

Fake news governance by social and traditional media organizations



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Master Thesis

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1. Introduction

The increasing adaptation and use of technology, also known as digitalization, has changed ways of communicating with others. Social media organizations have played an important role in this, by enabling users to communicate with each other from anywhere at any time via their online platforms. Besides enabling users to communicate with each other, social media organizations are increasingly growing into the role of traditional media organizations and being a news source to their users (Shearer, 2018). Traditional media organization also have adapted to digitalization and are increasingly reaching their audience online (Brennen & Kreiss, 2016; Pew Research Center, 2019). In an ideal situation internet media platforms can contribute to freedom of speech and public discourse (Gimmler, 2001; Schwoon, Schembera, & Sherer, 2021). However, media platforms are facing challenges on how to govern issues such as freedom of speech, hate speech, and fake news, which can be harmful for the public discourse. In 2020 the BlackLivesMatter protests, the COVID-19 pandemic and the US elections were major events which displayed the importance of managing the above described challenges adequately (Robitzski, 2020). Distinguishing facts from manipulated facts, fiction and conspiracy theories seems to be an ever growing challenge for today's media organizations. This study will focus on the issue of fake news in particular, incited by the 2020 US elections and the COVID pandemic during which fake news was spread on a large scale via social media (BBC News, 2020; Robitzski, 2020). Fake news is a rather contested concept despite the fact that it is commonly used across the media. What fake news consists of and what will be regarded as fake news in this paper will be discussed later, in the theory section of this paper.

Dealing with fake news in a proper manner, as well as the other issues mentioned above, is crucial to ensure legitimacy, which can be defined as: *"a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions"* (Suchman, 1995, p.574). In other words, being perceived as a legitimate organization by the direct audience or users, as well as the broader stakeholders is of large importance to both social and traditional media organizations. When failing to manage legitimacy properly, this could hurt the organization. (Richards & Schembera, 2019; Suchman, 1995). Online platforms are often under-regulated, and as a result of this the boundaries regarding what online behavior is acceptable are somewhat blurred (DeNardis & Raymond, 2013). Globalization and the internet's decentralized and global nature are part of the reason why online media platforms are under-regulated, since state actors are simply not capable of regulating this adequately (Drahos, 2017; Puppis, 2010; Schwoon et al., 2021). The lack of regulatory capabilities by state actors leaves more margin for online media organizations to determine what is accepted on their platform and what is not, which indicates the importance of regulation by parties other than governments. An example of this is self-regulation, which according to Puppis (2010) by definition implies regulation by non-state actors. Self-regulation can be collective, when media organizations align their rules and standards with those of other firms in

the industry, and by doing so the industry regulates itself. On the other hand individualized self-regulation relates to internal rules and control mechanisms within a single media organization (Gunningham & Rees, 1997)

In this paper the governance of fake news by social media organizations will be compared to that of traditional media organizations. Before going into further detail about the theoretical grounding for this study, it is important to acknowledge some differences between these two organizations. Firstly, social and traditional media organizations were founded for different reasons. Traditional media organizations are rooted in journalism and have had the goal of supplying news to the general public, while social media organizations were established to facilitate online communication between users on their platform, either to connect personally or professionally with their network (Van Dijck, 2013). Secondly, the business models of social and traditional media organizations seem to differ and therefore the main part of the revenue comes from different sources, which could possibly influence the governance of fake news. Schwoon et al.(2021) have carefully displayed how the business model of a traditional media organization in Switzerland changed over time, in their multi-level analysis. Their findings suggest that over time, traditional media organizations have shifted more to profit seeking through quality journalism. Most social media organizations organization on the other hand rely on different kinds of advertising on their platforms for the majority of their revenue, and to a lesser extent on data licensing (Wikström & Ellonen, 2012). Thirdly, a significant difference can be found in who is able to distribute information. Traditional media organizations have traditionally had full authority over what they publish, both offline and online, which suggests that the spreading of fake news lies in their own hands, although online comment sections below articles are increasingly used by traditional media organizations which may impede this authority, at least to some extent. Social media organizations on the other hand are dealing with hundreds of millions of users who are all able to publish and share information on the platform, which suggests more difficulties regarding the governance of fake news. These differences makes this comparative study relevant, considering the previously mentioned notion that social media over the years have grown into the role of being an important news source to its users, and in that sense are taking over the role of traditional media organizations (Shearer, 2018). The aim of this study is to get insight in how media organizations are governing fake news and why they do so, in order to contribute to our understanding of how media organizations are dealing with this increasing threat to organizational legitimacy. To do so, the following research question has been formulated:

How and why do social and traditional media organizations govern fake news?

To have a thorough analysis of the research question, three different theoretical approaches will be used. First, theory on corporate citizenship (CC) will be assessed, since this allows for examination on how governance of fake news is internalized in the organizations of interest and really captures the descriptive nature of the research question. For the explanatory part of the research question two

approaches will be used. Regulatory theory will be examined, since organizational behavior is controlled by regulations. This is particularly relevant for this study as media organizations and the internet are considered to be unregulated by the state. Furthermore, the attitude towards fake news will be assessed, considering that this can influence how media organizations are governing fake news. This study has important implications for both theory and practice. Governance of fake news will be examined in the digital context, approached from multiple perspectives, which contributes to our theoretical understanding of governance of fake news. Increased understanding of fake news governance can also benefit the field of practice, since it can offer new insights and guidance on how to govern fake news accordingly.

This study will apply the above mentioned research question to the case of Twitter as a social media organization, and the Washington Post as a traditional media organization by performing a deductive content analysis. The choice for Twitter was made based on its high paced and short communication in real time. The decision for The Washington Post was made based on the fact that the newspaper is considered to be factual, and fairly unbiased. More regarding the choice for these organizations will be discussed in the methods section. As previously stated, this study will compare these two organizations and their fake news governance in the context of the COVID-19 pandemic and the 2020 US elections, therefore the timespan that will be focused on from the beginning of 2020 up until May 2021. By doing so, the analysis encompasses the pandemic and the entire US elections, including the installment of the new President Joe Biden (USAGov, 2021).

2. Theory

In this chapter the theoretic background necessary to answer the main question will be discussed. This will entail the definition of the concept fake news, background knowledge on social and traditional media organizations, the theoretical approach regarding the descriptive part of the research question followed by theory regarding the explanatory part of this study.

2.1. Defining fake news

Fake news has become a popular term and is used quite often nowadays, and while there seems to be some common understanding of what it means, scholars have defined fake news differently. Tandoc, Lim, & Ling (2018) have reviewed a total of 34 definitions in academic articles and mapped out the typology of the various definitions, see Figure 1 below.

A typology of fake news definitions

Level of facticity	Author's immediate intention to deceive	
	High	Low
High	Native advertising Propaganda Manipulation	News satire
Low	Fabrication	News parody

Figure 1: *A typology of fake news definitions (Tandoc et al., 2018)*

According to Tandoc et al.(2018) two dimensions can be distinguished, namely the level of facticity of the news, and the intentions of the ‘fake news author’. As can be seen in Figure 1, the different types of fake news described in the current academic literature is rather broad, since news parodies and manipulation both fall in the category of fake news although being very different. This indicates the important role that the audience plays. The authors argue that fake news is co-constructed by the audience, since its fakeness depends to a large extent on whether the audience perceives it as real or not. For example a news parody might be more likely to be recognized as a parody than other forms of fake news and therefore be perceived as fake, and for it to be fake news, it has to be perceived as real. In line with this example, it is important to stress that one person can recognizes parody, but another does not which leads to a different perception of the content.

The notion stated by Tandoc et al.(2018) that the author’s intention plays an important in defining fake news is one shared by many authors(Aswani, Kar & Ilavarasan, 2019; Ireton & Posetti, 2018; Karlova & Fisher, 2013; Nagasako, 2020; Shu, Wang, Lee, & Liu, 2020; Wu, Morstatter, Carley, & Liu, 2019). As a result of this, fake news can be split up in to two pillars, namely misinformation and disinformation. Misinformation can be defined as false information, which is shared without knowing

that the information is false, and without the intention of harm involved. Examples of misinformation are false connections or misleading context of which the author or spreader of the information is unaware. Disinformation on the other hand is information which is known to be false or incorrect, and shared with the intent to harm. The recent work of Nagasako (2020) makes an even clearer distinction regarding the facticity of disinformation than others like Ireton and Posetti(2018) who state that disinformation is only false information. Disinformation according to Nagasako (2020) can be either false information, such as a false or fabricated context. On the other hand it can be correct information which has been manipulated or is an inconvenient truth. However, both types of disinformation are used in a way to harm or deceive. A visual representation of how misinformation and disinformation are related can be seen below, in Figure 2. Returning to the issue of co-creation of fake news by the audience, it could be well the case that person A spreads disinformation, with the intention to harm, while person B does not recognize the false context or manipulated information and spreads it as well. In this example the spreading of the same information would be regarded differently, again because of the intent.

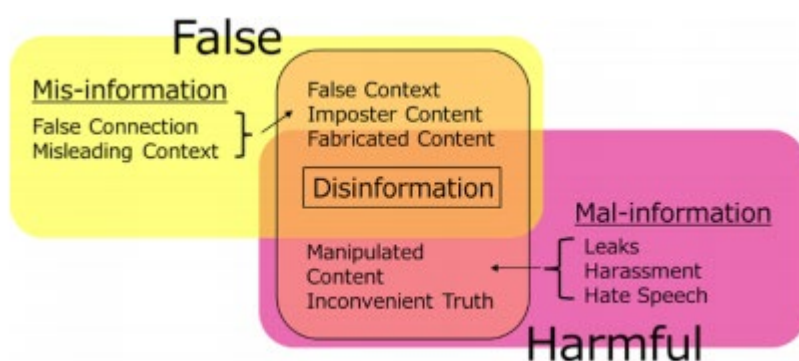


Figure 2: *Definition of disinformation* (Nagasako, 2020, p.128)

A third type of information disorder which is discussed by multiple scholars in combination with the former two is mal-information (Ireton, & Posetti, 2018 ; Nagasako, 2020; Shu et al., 2020). Mal-information can be defined as factual information which is shared to cause harm to inflict harm on a particular person or organization. Mal-information mostly refers to information which was supposed to stay in a private sphere, but made public deliberately by the distributor of the misinformation to cause harm (Nagasako, 2020). In some situations the line between mal-information and disinformation can be thin, for example regarding claims that are very hard to check. However since mal-information is rooted in genuine information, often in the nature of leaks, harassment or hate speech, this will not be considered as fake news in this paper but as hate speech. This paper does include both misinformation and disinformation in the definition of fake news and will go on to use both in studying how both social and traditional media organizations deal with fake news. The reason for including both misinformation

and disinformation is because both types of information disorder are expected to be relevant for social and traditional media organizations, since the issue at hand is the false or misused information being shared, regardless from one's intention. Furthermore, researching only misinformation or disinformation would inevitably lead to deciding on what one's intention was when spreading the information, which is extremely hard and rather ambiguous.

2.2. Governance of fake news

The current literature on governance of fake news highlights some challenges. First of all, a significant part of the literature focuses on regulatory challenges that come with governance in the digital sphere and media in general. Some of these challenges will be discussed in chapter 2.3.1., which focuses solely on regulation. Before going into detail about what theory will be used in this study, it is relevant to outline some governance challenges, from a communications perspective.

The digital nature in which people nowadays receive most of their information, rather than via a newspaper or broadcast, plays an important role in what type of information one receives. Syed (2017) indicates that filters or bubbles (manual and algorithms) play an important role in what information one receives in general. Furthermore, communities reinforce thought and opinions that someone has, which essentially means that the amount of contradicting thoughts and opinions someone receives will vanish over time. Essentially, this means that information is spread within these filters and communities and thereby, fake news can get amplified according to Syed (2017). Furthermore, the speed of sharing is critical to understanding the spread of fake news and its governance, which causes a significant challenge for organizations.

Horne (2021) studied the key topics in conversations by the Internet Governance Forum (IGF). This study displayed that the conversations around internet governance by this organization have shifted its focus. In 2016, the most used terms during conversations of the IGF were “rights” and “journalists”, whereas in 2019 the most used terms included “disinformation”, “countries”, “platforms”, and “public”. This study seems to indicate that the importance of private platforms, social media organizations in other words, in governing fake news is increasing significantly. Considering their embeddedness in today's society, more and more pressure is applied on these organizations to take actions on fake news. Furthermore, Horne's (2021) findings indicate that stakeholders may play an important role in building and shaping internet governance.

Napoli (2015) examined how the notion of the public interest is shaped in the context of social media. Two main findings came from this study. First, the algorithms that are active on social media focus on restricting content rather than encouraging content, with news and information being neglected in these formulations. Second, many of the responsibilities associated with the production and dissemination of news and information are with the individual users themselves. Essentially, the critique

is that news is not spread correctly in the digital context and that action has to be taken. Therefore Napoli (2015, p.757) expresses the need for a discussion about the integration of well-articulated news values or institutional articulations social responsibility like they have been developed in traditional media, through regulatory oversight or codes of conduct.

