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The world of shadows of disinformation: the emerging technological caves*

O mundo das sombras da desinformação: as emergentes cavernas tecnológicas

Iolanda A. S. Rodrigues de Brito**

*‘Vemos, ouvimos e lemos
Não podemos ignorar’.*

Sophia de Mello Breyner Andresen, *Cantata da Paz*.

*‘That, trusted home,
Might yet enkindle you unto the crown,
Besides the Thane of Cawdor. But ‘tis strange.
And oftentimes, to win us to our harm,
The instruments of darkness tell us truths,
Win us with honest trifles, to betray’s
In deepest consequence’.*

William Shakespeare, *Macbeth*, Act 1, Scene 3.

Abstract: By returning to one of the most prominent classics of political philosophy, *The Republic*, by Plato, this article aims to raise public awareness about the repercussions of the mass proliferation of falsehoods in the public sphere, concerning the sustainability of democratic values. By considering Socrates’ critique about a democracy’s weaknesses and the allegory of the cave, this paper explores the idea that disinformation is akin to Plato’s shadows on the cave wall. Fabricated by anonymous, undemocratic forces, false

Resumo: Ao retomar um dos mais proeminentes clássicos da filosofia política, *A República*, de Platão, este artigo visa despertar a consciencialização pública para as repercussões da proliferação massiva de falsidades na esfera pública, no que concerne à sustentabilidade dos valores democráticos. Ao considerar a crítica de Sócrates sobre as fraquezas da democracia e a alegoria da caverna, explora a ideia de que a desinformação é semelhante às sombras na parede da caverna de Platão. Fabricadas por forças anónimas

* An earlier version of this paper has been presented in lectures at the *Ius Gentium Conimbrigae* – Human Rights Centre, University of Coimbra.

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news is primarily intended to turn citizens into prisoners of technological caves, as it manipulates their perceptions of the world, deflates their freedom, and interferes in democratic elections. In each citizen, it is imperative to encourage the pressing need to commit to the truth. Otherwise, people will become accustomed to the cave's darkness and begin believing that imprisoned life is all there is.

Keywords: technological cave; disinformation; manipulation; truth-blind society; democracy.

e antidemocráticas, as notícias falsas têm como principal escopo transformar os cidadãos em prisioneiros de cavernas tecnológicas, manipulando as suas percepções do mundo, esvaziando a sua liberdade e interferindo em eleições democráticas. Em cada cidadão, é imperativo estimular a necessidade urgente de um compromisso com a verdade. De outra forma, os cidadãos acostumar-se-ão à escuridão dentro da caverna, acreditando que a vida aprisionada é tudo quanto existe.

Palavras-chave: caverna tecnológica; desinformação; manipulação; cegueira social para a verdade; democracia.

Summary: 1. Introduction; 2. From the Socratic critique of *demokratia* to his vision of *Kallipolis*; 3. The shadows of falsehoods on the technological cave wall; 3.1. Terminology; 3.2. Emerging social framework; 3.3. Brief historical background; 3.4. Effectiveness factors; 3.5. The paradox of time; 3.6. Motivations of perpetrators; 3.7. Real-life consequences; 3.8. Misleading potential; 4. The epidemiological effect of disinformation on democratic societies; 5. The (re)discovery of sunlight: the truth; 5.1. Public consciousness; 5.2. Ongoing counteractive strategies; 5.3. The current state of affairs; 5.4. The urgent need to awaken citizens to the light of truth; 6. Conclusion.

1. Introduction

Socrates' criticism of Athenian democracy should be examined in the light of twenty-first century democracies in the West. Even if his vision of the 'beautiful city' (*Kallipolis*)¹ has to be rejected², his warnings of democracy's weaknesses³ deserve consideration to help neutralize undemocratic entities that threaten to spread and endanger human rights and Western values.

The propagation of massive amounts of falsehoods in the public sphere, which are propelled by new technologies and social media, conceals an anti-democratic ideology

¹ ALLAN BLOOM, *The Republic of Plato*, Second Edition, New York: BasicBooks, 1991, 408.

² In this regard, see, for example, KARL POPPER, *The Open Society and Its Enemies, Volume I, The Spell of Plato*, London and New York: Routledge Classics, 2015, 121-148.

³ BLOOM, *The Republic*, cit. (footnote 1), 233-249.

that is not only intended to distort opinion on public interest issues but also interfere with an individual's political will to manipulate the democratic process⁴. Citizens that struggle with an overload of (true and false) information often experience the *illusion of enlightenment*⁵. Since individuals can increasingly access information, they believe that their knowledge of the world is expanding⁶. However, instead of becoming enlightened, they comprehend less than they knew before⁷, which triggers an epidemiological effect that pervades the structural dimensions of a democratic society⁸.

2. From the Socratic critique of *demokratia* to his vision of *Kallipolis*

The ancient Greeks have a reputation for inventing *demokratia*, which is etymologically understood as the 'rule of the people'⁹. Even though it emerged as a form of resistance against tyranny, many repudiated Athenian democracy, fearing that it would instigate chaos¹⁰. In Book VIII of *The Republic*, Plato confronts the reader with Socrates' critique. Despite recognizing the virtues of this regime, the philosopher highlights a host of dangerous issues associated with it, such as corruption, anarchy and ignorance¹¹. For Socrates, democracy's primary problem is its susceptibility to tyranny¹². He believed that democracies would eventually elect tyrants: 'as the saying goes, the people in fleeing the smoke of enslavement to free men would have fallen into the fire of being under the mastery of slaves;

⁴ SUSAN MORGAN, *Fake News, Disinformation, Manipulation and Online Tactics to Undermine Democracy*, 'Journal of Cyber Policy', Vol. 3, n.º 1, 2018, 39-43, available at <https://www.tandfonline.com/doi/full/10.1080/23738871.2018.1462395>, last accessed 25 July 2022.

⁵ About the illusion of enlightenment, see GERRIT HÖLZLE, *Verstrickung durch Desinformation: Eine Rechtsdogmatische Auseinandersetzung auf Grundlage einer Ökonomischen Analyse im Recht*, Tübingen: Mohr Siebeck, 2012, 11; MICHAEL MORREAU, *Democracy Without Enlightenment: A Jury Theorem for Evaluative Voting*, 'The Journal of Political Philosophy', Vol. 29, n.º 2, 2021, 188-210, available at <https://doi.org/10.1111/jopp.12226>, last accessed 25 July 2022; CRYSTAL HALL, LYNN ARISS, and ALEXANDER TODOROV, *The Illusion of Knowledge: When More Information Reduces Accuracy and Increases Confidence*, 'Organizational Behavior and Human Decision Processes', Vol. 103, n.º 2, 2007, 277-290, available at <https://doi.org/10.1016/j.obhdp.2007.01.003>, last accessed 25 July 2022.

⁶ HALL, ARISS and TODOROV, *The Illusion*, cit. (footnote 5).

