

3

Building trust in public communication to succeed in a complex information ecosystem

This chapter discusses the complex information ecosystem in which communicators operate. It proposes recommendations to strengthen the function as a trustworthy source of information against the spread of polarising and false content. The function must be trustworthy to be able to effectively support policy objectives and combat mis- and disinformation. The analysis stresses the risks posed by perceived politicisation and the disproportionate focus on managing a few politically influential media. It proposes measures to strengthen guidance on impartiality and introduce oversight mechanisms as safeguards. In a similar vein, it raises considerations for reinforcing ethical standards that can reassure the public about legitimate uses of new technologies and communication methods. The chapter also discusses the UK government's evolving range of responses to the proliferation of mis- and disinformation. It acknowledges the role of public communication as integral to multi-disciplinary interventions, both domestically and internationally. It highlights the growing focus on pre-emptive actions, such as in Russia's war of aggression in Ukraine, to highlight practices that can be strengthened in this dynamic field.

This *Scan*'s first two chapters emphasised opportunities for public communication to contribute to greater policy impact, improved outcomes for citizens, and more constructive dialogue and engagement. However, as ambitions and expectations for the function grow, the communication environment is becoming more challenging than ever.

Public discourse, the media, and political rhetoric have grown increasingly fragmented and polarised in many democracies such as the UK (More in Common, 2021^[1]; Matasick, Alfonsi and Bellantoni, 2020^[2]; Norris, 2022^[3]; Newman et al., 2022^[4]). Fringe views are amplified over moderate ones by social media algorithms, and, along with mis- and disinformation, they pollute the public sphere where democratic societies form opinions and debate policy questions (More in Common, 2021^[1]; Matasick, Alfonsi and Bellantoni, 2020^[2]). The challenges of the information ecosystem are fuelled by and deepen a persistent lack of trust and social cohesion. These problems underpin a broader threat to the resilience of democracies, recognised by the OECD's initiative on Building Trust and Reinforcing Democracy (OECD, 2022^[5]).

While this can make public communication's tasks difficult to achieve, it also makes the function's success all the more urgent. Effective, citizen-centred public communication can help build trust in democratic institutions by ensuring and demonstrating that the government is reliable, responsive, open and fair.¹ It is an essential asset to prevent and counteract mis- and disinformation, along with other governance responses (OECD, 2022^[6]). As described in the preceding chapter, it can be leveraged as an important vehicle for dialogue and participation, the lack of which the OECD Trust Survey (2022^[7]) finds is at the heart of citizens' frustrations with their governments (see Box 3.1).

This chapter outlines how the UK is navigating this difficult context and addressing the issues of declining public trust in both institutions and information at large. The first part of this chapter calls for continued efforts to ensure high ethical standards in public communication. This is essential for maintaining the function's social licence to apply new technologies and methods responsibly. This requires rethinking the complex relationship between public and political communication and the media, which is vulnerable to underlying socio-political tensions in the UK as played out in the information space.

UK government communicators have made important efforts to manage the impact of mis- and disinformation² through targeted communication interventions, especially with regards to foreign threats. The second part of the chapter looks at how institutions took on board the lessons of the pandemic and built greater resilience against mis- and disinformation. Such resilience will remain crucial to supporting fact-based public debate, rebuilding trust in information, and increasing the efficacy of public communication to change behaviour or perceptions for the public good.

Navigating a complex information ecosystem in a climate of low public trust

The OECD has recognised that “the resilience of our democratic systems comes from the open public debate they foster” (OECD, 2022^[7]). In the UK, like many other OECD members, the space for such open debate has been occupied by polarising narratives, and mis- and disinformation, which have resulted in growing public disengagement from political and civic participation. These are related, self-reinforcing elements in the UK's public communication environment.

The Edelman Trust Barometer (Edelman, 2023^[8]) characterised the UK as being “in danger of severe polarisation” based on public perceptions of how acute and entrenched social divisions are. About half of respondents in another survey claimed that “they had never seen the country so divided” (Juan-Torres, Dixon and Kimaram, 2020^[9]). New social and cultural fault lines are forming in this trend. For example, studies on affective polarisation³ in the UK public have found that identification with either side of the Brexit referendum supersedes party-political affiliations (Duffy et al., 2019^[10]; Curtice, 2018^[11]). Combined with a

divisive media landscape that often sets the tone for public discourse, these tensions make it difficult to promote constructive debates on important policy issues.

Box 3.1. Measures of public trust in key institutions in the UK and in the OECD

The OECD's focus on understanding and measuring trust is based on the premise that "trust is an important indicator to measure how people perceive the quality of, and how they associate with, government institutions in democratic countries" (OECD, 2022^[7]). Many established democracies, including the UK, have experienced relatively low levels of public trust in government dating back to the 2008 global financial crisis (OECD, 2017^[12]). Against the backdrop of recent crises affecting citizens' lives and livelihoods, the OECD Trust Survey of publics in 22 Member countries found that governments are generally trusted to deliver services or handle a future pandemic. Conversely, the roots of mistrust relate more to responsiveness and fairness, such as perceptions that governments do not act on citizen concerns and that powerful officials lack integrity (OECD, 2022^[7]).

In the UK, trust in national government stood at 34.8% compared to an OECD average of 41.1% in 2021 (OECD, 2022^[7]). When measures of trust are disaggregated for different public actors, they provide a more complete picture of how citizens trust different institutions and what drives their trust. The UK civil service, for example, is trusted by 55.5% of the public, above the OECD average of 50.2%, similarly to other service-providing institutions like the health system and the police and courts. On the other hand, similarly to other OECD countries, political parties are the least trusted institution in the Survey, at 19.9%, below the media and national legislature (OECD, 2022^[7]).

The above findings are largely consistent with other studies of trust, including the 2023 Edelman Trust Barometer UK supplement. The latter additionally found that 57% of respondents feel their interests are not represented in British politics and a greater share hold politicians responsible for driving social divisions (80%) and eroding public trust in government (85%) (Edelman, 2023^[13]).

As the OECD Trust Survey report states, this picture owes to "a broader pattern of feelings of disempowerment" vis-à-vis political elites' perceived agendas (OECD, 2022^[7]). The sense of disempowerment may also be a factor making some citizens more susceptible to suspicions and even conspiracies about powerful individuals and groups, which are common to disinformation circulating online.

Source: OECD (2022^[7]), *Building Trust to Reinforce Democracy: Main Findings from the 2021 OECD Survey on Drivers of Trust in Public Institutions*, OECD, Paris; OECD (2017^[12]), *Trust and Public Policy: How Better Governance Can Help Rebuild Public Trust*, <https://dx.doi.org/10.1787/9789264268920-en>; Edelman (2023^[13]), *2023 Edelman Trust Barometer - UK Supplement Report*, <https://www.edelman.co.uk/sites/g/files/aatuss301/files/2023-03/UK%20Trust%202023%20Website.pdf>.

The UK has a vast market for news media, with global reach and influence. This includes some of the world's most recognised journalistic brands, such as the British Broadcasting Corporation (BBC), which is one of the most recognised and trusted news outlets domestically and internationally (Newman et al., 2022^[4]).

Nonetheless, British tabloids, known for sensationalist headlines, enjoy some of the highest circulation figures in the country, surpassing those of other highly regarded news organisations (Mayhew, 2020^[14]). A number of top outlets also hold large sway on the news cycle and the political and policy agenda despite a global trend of greater fragmentation and digitalisation of news content and consumption (Garland, Tambini and Couldry, 2017^[15]; Simpson and Startin, 2022^[16]). This makes relations with the media a high-stakes endeavour for public communicators and political actors.

Notwithstanding its established status, the UK media market is vulnerable to some of the same pressures visible in other OECD countries. It is marked by dwindling revenue streams and intense competition on mobile screens for the public's finite attention span (Matasick, Alfonsi and Bellantoni, 2020^[2]). The economic model for quality journalism has been under strain, with a quarter of all regional and local newspapers closing between 2007-2017 (DCMS, 2018^[17]). Over the same period the number of full-time journalists in print and online media in the UK dropped by 25%, and the downward trend is set to continue as of 2023 (DCMS, 2018^[17]; Maher, 2023^[18]).

Among some tabloids and clickbait news platforms, this context has favoured an inclination towards sensationalist rhetoric and provocative content that perform well with time-poor audiences and social media algorithms. Combined with what observers qualify as some media's own political and commercial agendas (Simpson and Startin, 2022^[16]; Tryl et al., 2021^[19]; Yonder, 2021^[20]), these practices contribute to the deteriorating supply of quality information in the country.

Indeed, tabloids have been characterised by observers as “uniquely hostile” (Simpson and Startin, 2022^[16]), and “not conducive to fact-based communication”.⁴ The phenomenon has longstanding roots: a decade ago, the British media's “culture, practices, and ethics” were the subject of a high-profile judicial inquiry by Lord Justice Leveson following a series of scandals over the conduct of a number of outlets and calls for regulation (Leveson, 2012^[21]).

Some of these lower-quality outlets have also been alleged to exaggerate or distort facts to shock or provoke readers, to the detriment of constructive public debate. For example, some British tabloids used misleading statistics and narratives in reporting topics such as migration (Full Fact, 2023^[22]) and climate change (Ward, 2019^[23]). Similarly, several instances of inaccurate media reporting related to the European Union (EU) prompted the European Parliament's UK liaison office to issue fact-checks to correct inaccuracies.⁵ As a result, complex policy issues such as migration, welfare, and relations with the EU have been rendered increasingly intractable by media narratives, exacerbating existing social fault lines (Tryl et al., 2021^[19]).⁶

The divisive discourse encouraged by certain news outlets is not lost on the British public. Today, it is among the least trusting public of news media compared to other countries (Edelman, 2023^[8]). At 38.8%, the media was the second-least trusted institution out of nine covered in the OECD Trust Survey (2022^[7]). Three-quarters (74%) of respondents in the UK surveyed by non-profit More in Common held “the media” directly responsible for making the country “feel more divided than it really is” (Tryl et al., 2021^[19]). More worryingly, a growing proportion of the public is avoiding news altogether because “they anticipate news will make them anxious without being relevant to their lives, resulting in limited engagement with news, and by extension, civic and political affairs” (Toff and Nielsen, 2022, p. 697^[24]).

It is worth noting that this context is not unique to the UK. In 2022, the Edelman Trust Barometer found that 67% of respondents across 28 countries surveyed worried that the media were purposely misleading people with headlines they know to be incorrect or exaggerated (a similar share as those who say the same about government and political leaders). As a result, the study warned of “governments and media fuel[ling] a cycle of distrust” (Edelman, 2022, p. 4^[25]). These commonalities make the considerations in this *Scan* relevant to other OECD Members operating in similar environments.

Finally, the issue of mis- and disinformation erodes trust further. Two-thirds of British people polled by YouGov indicated being either “very” or “generally” concerned about the spread of “fake news”⁷ (Kersley, 2022^[26]). The scale of the problem has concrete implications for policy. Analysis carried out during the COVID-19 pandemic revealed that anti-vaccine accounts experienced a 25% increase in following from 2019 to 2020 and that some 5.4 million UK Twitter users followed such accounts (Christie, 2021^[27]). Moreover, one year into the pandemic a survey by the UK communications regulator Ofcom found that 28% of respondents reported being exposed to false or misleading claims about the coronavirus in the previous seven-day period, a figure that remained broadly similar over monthly editions of the survey (Ofcom, 2021^[28]).

Beyond its effects on policy, the amplification of falsehoods on communication channels by ill-intentioned actors deepens the perceived rifts between societal groups and distrust of those with opposing views. A study commissioned by Ofcom finds that audiences who question or reject mainstream media actively seek sources that confirm their world views, with less regard for accuracy. Notably, these groups also tend to treat all sources as subjective and attribute misinformation to mainstream media as much as alternative sources (Yonder, 2021^[20]).

The important interplay of identity, values, and world views with mis- and disinformation is at the heart of its complexity. Addressing it requires more than supplying factual information against rumours: it requires a sustained effort to build social cohesion and genuine dialogue with groups in British society who feel marginalised or distrust the political system.

There are encouraging signs that point to how such cohesion can be built, with support from public communication. Whereas the findings in this section highlight perceptions of opposing groups with irreconcilable preferences, studies suggest that British citizens share more common ground on policy questions than some of the media discourse lets show (Duffy et al., 2019^[10]; Tryl et al., 2021^[19]). Importantly, there is an appetite for less political and more relatable content across news and communications. A survey identified “political reporting [that] is disconnected from what matters in the lives of most Britons” as a key source of public distrust and frustration with the media (Tryl et al., 2021, p. 16^[19]).

Public service media and public communicators can act as impartial vehicles for reliable and relevant information that helps citizens understand, form opinions, and weigh in on public issues. A useful parameter for this is included in a recent review of BBC coverage, which advances the case for “broad impartiality” (Blastland and Dilnot, 2022^[29]), building on the BBC pledge in 2021 to “address the issue of impartiality in its broadest sense, pushing the debate beyond traditional left/right divides and addressing the challenge of audiences who do not currently feel their lives, attitudes and opinions are adequately represented or portrayed on the BBC”. (BBC, 2021, p. 2^[30]). This pledge followed a rise in audience concerns with impartiality and criticism of perceived bias and political interference (Newman, 2022; Martin & Revoir, 2022; Elgot & Mason, 2023).

