the work comes to be taken up by reviewers addressing questions, e.g. applying factors in the table at page 19 of the Australian report. In this way a volume of data is machine produced which gives way to the “manual” process, an operator checking an article from the publication against defined indicators (*loc. cit*). The stages, from machine production, to “manual” evaluation, to conclusions or formulation of assumptions about the media under review, will be progressively more demanding on the capacity and competence of the GDI franchise performing the work.

The Australian research cluster was arguably too small for the size and import of the undertaking: one Professor, whose discipline knowledge is in music and Internet, a post doctoral fellow, a PhD student, a lecturer and one other. They are predominantly early career university researchers and variously of Swedish, Myanmar, Iranian or Russian background. If they are set up for the kind of analysis entailed in this task, they should yet demonstrate background they have in Australian culture and media, especially and exactly any engagement in media production, which might help their case to be acting or posing as regulators.

That is so, as the research method is to rely on the “manual” assessment of ten articles taken on a randomised basis from each of 34 media outlets, so that, if the work was divided equally among the research group, each would have to manage 60-70 articles. Such work might indicate dedication, especially in a limited time frame (the publishing period for the media outlets ended in September 2021, when the GDI report itself was published), but it is fair to ask if the volume was too much to assure a fair, accurate and judicious outcome from this panel of readers. This response has looked for exposure of data and workings, exhibiting the thorough way it may have been carried out, article-by-article, then in the following stages. As said it was helped to an extent by the listing of “pillars and indicators” at page 19 of the report, which amongst other things made clear the dependence on ‘self reporting’ by the media outlets on their resources, methods and probity provisions. Discussion of ‘Content’ in the Australian report admits to a weakness with ‘self-reporting’, as when separate mastheads of a big publishing company carry shared affirmations on standards and declarations of intent, capable of making a good impression, letting each

escape some of the called-for discrete scrutiny. High scores in the category might be explained, “by the fact that many of these sites are owned by the same parent companies, which apply similar policies and guidelines to their various media outlets.”

The outcome might have become valid had the missing component of the report on *Independent Australia*, the “Context Pillar”, been deployed. It was meant to be there, to directly assess “the overall credibility and reliability of news-related information provided by a specific domain”. Its purpose was to provide a broader context for content presented on a site, and consider whether such presentation was accurate and trustworthy. It was meant to have queried reputation of brand, credibility, trustworthiness, conflicts of interest and biasedness. Between 200 and 1000 “informed online users” were supposed to have been interrogated to obtain perceptions data from them, by an “independent and trusted survey company”. They were to have been on the look-out for signs such as the use of clickbait-type headlines, failed differentiation between news and opinion, laxness in publishing corrections. Plainly if the research group’s analysis had then implied failure on variables such as brand reputation or trustworthiness, or success on those variables, it could have been checked against the “Context Pillar” survey. In the absence of the “Context Pillar”, is the GDI failing to employ its own methodology and omitting a significant ethical and methodological buffer from its investigation?

The two surviving “Pillars” in the exercise

The “Content” pillar contains “indicators that assess different elements of articles published to a specific domain, including their credibility, sensationalism, hate speech and impartiality”. As to method, the index takes a sample of articles published to a news domain over a two-week period, combining the most frequently shared content along with content it was considered might include disinformation. Specifically, for use with both “Pillars”, the Alexa ratings for the sites are used and the number of their social media followers – on Facebook and Twitter. The criteria for choosing the 34 outlets include “consultation with leading media scholars in Australia”, and the ten articles from each are drawn from “among the most frequently shared pieces of content during the data collection period and a sample of content pertaining to topics which present a disinformation risk, such as politics and

health". These articles then undergo the "manual reviewing". (More information might garner more acceptance of this method. The "most frequently shared" factor would be quantifiable and demonstrable; the selection of mastheads to be reviewed is directed by an *illuminati* as yet in the shadows of the project; chances of finding some "disinformation" are sponsored by a proposition which readers might find reasonable, that it can be located most readily by applying standard news values – 'conflict' and 'dispute' will show up in areas like politics and health.)

