SEPARATING TRUTH FROM FICTION: LEGAL ASPECTS OF "FAKE NEWS"

VALÓSÁG ÉS FIKCIÓ: A „HAMIS HÍREK" JOGI SZEMPONTJA

NINKOV, Ivona [1]

Abstract

Nowadays, the IT technology enables online communication all over the world with extremely high speed. In addition to information the so called 'fake news' are also spreading. Fake news are usually fabricated information with the aim to be harmful for the system or person. It is of special interest to eliminate or control disinformation which appear on social networks. The hypothesis is that the spreading of fake news is able to be stopped if legal acts and regulations would be introduced. In our study the existing fake news laws of some of countries all over the world are analyzed and compared. The advantages and disadvantages of legalization of fake news are discussed. It is concluded that the potential `fake news` legislation seriously damages the concept of democracy. A procedure for protecting of spreading of fake news is suggested. The solution effectively stops spreading the misinformation and damaging reputation, but at the same time the freedom of expression would not be harmed according to inclusion of principles of human rights.

Absztrakt

Manapság az IT technológia rendkívül nagy sebességgel teszi lehetővé az online kommunikációt az egész világon. Az információk mellett az úgynevezett „hamis hírek" is terjednek. A hamis hírek általában gyártott információk, amelyek célja a rendszer vagy az ember számára ártalmas. Különösen érdekes a társadalmi hálózatokban megjelenő dezinformációk kiküszöbölése vagy ellenőrzése. A hipotézis az, hogy a hamis hírek terjedését meg lehet állítani, ha törvényeket és rendeleteket vezetnének be. Tanulmányunkban a világ számos országában létező hamis hírekre vonatkozó törvényeket elemezzük és összehasonlítjuk. Beszámolunk a hamis hírekre vonatkozó törvények előnyeiről és hátrányairól. Megállapítottuk, hogy a potenciális „hamis hír" jogszabály súlyosan károsítja a demokrácia fogalmát. A cikkben egy eljárást javasolunk a hamis hírek terjedésének gátlására. A megoldás ténylegesen megállítja a félrevezető információk terjesztését és a jó hírnév károsítását, ugyanakkor az emberi jogok elveinek beillesztése nem sérti a véleménynyilvánítás szabadságát.

Keywords

fake news, disinformation, misinformation, freedom of expression, democracy

Kulcsszavak

hamis hírek, félretájékoztatás, szabaság kifejezése, demokrácia

[1]ivonakakas@yahoo.com | ORCID: 0000-0002-0116-2453 | PhD student / doktorandusz | Obuda University Doctoral School of Safety and Security Sciences / Óbudai Egyetem Biztonságtudományi Doktori Iskola

INTRODUCTION

Currently, a lot of network information appear about coronavirus. However, some of them are disinformation. Thus, in Hungary, although the first coronavirus cases have been identified and confirmed on 4th March 2020, two weeks before that date a number of conspiracy theories and advises on the possible cures of the disease appeared on some portals and social media. Statement on the police website said that "a man and woman were suspected of operating dozens of fake news portals and Facebook pages, claiming that several people have been infected and died from coronavirus" [1]. The government said that fake news spread faster than coronavirus [1], but the action is done to boost the 'fake news' network [2]. Such information was designed to attack on the human's emotion side, to spread panic and fear-mongering, but to presents a challenge to authorities, too. In addition, false or misleading medical advice given in these disinformation can lead to fail treatment.

Nowadays, it is of special interest to spot and make a control of disinformation and so called 'fake news' which appear on social networks as they may have a negative influence on the safety and security of the country, i.e. its government and their sectors. Because of that the prompt reaction for disinformation recognition and elimination is necessary. Thus, as the first reaction after publishing of disinformation about corona virus, Hungarian authorities seized various computer equipment at several locations [3].

Problems of disinformation are rapidly developed with the digital media. Nowadays, in the era of the Industry 4.0 strategy, when digitalization and IT technology are highly developed, network of trolls, fake profiles and Facebook pages are able to spread disinformation very fast all over world. In addition, various social networks attract a relatively large audience. Traditional methods for spreading information are television, newspapers, websites and emails.