By this metric, the review found that BBC coverage on the topics of taxation, public debt and spending fell short of serving audiences adequately rather than being politically partisan. In particular, the review noted journalists’ insufficient grasp of subject complexity and their focus on relaying political arguments over explanation of the underlying topics. This made for reporting that unintentionally favoured some interests over others (Blastland and Dilnot, 2022^[29]). Additionally, the review noted that, as a result, “broad interests that lack political salience can be neglected” as well as voices that represent vulnerable audiences (Blastland and Dilnot, 2022^[29]).

This example has useful implications for both journalism and public communication. Serving the public requires meeting the information needs of all citizens. This entails content that is informative, relevant, and understandable to all (Cazenave and Bellantoni, 2022^[31]). The BBC review also points to the importance of rebalancing communication’s focus away from presenting and discussing political positions that tend to drive the news agenda on most topics, and towards context and facts underpinning the same topics. UK public communicators have an important opportunity to contrast divisive narratives with unifying, fact-based messages to safeguard the space for constructive engagement.

Reinforcing trust in public communication: The role of ethics and propriety

Public communication has an important role to play in counteracting mis- and disinformation and supporting governmental efforts to build social cohesion against the divisive and polarising trends that characterise the information ecosystem in the UK and many other OECD countries. However,

communication's effectiveness vis-à-vis these objectives rests significantly on how much it is trusted by audiences across society.

The GCS Strategy (2022, p. 19^[32]) recognises that “[p]ublic confidence and trust in government communications is critical to our national security and well-being”. Public confidence is equally necessary to grant the function its social license to use certain personal data, behavioural insights, and new technologies responsibly so as to make its communication more relevant and responsive to audiences. Furthermore, and as the following section highlights, communication-based responses to mis- and disinformation rest on the criteria that the sources of information are truthful and reliable.

To this end, it is essential that citizens see public communication as serving their needs for information and participation. It is equally important that the public perceives the function to operate according to high ethical standards and to put the needs and interests of its audiences ahead of political motives.

This section puts forward considerations for reinforcing the current ethical and propriety frameworks to ensure GCS and its work remain trusted. It also discusses opportunities for constructive multi-stakeholder engagement to redefine norms and standards for public communication in light of developments in the information ecosystem described above.

Trust and the separation between political and public communication

The role for public communication to help build trust in the difficult environment described above rests on institutions' ability to remain trusted sources of information, rather than being associated with the divisive discourse that citizens tend to attribute to the media and political actors. Yet, a recent global study comprising over 150 public communicators warned that politicisation of the function has increased around the world, with adverse consequences for the efficacy of and public trust in messages from government channels. The study, conducted by a leading consulting firm, stressed the concern “that continued politicisation of communications may lead governments into a doom loop of distrust that they will struggle to recover from” (WPP/Kantar Public, 2023, p. 27^[33]).

As this section discusses, a similar trajectory has been noted in the UK (Urban, 2023^[34]; Barwick, 2019^[35]; Garland, 2021^[36]). Recent episodes of politicised communication breaching the propriety rules of the civil service in particular have brought renewed attention to historical concerns over the conduct of communicators that were the subject of external inquiries (BBC, 2022^[37]; Garland, 2022^[38]; Phillis, 2004^[39]; Macnamara, 2020^[40]). Such instances can dent public trust in the function at a time when addressing misinformation and embracing technological change require it to demonstrate unwavering integrity and responsibility. This sub-section therefore advances recommendations for reinforcing mechanisms that limit the potential politicisation of public communication and supporting efforts for greater separation from its political counterpart.

Internationally, the OECD *Report on Public Communication* (2021^[41]) highlighted the distinction and separation between public and political communication as an essential criterion for the governance of the function and for it to serve all citizens and merit their trust. The Report notes that several OECD countries, like the UK, stipulate this distinction formally in the relevant policies governing public communication. This is reflected, for example, in commonly found policies on the neutrality or impartiality of civil servants; the use of institutional branding, channels and resources; and the separation of roles between political appointees and civil servants.

A common criterion for differentiating between *political* (or party-political) and *public* communication is proposed by Sanders and Canel (2013^[42]). It focuses on the purpose of communication: whether it relates to reputation management or promoting a favourable perception of incumbent political parties and officials or aims to inform and engage citizens on issues that concern them. In practice, the boundaries between these two realms of communication tend to be blurred and citizens themselves often do not distinguish between the two (OECD, 2021^[41]; OECD, 2022^[6]).

This distinction should not be seen to discredit political communication, which in a democracy is not just legitimate, but also necessary. Citizens choose their representatives and hold these officials accountable for their actions. The public must therefore be able to understand elected officials' positions on policy issues and to judge their record in office. It is the reason why politicians, rather than the civil service, ought to be the ones to relay their arguments and justify the decisions they make.

In the UK context the parameters of this distinction are reflected in the UK's Civil Service Code of Conduct and in the GCS Propriety Guidelines. These are the two documents setting out formal provisions on the separation of public and political communication alongside specific guidance for politically-appointed ministerial Special Advisers⁸ (see Box 3.2). However, impartiality rules in the UK require civil servants to set aside their own political views in supporting the sitting government. As such, institutions have a duty to present the government's view on policy issues, but refrain from carrying out communications that would be intended to derive electoral advantage for the government of the day.

As was also stressed in a number of interviews, such provisions do not imply a requirement for neutrality in communication carried out by the civil service. Nonetheless, guidance specifies that it should not be "biased or polemical" nor "liable to be misrepresented as being party-political" (GCS, 2022^[43]). Furthermore, the Civil Service Code prohibits the use of public resources for party-political activities, including communication (UK Government, 2015^[44]). These activities are instead carried out by Special Advisers, who are commonly responsible for managing ministers' relations with the media and their personal communication channels.

POLITICISATION RISKS AND CHALLENGES FOR PUBLIC COMMUNICATION

Although the existing guidance makes an explicit distinction between public and political communication, OECD interviews with communicators highlighted significant scope for individual judgement and subjective interpretation of subtle boundaries. This can lead to activities that cross the fine line into impropriety through, for example, the selective presentation of statistics, overstating facts, and profile-raising for ministers (such examples were cited in OECD interviews with government communicators, as well as in Urban (2023^[34]) and Garland (2022^[38])).

Studies based on communicators' own accounts warned of a trend for public communication being "overly driven by political priorities and ministerial demands, rather than serving the public"⁹ (Urban, 2023, p. 11^[34]). A number of OECD survey responses and interviews carried out in the context of this *Scan* also cited changing priorities at the political level as a top challenge. These findings have important implications for the function's reputation and trustworthiness, and call for enhanced solutions to mitigate potential vulnerability to politicisation.

First, GCS communicators interviewed by the OECD were nearly unanimous in commending present recourse mechanisms for flagging ministerial or political-level requests in breach of propriety guidelines (see Box 3.2) and the ability of senior communicators to push back against this kind of requests. Such comments indicate that, when it is applied, the mechanism is effective at managing potential political pressures to shield the function from politicisation.

However, interviews suggested that pushing back or resorting to the recourse mechanism can be complicated by the dynamics of individual relationships between public communicators and political advisers and ministers, whose trust and respect the former rely on to be effective in their jobs. As noted in Chapter 1, the empowerment of the function rests in part on earning a seat at the table and communicators interviewed noted the need to be politically astute with regards to political priorities. Conversely, several interviewees indicated that being seen as uncooperative or obstructive can come at a cost for both individual communicators and the function. They can be side-lined or rendered irrelevant vis-à-vis politically appointed advisers. Recent academic research has also emphasised concerns and precedents related to this (Garland, 2021^[36]).

Box 3.2. Guidance and standards on the impartiality of public communication in the UK

The British **Civil Service Code** defines the core values of the civil service as integrity, honesty, objectivity, and impartiality. Political impartiality is characterised as requiring civil servants to serve the government to the best of individuals' ability, regardless of the sitting governments' political persuasion.

Simultaneously, civil servants must act in a way “which deserves and retains the confidence of ministers, while at the same time ensuring that you will be able to establish the same relationship with those whom you may be required to serve in some future government” (UK Government, 2015^[44]) The use of government resources for party political purposes is prohibited. Objectivity is described as obliging civil servants to provide information and advice on the basis of the evidence, with accurate presentation of options and facts. Inconvenient facts or relevant considerations must not be ignored when providing advice or making decisions (UK Government, 2015^[44]).

Separately, the **GCS Propriety Guidance** specifies that government communication:

- Should be relevant to government responsibilities.
- Should be objective and explanatory, not biased or polemical.
- Should not be – or liable to be – misrepresented as being party political.
- Should be conducted in an economic and appropriate way.
- Should be able to justify the costs as an expenditure of public funds.

The guidance outlines a three-step procedure whereby communicators can raise concerns on issues relating to impartiality or propriety, stipulating that in the first instance, concerns should be raised with individuals' line managers and at the team level, before then being escalated to the departmental Director of Communications if the concern has not been resolved. Further advice beyond that is available via the dedicated GCS propriety email inbox. The latter is a new centralised reporting email mechanism whereby communicators can report issues directly to the central GCS team, who aim to reply within three working days.

The work of Special Advisers is guided by their respective Code of Conduct. This outlines that by adding a distinguishable political dimension to advice and assistance to Ministers, Special Advisers reinforce the political impartiality of the Civil Service. They are able to support Ministers with work that would be inappropriate for civil servants to carry out, including representing the views of the Minister to the media.

The Code of Conduct specifies that Special Advisers can, “review and comment on – but not suppress or supplant – advice being prepared for Ministers by civil servants” and are able to “give direction to civil servants in relation to their day-to-day work”. (Cabinet Office, 2016^[45]). However, they must not, “ask civil servants to do anything which is inconsistent with their obligations under the Civil Service Code” (Cabinet Office, 2016^[45]).

Source: UK Government (2015^[44]), *Statutory Guidance: The Civil Service Code*, <https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code>; GCS (2022^[43]), *Government Communication Service Propriety Guidance*, <https://gcs.civilservice.gov.uk/publications/propriety-guidance/>; Cabinet Office (2016^[45]), *Code of Conduct for Special Advisers*, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832599/.

Such accounts suggest these dynamics are an important factor impacting on the judgements of senior communicators, one that the present ethical framework could better address (Urban, 2023^[34]). Mitigating this may require introducing mechanisms that rebalance the distribution of incentives for upholding standards of propriety so that responsibility does not fall disproportionately on communicators. Such options are proposed below.

Second, emphasis placed on managing the reputation of government constitutes another risk factor for the politicisation of public communication. According to OECD interviews and recent studies, reputation management remains a dominant feature of the organisational culture in UK communication units and internationally (Urban, 2023^[34]; Garland, 2021^[36]; WPP/Kantar Public, 2023^[33]). This practice is not *per se* problematic and reputation matters to how people trust an institution. However, based on these accounts, the often-politically driven goal to maintain a positive reputation can on occasion come into tension with rules on objectivity and the duty to “make as positive a case as the facts warrant” (GCS, 2022^[43]). This can be the case especially in situations where communication is intended to make the case for or defend policy decisions vis-à-vis an often adversarial media.

Reputation management tends to be more closely related to the work of press offices, which are most exposed to these risks. Confirming the accounts of several communicators interviewed by the OECD, recent publications have stressed the extent to which press headlines constitute a “primary focus” of ministers and their advisers (Cain, 2021, p. 2^[46]), “even influencing the timing and content of policy making” (Garland, Tambini and Coudry, 2017, p. 20^[15]). The emphasis on managing an influential group of political media, what insiders call the lobby of journalists (Urban, 2023^[34]), appears to spill over into the work of government press offices. This is often a result of a disproportionate focus on reputation management from their hierarchy (Garland, 2021^[36]).

This attention to reputation management regarding a narrow group of news outlets and related allegations of the politicisation of public communication have a longstanding legacy. They have been the subject of independent inquiries, chiefly the Phillis Review of 2004 (see Box 3.3), which, at the time, found considerable political interference and breach of impartiality within the public communication function. A decade later, the Leveson Report into British media highlighted “perceptions and concerns that politicians and the press have traded power and influence in ways which are contrary to the public interest” (Leveson, 2012, p. 29^[21]).

Box 3.3. The Phillis Review: An Independent Review of Government Communication

The review of GCS’s predecessor, the Government Communication and Information Service, resulted from controversy around prevalent communication and media relation practices in government that became derogatively labelled as ‘spin’ and blurred the lines between party-political communication and the civil service. The report advanced 12 substantial recommendations for the reform of the function that urged an increased focus on serving citizens and being “customer-driven”, an elevated role for professional public communication, and greater separation from political communication. The recommendations were taken on board by the then government but subsequently dropped (Gregory, 2012^[47]).

The Review highlighted a number of principles for public communication in the UK, which continue to be valid and relevant beyond its borders (extract from Phillis, 2004, p. 2):

- Openness, not secrecy.
- More direct, unmediated communications to the public.
- Genuine engagement with the public as part of policy formation and delivery, not communication as an afterthought.
- Positive presentation of government policies and achievements, not misleading spin.
- Use of all relevant channels of communication, not excessive emphasis on national press and broadcasters.
- Coordinated communication of issues that cut across departments, not conflicting or duplicated departmental messages.

- Reinforcement of the Civil Service’s political neutrality, rather than a blurring of Government and party communications.

Source: Phillis, R. (2004^[39]), *An Independent Review of Government Communications*, <http://image.guardian.co.uk/sys-files/Politics/documents/2004/01/19/Phillis.pdf>; Gregory, A. (2012^[47]), “UK Government communications: Full circle in the 21st century?”, <https://doi.org/10.1016/j.pubrev.2012.01.002>.