Some of the concepts listed under "Content", or under the missing "Context Pillar," require definition before being received as reliable measures. The words "biasedness" and "impartiality", and "sensationalism", are a tradition in criticism of media, with diverse meanings to diverse people, employed by some very staid complainants against news media over many years. Their meanings have been debated without end in Journalism schools for close to a century. Conventionally, in the case of the first two, "biasedness" and its opposite "impartiality", which focus on the journalist: bids to impose an intellectual vacuity and moral neutrality on journalists are generally eclipsed by journalists' use of measures of transparency and fairness, and the use of objectivation, not "objectivity", as a working device. Without a settled understanding of that kind, such variables are not useful. Deploring of "sensationalism", which generally focuses on audiences: this can deny agency to audience members and see them condescendingly or piously condemned for being drawn to news about sex and violence. If "sensationalism" is classed as a negative phenomenon, the definition of it would need to be reconciled with considerations of right-to-know and censorship, the capacity of autonomous adults to maintain psychological defences against being stirred to madness by news reports, and even media use as social action by audience members wanting to engage with a full range of media treatments. It is stated that the reviewers are "trained in GDI's methodology." However the assumptions or definitions remain mostly unexplained, making it unclear how far the evaluations might proceed beyond an assessor, looking at an article, making intuitive stabs at an understanding of what the labels might mean.

A further, notional quantification is achieved in the report using what appears to be simple arithmetic. Evidently when reviewers give a number to each variable in a "Pillar", out of 100, those marks are added-up and divided by the number of variables in the set, unweighted, to give a score out of 100, like a

percentage, for the “Pillar” – with 100 held to represent the minimal risk of disinformation. (It was not simple enough to avoid a small error allocating a score of 42 to *Independent Australia* instead of 43, for the “Operations Pillar”.) Overall scores are done the same way, blending the numbers for the two “Pillars”. One “Pillar” contains nine variables, each getting a score, the other “Pillar” contains five such variables; the consolidated number for each of these different ‘sized’ “Pillars” is given equal weight to the other. Readers should be enabled to know more about how these ratings numbers are arrived at, to consider if they have actual interpretative value; how consistent, revelatory or reliable they might be.

“Operations Pillar” and *Independent Australia*

From the 14 criteria spanning the two “Pillars” that got to be looked at, out of the three “Pillars” intended for the process; *Independent Australia* got more than 50 marks out of 100 for each of 11 criteria. The management of *Independent Australia* has accepted that for now, in terms of threat to reputation, the outcome in those categories, which we might dispute, even with four of the constituent marks only in the ‘50s, would fit the widely held perception that 50% is a pass, and would hardly be remarked on by persons who might notice it. The absence of a more exhaustive explanation of the numbering system, and general sketchiness of the information would not be very likely to commend it to genuinely curious inquirers. The Overall Score for *Independent Australia* was 53 and with such a ‘pass’ it might do no harm, at least in the absence of any ‘bad’ scores dragging it down. However the review process, in the “Operations Pillar” produced the following marks for *Independent Australia* in the categories of Attribution (12 marks), Ensuring Accuracy (20) and Comment Policies (46), which must be addressed.

To establish definitions on the “Operations Pillar” which can be problematic: The ‘home’ GDI documentation states that “country analysts answer a set of 98 questions aimed at evaluating each domain’s ownership, management and funding structure, editorial independence, principles and guidelines”, and it adds the three problem variables in this exercise: “attribution policies, error-correction and fact-checking policies, and comments section rules and policies.” In the Australian report, “Operations” is meant to assess “underlying policies and rules that domains abide by to establish trust and reliability in the quality of news being published” ... capturing “conflict of interest, lack of operational integrity, inaccurate reporting and lack of accountability”. In the case of *Independent Australia* it gives the separate scores for the two

interpretative variables, Attribution and Accuracy, though some blurring of the two persists.

Three problem variables – *Independent Australia's* rebuttal

The methodology as published in England indicates it is the “Context” pillar, missing from the Australian report, not “Operations”, which should be measuring a domain’s overall reliability, with focus on the following “disinformation tags”: credibility, trustworthiness, conflicts of interest and biasedness. Evidently as a version of the arms-length commercial survey earlier referred to, the assessment for that “Pillar” was meant to be done through a survey of “local media experts ... carried out by a third party” – “experienced journalists, senior level media researchers and academics, executives from non-governmental organisations (NGOs) and think tanks and business leaders”. If the Australian exercise has improvised on the methodology to deny the media outlets investigation by the third party ‘experts’, in the field of attribution, accuracy and contents policies, crucial to their reputations; it is no surprise to find a set of aberrant scores affecting the general outcome.