In this systems manipulated videos and images, but also fake news, hateful speech may be spread. It means that sometimes the non-existing events and hateful texts which have strong language, are presented in the media. Techniques for disinformation are video manipulation, falsification of official documents, use of internet automated software, attacks on social media profiles [2]. They often post manipulated pictures, target opposition parties, make some claim or shame some politicians.

Disinformation decrease the trust in all media (traditional and digital) and also in institutions which are proclaimed to guarantee the truth and represent the factor of good information. Disinformation can initialize conflicts, debates and form deep tensions in society which would cause the destruction of the security of the system.

Disinformation is a threat done by relevant actors with their impact and by using various tools and methods. The actors may be various like media, citizens, state and non-state political actors, profitable and non-profitable organizations. The action can be done individually or in group. Those who are behind disinformation are external non-EU Member States or internal EU Member States [4].

Very often the disinformation is harmful for the society in whole as it is multifaceted and acts on all parts of the public goods like safety and security, finance, health, environment, etc. It may include attack on democratic processes in the society.

Disinformation campaign represents one of the activities inside the multidimensional ones, which refer to hybrid threats, targeted towards vulnerabilities of the opponent in diplomatic, military, economics or technological sense [5]. It is usually connected with

cyber-attacks and can be oriented to include historical memory, legislation, old practices, geostrategic factors, strong polarization of society, technological disadvantages or ideological differences [5]. There are governmental and non-governmental actors. Their main aim is to realize goals and interests in destroying the system using various methods and activities like including attack on the information system, economics, finance, logistic in energy supply and even on institutions struggling against terrorism.

It is believed that rapidly evolving hybrid threats are a challenge to security in Europa. Namely, it is evident that disinformation campaign by third countries are very often part of the hybrid warfare, including cyber attacks and hacking of networks [6]. These states are spreading disinformation with the aim of harmful action to democracy in societies, in member states of EU or in the Union as a whole [7]. Methods can be conventional and unconventional.

DEFINITION OF MISINFORMATION, DISINFORMATION AND FAKE NEWS

It is important task to clarify: What is a 'fake news'? How to define it?

In the literature various definitions of disinformation, misinformation and fake news are find.

The term 'fake news' is used since 19th century [8] but is widely spread since the time when the U.S.A. president Donald Tramp used it in an October 2017 during his interview with Trinity Broadcasting Network when he attacked publicly the 'fake news media'. Trump said that the phrase he invented is 'one of the greatest of all terms he has come up with.' The original meaning of the term is: 'fabricated stories intended to fool you'. Fake news is usually fabricated information with the aim to be harmful for the person or system. In the 1930s the Nazis used the most equivalent term 'Lügenpresse' or 'lying press,' and revived by far-right anti-immigration activists in Germany in 2014. Trump supporters, politicians and other groups across the political spectrum have used the term 'fake news' during the 2016 campaign to undermine public confidence in the mainstream media. Allcott and Gentzkow [9] gave the definition to the online disinformation as „news that are intentionally and verifiably false and could mislead readers." Lazer et al. [10] gave the simpler formulation for misinformation as „false information that is purposely spread to deceive people." Ireton & Posetti [11] said that fake news has „straightforward or commonly understood meaning." The French law [12], which is the legislative act, gives the definition of the 'fake news' as „inexact allegations or imputations, or news that falsely report facts, with the aim of changing the sincerity of a vote", for example. In the Law of Great Britain [13] it is said that fake news is „completely false information, photos or videos purposefully created and spread to confuse or misinform". Information, photos or videos are manipulated to deceive and/or old photographs are shared as new. In the Law of Great Britain even satire or parody, which means no harm but can fool people, are included into fake news. In addition, the fake news are considered also those that were once true but no longer are. In [14] fake news is defined as a „kind of weird, perfect storm". It is said that „there is a political and social situation in the world where there is a lot of fragmentation, combined with the rise of populist movements, global polarization and the technology to create fake news and