These perceptions have persisted among the public in the decades since these inquiries were conducted: in 2022 just 20% of respondents surveyed by the Reuters Institute believed that the media were independent from political influence (Newman et al., 2022^[4]). Stakeholders and communicators interviewed by the OECD in the context of this *Scan* have similarly pointed to alleged episodes of preferential treatment of news outlets aligned with incumbent governments’ policy stances (Thorpe and Savage, 2023^[48]).

Several observers, including senior communicators interviewed by the OECD and, even, the GCS 2022-25 Strategy, suggest that the focus on daily press headlines likely exceeds their strategic significance and is to the detriment of longer-term planning and objectives (Cain, 2021^[46]; Urban, 2023^[34]; GCS, 2022^[32]). Considering the divisiveness of some British media and how distrusted it is across large swathes of society, there is an argument for allocating less attention and public resources to managing government reputation via these outlets.

Under the GCS 2022-25 Strategy there is an opportunity to shift focus away from reputation management vis-à-vis a narrow group of news outlets. Instead, focus could be to strengthen the trustworthiness of the communication function and counter the divisiveness of the information ecosystem with citizen-centred outlook for public communication.

Transparent oversight and updated ethical standards

Reputation management as a purpose of communication is not in itself problematic: building a reputation that the government and its institutions are reliable, responsive, open, and fair is valuable in improving public trust towards them (OECD, 2022^[7]). The reputation of the public communication function itself ought to be safeguarded to ensure its effectiveness amid multiple challenges to the information ecosystem (WPP/Kantar Public, 2023^[33]).

Through considerable efforts, GCS has made advancements to build trust in public communication and earn recognition for its value as a lever of government, as discussed in previous chapters. Multiple government interviewees stressed, for example, how their response to the COVID-19 pandemic earned the public’s trust by demonstrating competence and reliability.

Yet, the function’s reputation remains vulnerable and has not wholly overcome its troubled legacy. It is important that public communication does not become associated, even if undeservedly, with polemical narratives and tactics employed by some media and non-governmental actors.

To this end, ensuring a visible distinction from political communication could be most valuable, for instance, by supporting a more conservative application of the Propriety Guidelines and complementing these with more prescriptive examples.

Likewise, reviewing the definition, scope and methods for reputation management could help reduce room for grey areas that blur the line of impartiality. This could be elaborated in the Propriety Guidelines in the Modern Communications Operating Model (MCOM), where maintaining the reputation “of the UK” and the government is listed as a core purpose of government communication.¹⁰ Updates to guidance could, for instance, link reputation management more tangibly with drivers of trust¹¹ (OECD, 2022^[7]) so that these activities are aimed at demonstrating attributes citizens will value. The work of HM Revenue and Customs

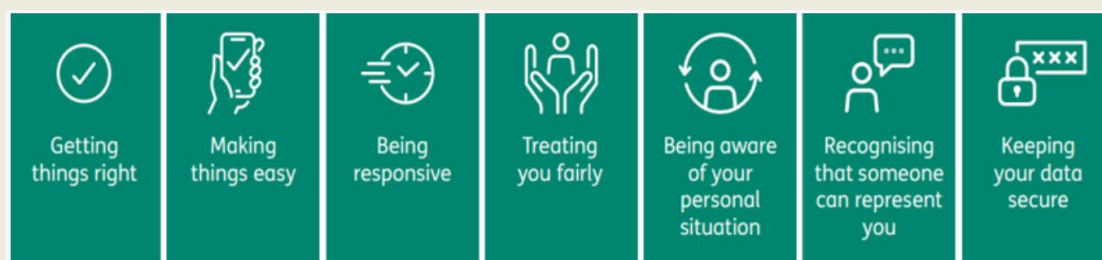
(HMRC) to ground its organisational objectives in public trust offers a useful example for linking it concretely with reputational concerns (Box 3.4). Proposals for a similar “GCS Charter” are discussed at the end of the chapter.

Box 3.4. Public trust at the heart of HMRC’s strategic vision

HM Revenue and Customs (HMRC), the department responsible for tax collection, administration of national insurance, and the national minimum wage, established a dedicated “Trust Team” to lead organisation-wide efforts to measure and drive trust in the department. The team’s work is underpinned by the understanding that greater trust “improves voluntary compliance with tax regulations and obligations; it improves the customer experiences, strengthens [HMRC’s] license to operate”.

HMRC has elaborated this commitment into its public Charter, which articulates and stresses the values of transparency, reciprocity, fairness, competence, and the role of social norms and expectations. These are articulated in a set of standards in Figure 3.1.

Figure 3.1. HRMC trust charter



The Charter was built upon research identifying institutional fairness and reputation as key drivers of trust, along with transparency, and measures of competence (clarity and ease of interactions). HMRC’s performance against the Charter is assessed annually against a set of indicators via independent review and customer surveys.

Communication channels, their clarity, simplicity, accessibility and the messages they transmit, are core to HMRC’s ambition to build trust, along with interactions with customers.

Source: HMRC (2022^[49]), *The HMRC Charter*, <https://www.gov.uk/government/publications/hmrc-charter/the-hmrc-charter>; “Building trust in HMRC” presentation provided to the OECD Secretariat.

Such an approach to reputation management could be reflected in the GCS Propriety Guidelines related to media handling, considering the above discussion and evidence. For example, provisions in the document urge caution towards “Ministers using the Press Office to ensure that their policy and actions are explained and presented in a positive light”, specifying that “Ministers can do this, but care must be taken that any press activity is designed to further government objectives” (GCS, 2022^[43]). Such language can remain susceptible to subjective interpretation, which could be remedied, for instance, with the provision of concrete scenarios illustrating common challenges.

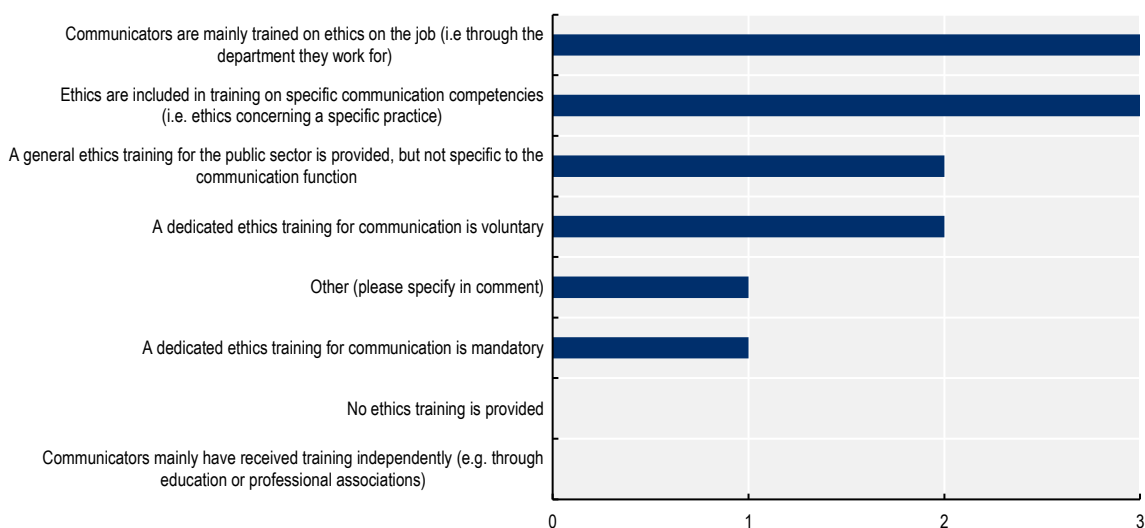
Supporting a more cautious reading of the Propriety Guidelines may also help keep civil servants clear of the potentially political type of media relations that political parties’ press offices and spokespeople handle (Urban, 2023^[34]). It is therefore also important that the Guidelines are well publicised with these specific

stakeholders to reinforce their awareness and limit requests that can potentially fall in grey areas, as reinforced by one of the communicators interviewed for this *Scan*.

Concurrently with a revision of the GCS Propriety Guidelines, promoting uptake of new practical training on ethics would be a worthwhile intervention. At the time of writing, departments reported mixed approaches to ethics training based on survey responses (see Figure 3.2). The need to reinforce this has been recognised in the GCS 2022-2025 Strategy. This has led to the introduction of annual mandatory training with case studies that will be complemented with updated guidance on the ethical use of new technology, further discussed below (GCS, 2022^[32]). The new propriety and ethics training, mandatory for all GCS members in ministerial departments, includes imagined and real-life scenarios for people to test their knowledge and assess situations.

Figure 3.2. Practical training on ethics and integrity

Is practical training on ethics and integrity provided to communication personnel?



Note: N=12, single choice answer.

Source: OECD survey of UK government communication offices at departmental level, 2022.

New mechanisms for oversight of the public communication function

Some studies and stakeholders interviewed for this *Scan* have additionally called for more extensive oversight and accountability for the function, which they argued is opaque. For instance, some communicators who contributed to a recent Institute of Government study suggested instituting a “communication watchdog” (Urban, 2023, p. 11^[34]). Similar proposals by academics have also been advanced to introduce greater parliamentary scrutiny (Garland, 2021^[36]). These suggestions indicate that the function’s system of internal self-regulation is perceived by many as needing rethinking.

For these reasons, engagement of non-governmental stakeholders is arguably a valuable factor to lend greater legitimacy to any supervisory initiative. At present, according to OECD interviews with government and civil society stakeholders, it is mainly fact-checking and civil society organisations that carry out some external review of communication by departments and Number 10. Often, interviewees pointed out, this occurs through requests submitted via the UK’s Freedom of Information (FOI) regime. These actors could similarly play a role in formal mechanisms to review the function.

Some interviews pointed to the example of oversight applied to official statistics, which is under the UK Statistics Authority (UKSA), an independent arms-length body that reports directly to Parliament. Among its responsibilities, the UKSA is officially tasked with “publicly challenging the misuse of statistics” (UK Statistics Authority, 2023^[50]), including highlighting when communications by government agencies and politicians are misinterpreting or misrepresenting statistics. Inherent to this example is the recognition of the value of rigorous statistics as an indisputable source of evidence. The same reasoning could be extended to certain information relayed via public communication, which can be regarded as essential to the public.

A similar model to that of the UKSA could be adapted to review public communication by GCS on a periodical basis and report to Parliament, which would then have the authority to act on any findings and recommendations. To this end, Garland (2021^[36]), for example, suggested establishing a “Communication and Digital Committee” within the House of Commons to address the absence of a dedicated Committee with this focus.¹² An additional example of external oversight is that applied to advertising by public institutions in Canada, which is concerned with ensuring compliance with non-partisan communication requirements (see Box 3.5).

Box 3.5. External oversight for non-partisan government advertising in Canada

In 2016, the Government of Canada put in place an external oversight mechanism to ensure that government advertising meets criteria based on the definition of “non-partisan communications” as outlined in the Policy on Communications and Federal Identity.

While federal departments are responsible for ensuring that all campaigns are non-partisan, Ad Standards, the not-for-profit organisation responsible for administering the Canadian Code of Advertising Standards, has been under contract with the Government of Canada since 2016, to conduct independent reviews of government advertising.

Ads are reviewed at two stages. The initial review examines preliminary versions of departmental advertisements before the department incurs additional costs for the development of the creatives. All ads have passed a final review by Ad Standards before being placed in media.

The initial threshold for mandatory reviews was CAD 500 000 in 2016 but was lowered to CAD 250 000 in 2020.

Ad Standards has extensive experience reviewing advertising against legislative and regulatory requirements through their fee-based pre-clearance service for industry in the following areas: alcoholic beverages, children’s advertising, cosmetics, food and non-alcoholic beverages and health products.

Note: The example was prepared by the peer reviewer from the Government of Canada for this scan.

Source: Government of Canada (n.d.^[51]), *Advertising Oversight Mechanism*, <https://www.canada.ca/en/treasury-board-secretariat/services/government-communications/advertising-oversight-mechanism.html>; Government of Canada (n.d.^[52]), *Policy on Communications and Federal Identity*, <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=30683>.

The idea of introducing additional layers of oversight, scrutiny, and accountability external to GCS has a number of merits. First, independent reviews or auditing can heighten the consequences of a breach of propriety by political and civil service actors. This provides more powerful incentives for compliance. Second, such a mechanism could be useful for reinforcing the public service mission of the function’s mandate. Depending on its form and scope, the introduction of such an oversight body or process would likely require primary legislation.

If public communication activities are reviewed against the principles outlined in the Phillis Review (Box 3.3) alongside the Functional Standards and Propriety Guidelines, it could motivate greater observance of these principles and focus on citizens. Finally, such oversight can facilitate greater transparency and accountability of the function. Where institutions are found to be communicating with impartiality and in the public interest, this external review can provide important validation to help build the public's trust in the communication function and overcome legacy reputational issues.

It is not enough to simply make a greater distinction between party-political and public communication. While special advisers do not face the same constraints as civil servants in their interactions with the media, the conduct and tactics of the former nonetheless affect how the communication profession as a whole is perceived and can indirectly cast wrongful perceptions of the public function with which they are associated. Instead, reinforcing trust in impartial public communication should remain an important long-term goal to better contribute to positive outcomes for policy and democracy.