⁷ HALL, ARISS and TODOROV, *The Illusion*, cit. (footnote 5).

⁸ ADAM KUCHARSKI, *Study Epidemiology of Fake News*, 'Nature', Vol. 540, 2016, 525, available at <https://doi.org/10.1038/540525a>, last accessed 25 July 2022.

⁹ MOGENS HANSEN, *Was Athens a Democracy? Popular Rule, Liberty and Equality in Ancient and Modern Political Thought*, Copenhagen: The Royal Danish Academy of Sciences and Letters, 1989, 3.

¹⁰ JOHN KEANE, *The Life and Death of Democracy*, New York: Norton & Company, 2009, ix.

¹¹ BLOOM, *The Republic*, cit. (footnote 1), 170-171, 239-240; RICHARD HOLWAY, *Achilles, Socrates, and Democracy*, 'Political Theory', Vol. 22, n.º 4, 1994, 561-590, at 561.

¹² BLOOM, *The Republic*, cit. (footnote 1), 240.

in the place of that great and unseasonable freedom they have put on the dress of the harshest and bitterest enslavement to slaves'¹³.

According to Socrates, democracy, 'like a many-colored cloak decorated in all hues', appears as the most idyllic form of government¹⁴. However, the greed for what democracy defines as its supreme good – freedom – is also the cause of its dissolution¹⁵. Socrates explains, 'anything that is done to excess is likely to provoke a correspondingly great change in the opposite direction'¹⁶. So, 'tyranny is probably established out of no other regime than democracy' because extreme freedom leads to extreme slavery 'both for private men and city'¹⁷.

The philosopher says, 'the acropolis of the young man's soul [...] was empty of fair studies and practices and true speeches' and 'in their absence, false and boasting speeches and opinions ran up and seized that place'¹⁸. Socrates explains the enjoyment of absolute freedom:

'[He] lives along day by day, gratifying the desire that occurs to him, at one time drinking and listening to the flute, at another downing water and reducing; now practicing gymnastic, and again idling and neglecting everything; and sometimes spending his time as though he were occupied with philosophy. Often he engages in politics and, jumping up, says and does whatever chances to come to him; and if he ever admires any soldiers, he turns in that direction; and if it's money-makers, in that one. And there is neither order nor necessity in his life, but calling this life sweet, free, and blessed he follows it throughout'¹⁹.

For the philosopher, the democratic man becomes a tyrant because in the dispute for wealth between oligarchs and the people, which is fertile with 'impeachments, judgments, and contests against one another'²⁰, the people are 'always accustomed to set up some one man as their special leader and to foster him and make him grow great'²¹. Therefore, 'when a tyrant grows naturally, he sprouts from a root of leadership and from nowhere else'²².

¹³ BLOOM, *The Republic*, cit. (footnote 1), 248-249.

¹⁴ BLOOM, *The Republic*, cit. (footnote 1), 235.

¹⁵ BLOOM, *The Republic*, cit. (footnote 1), 240-241.

¹⁶ BLOOM, *The Republic*, cit. (footnote 1), 242.

¹⁷ BLOOM, *The Republic*, cit. (footnote 1), 242.

¹⁸ BLOOM, *The Republic*, cit. (footnote 1), 238.

¹⁹ BLOOM, *The Republic*, cit. (footnote 1), 239-240.

²⁰ BLOOM, *The Republic*, cit. (footnote 1), 243-244.

²¹ BLOOM, *The Republic*, cit. (footnote 1), 244.

²² BLOOM, *The Republic*, cit. (footnote 1), 244.

This leader ‘is the man who incites faction against those who have wealth’²³ and deceives people with promises of ‘cancellations of debts and redistributions of land’²⁴. Soon, the notorious tyrannical request will emerge ‘to ask the people for some bodyguards to save the people’s defender for them’²⁵. Unsurprisingly, ‘the people grant the request, frightened for him and sure of themselves’ and “surely it’s plain that this leader himself doesn’t lie ‘great in his greatness’ on the ground, but, having cast down many others, stands in the chariot of the city, now a perfected tyrant instead of a leader”²⁶.

The philosopher explains how ‘[in] the first days of his time in office’, this leader will smile and greet people, denying his role as a tyrant and promising ‘much in private and public’²⁷. For example, he will claim to grant ‘freedom from debts’ and distribute ‘land to the people and those around himself’, while pretending ‘to be gracious and gentle to all’²⁸. As soon as he has consolidated his power, the leader will continuously ‘[set] some war in motion, so that the people will be in need of a leader’²⁹. Meanwhile, he will destroy all men suspected ‘of having free thoughts and not putting up with his ruling’, including those ‘who helped in setting him up and are in power’³⁰. As the public begins to criticize these actions, the tyrant will purge the city and ‘do away all of them until he has left neither friend nor enemy of any worth whatsoever’³¹.

The Athenian democracy that Socrates criticized, however, is substantially different from modern Western democracies. Founded on the values of liberty and equality, *demokratia* was based on four key principles: *isegoria* (the equal right to speak in political assemblies), *isonomia* (equal political rights), *isogonia* (equality of birth) and *isokratia* (equality of power)³². Despite apparent similarities, differences become unravelled when citizenship status is analysed more closely. For example, only a minority of men were recognised as citizens and citizenship status excluded women, slaves, and foreigners entirely, demonstrating that liberty and equality were not universally guaranteed, which is in contrast to the values of contemporary

²³ BLOOM, *The Republic*, cit. (footnote 1), 245.

²⁴ BLOOM, *The Republic*, cit. (footnote 1), 245.

²⁵ BLOOM, *The Republic*, cit. (footnote 1), 245.

²⁶ BLOOM, *The Republic*, cit. (footnote 1), 245.

²⁷ BLOOM, *The Republic*, cit. (footnote 1), 245-246.

²⁸ BLOOM, *The Republic*, cit. (footnote 1), 246.

²⁹ BLOOM, *The Republic*, cit. (footnote 1), 246.

³⁰ BLOOM, *The Republic*, cit. (footnote 1), 246.

³¹ BLOOM, *The Republic*, cit. (footnote 1), 246.

³² HANSEN, *Was Athens*, cit. (footnote 9), 21.

democracies³³. Despite this, it has been said that *demokratia* was more democratic than a modern-day democracy in other ways³⁴. In ancient Greece, citizens participated in the life of the *Polis*, but in current democracies, citizens elect representatives to exercise rule³⁵.

Regardless of Athenian democracy's imperfections, a pivotal aspect of Socrates' claim merits consideration. Even if the idea of a philosopher king should be rejected for its tyrannical potential, which would destroy the philosophy³⁶, it is correct in highlighting the importance of wisdom and virtue in governing³⁷. Socrates suggests that democracies, where rule is exercised by the people, turn into tyrannies because citizens lack this wisdom and virtue³⁸. According to Socrates, ignorance is one of the most important reasons for why democracy's problems come to fruition³⁹.