Independent Australia notes that its own provisions to make secure its performances under those three topics reflect its publishing model, as an adapted and moderated form of citizen journalism, privileging regular and tested writers but accepting pitches from many. Accordingly its operational rules are set out clearly on the site as guidelines and instructions for contributors, with pointers to the underlying principles, and citations for source documents such as the MEAA journalists’ code of ethics. As the GDI report imparts that its data is drawn from the publishing site, or makes inferences based on what is published on the site, *Independent Australia*, in a reply to GDI in England in September 2021, showed where its information is [easily found on the site](#), readily available to any diligent reviewer.

The Attribution score defined by GDI is to reflect “policies and practices identified on the site which ensure that facts and content are accurately and transparently sourced and attributed”, and abiding by policies that ensure “accurate facts, authentic media, and accountability for stories“. The *Independent Australia* site tells users: “*IA is proud of the fact that our readers can check all claims and quotes, and satisfy themselves that our sources are credible*“. It emphasises the use of hyperlinks to show where information comes from, open for readers to check conveniently: “*Always provide links and*

references (preferably to primary sources or credible institutions) to back up any claims, as well as quotes. We also appreciate it if you could link any names not easily recognised by our readers". On sourcing of advertising material: "We do not accept unpaid native advertising dressed up as news". On the use of graphics, photos and other images, a field of egregious theft across social media: "Images and graphs from other news sites may violate the MEAA Code of Ethics. Please ensure you attribute the sources and licence details of any images, graphs and multimedia used. IA is not affiliated with or endorsed by any other organisation". Independent Australia allocates staff time for checking on articles to apply the above practices and changes are frequently made. Each article is read and reviewed before publication, privileging checking-time over haste – no emphasis on rushing to publish. Extreme concentration on deadlines is seen by IA as highly appropriate to daily publications carrying a heavy volume of always-accumulating material, such as a newspaper, but not necessary to its own model, built as it is on considered articles that are thematically transparent and validated by such practices as the open attribution of information.

The Accuracy indicator is set up to assess "policies which ensure that only accurate information is reported, and that—if needed—corrections will be made promptly and communicated to readers". Where the assessment is placed under "Context", a low score would suggest that the market as a whole has poor pre-publication fact-checking and post-publication correction policies, and could "potentially indicate a lack of accountability for the accuracy of content, hence leading to an increased likelihood for false information to remain and circulate online. It also increases the risk of disinformation if an article is not confirmed to be factual prior to publication, and may result in the sharing and spread of [dis]information across social networks and *via* word of mouth", according to GDI. The notices for readers and contributors on **Independent Australia** emphasise accuracy with facts expressly in line with the so-called Western liberal tradition and best-practice journalism. It states: "*Independent Australia is a member of the Australian Press Council, complies with the MEAA Code of Ethics and has a rigorous fact-checking, feedback and complaints policy. We recommend you familiarise yourself with it before submitting your piece. We also have reference to the ACMA Code of Conduct". Please see the [contributor guidelines](#).*

The Comment policies indicator assesses "the number of policies related to mitigating disinformation and harmful content in user-generated comments, in addition to a rating for how well the media outlet enforces those comment policies". Is it bizarre logic, that sites which do not have a comments section

were awarded a score of 100 on this indicator, “on the basis of the absence of this source of risk on the site”? That idea could well have caused the overall high score by publications in the category. The GDI does recognise that media outlets may publish guidelines regarding comments and user-generated content, but observes “many are not transparent about how these policies are enacted and the regulation process”. ***Independent Australia*** has a comments section for each article, consistent with its support for democratic discourse and openness, which is moderated to exclude *inter alia* elements of racial prejudice, gender discrimination and the like, obscenity or gratuitous vilification of identified persons. Readers can see where an editor has removed copy; some have been known to engage in banter with the editors on line over having a “try-on”. The comments policy published on the site states: “Comments are moderated and may be removed if they are untrue, contain untruths, or contain allegedly factual claims that are unsourced and/or unreferenced”. Articles are distributed among the interest categories of politics, environment, business, ‘life’ and ‘Australia’, and clearly labelled as news or opinion. The site has a declared interest in prioritising investigative material that will expose entirely new and arcane information. Please see the [comments policy](#).