As this *Scan* finds, and according to observers (Garland, 2021^[36]; Gregory, 2012^[47]), several of the issues and recommendations contained in the Phillis Review have remained relevant in the two decades since it was published. Serving the public and helping citizens make informed choices to improve their lives would likely benefit from a public communication function that is less political and more trusted. The 20th anniversary of the Review provides a timely opportunity for internal stocktaking to identify potential priorities to integrate in the GCS 2022-25 Strategy or pursue in a second phase.

Reviewing ethical standards for the age of algorithms

To conclude this section, it is important to discuss how GCS maintains its trustworthiness with regards to the adoption and application of new technologies and methods. The evolution of the communication profession, and the tools at its disposal, continues to raise novel ethical questions and challenges (for an overview of relevant concerns, see Alfonsi et al. (2022^[53])).

Before generative Artificial Intelligence (AI) became an immediate tool for communicators to experiment with in 2023, studies showed practitioners were already grappling with ethical questions linked to recent innovations. For instance, government communicators surveyed in the 2020 European Communications Monitor rated as ethically challenging common practices such as paying influencers to communicate on their topics; using sponsored content to look like regular content; using audiences' personal data; and profiling and targeting audiences based on age, gender, ethnicity, job, or interests (Zerfass et al., 2020^[54]).

GCS has made clear its intention to seize new technologies for the improvement and innovation of communication practices, which is a valuable priority. In its yearly communication plan for 2023/24, GCS has claimed to focus on harnessing the latest technologies through its new GCS Innovation Lab and by encouraging the allocation of 10% of departmental campaign spend towards innovative approaches (GCS, 2023^[55]). In parallel, its multi-annual reform Strategy also lists commitments for updating existing guidance to incorporate the ethical use of new technology (GCS, 2022^[32]).

When it comes to ethical guidance there are a number of important considerations for GCS and its leadership. First, it would be valuable to ground the above efforts at experimentation and innovation in ethical principles and the service of the public good. Especially with new and advanced technologies such as generative AI, the potential risks are yet to be fully understood. Developing living guidance for experimentation, drawing on external research and internal insights from teams' experiments can help mitigate risks and foster a safer environment for innovation.

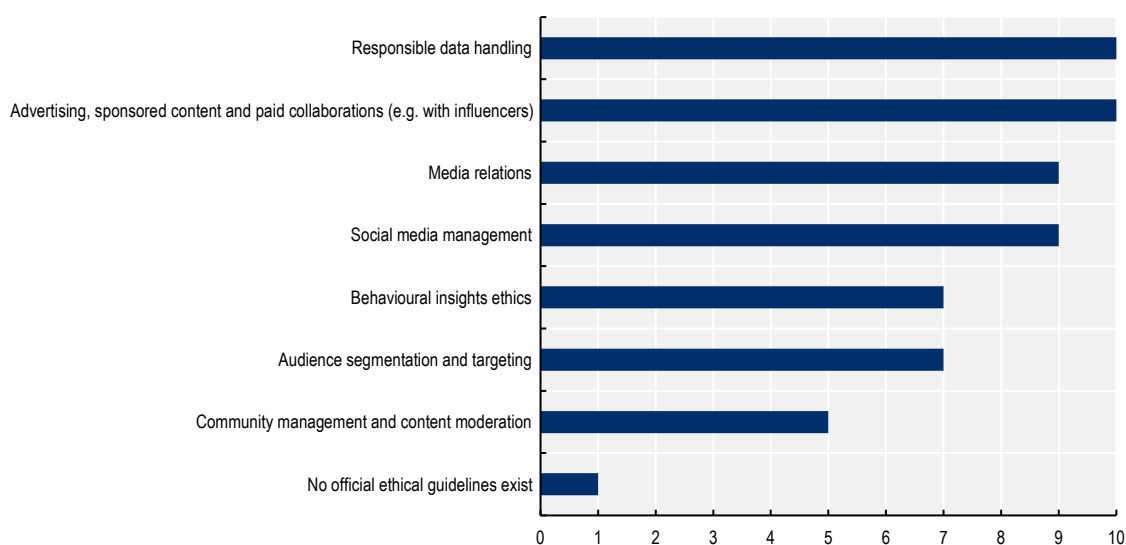
Second, a greater focus on applying technologies and innovative approaches would benefit from a greater emphasis on raising communicators' literacy and understanding of how these work and their potential shortcomings and ethical pitfalls. UK communicators, like most practitioners in the field, rely on a wide range of software and platforms, including social media and dedicated analytics tools. While the latter mostly function based on complex algorithms and big data gathered from online users, they tend to be

used by communicators as “black boxes”, without a meaningful grasp of how they work (Zerfass, Hagelstein and Tench, 2020^[56]; Wiesenberg, Zerfass and Moreno, 2017^[57]). As the use of AI- and big data-powered tools expands, greater understanding of and confidence in their properties could support a more responsible use of these technologies and mitigate unwanted consequences.

Third, updates to the GCS Propriety Guidance can focus more explicitly on recent but increasingly common communication practices, for instance, those related to online targeting based on demographic and behavioural profiling or applications of behavioural science. Data from the *OECD Survey* revealed some discrepancies among departments on the availability of ethical guidance on a range of such practices (Figure 3.3). This may indicate that departments have developed own guidance or that their interpretations of central guidance are not consistent, which would warrant greater investment in training.

Figure 3.3. Ethical communication guidelines

Do official ethical communication guidelines address the following areas?



Note: N=12, multiple responses possible.

Source: OECD survey of UK government communication offices at departmental level, 2022.

In these respects, GCS has made important progress with new initiatives that will address the challenges identified in the research. It recently introduced a core training module as part of its GCS Advance programme (see Chapter 1) focused on “AI for communicators”. Besides providing guidance on how to apply AI and Large Language Models (LLMs) in their work, the training explains the ethical questions associated with the technologies and gives guidance on balancing opportunities and risks. Notably, completion of the training module has been made a prerequisite for accessing the bespoke LLM developed by GCS. An upcoming Ethical Decision-Making Framework will accompany practical adoption of AI and support decision making.

Expanding the publicly available Propriety Guidelines with comprehensive standards and rules on potentially risky approaches can also help reinforce the notion that GCS is applying such methods only for legitimate purposes. As noted earlier in the chapter, the UK government enjoys the trust of slightly over half of its citizens to use their personal data for legitimate purposes (OECD, 2022^[71]). A study by the Centre for Data Ethics and Innovation for the UK government found that attitudes towards online targeting were equally favourable, but concerns remained about “lack of awareness, understanding and control over online targeting systems, and about the potential negative impacts” (UK Government, 2020^[58]).

Engaging citizens and stakeholders to build resilience and trust in the information ecosystem

In the current climate of misinformation and low public trust there is a case to broaden the debate on societal expectations and norms surrounding the role of public communication and how it can support greater trust in both information and government. Across OECD countries, governments have been reacting and adapting to transformations and disruptions to the information ecosystem (Alfonsi et al., 2022^[53]; OECD, 2021^[41]). However, as illustrated above, these changes have profound effects on society, democratic governance and trust that warrant a rethink of the models, purposes, and ethics of communication.

Against this backdrop, a whole-of-society exercise to involve citizens and stakeholders in re-defining public communication's role and rules of engagement could be an important way to reflect on these questions and help define a way forward.

As noted in Chapter 2, citizen participation initiatives allow governments to take into account and use citizens' experience and knowledge to address pressing public needs. Concretely, a powerful approach for involving citizens in shaping decisions is through deliberative processes, in which a broadly representative body of people weighs evidence, deliberates to find common ground, and develops detailed recommendations on policy issues for public authorities (OECD, 2020^[59]). Common examples of one-off processes are citizens' assemblies, juries, and panels.

These types of innovative participatory initiatives are especially valuable to discuss and build a consensus around divisive issues or ones that touch on societal values and trade-offs. This is the case, for example, with efforts to tackle mis- and disinformation, which raise important questions about freedom of speech and the authority to determine what is true or false (Matasick, Alfonsi and Bellantoni, 2020^[2]). Likewise, common practices for behaviour change, ad targeting, and social listening can cause concern among some over manipulation and privacy (Alfonsi et al., 2022^[53]). Generative and other categories of AI stand to further challenge social norms in this domain. Yet all these are necessary communication tools and activities that can, and do, have significant positive impact, particularly against the backdrop of a deteriorating information ecosystem.

Deliberation has already been used in OECD countries to discuss and inform governmental action on complex questions surrounding the information ecosystem and offer examples that can be relevant to the UK context (see Box 3.5). In Canada, three Citizen Assemblies on Democratic Expression have been underway since 2020 to define public expectations and issue recommendations on issues of mis- and disinformation and other online harms that challenge democratic debate. A Citizens' Panel on Freedom of Expression was similarly held in Finland in 2021 to issue recommendations on actions that support freedoms against the challenges of hate speech online.

An inclusive and focused societal discussion can help define what citizens expect from their government's communication and how the latter should be conducted to support constructive public debate. A valuable exercise would be to reflect on the principles and recommendations of the Phillis Review two decades after its publication, to update it and strengthen it with the legitimacy that comes with public deliberation (OECD, 2020^[59]).

A deliberative process of this kind could be designed collaboratively with key stakeholders and result in a set of recommendations or a charter on communication (such as the HMRC example discussed above) to serve as a reference for the function and inform its oversight. These types of outputs can also serve as the basis for bringing a renewed focus on citizen-centred communication to the GCS 2022-25 Strategy or a future edition of it, as recommended in previous chapters of this *Scan*. Additionally, they could provide communicators, and those overseeing their work, with more detailed guidance on the boundaries between party-political and public communication.

Such an exercise could also help reinforce trust in the function and the information it provides. It could strengthen GCS' social license to leverage new technologies and methods responsibly and for the public good, which is critical for its effectiveness in the current context and near future. Finally, the questions up for public deliberation on communication for trust could further extend to the media and political sphere, which are central actors contributing to the quality of the information ecosystem.

Box 3.6. Public deliberation on democratic expression and online speech in Canada and Finland

Canada's Citizen Assembly on Democratic Expression

Canada's Citizens Assemblies on Democratic Expression have brought together 120 citizens to discuss the impact of technology on Canadian society and democracy, with a focus on how to retain freedom of expression online while also developing protections from a range of online harms.

Participants for the assembly are randomly selected from the Canadian population, with three assemblies taking place over three years. Citizens taking part in each assembly hear from a panel of experts drawn from academia, law, and the private sector and spend about 40 hours examining and deliberating on the questions at hand.

Each Assembly issued a detailed report to the Canadian public, the federal government and the Canadian Commission on Democratic Expression, a dedicated task force made of nine selected experts set up to advise government on this area of policy. The 2020 Assembly focused on reducing the prevalence and impact of harmful and hateful online speech, and produced 33 recommendations. In 2021 the Assembly discussed how to strengthen Canada's response to the spread of online disinformation. The 2022 Assembly instead capped the exercise with a comprehensive report that serves as the basis for government regulations of digital platforms to safeguard democratic expression and protect rights. The recommendations inform ongoing conversations around the public policies needed to ensure that digital technology supports democracy.

Finland's Citizens' Panel on Freedom of Expression

In February 2021 a national-level Citizen's Panel on Freedom of Expression was conducted that resulted in 25 recommendations to the government on how to "protect people who are in the public eye due to their professions from hate speech and to safeguard free expression of opinion".

From 3 000 randomly selected citizens, the panel was ultimately composed of 29 volunteers that were representative of the geographic and socio-demographic composition of the country. The panel met virtually over one evening and two full days, during which it acquired in-depth background on the subject area, and received briefings from a group of experts on freedom of expression, hate speech and online harassment. Citizens in the panel held small-group discussions to elaborate their recommendations with the help of trained moderators.

The recommendations stretch across legislative, regulatory and administrative actions, and urge the development of updated guidelines, capability and research to uphold freedom of expression and safety from hate speech online.

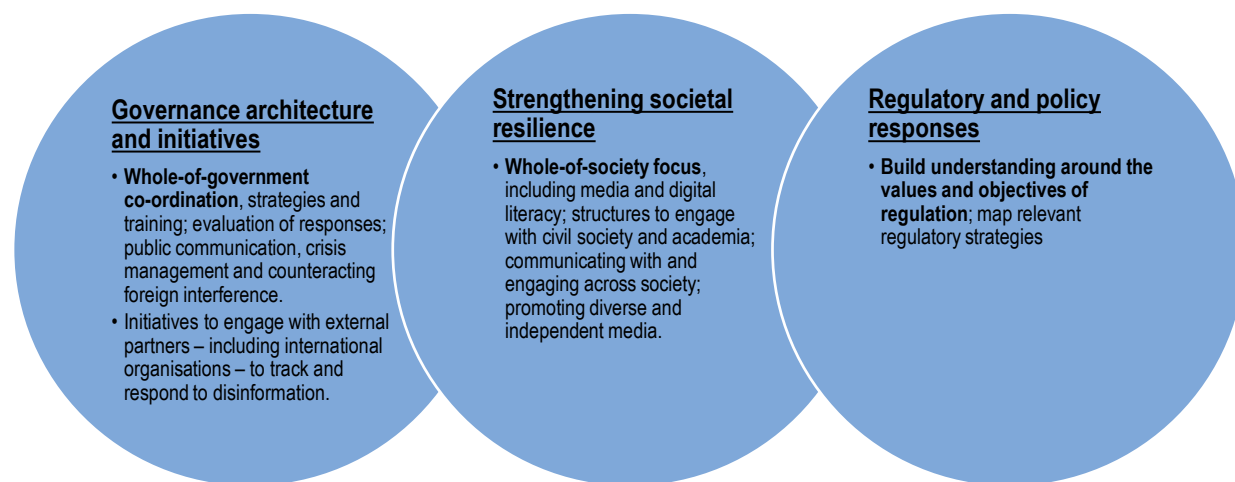
Source: Canadian Commission on Democratic Expression (n.d.^[60]), "Examining the impact of digital technologies on Canadian society", Canadian Citizens' Assemblies on Democratic Expression, <https://www.commissioncanada.ca/> (accessed on 28 April 2023); Jäske, M. et al. (2021^[61]), *Citizens' Panel on the Freedom of Expression: Recommendations for Measures to Be Taken in Finland to Protect People in Public Professions from Hate Speech and to Safeguard Free Expression of Opinion*, https://avoinhallinto.fi/assets/files/2021/03/Citizens_Panel_on_the_Freedom_of_Expression-Final_Report.pdf.