Even if Socrates' idea of the 'beautiful city' (*Kallipolis*) aroused general disapproval⁴⁰, Plato was perceptive to identify ignorance as an Achilles' heel of democracy. After all, this was the primary reason for the murder of his mentor, Socrates, in the Athenian democracy⁴¹. Therefore, the transformation into tyranny would be more difficult (if not improbable) in a democracy of enlightened citizens where knowledge is not a privilege of the elite (or 'chosen ones') but a guaranteed right of every individual⁴².

³³ HANSEN, *Was Athens*, cit. (footnote 9), 4.

³⁴ HANSEN, *Was Athens*, cit. (footnote 9), 4.

³⁵ HANSEN, *Was Athens*, cit. (footnote 9), 4.

³⁶ ALEXANDRE SÁ, *Plato and Democracy's Ambiguous Beauty (II): The Tension Between Philosophy and Democracy*, 'Archai: Journal on the Origins of Western Thought', Vol. 20, 2017, 15-38.

³⁷ CHRISTOPHER BOBONICH, *Why Should Philosophers Rule?: Plato's Republic and Aristotle's Protrepticus*, 'Social Philosophy and Policy', Vol. 24, n.º 2, 2007, 153-175, available at <https://doi.org/10.1017/S0265052507070203>, last accessed 25 July 2022.

³⁸ BOBONICH, *Why Should*, cit. (footnote 37), 153-175.

³⁹ BLOOM, *The Republic*, cit. (footnote 1), 60, 238, 244.

⁴⁰ JOE MULLER, *Constructing Kallipolis: The Political Argument of Plato's Socratic Dialogues*, Doctoral Dissertation, Harvard University, 2016, 148-149, available at <https://dash.harvard.edu/handle/1/33493293>, last accessed 25 July 2022; ANTON-HERMANN CHROUST, *Aristotle's Criticism of Plato's Philosopher King*, 'Rheinisches Museum für Philologie', Vol. 111, n.º 1, 1968, 16-22, available at www.jstor.org/stable/41244350, last accessed 25 July 2022.

⁴¹ MARK KINGWELL, *Why Every Government Should Keep an Empty Seat for a Philosopher King*, 'The Guardian', 10 May 2012, available at <https://www.theguardian.com/commentisfree/2012/may/10/empty-chair-for-philosopher-king>, last accessed 25 July 2022; C. J. ROWE, *Killing Socrates: Plato's Later Thoughts on Democracy*, 'The Journal of Hellenic Studies', Vol. 121, 2001, 63-76, available at <https://doi.org/10.2307/631828>, last accessed 25 July 2022.

⁴² JAMES WEINBERG and MATTHEW FLINDERS, *Learning for Democracy: The Politics and Practice of Citizenship Education*, 'British Educational Research Journal', Vol. 44, n.º 4, 2018, 573-592, available at <https://doi.org/10.1002/berj.3446>, last accessed 25 July 2022. See also MORREAU, *Democracy*, cit. (footnote 5).

As Plato put it, knowledge is the ‘best watchmen’ and guardian ‘in the thought of men’⁴³. By equipping each citizen with light that emerges from the truth, it is possible to ensure that the democratic leader will not be replaced by a tyrant, as Socrates predicted.

3. The shadows of falsehoods on the technological cave wall

In Book VII of *The Republic*, Socrates challenges his companions to imagine the following:

‘...human beings as though they were in an underground cavelike dwelling with its entrance, a long one, open to the light across the whole width of the cave. They are in it from childhood with their legs and necks in bonds so that they are fixed, seeing only in front of them, unable because of the bond to turn their heads all the way around. Their light is from a fire burning far above and behind them. Between the fire and the prisoners there is a road above, along which see a wall, built like the partitions puppet-handlers set in front of the human beings and over which they show the puppets’⁴⁴.

This segment is the beginning of the famous allegory of the cave. Socrates explains that ‘along this wall, human beings’ are ‘carrying all sorts of artifacts, which project above the wall, and statues of men and other animals wrought from stone, wood, and every kind of material’, while prisoners – ‘like us’ – ‘[have] been compelled to keep their heads motionless throughout life’, believing ‘that the truth is nothing other than the shadows of artificial things’⁴⁵.

Socrates suggests the prisoners’ liberation and healing from their bonds while encouraging his companions to wonder what one of those released prisoners would say ‘if someone were to tell him that before he saw silly nothings, while now, because he is somewhat nearer to what is and more turned toward beings, he sees more correctly’⁴⁶. After being forced from the cave, a man would feel pain across his body, and his eyes would hurt from the sunlight⁴⁷. At first, he would try to seek refuge in the shadows⁴⁸. If he were prevented from following this urge to return to the

⁴³ BLOOM, *The Republic*, cit. (footnote 1), 238.

⁴⁴ BLOOM, *The Republic*, cit. (footnote 1), 193.

⁴⁵ BLOOM, *The Republic*, cit. (footnote 1), 193-194.

⁴⁶ BLOOM, *The Republic*, cit. (footnote 1), 194.

⁴⁷ BLOOM, *The Republic*, cit. (footnote 1), 194.

⁴⁸ BLOOM, *The Republic*, cit. (footnote 1), 194.

shadows and dragged into the sun, he would be so dazzled that it would be difficult to observe real objects initially⁴⁹. Eventually, his eyes would adjust to the light and, finally, he would be able to see the truth in the upper world⁵⁰.

Suddenly, the released prisoner would recall and pity his companions inside the cave, who continued to live in ignorance⁵¹. He would desire to return to that subterranean world and announce the existence of sunlight in order to awaken them from a life of darkness so they may contemplate real objects and the Good⁵². While he would remain blinded by the light at the beginning, his eyes would slowly become accustomed to the dark and he would be able to see the shadows again⁵³. Yet, when he shares his experience with his companions, the other prisoners will laugh and say that leaving the darkness had corrupted his eyes⁵⁴. They will refuse to leave the cave⁵⁵.

Thousands of years later, reading Plato's allegory of the cave recalls the present-day phenomenon of disinformation⁵⁶. If false information is created to make citizens believe that it is a reproduction of reality, then it is similar to the cave's shadows⁵⁷. At an early stage, citizens tend to be aware of the intentional proliferation of falsehoods, but gradually, the subtle insistence of this manipulative strategy may

⁴⁹ BLOOM, *The Republic*, cit. (footnote 1), 194.

⁵⁰ BLOOM, *The Republic*, cit. (footnote 1), 195.

⁵¹ BLOOM, *The Republic*, cit. (footnote 1), 195.

⁵² BLOOM, *The Republic*, cit. (footnote 1), 195-196.

⁵³ BLOOM, *The Republic*, cit. (footnote 1), 195-196.

⁵⁴ BLOOM, *The Republic*, cit. (footnote 1), 195-196.

⁵⁵ BLOOM, *The Republic*, cit. (footnote 1), 195-196.