spread it rapidly". In the European Commission Report it is suggested to use the term „disinformation' instead of 'fake news' [15]. Disinformation is defined as a 'verifiably false or misleading information created, presented and disseminated for economic gain or to intentionally deceive the public. It may have far-reaching consequences, cause public harm, be a threat to democratic political and policy-making processes, and may even put the protection of EU citizens' health, security and their environment at risk" [15]. The High-level group of EU (HLEG) on fake news and online disinformation [16] included all forms „of false, inaccurate or misleading information designed, presented to intentionally cause public harm or for profit" into disinformation definition.

HOW TO DIFFER TRUE NEWS AND FAKE NEWS

The main question is how to differ the 'true news' from 'fake news' and how to point out to reader that something is a fake news. An additional question, already asked by Pontius Pilate, appears: "What is truth?" "Who decides what is true?" And "who should compel the press to "tell the truth"?" There were no easy answers to these questions then, and also nowadays, not only in Europe, but in the United States and around the world. The widely accepted opinion is that the sources of "real news" are from newspapers or television networks which might make mistakes, but it doesn't distribute false information on purpose [17]. Reporters and editors who report real news have a code of ethics that includes using reputable sources, checking facts, and getting comments from people on both sides of an issue. At the other side, there exist some sources which might have addresses that sound like legitimate news organizations, but spreading fake news which are designed to deceive. These sources might even copy other news sites' design and may invent "news" stories or republish stories from other internet sources without checking to see if they are true. Kirtley [18] in his study reported that "three out of four Americans believe that the media routinely report fake news, while a Gallup/Knight Foundation study found that 42 percent of Republicans in U.S.A. consider any news stories that cast a political group or politician in a negative light to be fake news." The study of the Pew Research Center [19] showed that 23% of American believe in fake news. Statistics show that most of the people all over the world believe in these information and changing their mind is almost impossible. Very often the fake news phenomenon motivated governments to respond or to delete fake information. Research shows that responding to misinformation or deleting fake information does not produce the desired effect: it very often causes the opposite effect and reinforces the reader's belief in the correctness of such inaccurate news.

Nowadays, very often technical methods are applied for detection of fake news among many information. Special software are developed with the aim to detect fake text and fake pictures on the social networks. Such technical system is convenient for application as it does not make attack on the author of the text, just identify disinformation.

When the information is proved to be a disinformation, the problem is how to act. In the following section a review on tackling methods [20] against fake news in the world are presented.

REVIEW ON ACTIONS AGAINST 'FAKE NEWS' IN EU

Europe is exposed to extensive hybrid threats and Commissions of EU in cooperation with NATO developed a strong strategy against them [21]. In combat against hybrid threats, the internal and external security are closely linked, and effective response often preparedness from all actors in society is necessary. Because of that the European Commission gave a system of measures directed against spreading of illegal content on-line [22] which can be summarized in general [23] as:

- fostering a security
- forming of trustworthy and accountable online ecosystem
- introducing activities connected with improving of media literacy
- supporting the independency of media and improvement of the journalism quality.

Communication on tackling online disinformation [24]

It is very important to know the opinion of European citizens about fake news. Because of that wide survey was done. Conferences and talks about the problem were also organized. Based on these results EU Commission introduced four principles to prevent the spread of online disinformation and to improve the protection of the democracy in systems and to support the most important EU values. These are [24]:

- "Improvement of transparency regarding the way information is produced or Sponsored"
- "Diversity of information"
- "Credibility of information"
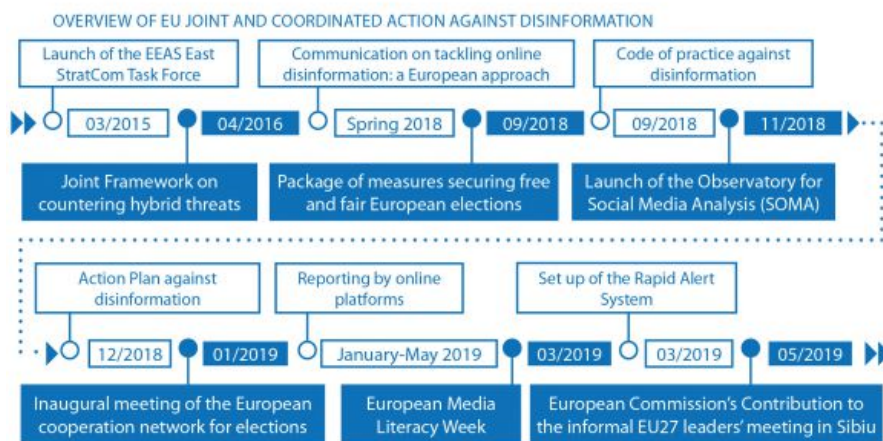- "Inclusive solutions with broad stakeholder involvement."

Figure 1: Overview of EU JOINT and Coordinated Action against disinformation [25]

To fulfil these requirements the EU prescribed the actions showed in Figure 1.

The EU and authorities worldwide protect the society by regulating of big technology and social media systems. It is required the disinformation to be detected, blocked or

even eliminated. In accordance with the Code of Practice the online platforms and advertising systems in EU formed 'a network of fact-checkers' with the aim to detect disinformation [26]. However, the online platforms are not ready to remove and delete disinformation and illegal content. This segment of action has to be done in the future, Law regulations are required [27].

The Code of Practice on Disinformation [23]

In 2018, EU introduced the Code of Practice on disinformation [23] as the first worldwide self-regulatory set of standards to fight disinformation voluntarily signed by platforms, leading social networks, advertisers and advertising industry. The Code [23] includes actions in 5 areas:

- "Disrupting websites that spread disinformation";
- "Making advertising and issue based advertising more transparent";
- "Addressing the issue of fake accounts and online bots";
- "Empowering the research community to monitor online disinformation through access to the data on platforms";
- "Empowering consumers to report disinformation".

Activity in European Commission was oriented toward forming a high-level group of experts (HLEG) on fake news and online disinformation. The HLEG gave a multi-dimensional approach and suggestions to disinformation [16]:

- "Improvement in transparency of the digital information ecosystem and of the online news"
- "Promotion of information literacy and media approaches to counter disinformation and help users to navigate the digital media environment"
- "Developing of tools for empowering users and journalists to tackle disinformation and to obtain information with fast IT"
- "Protection of the diversity and sustainability of the European media systems"
- "Evaluation and continual research on the effect of measures used against disinformation in Europe and developing of new appropriate protection methods"

Action Plan on disinformation [21]

Based on the aforementioned Code, the EU had outlined the Action Plan on disinformation [21]. The Action Plan has the aim to protect the EU's democratic systems and combat disinformation. The Plan includes input, received from Member States and CEU's key partners including NATO and the G7. The Action Plan step up efforts to counter disinformation in Europe and is focused on four key areas [21]:

- improving detection, analysis and exposure of disinformation
- strengthening the cooperation and joint responses to threats
- enhancing collaboration with online platforms and industry to tackle disinformation
- raising awareness and improve societal resilience

The Code of Practice formed online system which is much more transparent and trustworthy and is suitable to protect users from misinformation. In [28] it is underlined that "online platforms cooperate with the national audio-visual regulators and with independent

fact-checkers and researchers and detect and flag disinformation campaigns". Independent fact-checkers and researches play a key role in furthering the understanding of the structures that sustain disinformation and the mechanisms that shape how it is disseminated online. EU and member states support the tendency of improvement of the media literacy. For solving of the problem of disinformation the most important systems are the online platforms but also various advertisers and advertising industry.

Strengthening the answer to disinformation

After the misinformation is marketed, the first hours are crucial. Because of that contact points, of the so-called Rapid Alert System, has to be designate within strategic communication departments [21]. Online platforms, connected with the contact points of the Rapid Alert System provide relevant and timely information. The result of the work of the Rapid Alert System in every country of EU should be shared with European cooperation networks with the aim to exchange information on threats.