Public communication as a pillar of government action against mis- and disinformation

The challenges to the information ecosystem in the UK and other OECD Members are more complex than just the spread of mis- and disinformation, as described above. Nonetheless, the latter phenomenon both thrives on and aggravates the low quality of information and deterioration of public discourse in many democratic societies (Matasick, Alfonsi and Bellantoni, 2020^[2]). Combating mis- and disinformation is therefore a core priority for OECD Members to build the resilience of information ecosystems, recognised in the Ministerial Declaration on Building Trust and Reinforcing Democracy (OECD, 2022^[62]).

Combating mis- and disinformation is a multi-disciplinary and whole-of-society endeavour (see Figure 3.4) which the OECD is working to document internationally and across a wide range of governance responses in a dedicated DISMIS Resource Hub.¹³

Figure 3.4. OECD framework of policy options to counter disinformation and strengthen information integrity



Source: OECD (forthcoming^[63]), *DISMIS Resource Hub Report - Toward a Whole-of-society Approach to Building Societal Resilience*, OECD Publishing, Paris.

The *OECD Good Practice Principles on Public Communication Responses to Mis- and Disinformation* (hereafter “the Principles”, see Box 3.7) highlight how the function has an important role to play in the context of a holistic response. The *Principles* capture how public communication emerged as one of the main tools to help governments prevent and mitigate the effects of false or misleading content, particularly during the COVID-19 “infodemic” and subsequent efforts to mitigate vaccine hesitancy. Due to the longer time-horizons for developing regulatory or systemic responses to mis- and disinformation (such as improving media literacy levels or increasing the supply and reach of quality journalism), communication-based responses such as debunking have become increasingly common. They play an important role in providing short-term responses to falsehoods while aiming to building trust in verified information over the long-term.

Box 3.7. OECD Good Practice Principles on Public Communication Responses to Mis- and Disinformation

The Good Practice Principles were identified based on the review of emerging practices to fight mis- and disinformation across OECD Members and beyond. They summarise the common principles underpinning governmental responses grounded in public communication. As such, they can provide a compass to develop, evaluate and better co-ordinate interventions against this challenge.

- **Institutionalisation:** Government should consolidate interventions into coherent approaches guided by official communication and data policies, standards and guidelines.
- **Public interest:** Public communication should strive to be independent from politicisation in implementing interventions to counteract mis- and disinformation.
- **Future-proofing and professionalisation:** Public institutions should invest in innovative research and use strategic foresight to anticipate the evolution of technology and information ecosystems and prepare for likely threats.
- **Transparency:** Governments should strive to communicate in an honest and clear manner, with institutions comprehensively disclosing information, decisions, processes and data within the limitations of relevant legislation and regulations.
- **Timeliness:** Public institutions should develop mechanisms to act in a timely manner by identifying and responding to emerging narratives, recognising the speed at which false information can travel.
- **Prevention:** Government interventions should be designed to pre-empt rumours, falsehoods, and conspiracies to stop mis- and disinformation narratives from gaining traction.
- **Evidence-based:** Government interventions should be designed and informed by trustworthy and reliable data, testing, and audience and behavioural insights.
- **Inclusiveness:** Interventions should be designed and diversified to reach all groups in society. Official information should strive to be relevant and easily understood, with messages tailored for diverse publics.
- **Whole-of-society collaboration:** Government efforts to counteract information disorders should be integrated within a whole-of-society approach, in collaboration with relevant stakeholders, including the media, private sector, civil society, academia and individuals.

Source: OECD (2022^[6]), *Principles of Good Practice for Public Communication Responses to Mis- and Disinformation*, <https://www.oecd.org/gov/open-government/good-practice-principles-for-public-communication-responses-to-misinformation-and-disinformation.htm>.

Across the UK government, communication-based methods are embedded across most interventions against mis- and disinformation, and strengthen the overall response in a way that is consistent with the OECD *Principles*. For this reason, and because of the nature of the field, such communication-based actions cannot be analysed in a vacuum, but rather should be understood as part of the full spectrum of governance responses to this challenge.

This section therefore provides an overview of the overall architecture of counter-mis- and disinformation efforts across the UK government. It highlights the role of public communication within it, focusing on emerging practices and lessons learned. It puts forward recommendations to build on existing good practices to pursue a more integrated multi-disciplinary strategy in this field.

Overview of governmental action against mis- and disinformation in the UK

The wider picture of governmental actions to counteract mis- and disinformation in the UK has been evolving along with the issue itself. Over time, the structures and entities tasked with the above activities, along with their mandates and objectives, have changed to adjust to the multi-faceted nature of the challenges and the policy areas they impact. At the time of writing, domestic-facing actions encompass developing legislation, analysis of threats across information channels, flagging of illegal or harmful content for removal by social platforms, media and information literacy (MIL) programmes, and both proactive and reactive communication.

At the international level, the UK additionally maintains counter-disinformation operations aimed at building resilience against hostile foreign actors. These involve intelligence-sharing among partner countries, support for civil society and media in third countries, and capacity-building for allied and friendly governments to deploy communications against disinformation.

Communication expertise is deeply embedded across most of these counter-disinformation actions, building on the longstanding role played by British communicators in this space (discussed in the following sub-section). Communication is inextricable from the country's multi-faceted approach to fight mis- and disinformation. This strengthens its efficacy.

Policy responses and legal frameworks

The UK, like most OECD countries, does not have an overarching strategy in the field of counter- mis- and disinformation. Rather, its actions are embedded into multiple policies, legislation, and guidelines, each covering different elements of the response. The right to freedom of expression forms the legal foundation of UK actions in this field and is defined in the Human Rights Act of 1998. In the UK this is not an “unfettered” or unlimited right and boundaries of legal and illegal forms of speech are included in several laws, including the Public Order Act of 1986, Malicious Communications Act of 1988, the Communications Act of 2003, and the Terrorism Act of 2006 (House of Lords, 2022^[64]).

Legislative and regulatory responses to mis- and disinformation have been underway over recent years. These include the forthcoming Online Safety Bill, plans to increase market competition among digital platforms (House of Lords, 2022^[64]; UK Parliament, 2023^[65]) and the National Security Bill, which contains provisions on tackling foreign interference in the information ecosystem (UK Parliament, 2023^[66]). However, at the time of writing, these much-anticipated regulations are yet to be passed and implemented. This context means that the UK continues to face an uncertain regulatory environment that has made non-regulatory responses – chiefly communication ones – a primary focus of short-term interventions against mis- and disinformation, especially during the COVID-19 pandemic.

Beyond the legislative and regulatory framework, actions against mis- and disinformation are part of several policies advanced by the then Department for Digital, Culture, Media and Sport (DCMS)¹⁴, including the UK Digital Strategy (DCMS, 2022^[67]) and the Online Media Literacy Strategy (DCMS, 2021^[68]). However, these do not explicitly state a role for public communication. A separate media and information literacy strategy is also carried out by the UK communications regulator Ofcom. Notably, these actions aim to build society's resilience against the threats of a transforming information ecosystem. These include programmes and funding for civil society organisations, a multi-stakeholder Online Media Literacy Taskforce, and support for the “safety technology” sector of businesses developing tools and solutions against digital threats.

A noteworthy gap in the legislative and policy landscape concerns dedicated action on mis- and disinformation in the context of elections. Although provisions in the upcoming Online Safety Bill will address foreign interference in elections once it is passed, over recent years multiple actors have issued warnings about the present system. Public agencies such as the Information Commissioner's Office (ICO) and the Electoral Commission have cautioned that the present system is “not fit for purpose”, particularly

due to what they claim are lax rules on digital campaigning that leave voters potentially exposed to targeting by anonymous actors (Scott, 2019^[69]). Civil society experts have similarly advocated for the inclusion of more extensive provisions in the Online Safety Bill and transparent measures to monitor and address information manipulation around elections (Full Fact, 2022^[70]). These would be important complements to the actions described below.

Agencies and units working to combat mis- and disinformation

As a relatively recent hybrid threat, mis- and disinformation have required the introduction of new governmental structures and mechanisms capable of dealing with evolving and multi-faceted challenges. In the UK, this architecture has emerged in tandem with the evolution of interventions and approaches to tackle several waves of mis- and disinformation over recent years. Similar to the policy and legislative context above, responsibility for counter-mis- and disinformation measures is distributed across a number of entities, targeting different dimensions of the problem.

The Counter Disinformation Unit (CDU) leads ongoing actions to monitor and flag false and misleading content, either to prompt debunking or to liaise with online platforms to take appropriate action (in cases where an item violates platforms' own content policies or UK law). During the COVID-19 pandemic its mandate was expanded to cover not only deliberate disinformation, but also misinformation that could affect the success of measures to contain the virus (DCMS, 2020^[71]). The CDU is housed within the new Department for Science, Innovation & Technology (formerly DCMS) but plays a cross-government role with multi-disciplinary capability and expertise from across Home Office, Foreign, Commonwealth & Development Office, and Cabinet Office, including communicators and Ministry of Defence specialists.

The Unit was originally established during the 2019 European Parliament elections and UK General Election, before being re-focused on the pandemic and most recently on the war in Ukraine (DCMS, 2020^[71]; DCMS, 2022^[72]). The role of the CDU during election periods is especially important, given the potential threats of external or internal interference and the vulnerabilities highlighted above. Yet it is difficult to assess such a role for the Unit, or its capabilities and methods (about which relatively little information is disclosed). Nonetheless, OECD Members faced with similar threats have increasingly developed mechanisms to deal with disinformation around elections that include elements of communication, as in the examples shown in Box 3.8. These provide useful comparisons, particularly to define the criteria for action and ground the choice of interventions into official policy.

Box 3.8. Mechanisms for countering election disinformation in Canada and France

Canada's Critical Election Incident Public Protocol (CEIPP)

Canada's Critical Election Incident Public Protocol was initially established ahead of the 2019 General Election as a mechanism to communicate with Canadians if an information incident occurred during the period before an election that threatened its integrity, such as the wide-scale spread of disinformation around a specific topic.

A threshold was established that needed to be met in order for the protocol to be utilised, in cases where the country's ability to have a free and fair election had been jeopardised. A panel made up of five public servants would determine whether this threshold had been met, including the Clerk of the Privy Council, the National Security and Intelligence Advisor to the Prime Minister, the Deputy Minister of Justice and Deputy Attorney General, the Deputy Minister of Public Safety, and the Deputy Minister of Foreign Affairs. Should the threshold be met, the Panel would inform the Prime Minister, political party officials, and Elections Canada of the incident. A public announcement would then be made. As

of May 2021, the CEIPP remains in place for all future general elections unless specifically amended or revoked by the Cabinet.

France’s National Service in Charge of Vigilance and Protection against Foreign Interference (Viginum)

In advance of France’s 2022 general election, a new administrative entity was created, The National Service in Charge of Vigilance and Protection against Foreign Interference (Viginum). A decree was published enabling the unit to use automated data collection to identify foreign digital interference in French elections. To ensure minimum risk to civil liberties, a two-part process was established: first, likely instances of disinformation would be identified by manually monitoring social media posts. Based on elements gathered during this initial monitoring phase, the unit could then decide whether the situation required automated data collection and if necessary, would determine the scope of the data collection exercise.

During the unit’s design phase, a series of co-ordination and consultation meetings were held with relevant government departments including the Ministry of Armed Forces, Ministry of Foreign Affairs, and Ministry of Interior, who agreed on its main missions and achieved consensus around four elements:

- That its scope would be limited to debates regarding topics of fundamental national interest, including the “integrity of its territory, its security, and the republican form of its institutions”.
- That it would work exclusively on foreign threats.
- That it would only use publicly available open-source data.
- That its work would be monitored by an inter-ministerial Ethics and Scientific Committee, established within the Secretariat-General for National Defence and Security.

There was additional consultation with representatives of Parliament during the design phase where both the threat posed by foreign disinformation and the key features of the planned unit were explained. Alongside the creation of the unit, as a result of the aforementioned consultation process, a new inter-ministerial governance model was also established to fight foreign interference. It has a three-tier structure:

- A Monitoring, Detection, Characterisation, and Proposal Network was established, bringing together the unit and its counterparts within other ministries to share information on threats identified in addition to information on methodologies and tools.
- An Operational Committee for Fighting Information Manipulation was established, bringing together heads of services within relevant ministries (Armed Forces, Foreign Affairs, and Interior) to assess risks, discuss response strategies, and take action to neutralise threats.
- The pre-existing Committee for Fighting Information Manipulation convened wider ministries and agencies such as the media regulator, and focused on societal resilience and media literacy.