Finally, Egelhof and Lecheler (2019) state that the phrase fake news has become a two dimensional phenomenon. On the one hand fake news can be regarded as a genre, which entails the deliberate creation of pseudo journalistic disinformation. This fake news genre means that the information is low in facticity, published in a seemingly journalistic format, and has the intention to deceive. For governance, this is expected to be a significant challenge since it is published in such a manner that people tend to believe it. On the other hand, fake news is increasingly used as a label to delegitimize media organizations. According to Egelhof and Lecheler (2019, p.105) : *“this associated negativity has rendered the term a potent weapon for a number of political actors, who now use it to discredit legacy news media that contradict their positions, suggesting these outlets are politically biased”*. Regarding fake news governance this thus imposes the problem of media organizations being accused of spreading fake news rather than being seen as the governing entity themselves, which can be a significant challenge. After indicating some governance challenges regarding fake news in the digital context, now theory that will be used to develop the conceptual model will be discussed.

The concept of corporate citizenship (CC) is the theoretical approach that will be used to analyze governance of fake news, focusing on the descriptive aspect of the research question. CC stems from the perhaps more popular concept of corporate social responsibility (CSR) and captures the new political role of corporations in globalization (Baumann-Pauly & Sherer, 2013, p.1). In line with regulatory theory, CC acknowledges that rule-making and rule-implementing is no longer done solely by the state, but multinationals and NGO's can play an important role in this process (Baumann-Pauly & Sherer, 2013). Furthermore, Matten and Crane (2005) state that organizations can take on the role of *'administrators of citizenship'* and provide social, civil, and political rights in situations in which: (1) the government ceases to administer citizenship rights, (2) the government has not yet administered citizenship rights, or (3) the government is unable to administer citizenship rights. The latter situation relates well to the issue of fake news governance in media organizations considering the severe challenges of regulation by nation states. Furthermore, the rights provided by governance of fake news seem to be civil and political, considering governance of fake news focuses on providing correct information in general, facilitate participation in the democratic process, and perhaps even prevention of potential polarization by fake news. Governance of fake news will therefore be regarded as a distinct CC issue and approached. Baumann-Pauly and Sherer (2013, p.4-5) have defined three dimensions which are essential for organizations that are striving to become a corporate citizen, namely: commitment measures, structural and procedural measures, and interactive measures. These three

dimensions will now be discussed, along with how the theory of CC will be operationalized to fit the examination of fake news governance by media organizations.

Commitment is about demonstrating the company's will to fill regulatory gaps through their business activities. This commitment should be featured in strategic documents and basic policies, such as a mission statement or a code of conduct. Furthermore, commitment should not only be visible in corporate statements, instead Baumann-Pauly and Sherer (2013) argue that commitment should also be integrated in the organizational culture, meaning that the commitment dimension entails both formal and informal elements. Regarding fake news governance, this means that the organizations of interest in this study should display their commitment to challenge fake news in corporate statements, as well as in the 'ethos' of the organizations' employees. The commitment dimension has 2 indicators, namely the strategic integration of governance of fake news along with leadership support, and the coordination of governance of fake news.

Structural and procedural measures should be implemented to ensure the commitment to CC. This dimension describes the internal 'embeddedness' of CC in the organizations' daily activities. This includes systematic checks, procedures, and reporting and evaluation mechanisms. While these procedures and mechanisms are in place, ethical reflection in dilemma situations makes it possible to define the limits to CC adequately, which enables context specific action can be taken. Converting this to fake news governance, organizations should have specific structures and procedures in place to detect fake news, or prevent the spreading of it. The indicators that will be examined for this dimension are: the alignment of policies and procedures, the alignment of incentive structures, training on governance of fake news requirements, whether a complaints procedure is in place, whether governance of fake news is evaluated, and finally reporting on governance of fake news.

The interactive dimension of CC entails the interaction and relationships with external stakeholders, and embraces different levels of involvement by stakeholders. Having regular interaction with stakeholders can help organizations to spot societal trends and react rapidly to emerging crises (Baumann-Pauly & Sherer, 2013). The interactive dimensions of CC applied to the issue of this study would mean that stakeholders should be involved in the governance of fake news. This is in line with theory on political CSR, which expresses the need for democratic participation by a broad range of stakeholders in the corporate decision making, rather than just taking their perspectives into account (Palazzo, & Scherer, 2006). The two indicators which will be examined for this dimension are: the quality of stakeholder relationships and the level of participation in collaborative governance of fake news initiatives.

To conclude, the literature on corporate citizenship provides the 'commitment', 'structure and procedure', and 'interactive' dimensions. These dimensions respectively fall apart in two, six, and two indicators.

2.3. Explaining governance of fake news

Following the descriptive aspect of this study, this paragraph will focus on why the governance of social and traditional media organizations might differ. Globalization and the internet have had major implications for traditional media organizations and their activities. With the upcoming of the internet, traditional media organizations have experienced severe competition from online news outlets, such as social media platforms (Shearer, 2018). However, traditional media organizations have seen opportunities and have incorporated the use of internet in their activities in several ways. First, all of the traditional media organizations studied by Albarran and Moellinger (2013) have integrated the use of social media and internet web sites into their digital strategy. Second, Schwoon et al.(2021) have shown in their study that in fact the business model of traditional media organizations can change when transforming into a digital platform. A profit-seeking through quality journalism strategy distinguishes a traditional media organization significantly from social media, who mostly depend on advertising revenue.

The establishment of social media initially had the goal to maintain social relationships and communicate in a digital sphere with friends, relatives and other acquaintances (Van Dijk, 2013). Leaping forward to 2021, social media organizations are an important element in today's society and have transformed to all-encompassing platforms. With social media organizations focusing on a broad range of topics, ranging from gaming(Twitch), or video's (TikTok), to professional networks (LinkedIn) it seems safe to say that social media have outgrew the simple goal of enabling social communication. Because of its deeply embedded nature in society, social media is being used by many organizations, politicians and governments as a tool of communication. Van Dijk and Poell (2013, p.11) argue that: *"mass media and social media platforms can hardly be seen as separate forces when it comes to controlling information and communication processes"*.

Since social and traditional media organizations were founded for different reasons, depend on significantly different revenue streams, and differ in the extent to which they can control what is published on their platform, it is expected that their governance of fake news will differ. To study why these organizations differ will be approached via two dimensions, namely 'regulation' and the 'attitude towards fake news'. These will now be discussed.

2.3.1. Regulation

The term 'regulation' is a broad and perhaps a misunderstood concept, about which Orbach (2012, p.3) states the following: *"people intuitively understand the word 'regulation' to mean government intervention in liberty and choices- through legal rules that define the legally available options and through legal rules that manipulate incentives"*. The core idea behind this view is that states have the authority to impose 'hard' laws, which control behavior in society. However, despite the fact that states can still play an important role in regulation, nowadays several ways of regulation exist with less

influence of the state. A concept which has been put forward in academics to capture this broader view on regulation is called meta-regulation. “*Meta-regulation embraces activities in a wider regulatory space, under the auspices of a variety of institutions, including the state, the private sector and public interest groups*” according to Drahos (2017, p.150). It is the regulation by the private sector and public interest groups which is relevant for this study and can be defined as self-regulation. Although different definitions exist, this study focuses on self-regulation by industries, meaning that it requires firms in an industry to cooperate in order regulate the industry’s behavior (Gunningham & Rees, 1997, p. 365). Individualized self-regulation or self-organization on the other hand refers to a single organization and its internal rules and control mechanisms, in order to regulate itself (Gunningham & Rees, 1997; Puppis, 2010). Self-regulation and its related forms seem to be particularly relevant regarding the media sector and the internet, for reasons which will be discussed now.

In a democratic society, it is commonly understood that the media has a ‘duty’ to inform the public. To do so, press freedom is essential to allow the public to receive complete information, form their own opinion and thereby facilitate the political debate. Considering the need for press freedom, hard regulation in the form of laws by the state is somewhat delicate, although needed in certain circumstances to protect the rights of others (Frost, 2011, p. 209). For this reason the media landscape relies on ethics besides the law, which in essence has the same goal, namely to steer media to behave responsibly (Frost, 2011, p. 210). Codes of conduct are a good example of self-regulatory actions undertaken by the media sector in an attempt to have journalists behave ethically responsible. Where strict regulation regarding the media and press is undesirable, in the case of the internet it also seems to be unachievable. Considering the trans-national and decentralized nature of the internet, governments are not able to regulate the so called cyberspace. It is for this reason according to Drahos (2017, p.535) that the current literature is no longer focused on whether cyberspace can be regulated by states, but how and by whom it is regulated since it is generally accepted that states are not able to do so adequately. Therefore self-regulation is particularly relevant regarding the internet, and more specifically in this study regarding social media, since self-regulation offers speed, flexibility, sensitivity to market circumstances (societal circumstances in the case of fake news) and lower costs (Gunningham & Rees, 1997, p.366). Some scholars even consider that responsible self-regulation is the only legitimate form to govern the internet (Drahos, 2017, p. 538; Johnson & Post, 1996)

Following the discussion above, it is relevant for this study to examine how fake news is regulated. Therefore, ‘regulation’ will be included in this study as a dimension, for which two indicators will be included in the conceptual mode. These indicators are ‘government regulation’ and ‘non-governmental regulation’. which includes all regulation except government regulation and individualized self-regulation.

2.3.2. Attitude towards fake news

A rather sensitive issue lies in the fact that media organizations essentially decide on whether something is fake news or not, and take action accordingly. The more philosophical and ethical question whether media organizations should even have the verdict on deciding what is fake news will not be covered in this study. Traditional media organizations have had this verdict since their existence, considering that the organization itself decides what news is published. Newspapers are perceived as the most credible news source according to Kiouisis (2001), and since they are rooted in journalism they are expected to have an intrinsic motivation to govern fake news objectively and to balance free speech and censorship accordingly. Social media organizations on the other hand were not founded to distribute correct information, but to allow communication between people in the digital sphere. Since social media has grown significantly, these organizations are now dealing with the issue of governing fake news which comes with quite some responsibility.

In the light of a democracy in which freedom of speech and differing perspectives and opinions should be cherished, media organizations play an important role to balance free speech and censorship accordingly. Complete freedom of speech would include the ability to spread false and harmful information, which is not desirable from a moral and business perspective. From a moral perspective, it is expected that media organizations feel responsible to protect their users, readers, or stakeholders in general from falling into the trap of fake news and protect them from harmful content. From a business perspective, fake news and harmful content can hurt the business significantly because people have the ability to turn to a competitor if they believe that the governance is not sufficient. Leaning too much towards censorship could hurt the ability to spread differing information and ideas freely, which is also undesirable and could result in people seeking other media outlets that are perceived as less strict.

The “ideal” situation of fake news governance would probably be one in which false information is restricted as much as possible and human rights and dignity are protected, while people are still able to share opposing information, ideas and points of view. Still, some people will lean more towards censorship, while others will advocate for complete freedom of speech, which media organizations have to be aware of and are perhaps including in their governance decisions. This will be studied with the ‘interactive’ dimension.

The incompetence to govern fake news objectively can potentially steer the public opinion, either by allowing fake news on the platform, or by removing content which was wrongfully perceived as fake news. Important to notice is the issue of verifiability of information, which sometimes can be difficult or even impossible. This forces media organizations to govern fake news regarding a topic on which very little valid scientific information has been established. A recent example of this was the promoting of the drug hydroxychloroquine by Trump as a cure to COVID-19 (Papenfuss, 2020). Some anecdotal reports showed positive results, however no thorough research had confirmed this, while

Trump posted on Twitter that it had a chance to be “*one of the biggest game changers in the history of medicine*” (Papenfuss, 2020). Furthermore, information that is considered to be false might not actually be false after all, which is not only a recent problem, since Galileo Galilei was prosecuted for stating that the earth revolves around the sun in the 17th century, which back then was going against the established information and narrative (Finocchiaro, 2008). This example is given to illustrate that media organizations have to be aware that the “truth” is not fixed, and to acknowledge the possible damaging effects of censorship regarding information that is considered to be false and going against the established information or points of view.

Media organizations thus have to govern fake news, even in cases when it is not verifiable whether information is true or false, which requires a thorough reflection on the balance of free speech and censorship. This raises the question how media organizations are dealing with this, and where social and traditional media organizations can be placed on this continuum. Furthermore, it is relevant to examine how serious their battle against fake news is, and when they consider that something should be censored? To examine this, the dimension ‘attitude towards fake news’ has been developed. The definition of the dimension ‘attitude towards fake news’ that will be used for this study is the following: *a set of emotions, beliefs, and actions towards fake news*. This dimension thus entails multiple elements, including the behaviors of which many are expected to be found in the ‘structure and procedures’ dimension. By combining the behavior with the beliefs and emotions, this study tries to get insight in why media organizations are governing fake news as they do. This dimension is constructed by two indicators ‘free speech’ and ‘censorship’, by which this study tries to capture the attitude towards fake news on this continuum.