The countries in EU have additional special actions against fake news. Let us mention some of them.

Germany

Germany was the first country that brought a legal act against 'fake news'. The *Netzwerkdurchsetzungsgesetz* called NetzDG [29] came into force in Germany. According to the law, on the basis of a decision by the competent public administrative body, the federal government is supported to be the supervisor for requiring and control of the social media and portals to remove those information that are found to be "offensive or illegal". The social network provider has to block the unlawful content within 24 hours. In the law it is defined that "unlawful content meets the threshold of certain offences of the German Criminal Code, including incitement to hatred, insult and (intentional) defamation" [29]. However, this law does not give clear criteria for deciding whether blocked content is inappropriate or not. Also, it is not guaranteed a quick or effective procedure for acting against the decision for elimination of information. The NetzDG suggests the social network providers how to handle with illegal content.

The law [29] also contains a half-yearly reporting obligation for social network providers. The law predicts that those net providers who are outside Germany, but inform about Germany, must have an authorized person inside Germany. However, this law has a big lack: does not have enforceable mechanisms to combat misinformation. Because of that Germany has put a restrictive law in place to platforms that fail to remove "obviously illegal hate speech" [30].

France

In France a law against fake news was validated by the Constitutional Council, despite criticism that the law is a risk to human rights and freedoms [31]. The legislation gives authorities the power to remove or block the disinformation from social media. The activity is stronger during the election periods when special attention is directed toward sponsored content on platforms such as Facebook, Twitter and YouTube. According the law a judge

is authorized to act "proportionally" but "with any means" to halt the dissemination of misinformation before elections [31]. The Higher Audiovisual Council (CSA), as the broadcasting regulator, obtained new administrative and executive powers to ensure that platforms abide by the law and work according to law. The CSA can "unilaterally" revoke the broadcast rights of TV and radio outlets operating on French territory who are found to work "under the control or influence of a foreign state" and "disseminate misinformation" [31]. However, it was not supported by senators from the French Republican Party (LR). The lawmakers of the opposition parties argued that the law falls short of the principle of proportional justice and is not suitable for application. The Centrist Union group asked the opinion of the Constitutional court over the law. It is worth to say, that the law is among the first of its kind in Europe.

Italy

In 2018, the country's communications authority released a regulation on misinformation and fake news [32]. The Italian government had set up an online portal where citizens and others could report misinformation to the police. The department investigating cybercrime fact-checks the information and finds the users email addresses, links that post fake stories, fabricated media, or any social media network and to use legal action if laws are broken. To deny fake news and disinformation the support upon official sources is used.

Spain

National Security Commission of the Congress of Deputies in Spain [33] asked the government of the state to take action against online disinformation. Namely, the Committee requested the cooperation and application of EU protocols against misinformation. Unfortunately, it has not be realized.

In 2018, Russia signed an agreement with Spain [34] for creating a joint cyber security group with the aim to prevent disinformation specially from diplomatic relations between the two countries.

However, the most effective fight against disinformation in Spain is in the period of elections [35].

Sweeden and Denmark

In Sweden, authority has a quite different opinion about methods for treating disinformation than those in other countries. Instead of fighting against disinformation, the attention is directed toward strongly proved information [36]. The Swedish Civil Contingencies Agency published an emergency brochure where a section about disinformation is included. It is aimed the information to be fact-checked on line by the citizens.

Using the Sweden procedure of fight against disinformation, the Danish government organized a task force for addressing disinformation [37] with the aim to minimize the spread of misinformation in the state.

Finland

In Finland it is stated that disinformation is not just a government problem, but the whole society has to be included. In the action of the fight against false information, Finland

brought in American experts who advised officials on how to recognize fake news, understand why it goes viral and develop strategies to fight against it. In Finland the education system was reformed and a special accent is given to the importance of the critical thinking. It is said that "the first line of defense is the kindergarten teacher" and even the children is learned to develop critical thinking. Since 2016, government officials have trained over 10,000 Finns how to spot fake news [38].