⁵⁶ This connection is not groundbreaking. See, for example, NICHOLAS LEMANN, *Solving the Problem of Fake News*, 'The New Yorker', 30 November 2016, available at <https://www.newyorker.com/news/news-desk/solving-the-problem-of-fake-news>, last accessed 25 July 2022; DAVID WILLIAMS, *Plato Predicted 'Pizzagate' (Or Rather, Fake News More Generally)*, 'The Washington Post', 13 December 2016, available at <https://www.washingtonpost.com/news/monkey-cage/wp/2016/12/13/plato-predicted-pizzagate-or-rather-fake-news-more-generally/>, last accessed 25 July 2022; THOMAS FROELICH, *A Not-So-Brief Account of Current Information Ethics: The Ethics of Ignorance, Missing Information, Misinformation, Disinformation and Other Forms of Deception or Incompetence*, 'BiD: textos universitaris de biblioteconomia i documentació', Vol. 39, 2017, available at <https://dx.doi.org/10.1344/BiD2017.39.8>, last accessed 25 July 2022.

⁵⁷ FROELICH, *A Not-So-Brief*, cit. (footnote 56). In *The Cave* (in Portuguese, *A Caverna*), the Nobel laureate José Saramago had already explored Plato's allegory in connection with modern technological developments. In the book, the contemporary cave is a shopping centre that gradually overshadowed an old pottery, causing the loss of an ageing potter's livelihood. The writer encourages the reader to reflect on the dehumanization caused by the emergence of new technologies. See JOSÉ SARAGAMO, *A Caverna*, Lisboa: Companhia das Letras, 2014.

be enough to construct a *bubble of fiction*⁵⁸ around each citizen, resembling life within the cave⁵⁹. However, this new cave is no longer shared, as individuals tend to live alone in a technological cave⁶⁰. On the modern wall, shadows of false news can be observed on electronic visual displays. Technological platforms show news feeds that are increasingly vulnerable to disinformation campaigns⁶¹.

Disinformation has a deceptive intention, as it is designed to convince, persuade, and disrupt⁶². Falsehoods are not confined to a single subject but extend across multiple themes that are interconnected within various societal dimensions from lies about the universe (e.g., the idea that the Earth is flat or climate change denial)⁶³ to political falsehoods⁶⁴ and false news, like reporting on a celebrity's

⁵⁸ GEORGE BARRELL, Jr., *Bubbles of Fiction*, New York: Dewitt & Davenport, 1852. In France, some scholars also refer to 'bubbles of disinformation on Facebook' ('*bulles de désinformation sur Facebook*'). See JULIEN FIGEAC *et al.*, *Facebook Favorise-t-il la Désinformation et la Polarisation Idéologique des Opinions?*, 'Questions de Communication', N.º 36, 2019, 167-187, at 185, available at <https://doi.org/10.4000/questionsdecommunication.21149>, last accessed 3 August 2022.

⁵⁹ LEMANN, *Solving*, cit. (footnote 56); FROELICH, *A Not-So-Brief*, cit. (footnote 56).

⁶⁰ The idea of a 'technological cave' is not original. See, for example, IVANALDO OLIVEIRA DOS SANTOS and GERIZILDA DANTAS DE SOUZA, *Análise do Homem em uma Caverna Tecnológica: O Interdiscurso e o Ethos Discursivo na Obra A Caverna de José Saramago*, 'Revista Saridh-Linguagem e Discurso', Vol. 1, n.º 1, 2019, 40-66, available at <https://periodicos.ufrn.br/RevSaridh/article/view/17897>, last accessed 6 August 2022; MARCO ANDREACCHIO, *Leaving the Technological Cave*, 'VoegelinView', 2 February 2022, available at <https://voegelinview.com/leaving-the-technological-cave/>, last accessed 3 August 2022.

⁶¹ D. MICHAEL RIVAGE-SEUL, *The Magic Glasses of Critical Thinking: Seeing Through Alternative Fact & Fake News*, New York: Peter Lang, 2018, 3-13.

⁶² W. LANCE BENNETT and STEVEN LIVINGSTONE, *The Disinformation Order: Disruptive Communication and the Decline of Democratic Institutions*, 'European Journal of Communication', Vol. 33, n.º 2, 2018, 122-39, available at <https://doi.org/10.1177/0267323118760317>, last accessed 25 July 2022.

⁶³ ROB PICHETA, *The Flat-Earth Conspiracy is Spreading Around the Globe. Does it Hide a Darker Core?*, 'CNN', 18 November 2019, available at <https://edition.cnn.com/2019/11/16/us/flat-earth-conference-conspiracy-theories-scli-intl/index.html>, last accessed 25 July 2022. See also LEE MCINTYRE, *Flat Earthers, and the Rise of Science Denial in America*, 'Newsweek', 14 May 2019, available at <https://www.newsweek.com/flat-earth-science-denial-america-1421936>, last accessed 25 July 2022. Despite this, in scientific themes in general, it is important to point out that the truth is a working concept. As a matter of principle, minority ideas must be able to be brought into the 'free market of ideas' so that they can be rationally debated on equal footing with majority ideas, regardless of whether they turn out scientifically right or wrong in the end. If we remember Galileo Galilei, the need to avoid repeating historical errors in relation to the silencing of theories contrary to scientific consensus becomes evident. Therefore, tolerance for minority ideas is relevant, even if scientific evolution will demonstrate their invalidity.

⁶⁴ EDITORIAL, *The Guardian View on Political Lies: Only the Sword of Truth Can Vanquish Them*, 'The Guardian', 29 January 2017, available at <https://www.theguardian.com/commentisfree/2017/jan/29/the-guardian-view-on-political-lies-only-the-sword-of-truth-can-vanquish-them>, last accessed 25 July 2022.

death who remains alive⁶⁵. More recently, the World Health Organization (WHO) has raised major concerns over the spread of false news regarding the Covid-19 pandemic, calling attention to the risks involved with ‘infodemics’ and warning of its serious impact on public health⁶⁶. ‘Infodemics’ has been defined as:

‘an excessive amount of information about a problem, which makes it difficult to identify a solution. They can spread misinformation, disinformation and rumours during a health emergency. Infodemics can hamper an effective public health response and create confusion and distrust among people’⁶⁷.

3.1. Terminology

The dissemination of false information that is intentionally aimed at confusing reality and fiction is commonly called ‘fake news’. Although academics diverge when it comes to establishing a consensual definition⁶⁸, the Ethical Journalism Network describes fake news as ‘information deliberately fabricated and published with the intention to deceive and mislead others into believing falsehoods or doubting verifiable facts’⁶⁹.

⁶⁵ See, for example, ANDREW GRIFFIN, *Clint Eastwood Death Hoax: Why the Internet Keeps Saying Celebrities Are Dead When They Are Not*, ‘Independent’, 3 September 2019, available at <https://www.independent.co.uk/news/world/americas/clint-eastwood-dead-hoax-death-rumors-2019-debunked-true-false-a9089871.html>, last accessed 25 July 2022.