2.4. Conceptual model

Concluding the theoretical section, governance of fake news will be approached from three different perspectives. Theory on corporate citizenship focuses on the descriptive goal of this study, which is to explain how social and traditional media organizations are governing fake news, and provides three dimensions. These dimensions respectively consist of two, six, and two indicators. Regulation and the attitude towards fake news are included to explain why social and traditional media organizations are governing fake news the way they do. Both of these dimensions consist of two indicators. Altogether this leads to the conceptual model, shown below in Figure 3.

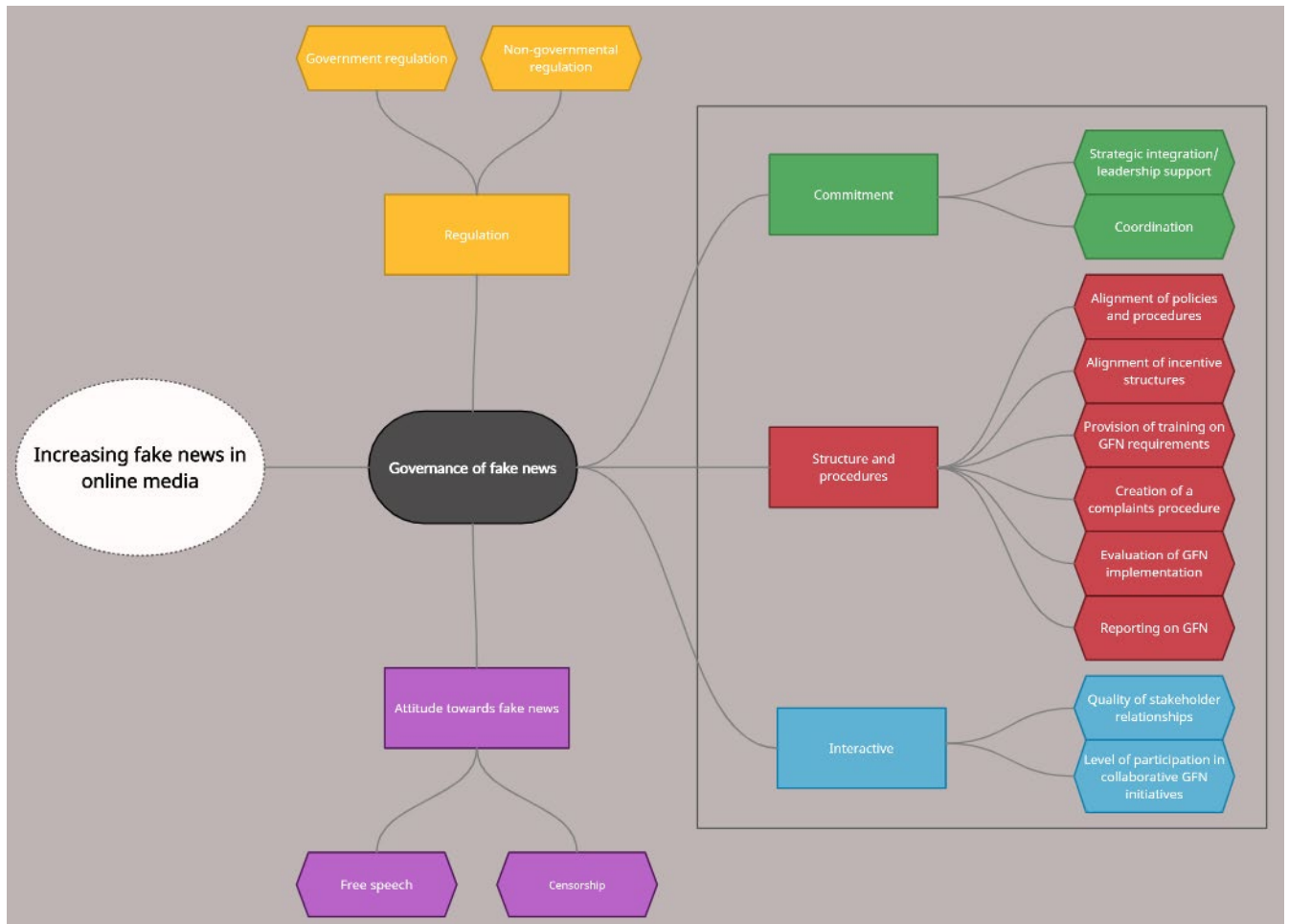


Figure 3: *Conceptual model*

3. Methods

This section will cover the methodological approach which that has been applied to answer the research question. First, the research design will be discussed, followed by the decision for Twitter and The Washington Post for this comparative case. Thereafter the data collection methods will be discussed, followed by the data analysis. Finally research ethics and the role of the researcher in this study will be touched upon.

3.1. Research design

This study is qualitative in nature, with the aim to get insight in how social and traditional media organizations are governing fake news. To examine this, a deductive content analysis has been used. A deductive approach to content analysis is often used when the researcher has preexisting knowledge, to test existing categories, concepts, models theories or hypotheses (Kyngäs & Kaakinen, 2020, p.23). In the theoretical chapter of this study, the conceptual model has been developed which will be the basis for the data collection and analysis. The research question of this study was: *How do social and traditional media organizations govern fake news?* More specifically, this thesis can be regarded as a comparative case study in which Twitter and The Washington Post were compared to one another.

3.2. Case context

As previously stated, this study has compared Twitter and The Washington Post in their governance of fake news. Background information will now be discussed, along with the reasoning for why these two organizations have been chosen specifically.

The business model of The Washington Post seems to fit the profit seeking through quality journalism very well. With its slogan “Democracy Dies in Darkness” the news organization seemingly tries to position itself as independent, unbiased and factual, and as an entity that sheds light on what is happening around the world to uphold the democracy. The first of seven principles of which the organization’s mission statement consists of says: *“the first mission of a newspaper is to tell the truth as nearly as the truth may be ascertained”* (Washington Post, 2016). In an interview with Reuters News Agency(n.d.) managing editor Emilio Garcia-Ruiz mentions that the number one way for monetizing an engaged audience is quality. Furthermore Garcia-Ruiz states that: *“ if you do quality work, people will pay for it”* (Reuters News Agency, n.d.). Altogether it seems like The Washington Post really tries to position itself as a news organization which values high quality journalism. The Washington Post works based on subscription based access to their articles. Non-subscribers only have access to a limited amount of articles before their access ends. The Washington Post does include advertising, depending on the subscription plan one has. Furthermore, they are active on all major social media platforms, because they acknowledge that this is where people are communicating. The aim is to have people experience the work of The Washington Post on social media platforms, with the idea that they will follow through and subscribe (Reuters News Agency, n.d.). Recently, under the lead of owner Jeff

Bezos, The Washington Post tapped into a new revenue stream with licensing its publishing software for the Post's digital content to other companies (Cao,2019). This is expected to become the third largest revenue stream after advertising and subscription in the coming years (Cao, 2019).

The decision for The Washington Post as the traditional media organization in this comparative study was made for two reasons. First of all, The Washington Post is a well-known, reliable news source which focuses on quality journalism as previously described. Secondly, the political bias of American media organizations was taken into account. Morris (2007) provides the evidence that American media is biased, and is also perceived as politically biased by the public. A politically skewed media organization could potentially behave differently in regard to what is considered to be fake news, and therefore influence the findings. Analysis by Ad Fontes Media (2021) shows that The Washington Post indeed does fact reporting, and is politically unbiased to slightly left leaning.

As a social media organization, Twitter has distinguished itself by encouraging quick communication with short messages (Tweets) containing a maximum of 280 characters (Perez, 2018). This is in fact different from other social media organizations that focus more on people one follows. On Twitter, users can see what important events are happening around the world, and locally with the use of trending hashtags. In the light of fake news, this is particularly challenging, because users can view what people are tweeting about trending events in real time, meaning that there is very limited time to govern the spreading of fake news. Considering their mission, which is to serve public conversation and their statement that they try to make twitter a safe space to talk, it will be interesting to analyze what internal mechanisms are in place to counter the spreading of fake news (Twitter, 2021). Twitter's business model is based three income streams, namely: advertising, data licensing and other arrangements (Uenlue, 2020). The advertising has many different forms, including promoted tweets, promoted accounts, and promoted trends (based on geography). The activity on Twitter's platform produces valuable historical and real-time data. This user data can be of significant value to companies, and Twitter exploits this by giving companies paid access to their user data (Uenlue, 2020). Other revenue is created by a Twitter company called MoPub which provides monetizing solutions for mobile app publishers and developers (MoPub,2021; Uenlue, 2020).

The decision for choosing Twitter as a social media organization was made because the flow of information on twitter is very rapid and messages can reach anyone in the world within seconds, unlike other platforms that focus more on engagement with acquaintances. Therefore the governance of fake news on Twitter is particularly interesting. Besides that, Twitter was Donald Trump's 'main' social media platform, on which he carelessly seemed to post whatever and whenever he wanted. Tweets ranging from insulting political opponents to flirting with a nuclear war, by one of the most important world leaders makes Twitter an interesting case. Furthermore, Trump actively promoted the narrative of a stolen 2020 election on Twitter.

As previously mentioned, fake news governance will be analyzed in the light of recent events which showcased problems of fake news in the US, such as the 2020 US elections and the COVID-19 pandemic. The timeframe that will be focused on in this study will be from the beginning of 2020 up until today, encompassing the pandemic as well as the complete 2020 elections including President Bidens installment. The decision for the US as a case is twofold. Firstly, fake news is particularly important in times of elections, since it could possibly influence people during this democratic process which makes this an interesting and relevant case. Furthermore, regarding the COVID-19 pandemic quite some information is not directly verifiable since we simply don't have the knowledge, but still fake news has to be governed. Secondly, this decision was made to narrow down the scope of this study, with the aim to enhance transferability. As a result of the focus on the US, possible relevant information regarding fake news governance in other regions will not be included in this study.

3.3. Data collection

This study has only used secondary data for this content analysis. To clarify, no interviews or observations have been performed. For the data collection, the conceptual model in this study was taken in to account. Data regarding the governance of fake news, the dimensions 'commitment', 'structure and procedures', and 'interactive' had multiple sources. The websites of the organizations of interest supplied most of the information. Furthermore, corporate reports, interviews, news articles, and websites in general have been used to get the needed information. Documents providing data on government regulation was mostly found on institutional websites. For the attitude towards fake news all of the above mentioned sources have been used.

The search engines that have been used the most for finding relevant documents were: Google, NexisUni, and the search engines on The Washington Post and Twitter itself. Some important keywords that have been used to search documents are: Fake news, Twitter, The Washington Post, media, law, misinformation, Trump, policy, elections, COVID-19, and false. As stated in the theory section, misinformation and disinformation are both considered to be relevant for media organizations. The essential part is that false information is spread as a fact. Therefore this study included articles containing many kinds of definitions of false or misleading information. Regular search attempts often show the most relevant or popular results, besides that the time period specific to this case was added many times to search more specific. In total 55 sources have been included in the data analysis.

3.4. Data analysis

Both the data analysis and data collection were iterative in kind, meaning that data collection was not stop at one point after which the data analysis started. The reason for an iterative approach is that this opened up the possibility to search for missing data, or enrich the analysis by data which was found after the initial data collection or analysis. As previously mentioned, the approach to this content analysis is deductive. To analyze the collected data, a deductive approach uses a categorization matrix to code

the data according to the categories (Elo & Kyngäs, 2008, p. 111). The categories stem from the theoretical section in the research. Following the conceptual model, the analysis will be based on predetermined dimension and indicators. See Appendix 1 for the coding tables. A deductive content analysis can be either structured or unstructured which are both based on theory, however a structured deductive content analysis has a more theoretically defined starting point (Kyngäs & Kaakinen, 2020, p.28). Considering the use of exiting theories and the use of predetermined dimensions and indicators to analyze the concept governance of fake news, this study can be defined as a structured deductive content analysis.

For the data analysis Excel was used, and was performed as followed. The dimensions and indicators from the conceptual model were placed in tables in Excel with the same color as in the conceptual model. This was done to collect the quotes from the data in an orderly manner. The documents were placed in a separate tab in Excel and fragments text of the documents were colored reflecting the indicators that the fragment referred to. For example: if a piece of text referred to stakeholder relationships, this text fragment was colored blue. The fragments of text were named quotes and all had a separate code to make clear where the quote came from. This consisted of two numbers, the first number referred to the document number, while the second number referred to the particular quote in the document. For example a fragment of text in the initial coding followed by (10-23), would refer to document 10, and quote 23. To clarify, the number referring to the quote can be found behind the marked text. These quotes were placed in the tables and were regarded as the initial coding. When quotes were very similar, this was just written down one, but with both of the references to the direct quotes. Some quotes however did not seem to fit one of the categories, but were considered to be relevant. These were placed together in the grey boxes to separate these quotes After the initial coding, these categories were named and analyzed whether more quotes could be added to these categories. Graneheim et al. (2017, p.30) state that the decision to include or exclude left-over data should be made in line with the aim of the study and the researcher's intentions. Since the goal of this study was to get insight in how and why social and traditional media organizations are governing fake news, the addition of inductive categories was considered to be valuable. Since the quotes in the initial coding were sometimes merged, numbers were added in front of the tables in the initial coding. These numbers were called codes. After the initial coding, the codes were grouped, and where relevant the grouped results consisted of a reference to the codes in the initial coding. To make the results more compact, only the most relevant findings were included in the grouped codes. As previously mentioned, this process was iterative, meaning that several times extra documents have been analyzed and quotes have been added.