Source: Government of Canada (2020^[73]), *The Critical Election Incident Public Protocol*, <https://www.canada.ca/en/democratic-institutions/news/2020/10/the-critical-election-incident-public-protocol.html>; Government of Canada (2023^[74]), *Critical Election Incident Public Protocol*, <https://www.canada.ca/en/democratic-institutions/news/2023/02/critical-election-incident-public-protocol.html>; Bernigaud, A. (2023^[75]), “Defending the vote: France acts to combat foreign disinformation”, https://successfulsocieties.princeton.edu/sites/successfulsocieties/files/France_AB_Viginum_.pdf.

Although the CDU notes having strategic communication specialists on board, the dedicated capability for leveraging the communication function against mis- and disinformation is additionally vested in the National Security Communications Team (NCST) within the Cabinet Office, which draw on experts from GCS.

The National Security Communications Team (NCST) was established in 2018 following a National Security Capability Review with the goals of embedding strategic communications in the pursuit of security objectives, enhancing the capacity of security communications professionals across relevant government units, and “improv(ing) and exploit(ing) information through greater and more effective use of insight, all-source data, and effective analysis and dissemination” (UK Government, 2021^[76]).

Set up around the same time as the NCST and disbanded in August 2022, the Rapid Response Unit (RRU) constituted a GCS-led effort to monitor mis- and disinformation narratives and support relevant departments with responses and rebuttals (GCS, 2018^[77]). The work of these entities alongside communications units across all government departments is described further in the next sub-section.

Along with central government specialised units, Ofcom has a prominent role in the broader architecture of mis- and disinformation responses as the communications sector regulator. As noted above, Ofcom is also tasked with promoting media and information literacy (MIL) under the UK’s Communications Act. Moreover, it will be designated with holding online platforms to account once the Online Safety Bill is passed, along with other relevant legislation (DCMS, 2022^[67]).

Across government departments, additional teams are in place that carry out activities to counter mis- and disinformation relevant to their respective policy domains. For instance, the Department for Health and Social Care employs specialists who focus on health misinformation.¹⁵ The Home Office has an established anti-radicalisation programme that leverages communication methods to counter propaganda by terrorist organisations targeting the UK (Home Office, 2023^[78]).

UK efforts to counteract foreign disinformation internationally

The security and defence dimension of the fight against disinformation from hostile foreign actors constitutes an additional and central layer of the UK government’s action against this challenge of which strategic communication is a prominent pillar. Like many OECD Members, the UK is building resilience domestically as a target of information operations originating in hostile states. It is additionally leveraging its capabilities on the international stage to counteract similar operations in allied and partner countries as a way to safeguard its foreign policy objectives (Baugh, 2022^[79]).

At the centre of this effort is the recently established Government Information Cell (GIC) within the Foreign, Commonwealth and Development Office (FCDO). The GIC, which has a primarily overseas focus, was set up on the eve of Russia’s invasion of Ukraine with the specific mission of countering information operations by hostile actors that pose threats to UK security, foreign policy and democratic institutions. In the current context, the GIC is the central agency leading UK government actions to dispel Russia-sponsored propaganda relating to the invasion of Ukraine, an area in which it shares responsibilities with the Ministry of Defence and receives support from GCS and DCU (see Box 3.9).

Box 3.9. The evolution of the UK’s communication strategy against disinformation from Russia: From reaction to prevention and resilience

The illegal invasion of Ukraine by Russia beginning in February 2022 has brought the largest physical war to Europe since the end of World War II. Even before the war in Ukraine, however, disinformation campaigns and initiatives carried out by hostile actors and states were a leading hybrid threat challenging the security of democracies around the world. Against a backdrop of technological transformation to the information ecosystem, hostile actors have become increasingly effective at using disinformation and propaganda tactics to sow conflict and destabilise societies in ways that favour their strategic objectives.

Like other democratic countries, the UK government has built on its experience in combating information operations by the Russian state and affiliated entities to counteract such threats on the eve of and in the aftermath of the invasion of Ukraine. Strategic communication action played a key role in this effort, alongside a range of governance responses.

The UK faced Russian-sponsored disinformation threats on its soil in the context of the poisoning of Sergei and Yulia Skripal in Salisbury (Gunter and Robinson, 2018^[80]; Harding, 2018^[81]). Since then, it has built its understanding of the narratives and tactics used by hostile actors, drawing on expertise built from international work in eastern European countries that have long been targets of Russian-led disinformation. At that point, actions against these threats were mostly reactive, according to OECD interviews with officials involved. Ongoing research and enhanced monitoring capabilities have been developed across UK communications offices, in addition to the publication of and continued revisions to the RESIST counter-disinformation toolkit (GCS, 2022^[82]). The lessons learned from the Skripal experience informed the UK communications approach in subsequent incidents, leading to the strategy deployed on the eve of Russia's war of aggression against Ukraine.

As a pillar of its diplomatic and security strategy, UK government communications sought to prevent false narratives from gaining traction and giving legitimacy or credibility to Russia's actions domestically, in Ukraine, or in third countries. Immediately prior to the invasion, the UK government gathered evidence of a mounting military presence and increasingly threatening Russian rhetoric. These included bogus claims that western Ukrainians were Nazi-sympathisers and accusations that the United States was using proxy forces to plan a chemical attack (Barnes, 2022^[83]). Particularly, UK government analysts noted that Russian propaganda was aiming to create "false flag" or pretext claims with the objective of sowing confusion, masking operational planning, and creating a false pretext for invasion (Baugh, 2022^[79]).

The war notably marked a shift from a prior counter-disinformation strategy based more significantly on reactive communications to an approach that prioritised prevention against now-familiar disinformation tactics. In the lead-up to the invasion, UK communication efforts against Russian information operations introduced the novel practice of declassifying selected intelligence and disseminating it across communication channels, both domestically and internationally. Intelligence released warned about Russia's intention to install new leadership in Ukraine, for example (Lombardi, 2022^[84]). These actions aimed to reduce the scope for uncertainty and lack of evidence that falsehoods and rumours need to gain traction, while helping to keep the public informed and justify policy decisions. In this context, the UK has contributed to the growing practice of using open source intelligence (OSINT) to pre-empt and debunk disinformation. This content had both domestic and international audiences in mind, and served as a diplomatic tool for the UK to advance evidence-based narratives in an information vacuum.

Since 24 February 2022, intelligence has been distributed daily across major social media platforms via the Ministry of Defence's official handles. Ensuring the reach of these pieces of intelligence among priority audiences has been a considerable challenge, especially across borders and languages. As part of the dissemination effort, Ministry of Defence officials have held ongoing briefings with media, defence opinion leaders, and senior officials. This provides a consistent set of facts to engender alignment and consistency of messaging, and limit confusing or conflicting public claims by like-minded stakeholders. Accounts from the Ministry noted that significant amplification also occurred organically thanks to influencers in the geopolitical sphere.

The dissemination effort was matched with advanced monitoring of the information space to identify emerging and trending narratives, including focus groups and social media listening. Domestically, the Ministry of Defence communication team identified six attitudinal segments of the UK population based on their views on defence. Out of the six, an older and highly informed audience group was deemed a priority target.

Declassified intelligence was shared directly with 97 media outlets, and communication teams have worked with media from 26 countries, also in co-ordination with UK embassies overseas (Malnick, 2022^[85]) GIC content has been translated into multiple languages, including German, Arabic and Mandarin (Dickson, 2022^[86]). Reports indicate that to target Russian audiences, content has been distributed through advertising agencies on local sites such as VK, a Russian social media platform (Malnick, 2022^[85]). Likewise, Telegram has also become a primary channel to circumvent bans introduced in Russia on other social and messaging platforms.

As the war entered its second year, UK communicators fighting back in the information war reported they were aiming to challenge the power of Russia's narratives, manage growing audience and message fatigue as the conflict continues, and consistently measure their impact to refine their methods.

Source: OECD interviews with Ministry of Defence, FCDO and Cabinet Office; Harding, L. (2018^[81]), "Deny, distract and blame': How Russia fights propaganda war", <https://www.theguardian.com/uk-news/2018/may/03/russia-propaganda-war-skripal-poisoning-embassy-london>; Gunter, J. and O. Robinson (2018^[80]), "Sergei Skripal and the Russian disinformation game", <https://www.bbc.com/news/world-europe-45454142>; GCS (2022^[82]), *RESIST 2 Counter Disinformation Toolkit*, <https://gcs.civilservice.gov.uk/publications/resist-2-counter-disinformation-toolkit/>; Barnes, J. (2022^[83]), "Russia steps up propaganda war amid tensions with Ukraine", <https://www.nytimes.com/2022/01/25/us/politics/russia-ukraine-propaganda-disinformation.html>; Baugh, S. (2022^[79]), "Responding to Russia's invasion", <https://gcs.civilservice.gov.uk/news/responding-to-russias-invasion/>; Lombardi, P. (2022^[84]), "UK warns of Kremlin plans to install new leadership in Ukraine", Politico, <https://www.politico.eu/article/russia-plan-coup-ukraine-uk-foreign-office/>; Malnick, E. (Malnick, 2022^[85]), "Inside the secret government unit returning fire on Vladimir Putin's 'weaponised lies'", <https://www.telegraph.co.uk/news/2022/03/19/inside-secret-government-unit-returning-fire-vladimir-putins/>; Dickson, A. (2022^[86]), "Britain's (opaque) war on Russian propaganda", <https://www.politico.eu/article/the-uk-counter-disinformation-russia-kremlin-cdu-media/>.

The Cell has gradually gathered a range of government specialists working across diplomatic and security operations, drawing on staff from the then DCMS, Ministry of Defence, FCDO, Cabinet and Home Office. Its staff encompasses diplomats and experts in analysis, communications, disinformation, behavioural science, and attitudinal change (DCMS, 2022^[87]). In this respect it is a valuable example of a multi-disciplinary entity equipped to tackle the multiple dimensions of the disinformation challenge.

International partnerships and co-ordination are at the heart of the GIC's mission. To this end, the GIC co-operates with peer groups in NATO, the G7 Rapid Response Mechanism and the Five Eyes intelligence-sharing community, although OECD interviews with officials have emphasised bilateral co-ordination as a primary mechanism for joint action with partner countries.

The Cell has a focus on building resilience in friendly third countries across Europe and in several low- and middle-income countries across continents, some of which are deemed more vulnerable to disinformation from foreign hostile actors. In this respect, the establishment of long-term multi-stakeholder networks and partnerships across countries has been central to its operations, according to OECD interviews with officials. Such networks have been built over recent years through diplomatic outreach and co-ordination. According to interviews with officials, this entailed identifying and supporting actors on the ground across government, journalism, fact-checking, OSINT communities, and activists by providing funding, training, and other forms of assistance. These activities bring together expertise from across the UK Government, with a prominent role for GCS in providing strategic communications support and capacity building.

Examples include actions to ensure reliable information reaches audiences in regions affected by the current war. The UK government has given GBP 4.1 million in emergency funding to support BBC Ukrainian and Russian language services in the region, to help it increase availability of verified and independent reporting about the ongoing conflict (UK Government, 2022^[88]). Since 2016, the international branch of GCS has also helped the Ukrainian government with strengthening its strategic communications capabilities, including by helping to build a professional network across government and delivering joint campaigns (Baugh, 2022^[79]). Since the beginning of the invasion, GCS and GIC have also used

communications to bolster morale and confidence within Ukraine through a sophisticated campaign described as a “leaflet drop operation for the social media age” (Baugh, 2022^[79]). GCS has likewise worked with governments in 20 countries across Eastern and Central Europe, where it trained over 500 communicators on using its RESIST 2 toolkit for spotting and debunking disinformation (further details below) (Baugh, 2022^[79]).

These objectives are also supported through dedicated actions included in the UK’s Conflict, Stability and Security Fund (CSSF) with its Countering Disinformation and Media Development Programme in collaboration with relevant agencies. This programme works to strengthen partner countries’ defences against disinformation by enhancing the quality of public service and independent media (UK Government, 2021^[89]). For instance, during the COVID-19 pandemic the programme adapted to prioritise COVID-19-related disinformation sponsored by hostile states and malign actors (UK Government, 2021^[89]). More recently, it has provided emergency support to media partners within Ukraine following Russia’s invasion (UK Government, 2021^[89]).

Finally, within the Ministry of Defence, the Army’s 77th Brigade is a dedicated unit “with specialist skills to combat new forms of warfare in the information environment”. It operates through non-lethal and non-military tactics to support military actions against adversaries (MOD, 2023^[90]). Its mission complements the work of the GIC to include intelligence analysis and the deployment of information operations specifically intended to gain advantage over military adversaries.

While it is difficult to measure the impact of each of the above-mentioned actions, a year and a half after the invasion began it appeared that public opinion in the UK remained favourable to policies for assisting Ukraine. There has also been continued support for sanctions against Russia and measures introduced to deprive it of oil and gas revenues to fund the war. Within government, evaluation of communication and other interventions has been carried out through polling data (both open-source and proprietary), search trend data and focus groups. As of February 2023, 81% of UK citizens stated that they want Ukraine to win the war, with support for maintaining current sanctions against Russia standing at 75%, with a similar proportion (73%) in favour of further economic sanctions against Russian interests in the UK (Smith, 2023^[91]). At the international level, UK government messaging exposing Russian disinformation has been shared in 108 countries.