⁶⁶ UNITED NATIONS DEPARTMENT OF GLOBAL COMMUNICATIONS, *UN Tackles ‘Infodemic’ of Misinformation and Cybercrime in COVID-19 Crisis*, 31 March 2020, available at <https://www.un.org/en/un-coronavirus-communications-team/un-tackling-%E2%80%98infodemic%E2%80%99-misinformation-and-cybercrime-covid-19>, last accessed 25 July 2022. In Italy, Lavinia del Corona drew attention to the serious repercussions of scientific disinformation and also of the crisis of science as an epistemic authority. See LAVINIA DEL CORONA, *I Social Media e la Disinformazione Scientifica: Spunti per un Cambiamento di Rotte alla Luce Dell’Esperienza Statunitense ed Europea*, ‘La Rivista Gruppo di Pisa’, *Atti del Seminario di diritto comparato dell’Associazione ‘Gruppo di Pisa’ del 26 marzo 2021 su ‘Diritto e nuove tecnologie tra comparazione e interdisciplinarietà’* – Università degli Studi di Milano – in memoria di Paolo Carrozza, Quaderno n.º 3, 2021, 473-487, at 475-479, available at <http://hdl.handle.net/2434/894455>, last accessed 3 August 2022.

⁶⁷ UNITED NATIONS DEPARTMENT OF GLOBAL COMMUNICATIONS, *UN Tackles*, cit. (footnote 66). About infodemics, see also RUI TAVARES LANCEIRO, *Pandemia, “Infodemia” e Liberdade de Expressão*, ‘e-Publica’, Vol. 8, n.º 3, 2021, 39-62, available at <https://e-publica.pt/article/34113-pandemia-infodemia-e-liberdade-de-expressao>, last accessed 26 July 2022.

⁶⁸ EDSON TANDOC, ZHENG LIM and RICHARD LING, *Defining ‘Fake News’: A Typology of Scholarly Definitions*, ‘Digital Journalism’, Vol. 6, 2018, 137-153, at 137, available at <https://doi.org/10.1080/21670811.2017.1360143>, last accessed 25 July 2022.

⁶⁹ AIDEN WHITE, *Ethical Journalism: It’s Back in The News as we Fight for Quality and Democracy in the Digital Age*, ‘Ethical Journalism Network’, 22 May 2017, available at <https://ethicaljournalismnetwork.org/ethical-journalism-fight-democracy-digital-age>, last accessed 26 July 2022.

In a strict sense, the terminology is inappropriate because it is rooted in an intrinsic contradiction⁷⁰. The concept of news presupposes the truth of reported facts, which means that if the information is false, there is no news⁷¹. Yet, from a broader perspective, this nomenclature may seem legitimate. Although false information cannot be understood as news when it comes to content, the term ‘fake news’ is acceptable if we consider that false information is disguised as news⁷². The trap lies in the misleading appearance of trustworthy information⁷³.

Moreover, the term has already gained a privileged status in the public sphere. In 2017, the Collins Dictionary and the American Dialect Society elected ‘fake news’ as the ‘word of the year’⁷⁴, indicating how much concern the phenomenon has generated in Western democratic societies. As a result, the term is popular among citizens who generally understand its meaning.

However, the concept, which is often associated with related expressions (e.g., ‘alternative facts’ or ‘post-truth’⁷⁵), has been used to discredit impactful news coverage on public interest issues⁷⁶. Since it is necessary to preserve genuine news, it is important to avoid using the term ‘fake news’⁷⁷. Some scholars, who reject the phrase, have developed a broader term for this phenomenon: ‘information disorder’. According to the Council of Europe Report DGI (2017) 09, this includes three types of harmful, false information: ‘misinformation’ (the sharing of false information without the intention of causing harm), ‘disinformation’ (false information knowingly shared to cause harm), and ‘malinformation’ (sharing genuine information to cause harm, which is often achieved by moving private information into the public sphere)⁷⁸.

⁷⁰ UNESCO, *Solving ‘Fake News’ Starts with Avoiding the Term*, 15 November 2017, available at <https://en.unesco.org/news/solving-fake-news-starts-avoiding-term>, last accessed 26 July 2022.

⁷¹ UNESCO, *Solving*, cit. (footnote 70).

⁷² SETH ASHLEY, JESSICA ROBERTS and ADAM MAKSL, *American Journalism and “Fake News”: Examining the Facts*, Santa Barbara, California: ABC-CLIO, 2018, 139-140.

⁷³ TANDOC, LIM and LING, *Defining*, cit. (footnote 68), 147.

⁷⁴ ASHLEY, ROBERTS and MAKSL, *American*, cit. (footnote 72), 139.

⁷⁵ ERIC KNIGHT and HARIDIMOS TSOUKAS, *When Fiction Trumps Truth: What ‘Post-Truth’ and ‘Alternative Facts’ Mean for Management Studies*, ‘Organization Studies’, Vol. 40, n.º 2, 2019, 183-197, at 183; JOÃO FIGUEIRA and SÍLVIO SANTOS (org.), *As Fake News e a Nova Ordem Des(informativa) na Era da Pós-Verdade*, Coimbra: Imprensa da Universidade de Coimbra, 2019.

⁷⁶ In this regard, see, for example, CLAIRE WARDLE and HOSSEIN DERAKHSHAN, *Information Disorder: Toward an Interdisciplinary Framework for Research and Policy Making*, Council of Europe Report DGI(2017)09, Strasbourg: Council of Europe, 2017, 5, available at <https://rm.coe.int/information-disorder-toward-an-interdisciplinary-framework-for-research/168076277c>, last accessed 26 July 2022; ASHLEY, ROBERTS and MAKSL, *American*, cit. (footnote 72), 139.

⁷⁷ UNESCO, *Solving*, cit. (footnote 70).

⁷⁸ WARDLE and DERAKHSHAN, *Information*, cit. (footnote 76), 5.

3.2. Emerging social framework

One of the defining features of the twenty-first century society is the extraordinary success of virtual social networks. Despite originating in the past century, they peaked during the millennium⁷⁹. By providing near-global connectivity, social networks, the internet, and new technologies have shortened the distances between people⁸⁰. With an internet connection, basic knowledge, and suitable technology anyone can instantaneously communicate, despite being located in diametrically opposite positions on the planet⁸¹. In the past, the process of sending and receiving a message was delayed, but now, there is instant connectivity⁸².

The possibilities that have arisen from the internet and its search engines, which allow access to nearly unlimited amounts of information within seconds, are also a mark of this century. Although this is advantageous in terms of knowledge construction, it also leads to a so-called ‘information overload’⁸³.