3.5. Research ethics

Considering the fact that this study only consisted of a content analysis, the important element of qualitative research: the treatment of participants during a research does not have to be considered. However, in the search for secondary data, the research has full control over what is included or excluded. I have therefore tried to remain as objective as possible during the data collection and analysis phase. Since fake news has become somewhat of a political issue, especially in the light of elections, it was important to be aware of this in order to remain as objective as possible during the analysis. Therefore I have taken steps back from my work, to reconsider the process, as well as my role as a researcher.

4. Results

In this chapter the results following the content analysis will be discussed. To discuss the results in an orderly manner, Twitter and The Post will be directly compared on each dimension, rather than discussing the results separately followed by a comparison. Following the research question, first the descriptive dimensions will be discussed, followed by the explanatory dimensions. When referring to direct quotes from the data analysis, the structure as explained in chapter 3.4 will be used. Additionally, a ‘T’ for Twitter or ‘WP’ for The Washington Post will be added between brackets to clearly refer to a specific document or quote. Note that the quotes in the results chapter are simply added to indicate some evidence in the data for the findings, since adding all quotes would hurt the readability of this section significantly. The complete results can be found in Appendix 2 and 3, and the separate file in which the content analysis was performed.

4.1. Governance of fake news

The results regarding the descriptive part of this study will now be discussed, consisting of the ‘commitment’, ‘structure and procedures’ and ‘interactive’ dimensions, along with their respective indicators.

4.1.1. Commitment

Following the content analysis it can be concluded that Twitter shows a strong commitment to the governance of fake news. One of the quotes that indicated this reads as follows: *“our goal is to make it easy to find credible information on Twitter and to limit the spread of potentially harmful and misleading content* (T: 6-1). The Post seems to display an even stronger commitment, since governance of fake news is really the core of their existence, and they believe that their job *“is not only try to report the factual news, but to knock down the fake news”*(WP: 1-4). Both organizations strive to be get credible information out to their readers and users, while trying to be transparent along the way (T: 1-24, 20-2)(WP: 10-38, 10-39, 20-6). The commitment to governance of fake news is spoken out and encouraged by leadership of both organizations. At Twitter, there was no data found which indicated the existence of a department which solely focuses on the issue of fake news. Instead, multiple departments showed to include some aspects related to the governance of fake news in their activities (T: 11-7, 11-39, 17-2, 22-14, 22-17, 23-5). Therefore, a fitting term regarding the governance of fake news could be integration rather than coordination for Twitter. At The Post it could be argued that the code of conduct is really the coordination mechanism. Most governance of fake news practices are described in this code, and therefore embedded in the daily activities of journalists and editors at all levels of the organization (WP: 10-23, 10-7, 10-1, 23-4, 20-all, 1-all).

4.1.2. Structure and procedures

The analysis on the dimension ‘structure and procedures’ was able to give valuable insights in the integration of governance of fake news in the organizations activities. The indicator ‘policies and

procedures showed that Twitter governs fake news by combining technological and human review of content (T: 11-20, 11-22, 26-6). Four main measures can be distinguished, by which fake news is governed on Twitter. First, elevating credible information (T: 12-5). This includes event pages, Twitter moments, search prompts, information hubs, and increasing the visibility of credible information via programming. These measures were used for COVID-19 and the US elections. Furthermore, election specific measures contained candidate and government labels on Twitter accounts, live streams of election events, and news and resources state by state. Second, Twitter labels tweets containing false or misleading information (T: 6-3, 16-10). Labelled content is provided with additional information or an explanation, a warning before replying, retweeting or liking, or turning off the ability to do so, and reduced visibility of the content. Third, removing content is done in more severe cases (T: 16-8). This can include the removal of tweets, profile modifications, and (permanent) suspensions of accounts. Finally, Twitter offers users the ability to govern fake news themselves to a certain extent. Hiding replies, blocking or muting accounts, reply filters, and a media literacy guide are some of the measures that are offered (T: 11-22). For content to be labelled or removed Twitter uses criteria. Content regarding COVID-19 is reviewed with the following criteria: (1) is the content advancing a claim of fact regarding COVID-19, (2) is the claim demonstrably false or misleading, (3) and would belief in this information lead to harm (T: 11-9, 16-2). Criteria to consider synthetic or manipulated media are: (1) are the media synthetic or manipulated, (2) are the media shared in a deceptive way, and (3) is the media likely to impact public safety or cause serious harm (T: 1-11). Twitter thus includes the risk of harm in their criteria to consider whether content should be labelled or removed, and “*especially when there’s an increased risk of real-world harm*”, Twitter is taking action (T: 22-11, 26-3). For repeated violations of twitter policies a strike system is used (T: 3-21, 16-7).

The Post’s governance of fake news policies and procedures are rooted in their code of conduct. “*Reporters and editors of The Post are committed to fairness*”, which is a key practice (WP: 10-6). Fairness includes completeness, relevance, honesty and diligently seeking comment when reporting stories (WP: 10-7). The analysis showed that The Post has a multilevel structure for reviewing and editing stories, which can include fact-checking (WP: 10-23, 20-27). These different levels of which the multilevel structure consists are: reporter, assignment editor, multiplatform editor, and senior editor (WP: 10-24). Assignment editors collaborate with reporters on the origination of stories and often provide initial review when a story is submitted. Multiplatform editors often provide initial review on breaking news stories and routinely provide second-level review on print and other less-time sensitive stories. Senior editors have overall oversight of the daily and weekend reports for publication. *The number of editors who review a story varies depending on a range of factors, including complexity, sensitivity, and the pressure of time* (WP: 10-26). Although this is not stated explicitly, it is expected that more complex and sensitive stories increase the number of editors who review a story, while pressure of time is expected to limit the number of editors who review a story before publishing. The

Post also has policies regarding their sources, which is in place because: *“The Washington Post is committed to disclosing to its readers the sources of the information in its stories to the maximum possible extent”*(WP: 10-37). The Washington Post also has its own fact checking organization, called The Fact Checker, with the purpose to ‘*Truth Squad*’ statements of politicians (WP: 11-1). To do so, false claims are labelled with so called ‘Pinocchio’s’. With this labelling system more ‘Pinocchio’s’ means worse claims, with four ‘Pinocchio’s’ being a blatant lie (WP:11-20). Furthermore, The Fact Checker uses the ‘Geppetto Checkmark’ for claims that are unexpectedly true, an ‘Upside-Down Pinocchio’ for statements that are a clear shift from a previously held position, a ‘Verdict Pending’ for very complex situations in which extra information is needed, and a ‘Bottomless Pinocchio’ for false claims that have been repeated at least 20 times. An example of this ‘Bottomless Pinocchio’ is the case of Trump who has made many false claims which he repeated even more than a hundred times, and in total The Fact Checker was able to identify over thirty thousand false claims made by Trump during his presidency (WP: 17, 27-1). The Fact Checker also investigates manipulated video and launched a guide to manipulated video. In doing so they distinguish three categories of manipulated video, namely: missing context, deceptive editing, and malicious transformation (WP: 12-3, 13-2). All three of these categories are further split up into 2 types, to more explicitly classify how the video is manipulated and thereby false or misleading (WP: 13-4, 13-5, 13-6). The goal of this guide to manipulated media by The Fact Checker is the following: *“we want this system of labeling videos to become the standard for journalists to help people be more informed as they navigate the information landscape”*(WP: 12-2). Finally, when publishing articles, The Post attaches labels to their articles to inform readers on what type of publication they are reading and prevent misunderstanding between opinions and facts. The 4 types of labels that are used for this are: analysis, perspective, opinion, and review (WP: 10-13). The Post does have comment sections, for which one has to be a subscriber. These are governed via its discussion and submission guidelines.

Both organizations have a complaints procedure in place. For Twitter two types of complaints procedures exist, namely to report fake news, or to appeal against GFN decisions (T: 3-22, 3-10, 11-3, 22-13). The Post’s complaints procedure offers three options: (1) the possibility to address missed information (WP: 11-26), (2) the possibility to address mistakes in articles (WP: 11-7), and (3) the possibility to submit a takedown request, which is rarely granted (WP: 10-36). Regarding the ‘evaluation of GFN implementation’ both organizations seem to have a similar approach. Both organizations emphasize that GFN is not fixed, but changing depending on what is happening around them. One of the quotes from the data analysis regarding Twitter captures this quite well, in which Twitter states the following: *“...continuously evolve our rules and policies to reflect the realities of the world in which we operate and to respond to new behaviors we observe on our service* (T: 22-15). Twitter’s evaluation is not limited to its general rules and policies, but also applies to evaluating whether technology is working effectively, for which generated data is used (T: 10-6, 2-6, 2-3).

The indicator ‘reporting on GFN’ shows differences between The Post and Twitter. Twitter published its first Global Impact Report, covering the year 2020, in which fake news was briefly touched upon by noting some policies and challenges (T: documents 22,23,24,25). However, GFN is not reported on in depth by Twitter, which is somewhat surprising considering their strong commitment to governance of fake news and the significant amount of policies and procedures in place to govern fake news. The Post on the other hand annually publishes a report on how they have lived up to the fact-check principles of the International Fact Checking Network, of which they are a signatory (WP: 11-30). Considering the embedded nature of fake news governance in The Post’s code of conduct and their daily activities, a separate GFN report is perhaps not something to expect from them. No publicly available data was found regarding the indicators ‘incentive structures’ and ‘training on GFN principles’ for both Twitter and The Post.

For both organizations one extra category was developed inductively for the ‘structure and procedures’ dimension. For Twitter this category was named ‘internal development’. The quotes in this category seemed to be the closest related to ‘training on GFN requirements’, considering the technological nature of Twitter’s governance of fake news, but were still regarded as significantly distinct from the deductive categories. The internal development gives insight in Twitter’s efforts to improve its governance of fake news. This is done by: investing in resources and human capital (T: 22-6), building new tools and processes (T: 10-5, 11-29, 11-30, 24-10, 27-1), and machine-learning (T: 11-21, 11-28, 22-7). Twitter states that: *“our systems learn from past decisions by our review teams”*, which means that machine-learning is expected to improve GFN over time and thereby includes characteristics of human reviewal in the technological aspect of GFN (T:11-21). Considering many of the policies and procedures have only been implemented recently in 2020, it could take a while before the effects of machine-learning are noticeable although it does give hope for the future of fake news governance. The inductively developed category for The Post was named ‘correction procedures’. Since the correction procedures take place after publishing incorrect information, it did not seem to fit the ‘policies and procedures’ indicator. Furthermore, corrections are closely related with the ‘complaints procedures’, but are considered to be happening after the ‘complaints procedure’ is finished. Therefore a separate indicator was made for the ‘correction procedures’. The goal of the correction procedure is the following: *“when we run a correction, clarification or editor’s note, our goal is to tell readers, as clearly and quickly as possible, what was wrong and what is correct”* (WP:10-28). Three types of corrections can be distinguished, namely corrections, clarifications, and editor’s notes. If The Post substantively changes an article, headline, graphic, video or other material, they will publish a correction to explain the change(s) (WP: 10-30). Clarifications happen when The Post was factually correct, but was not as detailed as it should be, when they initially failed to seek comment or a response that now has been added, or when new reporting has shifted The Post’s perception (WP: 10-31). An editor’s note is a

correction calls into question the entire substance of an article. This must be approved by a senior editor (WP: 10-32). Furthermore, less severe correction policies exist (WP: 10-33).