Thorough evaluation of counter-disinformation activities is one of the priorities highlighted in the OECD *Principles* as vital to understanding efficacy of practices in an emerging field. Although UK communicators have a strong record of conducting rigorous evaluation, it will be important to evaluate all aspects of the government’s responses. Additionally, data and analysis could be made available to contribute to research and knowledge that can help strengthen international action.

Transparency and accountability in counter-disinformation interventions

“Transparency” is one of the OECD *Good Practice Principles* noted in Box 3.7 and is important to proactively tackling rumours and falsehoods. This principle is equally relevant to government transparency in its actions against mis- and disinformation amid low public trust and concern over privacy and freedoms. Scandals like Cambridge Analytica’s improper gathering and use of personal data have led to a public backlash in favour of greater privacy (Lapowsky, 2019^[92]). These episodes dented public confidence in platforms worldwide and alerted citizens about how the information they see can be manipulated. In the current climate, this context calls for transparency and accountability in the approaches and means deployed in the fight against mis- and disinformation.

The UK government is trusted by over half of its citizens to handle their personal data “exclusively for legitimate purposes” (OECD, 2022^[7]). Yet lack of transparency in the activities conducted against mis- and disinformation can work against the government’s goals of building public trust in its communication. More worryingly, in a polarised context there is a risk that insufficient transparency can be weaponised by actors

who portray the government as playing “arbiter of truth” or even adopting the same manipulative tactics as disinformation peddlers.¹⁶

Officials interviewed by the OECD have stressed the sensitive nature of countering foreign disinformation, especially when national security is concerned. They have also noted the risks of compromising the efficacy of their actions by exposing them publicly, thereby allowing hostile actors to react. These are grounds for maintaining a degree of confidentiality.

On the other hand, there are aspects of counter-mis- and disinformation work that concern UK citizens and their data. Suppression of content can also be problematic. These would benefit from greater scrutiny. For example, the Counter Disinformation Unit (CDU) has “trusted flagger” status¹⁷ on a number of online platforms. This facilitates its role in highlighting content that is illegal or violates platform content policies. Although decisions to take down content or add warning labels lie with the platforms themselves, civil society actors have urged the government to introduce requirements for the disclosure of efforts made to influence social media companies’ content moderation decisions (Full Fact, 2022^[70]). Some of such government requests are disclosed by platforms themselves,¹⁸ although the criteria and mechanisms for flagging or removal decisions remain opaque (Trendall, 2022^[93]; Big Brother Watch, 2023^[94]; Dickson, 2022^[86]). Transparency in this domain, including over the criteria used for flagging content, would strengthen public confidence that freedom of speech is upheld while moderating content online. It would also enable external scrutiny that such actions are adequately addressing the problem.

The complex architecture of structures across the UK government working to counteract mis- and disinformation can be difficult to grasp for the public. The perceived opacity around these structures, their specific objectives, and the methods they employ have been remarked on by several observers (Trendall, 2022^[93]; Big Brother Watch, 2023^[94]; Dickson, 2022^[86]). There has been a limited amount of public information, provided in the form of answers to questions by Members of Parliament seeking to exercise scrutiny over such activities.

Although many of the above structures are explicitly inter-governmental, the degree of integration and co-ordination among actors in different intervention areas could be strengthened to ensure a more whole-of-government approach, according to interviews with communicators. There is also little clarity from public information and interviews with stakeholders about potential overlap or complementarity in the activities of different teams, for instance, in monitoring online narratives or flagging content to platforms.

A comprehensive strategy encompassing all elements of government action against mis- and disinformation could be a valuable way to transparently lay out objectives, programmes and responsible entities. It would additionally ensure Parliamentary scrutiny, gain public legitimacy, and foster greater co-operation by ensuring relevant stakeholders can contribute towards shared goals in a whole-of-society effort.

For example, the process to establish Viginum in France (described in Box 3.8 above) sought specifically to ensure the legitimacy of and support for the initiative ahead of its establishment (Bernigaud, 2023^[75]). Notably, it involved the introduction of an inter-ministerial Ethics and Scientific Committee to monitor activities that government units would be carrying out. It also included a consultative process to build political consensus around the eventual agency tasked with safeguarding the election from disinformation (Bernigaud, 2023^[75]). Such measures help consolidate a whole-of-government approach to tackling misinformation that enjoys legitimacy and widespread support. Similar steps could be part of a review of the UK’s approach in line with the forthcoming passage and implementation of the Online Safety Bill.

Public communication approaches to prevent and respond to the spread of falsehoods

As in many OECD Members, communication interventions have played a central role in the UK's response to mis- and disinformation and helped build public resilience against them. During interviews with the OECD Secretariat, several public officials emphasised that reactive public communication was the primary tool at the government's disposal when online mis- and disinformation first emerged as a significant threat.

Since then, GCS and teams across departments have worked to develop a range of tools and approaches that adapt good communication practices to both prevent and respond to the spread of rumours and falsehoods in the British information space. The core of the government's approach, however, remains grounded in timely, insights-based, transparent and inclusive communication consistent with the above-mentioned *OECD Good Practice Principles on Public Communication Responses to Mis- and Disinformation*.

Misinformation, and, occasionally, deliberate disinformation, affect virtually all policy domains in the UK similarly to many other OECD countries. Indeed, most of the departments surveyed noted topics and policies in their areas of work that are subject to rumours or false narratives, which affect how policies are perceived and their take-up by citizens. Although prominent topics and events, such as COVID-19 or the funeral of Queen Elizabeth II, require the deployment of dedicated teams and resources across departments, misinformation around more routine policies is handled directly by the relevant department, according to interviews.

To this end, the central GCS team in Cabinet Office has led on developing a range of guidance and frameworks that help each department apply tested methods based on lessons learned and cross-government experience (see Box 3.10). The most established framework is the RESIST 2 Counter-Disinformation Toolkit, which guides communication teams in spotting disinformation, assessing the appropriate course of action, and crafting communication in response. The RESIST model is a primarily reactive means of assessing the potential risk of a given narrative or piece of content in order to determine if any action is needed and what kind of debunking is required.

Box 3.10. GCS guidance for tackling instances of mis- and disinformation

RESIST 2 Counter Disinformation Toolkit

The RESIST 2 Toolkit aims to support policy makers and communicators in identifying and reducing the impact of mis- and disinformation through strategic communication interventions. It was introduced in 2018 and has since been updated to reflect learning from tackling problematic content online, including misinformation.

- **Recognise:** Includes a checklist that can be used by communicators to determine whether a piece of information is likely to be false.
- **Early warning:** Outlines the tools that can be used to monitor the media environment and supports communicators to map vulnerabilities within their organisations.
- **Situational insight:** Explores how information can be turned into actionable insight in a way that is accessible for officials.
- **Impact analysis:** Explains how communicators can use “structural analysis techniques” to predict the probable impact instances of false information.
- **Strategic communication:** Examines the skills communicators should employ when developing and implementing communications strategies to maximise their impact.

- **Tracking effectiveness:** Sets out the importance of measuring the effectiveness of communication strategies against pre-defined objectives.

The Wall of Beliefs Toolkit

The Toolkit focuses on audience insight to develop appropriate strategies to respond to false narratives. It states that its aim is to take a broad perspective, “understanding the role of identity, relationships, and worldview in the development of beliefs and susceptibility to false stories”.

It outlines four potential strategies to adopt, suggesting that communicators and policy makers should choose from among them depending on how embedded the false belief is and the extent to which it causes harmful behaviours.

- **Manage behaviours:** This approach is advised if beliefs are “highly embedded and also cause harmful behaviours in the short term”. Communicators should work alongside policy makers to challenge harmful behaviours directly without initially challenging the false beliefs that led to them. This could take the form of making the desired behaviour as easy as possible through incentives and removal of practical barriers, or, alternatively, making the harmful behaviour as difficult as possible by introducing new barriers such as fines. Once harmful behaviours have been managed, communicators can shift to a proactive promotion strategy.
- **Proactive promotion:** This strategy focuses on communicating the truth without directly engaging with falsehoods, using a range of channels to develop a compelling story with a focus on presenting information in a way that is easy to understand and recall.
- **Reactive response:** This strategy is appropriate if beliefs are not particularly embedded, but they are causing harmful behaviour in the short term. In this instance, a reactive or counter-narrative response is advised. This can involve directly addressing disinformation, explaining clearly why it is false, and ensuring the truth is set out clearly. Communication should be targeted to specific relevant audiences, employing a range of channels.
- **Watch and wait:** This approach is appropriate when beliefs are neither causing harmful behaviour nor particularly embedded within the target audience. Watching and waiting involves taking no immediate action and, instead, monitoring the false belief for signs that it may become more embedded.

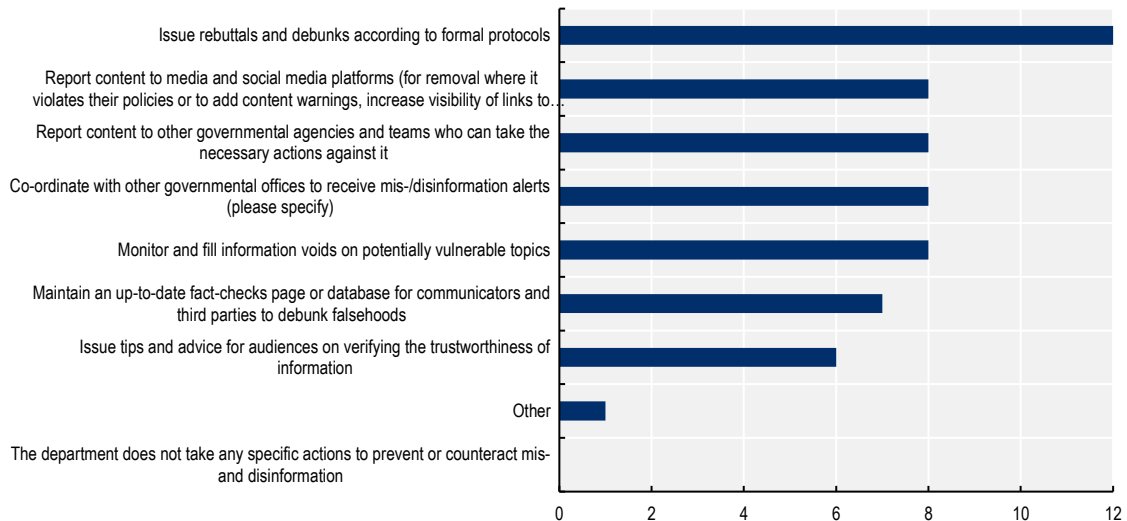
Source: GCS (2022^[82]), *RESIST 2 Counter Disinformation Toolkit*, <https://gcs.civilservice.gov.uk/publications/resist-2-counter-disinformation-toolkit/>; GCS (2022^[95]), *The Wall of Beliefs*, https://gcs.civilservice.gov.uk/wp-content/uploads/2022/09/Wall_of_Beliefs_-_publication.pdf.

More recently, GCS has also developed a behavioural science-based tool, the “Wall of Beliefs”, to help communicators and policy makers understand how false narratives and beliefs become entrenched in some audiences. The tool guides officials on how to approach these cases. Understanding motives and cognitive or social factors that explain why certain audiences are vulnerable to a given narrative or falsehood is important. This tool is especially relevant to navigating an environment in which confirmation bias linked to identities and values is a powerful predictor of how different groups engage with information and sources.

UK government departments reported taking the lead against false and misleading content and appear well-positioned to intervene effectively. Nine of twelve surveyed departments reported that their communicators receive training on mis- and disinformation responses. They noted taking a number of steps to deal with this challenge, which are illustrated in Figure 3.5.

Figure 3.5. Actions to prevent mis- and disinformation concerning policy areas

Which of the following actions does the department's communication unit perform to prevent or counter mis- and disinformation concerning its policy areas?



Note: N=12, multiple responses possible.

Source: OECD survey of UK government communication offices at departmental level, 2022.

All departments reported flagging problematic content within government and directly debunking it. Almost all departments also claimed reporting content to social media companies. According to interviews, departments tend to conduct their own detection and analysis of content, with some relying on a centralised service. Indeed, departmental communicators often see their teams as better placed to spot and act on misinformation in their own domains because of their deeper understanding of the topics.

Notably, several departments highlighted taking pre-emptive approaches to get ahead of potential mis- and disinformation. Figure 3.5 shows that a majority work to address information voids and proactively seek to issue information to avoid scope for rumours to take hold. The same proportion also publish fact-checks and up-to-date information, especially so that it may be accessed by media or fact-checking organisations also seeking to curb the spread of mis- and disinformation.

The Department for Education's *Education Hub* blog¹⁹ is one such example of proactive filling of information voids. The communication unit actively monitors incoming questions and search queries to update their Frequently Asked Questions (FAQs) page. It develops explanatory content that addresses identified information needs of audiences. It also provides facts for media and stakeholders to use in their reporting where such information is missing.