As increasingly sophisticated technologies are released, the majority of citizens are constantly being updated with a melange of notifications, which force recipients to be in a permanent state of alert, as they are driven by a ‘fear of missing out’ on something important⁸⁴. Simultaneously, the Internet of Things and Metaverse

⁷⁹ DANAH BOYD and NICOLE ELLISON, *Social Network Sites: Definition, History, and Scholarship*, ‘Journal of Computer-Mediated Communication’, Vol. 13, 2008, 210-230, at 210, available at <https://onlinelibrary.wiley.com/doi/pdf/10.1111/j.1083-6101.2007.00393.x>, last accessed 26 July 2022.

⁸⁰ ANDREW MURRAY, Mapping the Rule of Law for the Internet, in David Mangan and E. Lorna Gillies (eds), *The Legal Challenges of Social Media*, Cheltenham: Edward Elgar, 2017, 13-36, at 13 and 22.

⁸¹ MURRAY, *Mapping*, cit. (footnote 80), 22.

⁸² However, other past inventions, such as the telephone and the telegraph, already represented an extraordinary evolution. See, for example, DAVID HOCHFELDER, *Alexander Graham Bell*, ‘Encyclopædia Britannica’, 27 February 2022, available at <https://www.britannica.com/biography/Alexander-Graham-Bell>, last accessed 26 July 2022.

⁸³ See, for example, PAUL HEMB, *Death by Information Overload*, ‘Harvard Business Review’, September 2009, available at <https://bg.hbr.org/2009/09/death-by-information-overload>, last accessed 26 July 2022; CHARLIE BECKETT, “Stop Reading Stuff!” *Information Overload and Media Literacy*, ‘POLIS: Journalism and Society at the LSE’, 20 March 2010, available at <https://blogsdev.lse.ac.uk/polis/2010/03/20/stop-reading-stuff-information-overload-and-media-literacy/>, last accessed 26 July 2022.

⁸⁴ HEMB, *Death by*, cit. (footnote 83); AGATA BŁACHNIO and ANETA PRZEPIÓRKA, *Facebook Intrusion, Fear of Missing Out, Narcissism, and Life Satisfaction: A Cross-Sectional Study*, ‘Psychiatry Research’, Vol. 259, 2018, 514-519, at 514.

have also emerged⁸⁵. The former technology is already felt in daily life, while the latter will steadily become more visible in upcoming years.

Modern society has also challenged the foundation of mainstream media. Whereas the printing press played a key role in the last centuries⁸⁶, social media disputes the right to impart information and ideas with journalists. Since every citizen is currently equipped with a mobile phone camera, they can easily report and share events. On the other hand, an increasing number of people are receiving their news from social media outlets⁸⁷, and this availability of free information lowers people's willingness to pay for online news⁸⁸. If the people creating breaking news stories are not journalists, but anonymous individuals, it is legitimate to suspect whether they are committed to the truth. At the same time, traditional media has been suffering from a serious financial crisis, due to a loss of readers and sponsors as well as a decrease in sales, which also threatens the independence of the media⁸⁹.

The confluence of these factors has helped to create a propitious scenario for the massive dispersal of disinformation in the public sphere.

3.3. Brief historical background

The dissemination of false information with the intent to deceive is not a modern invention⁹⁰. The first disinformation campaign was used by Octavian to

⁸⁵ JAMES TIEN, *Internet of Things, Real-Time Decision Making, and Artificial Intelligence*, 'Annals of Data Science', Vol. 4, 2017, 149-178, at 149.

⁸⁶ HEIDI TWOREK and JOHN HAMILTON, *Why the 'Golden Age' of Newspapers Was the Exception, Not the Rule*, 'Nieman Foundation at Harvard', 2 May 2018, available at <https://www.niemanlab.org/2018/05/why-the-golden-age-of-newspapers-was-the-exception-not-the-rule/>, last accessed 26 July 2022; DAVE ROOS, *7 Ways the Printing Press Changed the World*, 'History Channel', 28 August 2019, available at <https://www.history.com/news/printing-press-renaissance>, last accessed 26 July 2022.

⁸⁷ NIC NEWMAN *et al.*, *Reuters Institute Digital News Report 2022*, Oxford: Reuters Institute for the Study of Journalism and University of Oxford, 2022, at 51 and 97, available at <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/dnr-executive-summary>, last accessed 26 July 2022.

⁸⁸ NEWMAN *et al.*, *Reuters 2022*, cit. (footnote 87), 19.

⁸⁹ PIPPA NORRIS, *A Virtuous Circle: Political Communications in Post-Industrial*, New York: Cambridge University Press, 2000, 63-65.

⁹⁰ In this regard, ROBERTO ADRIANI, *Libertà di Espressione e Disinformazione. Un Conflitto del Passatori Apparso nel Contesto Digitale*, 'Tigor. Rivista di Scienze della Comunicazione e di Argomentazione Giuridica', A. XIII, n.º 2, 2021, 91-101, at 97, available at <http://hdl.handle.net/10077/33324>, last accessed 6 August 2022.

defeat Marc Anthony in the final war of the Roman Republic in 27 BC⁹¹. Octavian, who proved to be a great strategist, became Augustus, the first Roman emperor⁹².

In the fifteenth century, the diffusion of falsehoods was particularly boosted by Gutenberg's invention of the printing press, which enabled a wide circulation of the news⁹³. In 1835, the newspaper *New York Sun* published a series of six articles, reporting that the famous astronomer John Herschel had found life on the moon⁹⁴.

In the first decades of the twentieth century, disinformation was used by governments to encourage people during the war, while the Nazi Party employed propaganda strategies to reinforce its power and promote German nationalism, eugenics, and anti-Semitism⁹⁵.

In the United States, the well-known radio adaptation of the book, *War of the Worlds*, by H. G. Wells, starring Orson Wells, aired in 1938, was an episode where the guise of fiction overtook reality⁹⁶. Even if there was no intention to deceive listeners (the people who aired the episode claimed that they did not expect anyone to take the story seriously), it resulted in real-life consequences⁹⁷. The incident entailed a narration about the Earth's invasion by extraterrestrials and included reports of people claiming to have sighted objects in the sky. Fearing gas raids, the episode generated mass panic in New York⁹⁸.

In the aftermath of the war, falsehoods continued to spread. During the Cold War, for instance, international broadcasting was utilised in order to persuade populations to take sides⁹⁹. Many other examples could also demonstrate how disinformation, hoaxes, and propaganda have been repeatedly used over different periods of time for a variety of purposes¹⁰⁰.

⁹¹ BENSON RAJAN, *New Mythologies of Fake News: WhatsApp and Misrepresented Scientific Achievements of Ancient India*, in Innocent E. Chiluba and Sergei A. Samoilenko, *Handbook of Research on Deception, Fake News, and Misinformation Online*, Hershey, PA: IGI Global, 2019, 192-208, at 196; MASSIMO FLORE *et al.*, *Understanding Citizens' Vulnerabilities to Disinformation and Data-Driven Propaganda: Case Study: The 2018 Italian General Election*, European Commission, JRC Technical Reports, Luxembourg: Publications Office of the European Union, 2019, 1-2.