4.1.3. Interactive

The ‘interactive’ dimension showed similar results regarding stakeholder relationships. Both organizations consider stakeholders to be very important and are committed to working in the interest of their stakeholders by serving them credible information. Quotes that display this are: “*we are committed to sound corporate governance and strong ethics and compliance practice which promote the long-term interest of our stakeholders* (T: 22-2), “*we have to be able to help the news consumer as much as possible*” (WP: 1-19), and “*The Washington Post is vitally concerned with the national interest and with the community interest*” (WP: 10-16). Furthermore, stakeholders are informed regularly and invited to give feedback by both organizations. (WP: 10-2, 11-5, 11-17) (T: 11-41, 22-8). The data also showed that both organizations are participating in multiple collaborative GFN initiatives. For Twitter, these collaborations can be divided into on-platform and off-platform collaborations. On-platform collaborations are: measures to make trusted sources highly visible on the platform (T: 6-4), using trusted sources to review content (T: 11-16, 16-6), and a community driven GFN initiative called Birdwatch in which users can label Tweets themselves (T:7-3). Off-platform collaborations consist of collaborations with other companies, as well as partnership in collective organizations such as: The International Fact-Checking Network (although Twitter is not a signatory to its principles), C2PA, CAI, and the Digital Trust and Safety Partnership. The Post is collaborating with many partners, who either focus directly or indirectly on the governance of fake news. While some partnerships cover broader journalistic topics, others are directly committed to quality journalism or fact-checking and therefore governance of fake news. Unlike Twitter, The Post is a signatory to The International Fact-Checking Organization’s principles, making this collaboration stronger (WP: 11-30). Furthermore, The Post collaborates with experts as well as their readers. Collaboration with experts is undertaken since they can: “*provide context for stories, make interpretive points or offer judgements about subjects we are covering*” (WP: 10-56). Readers are invited to collaborate regarding corrections, and they contribute most of the input for The Fact Checker (WP:11-27).

4.2. Explaining governance of fake news

Following the results of the descriptive dimensions, it is now relevant to try to explain why these organizations govern fake news the way they do. Therefore the dimensions ‘regulation’ and ‘attitude towards fake news’ will be discussed now.

4.2.1. Regulation

The regulation dimension shows significant differences between Twitter and The Post. Section 230 of the Communications Decency Act (47 U.S.C. § 230) protects social media from being legally responsible for what their users post, meaning that fake news on Twitter is in fact allowed by law (T: 1-

22, 13-2, 14-3). Furthermore, it gives social media the power to restrict access to material or the availability of it (T:14-4). This indicates the large regulatory freedom for Twitter to make their own decisions regarding the governance of fake news. However, political pressure has been applied over the last year to reform this law by both the Democratic and the Republican party, so perhaps this pressure can be seen as indirect regulation by the government (T: 15-4, 15-5, 15-6, 1-19). The Post on the other hand is regulated by The First Amendment. The First Amendment protects journalists and enables them to perform their job accordingly, thus enabling governance of fake news (WP: 8-1, 9-2). On the other hand, journalists and news organizations can indeed be held liable for publishing fake news following The First Amendment (WP: 2-8). The legal term for this is defamation and more specifically libel, which entails the following: “*libel occurs when a false and defamatory statement about an identifiable person is published to a third party, causing injury to the subject’s reputation*”(WP: 2-3). “*A libelous statement can be the basis of a civil lawsuit*”, thus directly imposes the need for governance of fake news (WP: 2-4). Furthermore, this liability is not limited to the initial publisher, but extends to who republishes the false information, which explains why The Post’s principles and fact-checking are of high importance from a legal perspective when working on articles themselves, and when building on stories of other journalists (WP: 9-8).

The indicator ‘non-governmental regulation’ also shows interesting differences. The Post’s strong code of conduct displays the embeddedness of The Post in journalism covering topics like truth, accuracy, objectivity, and fairness (WP: 20-22, 10-7, 10-5). Its participation in and collaboration with organizations that promote press freedom, journalistic values and quality reporting indicates self-regulation by the journalistic field which The Post is both contributing and adhering to (WP: 11-28, 18-3, 18-6, 18-7, 18-10, 24-4). Since these organizations are providing rules and principles which the signatories have to adhere to, industry self-regulation seems to play an important role for The Post as expected following the theory in chapter 2.3.1. The fact that The Post received awards for outstanding journalism also confirms the acceptance of The Post’s business practices (WP: 19-1, 19-2). The Post recognizes that “*public trust in the media has slowly eroded*”, which perhaps reinforces its commitment to stand out with quality journalism (WP: 22-4)

In contrast to The Post, the analysis revolving around Twitter showed very limited evidence that self-regulation in the social media industry plays an important role. Although similar actions are undertaken sometimes regarding the governance of fake news, no collaborative decisions or standards were distinguished for social media (T: 1-3, 1-5, 1-17, 1-18, 4-5, 17-3). This is somewhat surprising considering the strong commitment to the governance of fake news by Twitter, especially since they consider fake news to be “*an industry- and society-wide challenge* (T: 18-6). However, Twitter is working on developing digital standards as part of the CAI and C2PA, meaning that the efforts for future (cross-)industry standards are surely there (T: 20-3, 18-4, 19-4). Although digital standards would probably improve the governance of fake news, a common understanding of fake news and common

ethics and practices, like the journalistic field, seems to be necessary if the social media giants want to govern fake news in the best possible way. Finally, Twitter's involvement in partnerships is expected to perform a regulatory function to some extent (T: 22-9, 22-10), as well as pressure from stakeholders including users, mainstream media outlets (see the indicator 'challenges due to the internet' for The Post), and society at large.

4.2.2. Attitude towards fake news

The 'attitude towards fake news' provided valuable insights, especially since Twitter and The Post differ in stance significantly. Since the coding for The Post on this dimension lead to codes directly related to the dimension level, as well as the development of two inductive categories, this dimension will be discussed on the dimension level rather than comparing the indicators directly.

Twitter's goal is to serve the public debate and in doing so, free speech is weighed against censorship. Twitter states the following: *"we aim to strike an appropriate balance between empowering freedom of expression and creating a safe service for participatory, public conversation"* (T: 22-4). Policies to encourage the public debate also take into account the cultural context of the debate (T: 5-4). Examples that indicate that Twitter wants to empower freedom of speech in the light of COVID-19 are: the acceptance strong commentary or satire, counter speech, personal anecdotes, and debate about COVID-19 science and research (T: 16-4). As presented in the 'policies and procedures', Twitter has a range of measures to protect this public debate, and uses criteria to review content. In censoring content, the main focus is on preventing (real-world) harm (T: 22-11). Additionally, political advertising is prohibited since Twitter believes that: *"political message reach should be earned, not bought"* (T: 1-8, 21-10). Advertising regarding COVID-19 is only allowed under certain circumstance (T: 11-14). Despite its efforts to govern fake news, Twitter states the following: *"... will not be able to take enforcement action on every Tweet that contains incomplete or disputed information about COVID-19"* (T: 11-10). This statement indicates that Twitter is fighting against an inexhaustible enemy, which again displays the importance of policies that focus on the most important fake news issues.

A rather interesting is the development of Twitter's stance and actions towards fake news. In 2017 Twitter stated that *"we, as a company, should not be the arbiter of truth"* (T: 10-3), refraining from taking action and leaving that judgement to its users. In May 2020, two of Trump's tweets were labelled and provided with additional information for the first time (T: 1-13). Currently Trump has been permanently banned (although not for spreading fake news), and many policies regarding fake news have been implemented from 2020 up until now. This displays Twitter's increasing efforts to govern fake news.

A key policy regarding fake news in the US had been the public interest policy. This policy applies when: *"we consider content to be in the public interest if it directly contributes to understanding or discussion of a matter of public concern"* (T: 27-1). This policy has the following implications: *"as a*

result, in rare instances, we may choose to leave up a Tweet from an elected or government official that would otherwise be taken down” (T:27-3). Among other, this policy this applies to government officials and therefore Donald Trump during his presidency. In situations in which rules are violated, Twitter weighs the potential risk and severity of harm against the public interest value of the tweet (T: 27-6). For severe violations such as terrorism, violence, or suicide Twitter is less likely to make an exception. (T: 27-7). This policy explains why Trump could be active on Twitter while 36 of his 100 most popular tweet contained election falsehood (T: 4-2). Regular accounts would have already been banned a long time ago, following Twitters strike system. Concluding, this policy allowed one of the most important people in the world with an immense following to spread false information widely, because Twitter considers that it is in the interest of the public to know what important people like Trump are tweeting about, even if it contains false information, which is rather interesting.

The Post believes in the widest possible dissemination of information (WP: 10-17). When fake news is spread, The Post will deal with this by publishing about it themselves and shed light on controversies by doing so. The Post is aware of the risk of giving people that are spreading fake news too much attention, but they belief they have the obligation to cover it if those people are fulfilling important positions in politics (WP: 20-11, 20-13). Censorship is very limited at The Post. Take down requests are only accepted if the person is under physical harm because of the material (WP: 10-36). Furthermore, The Post’s Fact-Checker does not cover false claims that have received little attention on social media, since they do not want to elevate fake news (WP: 11-14). People that have made false claims are not censored, instead they are invited to respond (WP: 11-8).

For this dimension, two categories have been added inductively for The Post. The first category was named ‘opposition against mainstream media’, which was considered relevant for The Post’s attitude towards fake news, but did not fit in one of the indicators. The Post experiences an increasing opposition against mainstream media outlets (WP: 20-4). According to The Post, trust in mainstream media is low in general, but they are seeing an increasing amount of people who actually see mainstream media as an opponent. Conspiracy thinkers, controversial media outlets, and Donald Trump have played a role in this development according to The Post (WP: 20-18, 1-5, 1-13). The most problematic part of this development for The Post is that these opposing people are denying the existence of truth and facts which makes any debate impossible (WP: 22-5, 1-15). The second category that has been added inductively was named ‘increasing challenges due to the internet’. The data showed that The Post sees the internet and social media as a big part of the problem of fake news (WP: 1-2, 1-26, 10-18, 22-9). The information that is freely spread online with a lack of context makes it harder for The Post’s quality journalism to stand out, which was captures by the following quote: *“the shift from print to digital and social-media based journalism has also contributed to the spread of misinformation, making it difficult for legitimate reporting to stand out”* (WP: 22-8).

Finally, the codes directly related to the attitude towards fake news will be discussed. It can be concluded that The Post has a quite aggressive approach towards fake news. The Post considers it to be not only their job to report factual news, but to knock down the fake news (WP: 1-4). This is done by actively calling out fake news by debunking it in their articles and via The Fact Checker. This aggressive approach is definitely portrayed in their approach towards calling out Trump and perhaps the Republican Party in general, which resulted in Trump calling out The Post too as the “*enemy of the people*” (WP: 20-18). However, The Post does recognize that fake news happens on both sides of the political spectrum (WP: 1-28). Despite their current approach, The Post thinks they have to be more straightforward in calling out false claims: “*I think we have to be much more forthright in saying that is a false claim and there is no evidence to it, or that is a line of thinking that arose on this website or through this person- it has been checked and there’s nothing to it*” (WP: 1-18).

The approach of trying to knock down fake news can have a downside, since recently two stories in which The Post called out fake news had to be corrected (WP: 25-2, 14-1). The Post had falsely quoted Trump regarding a call that he made to an election investigator. “*Trump did not tell the investigator to ‘find the fraud’ or say she would be ‘a national hero’ if she did so*” (WP: 14-2). “*Instead, Trump urged the investigator to scrutinize ballots in Fulton County, Ga., asserting she would find ‘dishonesty’ there*” (WP: 14-3). He also told her that she had ‘the most important job in the country right now,’ reads the correction (WP: 16-4). This story landed on top of the uproar followed by Trump’s claims of a stolen election, especially because this resulted in other media outlets reproducing the story (WP: 16-5, 16-13, 16-14, 16-15). For this story The Post relied on a single source who was familiar with the call and spoke on the condition of anonymity, overruling The Post’s regular procedure regarding sources since: “*we prefer at least two sources for factual information in Post stories that depend on confidential informants, and those sources should be independent of each other*” (WP: 10-14, 16-9). Later, The Post acknowledged that using direct quotes from this source was wrong and said the significant mistake was unnecessary (WP: 16-18). Although this mistake could have been a failure of the multiple level structure for reviewing and editing, or a result of time pressure, it could well be the case that the attitude of actively knocking down fake news has (partly) led The Post to making this mistake. After all, Trump made many false claims regarding the elections and quotes like these could have definitely been made by him.

A second example regards COVID-19 and the origin of the virus. A theory put forward by Tom Cotton was called a ‘conspiracy theory’ and ‘debunked’ (WP: 25-2). Last year Cotton said the following: “*we don’t know where it originated, and we have to get to the bottom of that*” (WP: 25-4). Furthermore he stated: “*we also know that just a few miles away from that food market is China’s only biosafety level 4 super laboratory that researches human infectious diseases*”, thus suggesting a lab leak (WP: 25-4). Furthermore, the Chinese government was not really supporting and enabling a thorough investigation which was also questionable. Cotton’s statements did not seem to state the lab leak as a fact, moreover

he acknowledged the lack of evidence (WP: 25-5). Still The Post used the words ‘conspiracy theory’ and said it had been ‘debunked’ by experts and in their correction The Post states that these words have been removed because then and now, there was no determination about the origin about the virus (WP: 25-2). This raises the question why The Post used those words initially, considering there was a lack of information back then and even today, one year later. What was the motivation to call this theory a conspiracy and false claims by Cotton, when there is no evidence to disprove the theory? Furthermore, it raises the question why The Post wrote it had been ‘debunked’ by experts, without requesting the evidence that could back up those claims.