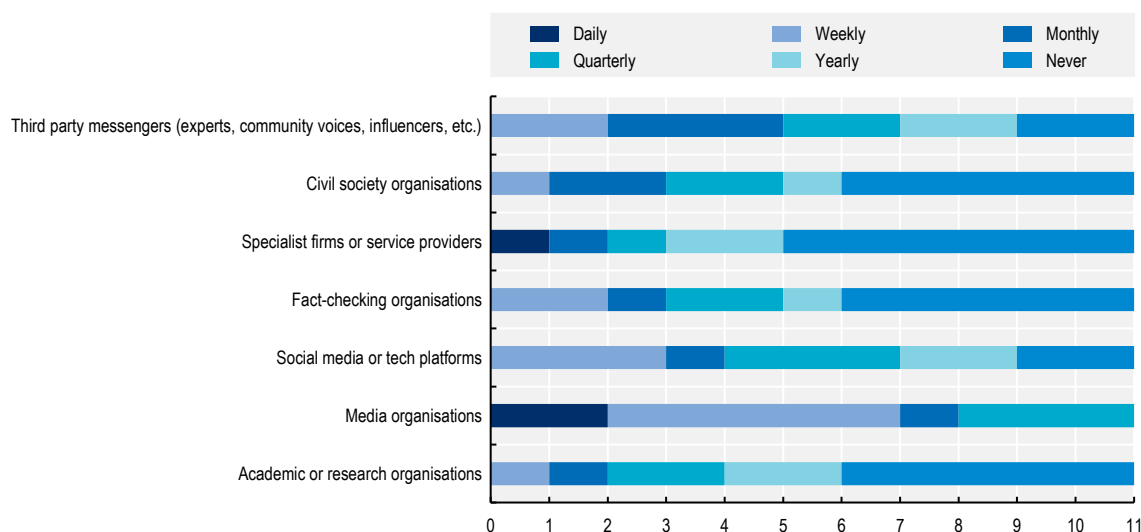
Related to this is the practice of pre-briefing internal and external messengers on facts, data and official lines. A few communicators interviewed identified diverging and inconsistent statements by officials, journalists, pundits and influencers as both increasing the risk of misinformation and hampering efforts to mitigate it. Conversely, they indicated that their efforts to issue topical briefings ahead of public announcements can serve to pre-empt dissonance over facts. A communicator interviewed stressed the importance of relationship-building and trust with such stakeholders and messengers. They suggested that briefings rely on neutral facts and data, and warned of the risks of politicised messaging with these third parties.

Some departments noted consulting or collaborating with a range of stakeholders as part of their efforts to counter mis- and disinformation (see Figure 3.6). Media and third-party messengers emerged as top stakeholders for collaboration. Conversely, half of departments in the survey also work with researchers, fact-checkers and civil society but less frequently. These examples illustrate whole-of-society collaboration against this challenge, which is one of the OECD *Good Practice Principles*, and highlight opportunities to make the most of the UK's strong civil society and media space.

Pre-emptive public communication approaches have also been applied to support media and information literacy (MIL) objectives and educate social media users about correct sharing behaviour on platforms that can amplify mis- and disinformation. A dedicated public information campaign by DCMS under the slogan "Don't Feed the Beast" targeted social media users with a five-step 'SHARE' checklist showing how to identify whether a given piece of content is misleading before sharing it. The campaign was deemed a successful contribution towards MIL policy goals: impact evaluation indicated that one in five adults recognised the campaign and saw a rise in awareness of disinformation. Statistics from Ofcom further highlighted that the campaign contributed to increased numbers of people using fact-checking websites (GCS, 2021^[96]).

Figure 3.6. Consultation with non-governmental organisations on countering disinformation

How often has your office consulted or collaborated with non-governmental organisations on the issue of countering disinformation in the past two years?



Note: N=12, single choice answer.

Source: OECD survey of UK government communication offices at departmental level, 2022.

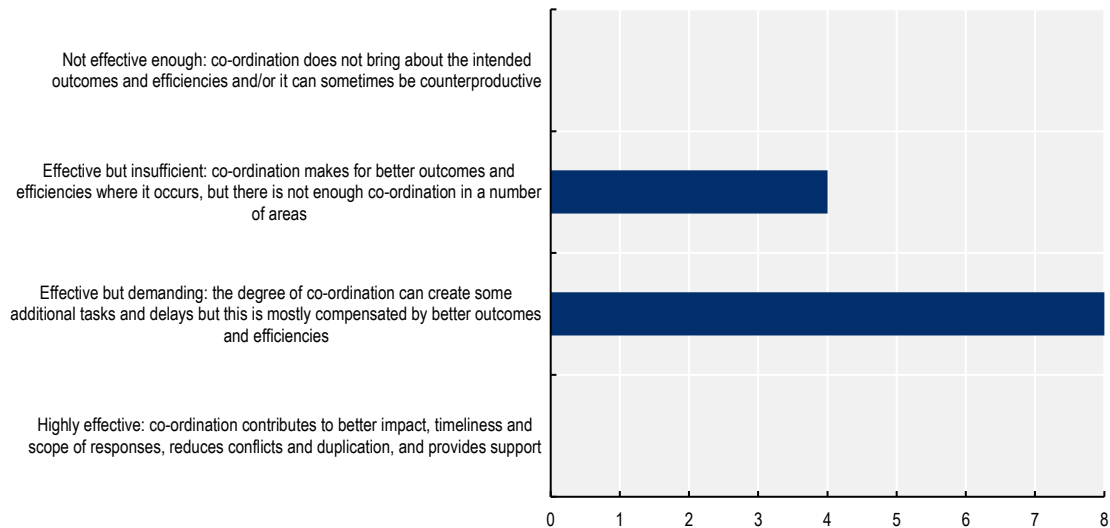
The role of GCS' central team in co-ordinating communication responses

At the centre of government in the Cabinet Office, the GCS team plays a co-ordinating role in relation to mis- and disinformation that cuts across departmental siloes and provides additional central capacity to monitor and respond to threats. Building on this role, there is scope to improve how the centre and the departments work together in this area. For instance, co-ordination was deemed "effective but demanding" by all but four of the departments that took part in the OECD survey, with the latter responding that co-ordination is insufficient (see Figure 3.7).

Some discrepancies are also visible in departments' responses on their reliance on central guidance and the clarity of the strategy and aims in this domain. Two of the six departments noted not relying on any central guidance on mis- and disinformation, whereas half of them said they “neither agree nor disagree” that their counter-disinformation communication strategy and aims are clear. These findings highlight the opportunity to better disseminate GCS guidance and common objectives across government.

Figure 3.7. Co-ordination on mis- and disinformation responses

How effective is co-ordination among departments and relevant agencies on mis- and disinformation responses?



Note: N=12, single choice answer.

Source: OECD survey of UK government communication offices at departmental level, 2022.

Overall, the above responses echo findings from OECD interviews that approaches to tackle mis- and disinformation are still evolving. This is also demonstrated by the recent updates to counter-disinformation guidance and the dismantling of the Rapid Response Unit, which has not at the time of writing been replaced with an alternative service. Yet, accounts from interviews with departmental communicators point to an appetite for more joined-up efforts and support.

One aspect in which this is valuable is practice-sharing and learning across departments, which is in high demand as each department seeks to stay up-to-date with emerging approaches and learn from the leaders. A successful example is that of the internal newsletter listing the “five things we learned”, namely the top five insights on mis- and disinformation that were gathered first during COVID-19 and later around the war in Ukraine. This example was cited in interviews as being a useful tool to share knowledge and help make sense of the vast amount of false content and its relatively limited impact on audiences. To facilitate such transfer of practices, GCS could consider appointing a “Head of Discipline”²⁰ to act as the cross-government expert in charge of developing knowledge, guidance and training on this competency area.

A vision for comprehensive, co-ordinated communication actions against mis- and disinformation is notably absent from the GCS’ 2022-2025 Strategy for reform despite its focus on innovation and fitness for the future. This area could also be more explicitly addressed in the Functional Standards on Communication. Although communication ought to be part of a holistic government approach, setting out commitments for a consolidated whole-of-GCS approach to mis- and disinformation could be a valuable addition to its reform Strategy. It would further institutionalise the role of public communication within government responses, thereby contributing to greater recognition for it as a main lever of government.

Key findings and recommendations

- Government action to build trust and counteract mis- and disinformation should take the identities, values and world views that underpin the British public's perceptions of trust and information consumption choices into greater consideration. This can help build social cohesion and dialogue to bridge divisions.
 - Government communicators could benefit from embracing “broad impartiality” in their work to strengthen unifying narratives and information. They can do this by prioritising communication that is relevant to and representative of the interests and experiences of the largest portions of society rather than content that merely drives the news cycle.
- GCS should focus on strengthening the reputation of the communication function for trustworthiness. It could consider ways to further shield the function from risk of politicisation. This is crucial to fulfilling its mandate and would help overcome unfavourable legacy perceptions surrounding public communication.
 - GCS might promote a more cautious and extensive application of its Propriety Guidelines, including narrowing the scope for subjective interpretation via illustrative examples such as those featured in the propriety and ethics training.
 - When conducting reputation management for the government, GCS could consider using the OECD Drivers of Trust (reliability, responsiveness, openness, fairness, integrity) as criteria to follow.
 - Some aspects of media relations such as reacting to certain media enquiries or rebutting coverage, emerged as the areas where civil servants can come under greater pressure to cross the boundaries of propriety defined in the GCS Guidelines. Reinforcing the division of responsibilities between party-political press officers and civil service ones could reduce civil servants' exposure to these risks.
- GCS should encourage wide uptake of the updated mandatory ethics and propriety training in its 2022-25 Strategy.
- The government could consider establishing an independent oversight mechanism to exercise regular scrutiny over the public communication function and ensure it is conducted with propriety and in the service of citizens. A parliamentary or independent body could be tasked with reviewing the delivery of public communication against the principles outlined in the 2004 Phillis Review or an updated version of the latter.
- The government could undertake a deliberative process to obtain recommendations on the role of public communication for building trust, combating mis- and disinformation and supporting social cohesion. The process could be the basis for a citizen charter on communication or a revised set of principles for the function, building on those provided in the 2004 Phillis Review. This will help discern citizens' expectations for public communication and build trust in a responsible use of new methods, data and technologies.
- Within the limits of non-sensitive or declassified information, units and agencies working to counteract foreign disinformation could contribute to a better understanding of this emerging practice by conducting evaluations of their programmes and co-operating with the research community to analyse their efficacy.
- With the passing of the Online Safety Bill, the government could consider developing a comprehensive strategy or policy document to define the existing and planned components of its action against mis- and disinformation, including mechanisms for evaluation, scrutiny and accountability to Parliament and the public.

- The emphasis on pre-emptive and proactive communication actions to monitor and fill information voids and deliver timely information ahead of rumours forming is welcome. GCS could help mainstream and reinforce this practice across departments by developing guidance and listing relevant examples.
- GCS could also encourage greater practice-sharing in this domain, including by appointing a “Head of Discipline” in the countering of mis- and disinformation.

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Notes

¹ These are among the drivers of trust identified by the OECD. For more information on OECD research on trust see <https://www.oecd.org/governance/trust-in-government/> (accessed on 31 March 2023).

² This report relies on the following definitions of the terms used in the OECD *Good Practice Principles on Public Communication Responses to Mis- and Disinformation* Misinformation: “when false information is shared, but no harm is meant”. This consists typically of rumour or misleading content shared unknowingly by individuals. Disinformation: “when false information is knowingly shared to cause harm”. Disinformation can often be traced back to actors with malicious motives and can be part of concerted large-scale campaigns (<https://read.oecd.org/10.1787/6d141b44-en>, accessed on 31 August 2023).

³ *Affective* polarisation is defined by Duffy et al. (2019_[10]) to mean “when individuals begin to segregate themselves socially and to distrust and dislike people from the opposing side, irrespective of whether they disagree on matters of policy”, as opposed to *issue* polarisation, which they define as “the divisions formed around one or more policy positions or issues.”.

⁴ OECD interview with civil society stakeholder, December 2022.

⁵ See Euromyths, <https://www.europarl.europa.eu/unitedkingdom/en/news-and-press-releases/euromyths.html> (accessed on 31 March 2023)

⁶ For example, see *Assessing government communication - A roundtable*, Kevin Rafter; Elizabeth Canavan; Fiach Mac Conghail; Derek McDowell (2022), p. 175, “I observe that to achieve attention seems to create more of a trend towards reductive, provocative headlines, ‘hard case’ stories... and purposefully dichotomist views.”.

⁷ The term ‘fake news’ reflects the wording used by YouGov for this poll.

⁸ In the UK, Special Advisers (commonly abbreviated to SpAds) are political advisers hired to provide ministers with party-political counsel.

⁹ Direct quote attributed to a government communicator and participant at the round-table on which the study cited is based.

¹⁰ The language relates to the 2.0 version dated 2019, rather than the 3.0 version updated in 2023.

¹¹ The drivers of trust identified by the OECD are:

- Competence: responsiveness, reliability
- Values: fairness, integrity, openness

¹² The same committee exists in the House of Lords.

¹³ The DISMIS Resource Hub is available online at <https://www.oecd.org/stories/dis-misinformation-hub/> (accessed on 4 September 2023).

¹⁴ At the time of writing, DCMS was beginning a reform to be split into a Department for Science, Innovation & Technology (DSIT), which would retain the oversight of digital markets policy and related counter-disinformation actions, and a Department for Culture, Media and Sport.

¹⁵ According to OECD interviews with representatives from the Department.

¹⁶ See for instance Big Brother Watch (2023^[94]).

¹⁷ Meaning it is one of the trusted entities which content moderation queries are treated as priority by social media platforms moderators.

¹⁸ See for instance Meta's disclosures: <https://transparency.fb.com/data/content-restrictions/country/GB/> (accessed on 30 May 2023).

¹⁹ See <https://educationhub.blog.gov.uk/> (accessed on 30 May 2023).

²⁰ As discussed in Chapter 1, Heads of Disciplines are unofficial GCS designations for senior communicators who are the leading experts in a specific area or discipline of public communication.



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