Recently, Finland is one of the top countries in the world with the highest level of education, social justice, gender equality, press freedom, happiness, transparency etc. Thus, Finland has the highest PISA score in reading in Europa [38]. Citizens of Finland strongly believe in state media and quite rare turn to alternative news sources. They strongly trust to the regional press and public broadcaster, too. The high level of education and social consciousness results in brilliant success in fight against disinformation.

Hungary

The two most important regulations which consider the information security in Hungary are "The Act on Electronic Public Service" [39] of 2009 and the "Information Security Act" [40] of 2013. The aim of the "Hungary's National Security Strategy" is to improve the security of electronic information systems and protection of the critical national information infrastructure, and to develop adequate cyber defense systems. In [41] is reported that in Hungary there are a number of organizations and IT companies which identify and track fake news. These organizations have software for automatic finding of disinformation. It is worth to say that units dealing with the problem are spread in the state and there does not exist a single specific institution founded for these purposes.

Hungarian government made adaptation on the 2012/2015 "Government Decree on the Digital Success Program" and introduced even two programs which affect media literacy for children, parents of students and teachers. These are the "Digital Child Protection Strategy of Hungary" and the "Digital Education Strategy of Hungary" [41]. Namely, it is found that population with limited media literacy is ready to believe in information given by alternative news channels on the Internet. Because of that many media has to give their maximum in improving the social awareness. The association of Hungarian media have to identify and publish research on significant social issues every year and to support and promote them in the media.

ADVANTAGES AND DISADVANTAGES OF `FAKE NEWS LAW

Based on the consideration in the previous section it is shown that a wide range of various methods are applied for treating the disinformation. However, most of the countries apply adequate legal protection which includes legal acts, amendments and media regulations or some laws which are not directly related to fake news. The way of treating with fake news problems differs from country to country. Some of them include penalties and even imprisonment. In this section the advantage and disadvantage of application of legal regulation in the combat against disinformation is considered.

Investigation on efficiency of the law against disinformation was already considered in some countries [42]. However, a final conclusion about that is not obtained, as there

is a problem of rapid and complex development of communications technology which include new methods for this informing which cannot be still managed effectively.

The general opinion is that the law of disinformation and its application gives good results in combat against fake news and increases the safety and security of society. Human rights activists raised some doubts about the fake news law. They mentioned that due to the law the democracy itself is under serious threat. They say that governments give to themselves rights to be the arbiters of truth, and that is a permitted act according to this law. In an open letter to the Singapore Government at the end of October 2019, David Kaye, the United Nations special rapporteur, urged ministers to reconsider the law [43]. The law was deeply criticized by United Nations special rapporteur as it wasn`t in accordance with the freedom of expression. Namely, it was stated that the law is 'deeply' problematic, as it may can seriously impair the freedom of expression. There is the opinion that the law introduced in France also gives power to broadcast authorities to control any network if it is thought to deliberately spread false information especially during political campaign.

However, in spite of the mentioned disadvantages, lawmakers agree that the law is necessary in combat false news and to stop the abusive online comment.

In 2018, the UK governmental committee reported that the term 'fake news' is hard to be defined. In the report [44] they added that "they have an experience with propaganda and politically-aligned bias, which were purported to be news". Because of that it has to be found the perfect formulation for the term `fake news` and its legal regulation but so not to be overbroad. Nowadays, due to new technologies, there are changes in distribution of propaganda and politically aligned bias. Greater transparency in the digital sphere is required for ensuring which is the source of information and who gave the financial support, but also to detect who sent the information and with which intention.

People has to be educated to estimate new forms of disinformation and to recognize their validity in spite of the fact how distorted or inaccurate are. Dismissing content with which they do not agree as 'fake news', however, may create the effect of confrontation, The reasonable discussion has to be on objective facts.

In spite of the negative connotation of the law against fake news, it is concluded that it would be unwise just to watch and do nothing against disinformation. Law against fake news is one of most efficient methods for struggling, but not the only one. Other methods have to be added to obtain the expected result.