What the reasons for these two mistakes really were remains difficult to say. As previously said, these mistakes can be a result of: a failure of The Post’s multilevel structure for reviewing and editing, time pressure, and additionally the incorrect use of expert sources. However, in both instances the result was an overstatement of the information at hand by The Post which made the authors of the claims look worse initially compared to the corrected versions of the stories. With the background knowledge of The Post’s belief that fake news has to be knocked down (WP: 1-4), these mistakes seem to indicate that this aggressive attitude towards fake news leads to instances in which seemingly fake news is called out wrongly or incorrectly.

5. Conclusion

The research question that was formulated for this study is: *how and why do social and traditional media organizations govern fake news?* To answer this question, one social media and one traditional media organization have been compared in their governance of fake news. The organizations of interest were Twitter as a social media organization, and The Washington Post as a traditional media organization. This was studied in the light of the 2020 US elections and the COVID-19 pandemic during which fake news was spread on a large scale. To answer the descriptive part of this question, theory on corporate citizenship(CC) has been used to extract three dimension, namely: ‘commitment’, ‘structure and procedures’, and ‘interactive’. These three dimensions consisted of respectively two, six, and two indicators. To answer the explanatory part of this question, ‘regulation’ and the ‘attitude towards fake news’ have been analyzed as dimensions, which both consisted of two indicators. To study this, a deductive content analysis has been carried out, after which several categories have been added inductively.

It can be concluded that Twitter and The Washington Post indeed govern fake news differently. These differences were most observable regarding the ‘structure and procedures’ dimension, and more specifically the ‘policies and procedures’ indicator. Twitter has many policies and procedures in place which include elevating credible knowledge, labelling content, and removing content. In governing fake news, Twitter uses criteria to take appropriate measures. Twitter seems to rely mostly on technology for its governance of fake news, and is investing in machine-learning which gives hope for the future, especially since Twitter is currently unable to govern all of the fake news on their platform. The Post only relies human judgement by its journalists. Since governance of fake news happens by The Post’s journalists, the most important policies and procedures are capture in the code of conduct in which fairness plays an important role. Fairness includes: completeness, relevance, honesty, and diligently seeking comment when writing stories. Furthermore, the Post is actively fact-checking via The Fact Checker, while Twitter seems to rely more on other sources to do so.

Similar results were found for Twitter and The Post regarding the ‘commitment’ dimension. Both organizations showed strong commitment to providing credible information and governing fake news. The coordination of fake news governance happens mostly via the code of conduct for The Post, which is embedded at all levels of the organization, while at Twitter many departments cover some aspects of fake news governance.

Similar results were also found for Twitter and The Post regarding the ‘interactive’ dimension. Both organizations consider their stakeholders to be important and invite them to give feedback. Both organizations are participating in multiple collaborative GFN initiatives. Regarding The Post, this includes collaboration with experts, readers, and their large number of partnerships. Regarding Twitter,

this participation consists of: (1) on-platform collaboration with readers and trusted sources, and (2) off-platform collaboration with singular organizations and partnerships with multiple organizations.

Why the organizations of interest are governing fake news as they are, is best described by the ‘attitude towards fake news’ dimension. Twitter’s goal is to serve the public debate and protect this by using censorship if needed. Over the years, Twitter has improved their governance of fake news significantly. However, an exception to the Twitter rules is the public interest policy, which prevents content from being removed when it contributes to the understanding or discussion of a matter of public concern. It is this policy which enabled Trump to spread his false claims freely via Twitter during his presidency. This is in sharp contrast to The Post’s attitude towards fake news, since The Post sees it as their job to not only report factually, but also to knock down fake news. This is done by publishing articles in which these false claims are refuted. This aggressive approach of calling out fake news by The Post comes with a downside, considering the significant mistakes that have been made when doing so. The Post also sees Trump as one of the important spreaders of fake news, and believe he played a role in the erosion of trust by the public in traditional media outlets. Thus while The Post was actively fact-checking and refuting Trump’s false claims, Twitter’s policy protected his tweets including false claims from being removed because they considered his tweets to be important for the public interest, essentially enabling him to keep spreading fake news. This is a significant difference in the attitude towards fake news and beliefs on how to deal with high-profile fake news spreaders.

Finally, it can be concluded that these organization are dealing with different regulation. The Post and its journalists can be held liable for the spreading of false information following the First Amendment, which also applies to republishing false information that was initially published by others. Social media on the other hand are protected by Section 230 of the Communications Decency Act from being legally responsible for the content posted by users. Furthermore, this law gives social media the power and freedom to restrict access to or availability of material. The Post also seems to be regulated by its peers via industry self-regulation, considering their participation in many partnerships that promote press freedom, journalistic values, and quality reporting. Winning awards for outstanding journalism displays the acceptance of The Post’s journalistic practices by the industry. Regarding social media, very limited industry self-regulation seems to be happening, if any at all. Although sometimes similar actions are taken by peers, no standards, ethics, or common understanding regarding the governance of fake news were found.

6. Discussion

This chapter will consist of research implications for theory and practice, limitations and recommendations for further research, and a reflection on my role as a researcher.

6.1. Theoretical implications

First of all, this study contributes to our understanding of fake news governance. By comparing a social and traditional media organization, this study was able to uncover some of the differences in governance approach, as well as the underlying considerations for their decisions. This is essential, considering the increasing threat of fake news to organizational legitimacy the embeddedness of fake news in today's media ecosystem. Since both organizations acknowledge the need for collaboration in governance of fake news, understanding of each other's practices and attitudes is a fundamental condition. From the governance challenges displayed by Syed (2017), the challenge regarding the speed of sharing was confirmed by this study, since Twitter focuses on dealing with fake news that gets a lot of attention quickly. The increasing importance of social media organizations in governing fake news as displayed by the study of Horne (2021) was confirmed by this study in two ways. First, because of Twitter's significant increased efforts to govern fake news, and secondly because of The Post's statements that social media have a key position in governing fake news. This study confirms the need for regulatory oversight or codes of conduct for social media organizations, in line with Napoli (2015), by indicating the regulatory differences between social and traditional media organizations. The notion that fake news has become a two dimensional phenomenon can be confirmed by this study. In line with what Egelhof and Lecheler (2019) described, The Post's stated that their work was discredited as fake news by Trump for example, and that they recognized the existence of websites actively publishing fake news, which relates to fake news as a genre.

Second, this study contributes to the theory on corporate citizenship, by applying the work of Baumann-Pauly and Sherer (2013) to assess governance of fake news. Governance of fake news was considered as a distinct corporate citizenship issue for media organizations and therefore adopted the dimensions and indicators of Baumann-Pauly and Sherer (2013) as a basis for the deductive content analysis. The dimensions and indicators of Baumann-Pauly and Sherer (2013) gave a valuable insights for the explanatory aspect of this study, showing 'how' organizations govern fake news. Considering the fact that no specific data was found regarding the 'incentive structures' and 'training on GFN principles' for both organizations, and the development of two inductive categories, this study contributes to the further development of theory on corporate citizenship by indicating the need for adaptation when studying distinct issues of corporate citizenship.

Third, this study contributes to regulatory theory by studying what governmental and non-governmental regulation the organizations of interest are dealing with in the specific context of fake news governance. The findings suggest that social media organizations, in contrast to traditional media

organization, show very limited industry- self regulation. Actions regarding the governance of fake news that are taken by social media organizations seem to be happening independently, without collaborating which indicates that currently only individualized self-regulation is happening.

Finally, this study contributes to a lesser extent to the theory of Schwoon et al.(2021), by studying the governance of fake news at a traditional media organization that has applied the strategy of profit seeking through quality journalism. Although their work focuses on a different governance issue on platforms, this study can give insights in how and why traditional media organizations that are using this particular strategy are governing threats to organizational legitimacy.

6.2. Practical implications

The goal of this study was to contribute to our understanding of how media organizations dealing with the issue of fake news. following the analysis, several relevant practical implications can be distinguished.

First, the lack of industry-self regulation regarding social media presents a significant opportunity to improve fake news governance. While currently similar actions might be take sometimes regarding the governance of fake news, very little cooperation seems to be there. Especially when comparing this to the strong code of conduct in that regulates traditional media, social media can improve their governance of fake news significantly. As described by Gunningham and Rees (1997), cooperation is needed in order to regulate the industry's behavior, which regarding the governance of fake news could benefit the entire industry.

Second, it was displayed that the traditional media organization in this study puts significant effort into fact-checking, while the social media organization mostly seems to rely on partners to do so. Further cooperation between social and traditional media in fake news governance, for example regarding fact-checking is therefore highly suggested.

Third, This study showed why it is important for media organizations to be aware of their attitude and the policies and practices following their attitude and perhaps reconsider their policies and practices. Social media organizations should reconsider making exceptions of policy violations for public figures, since this can devaluate other measures that have been taken, and can enable public figures to exploit this exception to spread fake news structurally. Traditional media organizations on the other hand should be aware of the risks that come with calling out fake news. Even when certain outlets are known for spreading fake news, one should refrain from allowing this frame to have an impact on one's reporting. When failing to do so, this can have a the opposite effect of what was intended, namely spreading false information yourself.

6.3. Limitations and recommendations

The aim of this study was to get insight in how media organizations are governing fake news and why they do so, in order to contribute to our understanding of how media organizations are dealing with this increasing threat to organizational legitimacy. To study this, a content analysis has been carried out. It is relevant to indicate some limitations of this study.

First, the methods that have been used bring some limitations. The decision for a content analysis limits this study to analyzing publicly available data, which influences results. This entails that some of the documents in the analysis are published by the organizations itself, which implies negative aspects of the governance of fake news by the organizations are less likely to be found. Furthermore, in the case of social media it could be that they are holding back technological information regarding the governance of fake news which offers them a competitive advantage. The results of a content analysis depend on the researchers ability to find the relevant information, and the researcher's ability to objectively review what data should be included in the analysis. This is somewhat paradoxical, since the researchers cannot know what information lies outside of his search attempts. This study tried to deal with this accordingly, by using multiple search engines in which different combinations of wording have been used to find information. Furthermore, the use of a content analysis can prevent the analysis from going really deep into the material, which interviews are more likely to offer.

Second, the use of preexisting categories extracted from theory prevents this study from discovering unexpected or new insights. The deductive dimensions and indicators steer the documents that are searched and analyzed quite heavily. Although this is inherent to the approach of this study, it is important to be aware of this when interpreting the results of this study. In line with the goal of getting inside in how and why media organizations are dealing with fake news, this study tried to deal with this by enabling the development of new categories from the coded material that did not fit the initial indicators, but was considered to be relevant.

Third, the decision for the case in this study has limitations. First of all, the choice for the United States as a case heavily influenced the results. It is important to acknowledge that studying fake news governance in another country could have led to significantly different results. The sole presence of Trump and the governance of fake news as a result of his actions should not be underestimated. Considering the use of only one social and one traditional media organization, the results depend a lot on which organizations have been chosen. Finally, the decision for limiting the reach of this study mostly to data that has been published in 2020 and 2021, can exclude relevant information that has been published earlier.

Following the results of this study and its limitations, a few recommendations for future research can be made. First of all, this study could be used as a starting point to examine the organizations of interest in depth with the use of interviews. Furthermore, it would be relevant to study other social and

traditional media organizations in a similar research context, to get a broader view on governance of fake news. Stepping away from the US, studying different regions would be interesting. The results of this study indicated limited self-regulation by the social media sector regarding fake news governance, which makes this interesting for future research.

6.4. Reflexivity

In this final paragraph it is relevant to reflect on my role as a researcher during the research process. At the very beginning of the thesis trajectory I did not have a specific topic in mind which I really wanted to study. However, when I became aware of the possibility to study fake news, this immediately drew my attention. I think I could be described as a critical thinker, which is one of the reasons why I am interested in the issue of fake news. When everyone claims 'A' is correct and 'B' is false, I do not believe it immediately, instead I like to find out myself. Especially cases in which the mass ended up being wrong have interested me to study the governance of fake news. Since the issue of fake news was studied in the light of the US elections, with Trump as a key figure, it is important to acknowledge the fact I as a researcher also have political opinions. Although I have tried to be as objective as possible during this research, it is important to acknowledge that my political opinions might have influenced this study unwillingly.

Since the case in this study was purely focused on the United States, and therefore American organizations it could be argued that some of the cultural context of the data is not captured because I am a Dutch. Although I have lived in a similar cultural context in Canada, I am aware of the fact that this could indeed have influenced the data analysis and perhaps the findings, particularly regarding the explanatory aspect of this study.

Finally, it is important to acknowledge that the research process did not go as smoothly as planned. A lack of productivity, as a result of a lack of personal motivation and lockdown circumstances led to quite some time pressure to finish this study. Although I have tried to perform the entire process adequately, I am aware that this has an impact on this study.