Conclusions

The presentation of The Global Disinformation Index displays a worthy distaste for anti-social social media and it is an attempt at blocking the publication of bad examples of it. The approach shows an awkward uncertainty about the functioning of mass media and the wild Internet, with inconsistencies in the form of appraisal: Declared targeting of gross online banditry gives way to a kind of interpretative review of main media outlets, mainly content analysis, as has been attempted in the academic field of ‘media studies’ over the last half-century. For whatever reason, the Australian study focuses on regular media outlets which produce social media as ancillary products. These products have developed beyond being ‘shovelware’ that carries material from their main sites or newspapers, but are still badged as the originals and are professionally curated. While they may be interactive, they are not the usual chat rooms or aggregators found on the Internet, but more employ the social media channel to air their own products and personalities. It is a conundrum, trying to determine why this approach has been taken, as it would plainly lead to its predictable and inconsequential conclusion: these social media products overwhelmingly do not pose a disinformation risk. The larger ones from corporate stables, which share consistent and heavily promoted standards indicators, like the three NewsCorp mastheads, the ABC and SBS, ‘win’ the

contest as being the least anti-social. Or so it would seem. It should be shown that a smaller operation such as *Independent Australia* also can be run at a good level of probity – if the investigative operation were able to grasp that.

The omission of the “Context Pillar” from the Australian investigation crippled it and additionally deprived it of effective value or usefulness. In the view of *Independent Australia*, as a victim of this flawed approach, the GDI in its attempt to expose fake news is drifting towards a zone of slovenly fake scholarship where ‘findings’ or ‘research’ struggle to rise much above the level of a rude hunch or rationalisation of prejudice. The point of discovering disinformation at work, as with any examination of mass media, would be to identify any influence it has in ‘real world’ public intercourse. The GDI Australian report if anything, could even be read to suggest that there is ‘nothing to see’ – that the social media phenomenon generally might not cohere with disinformation:

“Overall, the Australian media market showed low disinformation risks in relation to content, attesting to the quality of coverage in the sample of sites. The articles reviewed suggest relatively unbiased, neutral, non-sensational, and accurate reporting. The market average was 79 out of 100 points...”

“Most Australian news sites still present only a minimum risk in spreading fake news but could do much better when it comes to accountability, transparency, and attribution.”

In the above response, *Independent Australia* has countered the assertion about “accountability, transparency and attribution” in relation to itself, while worrying how such a conclusion could be produced. It believes the Global Disinformation Index over-states itself, proposing much and delivering very little. There is a prescriptive list of actions for streamlining the process disclosures on sites, at page 15 of the Australian report, which hardly require guidance from outside of journalism. For example on the structure of stories, an exhortation on the function of the lede (often ‘lead’) taught in first-year Journalism programs:

“Increase the number of articles containing a fact-based lede, so that readers can gather the basic facts of a story before being influenced by the journalist’s opinion or analysis.”

Journalists would respond that ledes already are overwhelmingly factual, to “tell what is new-interesting-important-informative, who-what-how-when-where-why in the first 29 words”; while writing the lead paragraph is an expression of creativity not suited to structural controls, as for example, deciding to start a story with a question. As well, audiences have a good degree of autonomy, being vulnerable to propaganda not so much through small devices as through situations, macro more than micro, like audiences seeing no alternative, e.g. through ‘echo chambers’ formed in social media, state media under despotism, a biased outlet operating a monopoly news service in the regions. Journalistic work generally is different to academic scholarship and not subject to the same protocols and limitations, such as the academic sector’s particular rules on referencing, processing of evidence, near-prohibitive restrictions on conduct of interviews, and the like; although journalism offers transparency, factuality, and correction facilities as needed. The issues underlying the online publishing reported on by GDI can be complex and so unsuited to resolution through a small-scale, if ambitious passive research project.

The Global Disinformation Index project has not improved our understanding of dysfunctional mass communication and the weakening of solidarity and coherence of society, nor of how to respond to that. Attempts to act on this exercise as a guide to placement of advertising or other funding would be likely to cause an injustice and would not reduce the proliferation of anti-social social media. Research in this field, as has been acknowledged in formulation of a methodology by the GDI, should include cultural or sociological understandings beyond the usual range of business analytics. Whichever approach might be applied in future, the outcome of the attempt on this occasion is not satisfactorily descriptive, diagnostic, predictive or prescriptive enough to warrant further attention.

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Advisory: Dr Duffield was previously an academic in the Creative Industries Faculty of QUT but had no engagements with the research area responsible for the GDI report.

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