⁹² FLORE *et al.*, *Understanding*, cit. (footnote 91), 1-2.

⁹³ JULIE POSETTI and ALICE MATTHEWS, *A Short Guide to the History of 'Fake News' and Disinformation*, Washington: International Center for Journalists, 2018, 1-2, available at <https://www.icfj.org/news/short-guide-history-fake-news-and-disinformation-new-icfj-learning-module>, last accessed 26 July 2022.

⁹⁴ POSETTI and MATTHEWS, *A Short*, cit. (footnote 93), 1-2.

⁹⁵ FLORE *et al.*, *Understanding*, cit. (footnote 91), 1.

⁹⁶ POSETTI and MATTHEWS, *A Short*, cit. (footnote 93), 1-3.

⁹⁷ POSETTI and MATTHEWS, *A Short*, cit. (footnote 93), 1-3.

⁹⁸ POSETTI and MATTHEWS, *A Short*, cit. (footnote 93), 1-3.

⁹⁹ POSETTI and MATTHEWS, *A Short*, cit. (footnote 93), 1-4.

¹⁰⁰ POSETTI and MATTHEWS, *A Short*, cit. (footnote 93), 1-4.

3.4. Effectiveness factors

Even though these strategies are far from being new, it is irrefutable that disinformation has become one of the major public concerns in recent years. According to the *Lloyds Register Foundation World Risk Poll 2021*, concern about whether news on the internet is factual or false is extremely high across the world, such as Portugal (69%), Brazil (74%), Spain (68%), France (73%), the United Kingdom (62%), and the United States (67%)¹⁰¹. However, according to *Reuters Institute Digital News Report 2022*, only a minority of citizens pay for accurate online news, despite a reported ‘coronavirus bump’¹⁰².

The massive impact of social networks is due to its immediacy and near-global outreach. While technological platforms are pivotal tools for exponentially increasing the effectiveness of these malign disinformation campaigns¹⁰³, other contextual factors largely contribute to their widespread success.

First, its perpetrators have taken advantage of the failure of mainstream media business models¹⁰⁴. To reiterate, the traditional press has been facing serious financial hardships with the loss of major sponsors that have moved to digital platforms, especially social networks¹⁰⁵. Moreover, news aggregators have allowed for the free provision of information, which has also contributed to newspaper sales decreasing¹⁰⁶. Meanwhile, journalists struggle with precarious employment

¹⁰¹ LLOYD’S REGISTER FOUNDATION, *Fake News is the Number One Worry for Internet Users Worldwide*, ‘The Lloyd’s Register Foundation World Risk Poll’, 2021, available at <https://wrp.lrfoundation.org.uk/explore-the-poll/fake-news-is-the-number-one-worry-for-internet-users-worldwide/>, last accessed 26 July 2022.

¹⁰² NEWMAN *et al.*, *Reuters 2022*, cit. (footnote 87), 19; NIC NEWMAN *et al.*, *Reuters Institute Digital News Report 2020*, Oxford: Reuters Institute for the Study of Journalism and University of Oxford, 2020, 10-11, available at <https://reutersinstitute.politics.ox.ac.uk/digital-news-report-2020>, last accessed 26 July 2022; OBERCOM, *Pandemia e Consumos Mediáticos*, Lisboa: OberCom, 2020, available at <https://obercom.pt/pandemia-e-consumos-mediaticos/>, last accessed 26 July 2022.

¹⁰³ ADRIANI, *Libertà*, cit. (footnote 90), 99; BENTE KALSNES, *Fake News*, ‘Oxford Research Encyclopedia of Communication’, 26 September 2018, available at <https://doi.org/10.1093/acrefore/9780190228613.013.809>, last accessed 26 July 2022; CAROLINE DELMAZO and JONAS VALENTE, *Fake News nas Redes Sociais Online: Propagação e Reações à Desinformação em Busca de Cliques*, ‘Media & Jornalismo’, Vol. 18, n.º 32, 2018, 155-169.

¹⁰⁴ MARGARET SIMONS, *Journalism Faces a Crisis Worldwide – We Might be Entering a New Dark Age*, ‘The Guardian’, 15 April 2017, available at <https://www.theguardian.com/media/2017/apr/15/journalism-faces-a-crisis-worldwide-we-might-be-entering-a-new-dark-age>, last accessed 26 July 2022.

¹⁰⁵ NORRIS, *A Virtuous*, cit. (footnote 89), 63-70.

¹⁰⁶ SUSAN ATHEY, MARK MOBIUS and JENO PAL, *The Impact of Aggregators on Internet News Consumption*, ‘National Bureau of Economic Research’, Working Paper 28746, April 2021, available at <https://>

conditions, becoming increasingly vulnerable to illegitimate interference in their freedom of the press¹⁰⁷. These difficulties hinder the media's independence, especially concerning journalism that scrutinises public authorities, and it may result in the silencing of adverse true information on matters of public concern or in the publication of false news involving public figures¹⁰⁸. Thus, mainstream media structures have been shaken, and this has given rise to opportunities for disinformation to flourish.

Second, disinformation campaigns are more likely to be effective when the education deficit is significant¹⁰⁹. People with lower education levels are more likely to have populist attitudes¹¹⁰. However, high education levels are not enough to guarantee immunity against deceptive pseudo-information. Psychological research has demonstrated that the most intelligent, educated people may be even more vulnerable to rationalise incorrect beliefs, such as false news and conspiracy theories¹¹¹. Yet, through education, citizens may develop 'strategies for monitoring and regulating one's own thinking', that is, their 'meta-cognitive skills', which are useful for recognizing false information¹¹². The levels of media literacy also play

www.nber.org/papers/w28746, last accessed 26 July 2022; BERTIN MARTENS *et al.*, *The Digital Transformation of News Media and the Rise of Disinformation and Fake News*, Seville: European Commission, 2018, 6, available at https://ec.europa.eu/jrc/communities/sites/jrccties/files/dewp_201802_digital_transformation_of_news_media_and_the_rise_of_fake_news_final_180418.pdf, last accessed 26 July 2022.

¹⁰⁷ MEHMET KOKSAL and DENIS GRÉGOIRE (eds.), *Journalism, an Increasingly Precarious Profession*, 'Hesamag#15', Spring-Summer 2017, 10-31, available at <https://www.etui.org/topics/health-safety-working-conditions/hesamag/journalism-an-increasingly-precarious-profession>, last accessed 26 July 2022.

¹⁰⁸ KOKSAL and GRÉGOIRE, *Journalism*, cit. (footnote 107), 26-27.

¹⁰⁹ KATHIANN KOWALSKI, *Studies Test Ways to Slow the Spread of Fake News*, 'Science News Explores', 17 October 2019, available at <https://www.snextplores.org/article/studies-test-ways-slow-spread-fake-news>, last accessed 26 July 2022.