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Appendix 1: Codebook content analysis

Regulation	Government regulation	Non-governmental regulation

Commitment	Strategic integration/Leadership	Coordination

Structure and procedures	Policies and procedures	Incentive structures	Training on GFN requirements	Complaints procedure	Evaluation of

Interactive	Stakeholder relationships	Level of participation in collaborative GFN initiatives

Attitude: towards fake news	Free speech	Censorship

Appendix 2: Coding results Twitter

Commitment	Strategic integration/Leadership support	Coordination
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	Strong commitment and leadership support: Strong commitment and leadership support to facilitate the public conversation by providing credible information. Transparency, understanding and trust are key principles for Twitter. (Codes: All)	Integration rather than coordination: This study was not able to discover the existence of a team that solely focuses on the issue of fake news within Twitter. Instead, the documents showed that multiple departments (Global Public Policy team, Global Trust& Safety team, Transparency Center, Trust and Safety Council, Site Integrity, Ethics and compliance program(regarding employees)) have integrated aspects related to the governance of fake news in their activities. (Codes: All)

Structure and procedures	Reporting on GFN	Incentive structures	Training on GFN requirements	Complaints procedure
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	Limited reporting on GFN In 2021 the first global impact report was published. This contained some information of GFN challenges and general information regarding the procedures and policies and investments. No separate GFN report. However, Twitter does communicate its policy changes and evaluation, sometimes including data.	No GFN specific data. No specific data was found on GFN and incentive structures. General training: Code of Business Conduct & Ethics, since Twitter believes everything should be measured against the highest standards of ethical business conduct.	No specific data on training on GFN requirements. No specific training programs on GFN were found in the data. General/mandatory training: regarding code of conduct (codes 8,9,10)	Complaints procedures in place. 2 types of complaints procedures are in place: <ul style="list-style-type: none"> - Reporting fake news To enable users to report fake news they see on the platform (codes 1,3,5) - Appeal against GFN decisions (codes 2,4,6,7) To enable users to appeal against decisions that were made against them: warning labels, removal of tweets, etc.

Evaluation of GFN implementation	Policies and procedures	Internal development (inductive)
<p>Regular evaluation of GFN, to ensure GFN is effective against new challenges.</p> <p>This is an iterative process in which rules and policies continuously evolve. This is done via the monitoring of the conversation on the platform including data, as well as a reflection of the context and world in which Twitter is operating. (<i>summary of all codes</i>)</p>	<p>4 ways of governing fake news</p> <p>1. Elevating credible information (<i>codes 20,23,28,29,36,39,40,41,43,44,46</i>)</p> <ul style="list-style-type: none"> -Twitter moments -Events page -Increasing visibility of credible information -Information Hubs in the explore tab -Search prompts -Increasing visibility of autorotative sources on public health(COVID-19) Elections specific: <ul style="list-style-type: none"> -Candidate labels -Government labels -Election hub -Live streams of election events -News and resources state by state <p>2. Labelling content (<i>codes 2,3,4,5,6,7,9,10,11,19,24,25,26,45,47</i>)</p> <ul style="list-style-type: none"> -Warning before sharing or liking -Turn off ability to reply, retweet, or like -Reduce visibility of content -Provide link to additional information or explanation/clarification <p>3. Removing content (<i>codes 1,3,5,8,9,10,11,12,15,17,26,38,45</i>)</p> <ul style="list-style-type: none"> -Tweet deletion -Profile modifications -Permanent suspension of accounts 	<p>This category consists of codes that did not fit well enough in one of the six indicator. Considering the technological nature of GFN, these codes are the closest to training in my opinion. For example the machine-learning could be argued to as self-training/ self-development. The most fitting name for this indicator in my opinion is 'Internal development' and gives insight in the efforts of Twitter to improve its GFN.</p> <p>Internal development</p> <ul style="list-style-type: none"> -Investing in human capacity <i>codes (1,6)</i> - Investing in resources <i>codes (1, 6)</i> -Building new tools and processes <i>codes (1,4,5,8,9)</i> -Machine-learning <i>codes (2,3, 6, 7)</i>
	<p>4. User control (<i>codes 33, 35</i>)</p> <ul style="list-style-type: none"> -Hide replies -Block -Mute -Reply filters -Other non- specified tools -Media literacy guide <p>-----</p> <p>Consequences of violations: (<i>codes 13,14,16,18,21,22,27,34,42</i>)</p> <ul style="list-style-type: none"> -Depend on severity and type of violation -Account history of previous violations -Focus on real-world harm <p>Strike system for repeated violations of twitter policies:</p> <p>1 strike: No account-level action 2 strikes: 12-hour account lock 3 strikes: 12-hour account lock 4 strikes: 7-day account lock 5 or more strikes: Permanent suspension</p>	
	<p>Use of criteria : (<i>codes 5,30,37</i>)</p> <p>1. Criteria to consider tweets and media for labeling or removal:</p> <ul style="list-style-type: none"> -First, are the media synthetic or manipulated? -Second, are the media shared in a deceptive way? -Third, is the media likely to impact public safety or cause serious harm? <p>2. COVID-19 criteria to consider removal:</p> <p>1. Is the content advancing a claim of fact regarding COVID-19? 2. Is the claim demonstrably false or misleading? 3. Would belief in this information lead to harm?</p> <p>-----</p> <p>By what means if fake news governed? (<i>codes 31,32,48</i>)</p> <p>Use of technology:</p> <ul style="list-style-type: none"> -Surfacing content that's most likely to cause harm -Proactively identify rule-breaking content -Challenge accounts automatically -To determine altered of fabricated media. <p>Manually:</p> <ul style="list-style-type: none"> -Reviewing content 	

Interactive	Stakeholder relationships	Level of participation in collaborative GFN initiatives
<p>Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents</p>	<p>Stakeholder relationships very important</p> <p>Stakeholder relationships are regarded as important, which is well captured by the following code: <i>“We are committed to sound corporate governance and strong ethics and compliance practices, which promote the long-term interests of our stakeholders”</i>. Twitter beliefs they have a broad responsibility to their users, stakeholders, and the world. Stakeholders are informed about updates and invited to give constructive feedback. <i>(Summary of codes)</i></p>	<p>Participation in multiple collaborative GFN initiatives.</p> <p>Two types of collaborative GFN initiatives can be distinguished:</p> <p>1. On platform:</p> <ul style="list-style-type: none"> -Making trusted sources highly visible on the platform to inform the public -Using trusted sources to review content. -Community-driven GFN initiative(Birdwatch) <p>(codes: 2, 3, 4, 5, 6, 7, 8, 9,10 11, 12, 13,14, 15, 16, 29, 32, 33, 36, 37, 38)</p>
		<p>2. Off-platform</p> <p>Collaboration: (codes 17, 18, 21, 22, 34 ,35)</p> <ul style="list-style-type: none"> -Working together with other companies -Supporting GFN initiatives <p>Partnership in collective organizations (codes, 19, 20,23, 24,25,26,27,28,30,31)</p> <ul style="list-style-type: none"> -International fact-checking network -Coalition for Content Provenance and Authenticity (C2PA) -Content Authenticity Initiative (CAI) -Civic engagement organizations -Digital Trust and Safety Partnership

Attitude: towards fake news	Free speech	Censorship
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	<p>Public conversation and freedom of speech very important.</p> <p>Twitter cares deeply about the issue of fake news and its potentially harmful effect on public discourse. Their goal is to find the balance between empowering freedom of expression and creating a safe service to participate in the debate. Policies are in place to encourage healthy informed and vibrant dialogue, while cultural context is taken into account. This applies to discussions about COVID-19, as well as the elections. Incorrect information is mostly allowed as long as this is not states as facts. Examples regarding COVID-19 that showcase Twitter's ambition to facilitate public and debate and free speech are: allowing strong commentary or satire, counter speech, personal anecdotes, and public about COVID-19 science and research. <i>(summary of codes)</i></p>	<p>Censorship to protect the public debate.</p> <p>In order to have an informed debate, and let credible information flourish on their platform, Twitter decides to prohibit certain content. See 'policies and procedures' for more information on how they do this. In censoring content, the main focus is on preventing harm, especially real-world harm. Furthermore Twitter prohibits political advertising with the belief that "political message reach should be earned, not bought" (Quotes: 1-8+21-10). Advertising regarding COVID-19 is allowed under certain circumstances. Twitter banned the promotion of medical masks and hand sanitizers to prevent inflation of prices globally. Despite its efforts Twitter states that it cannot take action on every Tweet that contains incomplete or disputed information. <i>(summary of codes)</i></p>
	<p>Public interest policy</p> <p>This entails content that violates rules but is not removed, since it contributes to understanding or discussion of a matter of public concern. Among others, this entails government officials and therefore Donald Trump. In situations in which violation happens: "we weigh the potential risk and severity of harm against the public interest value of the tweet. Where risk of harm is higher and/or more severe, we are less likely to make an exception(Quote: 27-6)." However, there are exceptions, such as tweets about: terrorism, violence, suicide. This explains why Trump was allowed on the platform, while 36 of his 100 most popular tweets contained election falsehood. <i>(codes 1,6,7,8,9,26,27,28,29,30)</i></p>	<p>Censorship over the years</p> <p>- Twitter's attitude towards fake news in 2017 was the following: "We as a company, should not be the arbiter of truth"(Quote 10-3). - In May 2020, Twitter added links with additional information to two of Trump's tweets for the first time. - At the moment, Trump has been banned from Twitter and many new policies have been established on Twitter from 2020 up until now. <i>(summary of codes)</i></p>

Regulation	Government regulation	Non-governmental regulation
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	<p>1. Section 230 (47 U.S.C. § 230)</p> <ul style="list-style-type: none"> - Protects social media from being legally responsible for what their users post - Gives social media the power to restrict access to or availability of material. (Codes: 4,6,7,8,9,10,11,12,13,14,15) <p>2. Political pressure to reform this internet law, from both the Democratic and Republican Party. (Codes: 1,2,3,5,16,17,18)</p>	<p>1. Limited industry self-regulation by social media organizations: Although sometimes similar actions are taken, no collaborative decisions or industry standard (Codes: 1,2,3,4,5,7,8,9,10,11,)</p> <p>2. To come: cross-industry collaboration in CAI and C2PA, working on design digital standards. (Codes: 12,13,14,15)</p> <p>3. Regulation by partnerships and stakeholders (Codes: 6,14,16,17,18)</p> <ul style="list-style-type: none"> - Santa Clara principles - Partnerships see indicator: 'level of participation in collaborative GFN initiatives' - Stakeholder pressure: society and traditional media

Appendix 3: Coding results The Washington Post

Commitment	Strategic integration/Leadership support	Coordination
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	<p>Governance of fake news is the core element of The Post.</p> <p>The Post sees it as their mission and responsibility to get credible knowledge to their readers and really combat fake news. <i>"We should not be an activist for anything except fact and truth"</i> (Quote 20-22) captures their commitment well. In doing so, the post tries to be as transparent as possible.</p> <p>Leadership support is very strong. (summary of codes)</p>	<p>Coordination by code of conduct and ethics.</p> <p>Code of conduct embeds the GFN practices in the daily activities of the post. These practices are embedded at all levels of the organization, from reporters up to the executive editor. Therefore, no coordination from one specific point in the organization. (summary of codes)</p>

Structure and procedures	Policies and procedures
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	<p>Fairness as key practice, which includes (codes 5,6,7,8,9,14,15,16,32,33,58,59,60)</p> <ul style="list-style-type: none"> - completeness. - relevance. - honesty — leveling with the reader. - diligently seeking comment and taking that comment genuinely into account. <p>Separation between type of publication to clarify for the readers: (codes 11,12)</p> <p>Analysis: Interpretation of the news based on evidence, including data, as well as anticipating how events might unfold based on past events</p> <p>Perspective: Discussion of news topics with a point of view, including narratives by individuals regarding their own experiences.</p> <p>Opinion: A column or blog in the Opinions section.</p> <p>Review: A professional critic's assessment of a service, product, performance, or artistic or literary work</p> <p>Multilevel structure for reviewing and editing, which includes fact-checking: (codes 18,19,20,21,27,31,47)</p> <p>1. Assignment editors (department heads, their deputy editors and assistant editors) who collaborate with reporters on the origination of stories and typically provide initial review when a story is submitted by a reporter;</p>
	<p>2. multiplatform editors (also called copy editors) who often provide initial review on breaking news stories and routinely provide second-level review on print and other less-time-sensitive stories;</p> <p>3. senior editors who have overall oversight of the daily and weekend report for digital publication throughout the day as well as The Post's print editions.</p> <p>The number of editors who review a story varies depending on a range of factors, including complexity, sensitivity and the pressure of time</p> <p>Policy regarding unnamed sources: (codes 22,23,24,25,26,27,28,29,30,31,32)</p> <ul style="list-style-type: none"> - Named sources are preferred to unnamed sources - Granting anonymity not done casually - Weighing benefit against cost of credibility - Editors obligation to know identity - Two sources preferred if sources are confidential.
	<p>The Fact Checker: (codes 36,37,38,39,40,41,47, 55)</p> <p>The purpose is to "truth squad" the statements of political figures regarding issues of great importance, be they national, international or local.</p> <p>Fact checker principles:</p> <ul style="list-style-type: none"> - Interested in facts only - Focus our attention and resources on the issues that are most important to voters - Strive to be dispassionate and non-partisan, drawing attention to inaccurate statements on both left and right - Stick to the facts of the issue under examination and are unmoved by ad hominem attacks - Consider the reach and importance of possible fact checks, using the quotes of politicians as a jumping-off point for an examination of policy issues - Adopt a "reasonable person" standard for reaching conclusions. We do not demand 100 percent proof - Committed to being transparent about our sources. we provide links to sources so readers can verify the information themselves