CONCLUSION AND RECOMMENDATION

Based on the previous consideration it is concluded that the law of disinformation has to be modified to satisfy the basic statements of the Human Rights:

- It is found that the potential 'fake news' legislation may seriously damage the concept of democracy. Disinformation problems have to be treated most effectively but without destroying the human right on freedom of expression. In the European Convention on Human Rights [45] the freedom of expression is defined as a core value of the European Union and its constitutive member states. Future researches have to be directed toward stopping the spreading of the misinformation and damaging reputation, but at the same time the freedom of expression cannot be harmed or arbitrary limited. The article 10 of Human Rights Act is introduced to protect the

right to hold the own opinions and to express them freely without government interference [45]. "This includes the right to express views aloud or through: published articles, books or leaflets television or radio broadcasting, works of art, the internet and social media" [45]. This right is not an absolute right. If the action is shown to be un-lawful in protection of national safety and security, the public authorities may give some restrictions to this right. It includes the inefficiency in protection of integrity of the territory of the state, but also in maintain of reputation of judges and other people. The law has to be restricted if it makes perturbation in the reception of confident information.

- The expression of religious and racial hatred has to be restricted by authority if it is the attack on the other person or society. Namely, the protection of human rights, such as a person's right to respect the private life, have to be guaranteed by authorities. The restriction has to be appropriate and directed toward the actor. However, the level of restriction has to be found. The principle of democracy cannot be disturbed. The relevance of criticism of media has not to be perturbed or stopped. Thus, for example, journalists and other people working in the media must be free to criticize the government and public institutions without fear of prosecution. There is the statement that disinformation on the internet are like pollutants in the environment and their sources have to be treated as it is regulated for any polluting companies or factories because the disinformation is 'polluting' the minds like polluting done by the air and the waters. So, they also have to pay for it and take responsibility for it.

Additional conclusion is that there is not only one single solution and not only one single way for tackling the problem of misinformation. Elimination of disinformation requires political determination and the unified action of cybersecurity, intelligence and strategic communication communities, data protection, law enforcement and media authorities. Various countries have to developed different procedures against disinformation mainly based on their specific properties. However, for all of them it is common that improving the detection, analysis and exposing disinformation is necessary. The news has to be taken only from sources that are reputable and not from fake news sites, which unfortunately, look and sound almost exactly like well-known media outlets. By analyzing and fact-checking the information, it is able to figure out if the news is fake or real. The main facts in the story has to be checked and confirmed by reading various sources. Some authors suggest to strengthen the answer to disinformation and to reply in the shortest time. Research shows that responding to misinformation or deleting fake information does not produce the desired effect: it often causes the opposite effect and reinforces the reader's belief in the accuracy of allegations [45]. However, it is very important the article not to be shared, if it is find out that it is fake. To stop spreading of fake news the following procedure is suggested:

- Network providers have to be forced by law to use inspection software for false news detection. Powerful artificial intelligence systems which automatically detect rumors have to be installed which would block and delete the fake news.
- In addition to legal regulation, much more must be done in education of the whole society in 'critical thinking'. Objective is to become more resilient against disinformation. To fulfill this aim it is required:

    a. New investigation have to be done directed toward understanding how and why population is drawn to disinformation and to give suitable replies to these phenomena.

    b. States have to organize campaigns and trainings for the public about disinformation to raise awareness of their negative effect.

    c. Special efforts are necessary in increase of the level of media education of citizens with the aim to minimize the influence of 'fake news'.

    d. Self-regulatory approach and improvement of the media and information literacy has to be done.

    e. It requires from country to provide various funding opportunities for research organizations, for accredited journalists and researchers from different relevant fields and also for representatives of platforms. Intensive teaching training in media literacy for all citizens is necessary.

Finally, we mention the already given conclusion [38]: "the war against disinformation has not any first, second or third rounds but it is, instead, an ongoing game and that is the never ending game".

It is anticipated that in the future we would become even more actively involved in understanding and solving this problem of 'fake news'.

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