<p>Fact check labels: (codes 41,42,43,44,45,46,55,56,57)</p> <p>1. One Pinocchio Some shading of the facts. Selective telling of the truth. "mostly true."</p> <p>2. Two Pinocchios Significant omissions and/or exaggerations. Some factual error may be involved but not necessarily. "half true."</p> <p>3. Three Pinocchios Significant factual error and/or obvious contradictions "mostly false". could include statements which are technically correct but are so taken out of context as to be very misleading.</p> <p>4. Four Pinocchios Whoppers (blatant lie)</p> <p>5. The Geppetto Checkmark: Statements and claims that contain "the truth, the whole truth, and nothing but the truth" will be recognized with our prized Geppetto checkmark claims that are unexpectedly true, so it is not awarded very often.</p> <p>6. An Upside-Down Pinocchio: A statement that represents a clear but unacknowledged "flip-flop" from a previously-held position</p>	
<p>7. Verdict Pending when it is impossible to render a snap judgment because the issue is very complex or there are good arguments on both sides, we will withhold our judgment until we can gather more facts.</p> <p>8. Bottomless Pinocchio: Claims must have received Three or Four Pinocchios from The Fact Checker, and they must have been repeated at least 20 times.</p> <p>Guide to manipulated video (codes 48,49,50,51,52,53)</p> <p>1. MISSING CONTEXT: - Misrepresentation Presenting unaltered video in an inaccurate manner misrepresents the footage and misleads the viewer - Isolation Sharing a brief clip from a longer video creates a false narrative that does not reflect the event as it occurred</p> <p>2. DECEPTIVE EDITING: - Omission Editing out large portions from a video and presenting it as a complete narrative, skew reality - Splicing Editing together disparate videos fundamentally alters the story that is being told.</p>	
<p>3. MALICIOUS TRANSFORMATION - Doctoring Altering the frames of a video — cropping, changing speed, using Photoshop, dubbing audio, or adding or deleting visual information - Fabrication Using Artificial Intelligence to create high-quality fake images simulates audio and convincingly swaps out background images.</p> <p>Comment sections are governed by the discussion and submission guidelines</p>	

Incentive structures	Training on GFN requirements	Complaints procedure	Evaluation of GFN implementation
No specific data regarding incentive structure and GFN was found.	No specific data regarding training on GFN requirements was found.	<ol style="list-style-type: none"> 1. Possible to address missed information 2. Possible to address mistakes 3. Take down request (exceptional) 	Code of conduct as a 'living document' Code of conduct, which is the basis for most GFN practices, is continually modified and updated based on feedback from Post journalists, readers and the Post's perception of changing needs. Furthermore, a fact check is never really finished according to The Post, meaning evaluation of articles takes place when additional information is available. (summary of codes)

Reporting on GFN	Inductive: correction procedure
<p>Report on IFCN principles</p> <p>Since The Post is a signatory to the fact-check principles of the IFCN, they are producing a public report each year indicating how they have lived up to each of those five principles</p>	<p>During the coding process, quotes related to corrections were found. Since corrections are performed after publishing incorrect information, this did not seem to fit in the 'policies and procedures' indicator. Corrections are often a result of complaints, but considered to be happening after the complaints procedure is finished. Therefore the correction procedure was made into a separate indicator.</p> <p>Corrections to tell readers as clearly as possible what was wrong and what is correct. In doing so, readers are welcome to submit correction requests.</p> <p>3 types of corrections for significant mistakes:(codes 1,2,3,4,5,6) Corrections: If we are substantively correcting an article, photo caption, headline, graphic, video or other material, we should promptly publish a correction explaining the change</p>
	<p>Clarifications: When our journalism is factually correct but the language we used to explain those facts is not as clear or detailed as it should be, the language should be rewritten and a clarification added to the story. A clarification can also be used to note that we initially failed to seek a comment or response that has since been added to the story or that new reporting has shifted our account of an event</p> <p>Editor's notes: A correction that calls into question the entire substance of an article, raises a significant ethical matter or addresses whether an article did not meet our standards, may require an editor's note and be followed by an explanation of what is at issue. A senior editor must approve the addition of an editor's note to a story</p> <p>Other corrections policies(code 7) - When an error is found by a reader and posted to the comment stream, the audience engagement team should indicate in comments that it has been corrected.</p>
	<p>List continued:</p> <ul style="list-style-type: none"> - If we have sent out incorrect information in an alert, we should send out an alert informing people that the news reported in the earlier alert was wrong and give readers the accurate information. - When we publish erroneous information on social networks, we should correct it on that platform. - We do not attribute blame to individual reporters or editors (e.g. "because of a reporting error" or "because of an editing error"

Interactive	Stakeholder relationships	Level of participation in collaborative GFN initiatives
<p>Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents</p>	<p>Stakeholders are very important to The Post. As shown in the commitment dimension, it is clear that the goal of The Post is to inform the public with credible news. A basic principle is to be as transparent as possible towards their readers and put the reader's interest first. Furthermore, stakeholders are invited to give tips, suggestions, or complaints. The Fact Checker operation is a good example which shows The Post's commitment to their stakeholders, by working for them. <i>(summary of codes)</i></p>	<p>Participation in multiple collaborative GFN initiatives Collaboration with experts who provide:<i>(codes 1,2,3)</i></p> <ul style="list-style-type: none"> -Context for stories -Make interpretive points -Offer judgements about subjects <p>Collaboration with readers<i>(codes 4,5,6,7,8,9,)</i></p> <ul style="list-style-type: none"> -Input for The Fact Checker -Input for corrections <p>The Post has many partners who directly or indirectly can be regarded as collaborative GFN initiatives:<i>(codes 10 till 24)</i></p> <ul style="list-style-type: none"> -International Fact-Checking Network at the Poynters Institute: collaboration of 10 U.S. fact-checking organizations with two major Spanish-language news broadcasters to fight mis/disinformation during a presidential campaign. -Committee to Protect Journalists: defends the right of journalists to report the news safely and without fear of reprisal -International Press Institute is a global network of editors, journalists and media executives who share a common dedication to quality, independent journalism.
		<p>list continued:</p> <ul style="list-style-type: none"> - James W. Foley Legacy Foundation focuses on American hostage freedom, protection of independent conflict journalists, and education of the public and university students regarding these silent crises. -National Press Club is the world's leading professional organization for journalists, and a tireless advocate for press freedom around the globe. -One Free Press Coalition is standing up for journalists under attack for pursuing the truth. -Reporters Committee for Freedom of the Press defends the legal rights of journalists – because an informed public is essential to a strong democracy -Reporters Without Borders defending press freedom and freedom of information for nearly 35 years. -Aspen Digital empowers to be responsible stewards of technology and media in the service of an informed, just and equitable world

Attitude: towards fake news	Dimension level: Attitude towards fake news	Free speech
Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents	<p>These codes were found to be directly relevant for the dimension level of attitude towards fake news, instead of belonging to an indicator.</p> <p>Fake news has to be knocked down. Fake news is considered to be a really big problem for The Post. The Post considers it to be not only their job to report the factual news, but to knock down the fake news. This is definitely shown in their approach towards Trump and the Republican Party in general, although they recognize that fake news exists on the right and on the left. Their approach to fake news is calling it out actively by publishing articles about it and refuting the false claims. Although they already seem to be quite aggressive in calling out fake news they think they have to be even more forthright in doing so. (codes 1,2,3,4,5,6,7,8,9, 39,40,41)</p> <p>However, recently two stories in which The Post called out the fake news had to be corrected: 1. The Post falsely quoted Trump regarding a call he had made to an election investigator in which, based on a single confidential source.</p>	<p>"We believe in the widest possible dissemination of information" In line with the codes at the dimension level of attitude towards fake news, The Post tries to combat fake news by publishing about it themselves, and they try to shed light on controversies by doing so. Although The Post does not want to give people who are disseminating fake news too much attention, they believe that when they are fulfilling important positions in politics, The Post has an obligation to cover it. (summary of codes)</p>
	<p>Trump did not tell the investigator to 'find the fraud' or say she would be 'a national hero' if she did so. Trump urged the investigator to scrutinize ballots in Fulton County, Ga., asserting she would find 'dishonesty' there. He also told her that she had 'the most important job in the country right now,'" reads the correction.</p> <p>2. A theory put forward by Tom Cotton was called a 'conspiracy theory' and 'debunked'. This regarded the origins of COVID-19 about which Cotton said the following: "We don't know where it originated, and we have to get to the bottom of that,". Furthermore he stated: "We also know that just a few miles away from that food market is China's only biosafety level 4 super laboratory that researches human infectious diseases", thus suggesting a lab leak. Despite Cotton's acknowledgement of a lack of evidence, the Post as said used the words 'conspiracy theory' and 'debunked' it following claims of experts. The correction reads: "debunked" and The Post's use of "conspiracy theory" have been removed because, then as now, there was no determination about the origins of the virus. This indicates that the aggressive approach to fake news can have a downside. (codes 10 till 38)</p>	

Free speech	Censorship	Inductive: opposition against mainstream media	Inductive: challenges due to the internet
<p>"We believe in the widest possible dissemination of information"</p> <p>In line with the codes at the dimension level of attitude towards fake news, The Post tries to combat fake news by publishing about it themselves, and they try to shed light on controversies by doing so. Although The Post does not want to give people who are disseminating fake news too much attention, they believe that when they are fulfilling important positions in politics, The Post has an obligation to cover it. (summary of codes)</p>	<p>Very limited.</p> <p>-Take down requests accepted if the person is under threat or physical harm because of the material</p> <p>-Not cover false claims that have received little attention online, since they don't want to elevate it.</p> <p>-No censorship to people that make false claims, instead they are given ample opportunity to argue their case. (summary of codes)</p>	<p>These codes were found to be very relevant for The Post's attitude towards fake news, but did not fit well in the indicators 'free speech' or 'censorship'. Therefore a new indicator was made. During the coding process codes appeared that showed that The Post experiences hostility or resistance towards them. This indicator has therefore been named 'Opposition against mainstream media'</p> <p>Increasing opposition against mainstream media</p> <p>The ebb in terms of trust in mainstream media is low in general according to The Post. Furthermore, The Post experiences that an increasing amount of people actually see mainstream media as an opponent. Conspiracy thinkers, controversial media outlets and Trump play a role in this development. An important problem according to The Post is that such a thing as 'a fact' does not exist to them, devaluing the work of The Post which is driven by facts. This is considered to be a big problem to The Post, since it prevents from having any discussion about topics. (summary of codes)</p>	<p>Following the quotes it appeared that The Post was struggling with the spreading of fake news via the internet and social media. Therefore this indicator has been added.</p> <p>Increasing challenges to GFN because of the internet</p> <p>Social media and the internet in general are seen as a large problem. The context that a newspaper offers is lacking online, which makes it hard to distinguish correct information. The fact that information can be freely shared online, including fake news makes it hard for The Post's legitimate reporting to stand out. Although being somewhat sympathetic towards social media, they have to face the fact that they are a media company and take responsibility according to The Post. News literacy is needed to navigate the new information landscape. (summary of codes)</p>

Regulation	Government regulation	Non-governmental regulation
<p>Codes refer to the numbers in the initial codebook, not to the quotes in the analyzed documents</p>	<p>The First Amendment</p> <p>1. Protects the rights of journalists to perform their job and therefore enables the governance of fake news.</p> <p>2. At the other hand, journalists and news organizations can be liable for publishing fake news. Defamation is when a false statement is presented as a fact and causes harm to the subject/plaintiff. More specifically, libel is relevant in the case of The Post, since this regards the writing (paper or digital) of false information presented as a fact, while slander only refers to statements made orally. Defamation isn't limited to the initial publisher, instead it extends to who republishes the false information. (summary of codes)</p>	<p>Self-regulation by the press</p> <p>This code of conduct seems to be in line with general/widely accepted standards of journalism. Furthermore The Post is directly regulated by its partnerships:</p> <ul style="list-style-type: none"> -Signatory to IFCN code of principles -National Press Club -One Free Press Coalition -WAN-IFRA -Other partnerships less directly related to GFN see: 'level of participation in collaborative GFN' indicator. <p>Furthermore It received awards for outstanding journalism, confirming the acceptance of its conduct. Eroded trust in the media in the changing media environment (summary of codes)</p>