¹¹⁰ NEWMAN *et al.*, *Reuters Institute Digital News Report 2019*, Oxford: Reuters Institute for the Study of Journalism and University of Oxford, 2019, 42-43, available at <https://ora.ox.ac.uk/objects/uuid:18c8f2eb-f616-481a-9dff-2a479b2801d0>, last accessed 26 July 2022.

¹¹¹ GORDON PENNYCOOK, JONATHAN A. FUGELANG and DEREK J. KOEHLER, *Everyday Consequences of Analytic Thinking*, 'Current Directions in Psychological Science', Vol. 24, n.º 6, 2015, 425-432, available at <https://doi.org/10.1177/0963721415604610>, last accessed 4 August 2022; ASHLEY JARDINA and MICHAEL TRAUOGOTT, *The Genesis of the Birther Rumor: Partisanship, Racial Attitudes, and Political Knowledge*, 'The Journal of Race, Ethnicity and Politics', Vol. 4, n.º 1, 2019, 60-80, available at <https://doi.org/10.1017/rep.2018.25>, last accessed 4 August 2022.

¹¹² DAVID HAMBRICK and MADELINE MARQUARDT, *Cognitive Ability and Vulnerability to Fake News*, 'Scientific American', 6 February 2018, available at <https://www.scientificamerican.com/article/cognitive-ability-and-vulnerability-to-fake-news/>, last accessed 26 July 2022.

a crucial role in this situation, as individuals with lower information literacy are less likely to identify false news¹¹³.

Third, the anonymous people behind disinformation campaigns seem to capitalize on the shortcomings of democracy by exploiting and highlighting its internal conflicts, such as incompetence, ignorance, and corruption¹¹⁴. These issues raise profound concerns among citizens and promote a crisis of confidence in democracy, which in turn, deeply contributes to the deficit of democratic participation, bearing in mind that abstention rates continue to grow¹¹⁵.

Fourth, the distinction between news and entertainment is significantly fading¹¹⁶. As disinterest grows over the core themes that underpin the public sphere¹¹⁷, some news media outlets continue to try captivating their readers with sensationalist headlines to increase sales¹¹⁸. Disinformation strategists also take advantage of this factor, since ‘entertaining news’, called ‘infotainment’, seems to be more appealing than real-life news¹¹⁹.

Fifth, individual exposition to a diversity of views, which is pivotal in democratic societies, is vanishing¹²⁰. As Cass Sunstein outlined, a ‘lot of people love reading things that fortify and confirm their own opinions – and, by definition, people like reading about topics that interest them. So, freedom of choice can produce

¹¹³ S. MO JONES-JANG, TARA MORTENSEN and JINGJING LIU, *Does Media Literacy Help Identification of Fake News? Information Literacy Helps, But Other Literacies Don't*, ‘American Behavioral Scientist’, Vol. 65, n.º 2, 2021, 371-388, available at <https://doi.org/10.1177/0002764219869406>, last accessed 26 July 2022.

¹¹⁴ FLORE *et al.*, *Understanding*, cit. (footnote 91), 14, 37.

¹¹⁵ RICHARD WIKE and JANELL FETTEROLF, *Liberal Democracy's Crisis of Confidence*, ‘Journal of Democracy’, Vol. 29, n.º 4, 2018, 136-150, at 136; PHILIPPE SCHMITTER and ALEXANDER TRECHSEL (eds.), *Green Paper on the Future of Democracy in Europe for the Council of Europe by a Working Group of High Level Experts* [Draft], 16-22, available at <https://www.eui.eu/Documents/DepartmentsCentres/SPS/Profiles/Schmitter/GreenPaper.pdf>, last accessed 26 July 2022.

¹¹⁶ DAYA THUSSU, *News as Entertainment: The Rise of Global Infotainment*, London: Sage: 2007.

¹¹⁷ More people avoid the news because of its negative impact on their mood or because they feel powerless to change events. The average level of trust in news brands is also falling back after Covid-19 bumps. See NEWMAN *et al.*, *Reuters*, 2022, cit. (footnote 87), 13, 15.

¹¹⁸ BARRY HARRISON, CHARLES SMITH and BRINLEY DAVIES, *Introductory Economy*, London: MacMillan, 1992, 81. In Germany, some scholars also underlined that the dangers related to disinformation are reinforced when mainstream media uses misleading headlines. TIM SCHATTO-ECKRODT *et al.*, *Bedrohete Deliberation: Information Warfare und Desinformation als Bedrohung Digitaler Öffentlichkeiten*, ‘Communicatio Socialis’, Jahrgang 52, Heft 2, 2019, 147-158, at 148.

¹¹⁹ THUSSU, *News*, cit. (footnote 116), 7-9.

¹²⁰ CASS SUNSTEIN, *#Republic: Divided Democracy in the Age of Social Media*, Princeton: Princeton University Press, 2017, 6-8.

self-sorting, in which people enter echo chambers or information cocoons¹²¹, which makes them believe in falsehoods¹²².

Finally, disinformation strategies are often linked with populism¹²³. The emergence of a populist leader greatly depends on the effectiveness of disinformation campaigns and their opportunistic approach¹²⁴. A populist individual sows the idea that he is a common citizen and a victim of the same social injustices; therefore, he is capable of identifying the system's weaknesses and eradicating them from democracies¹²⁵. Nevertheless, many of his actions should be signs of alert, including his detachment from the truth and human rights, fierce attacks on journalism, and claims of being immune to public scrutiny.

3.5. The paradox of time

The division of a day into twenty-four hours with each hour consisting of sixty minutes and each minute consisting of sixty seconds has been a constant throughout the centuries¹²⁶. Currently, however, it is difficult to find a citizen in the West who does not feel the impact of time scarcity¹²⁷. Each person plays multiple social roles in society while simultaneously accomplishing several demanding tasks that require constantly shifting one's attention from one activity to the next.

¹²¹ CHRISTINA PAZZANESE, *Danger in the Internet Echo Chamber*, 'Harvard Law Today', 24 March 2017, available at <https://today.law.harvard.edu/danger-internet-echo-chamber/>, last accessed 26 July 2022.

¹²² SUNSTEIN, *#Republic*, cit. (footnote 120), 11. However, some scholars criticize the 'echo chambers' concept. See, for example, ELIZABETH DUBOIS and GRANT BLANK, *The Echo Chamber is Overstated: The Moderating Effect of Political Interest and Diverse Media*, 'Information, Communication & Society', Vol. 21, n.º 5, 2018, 729-745, at 729.

¹²³ MATTEO MONTI, *The New Populism and Fake News on the Internet: How Populism Along with Internet New Media is Transforming the Fourth Estate*, Sant'Anna Legal Studies, Stals Research Paper 4/2018, 25 July 2018, 10, available at <https://ssrn.com/abstract=3175280>, last accessed 26 July 2022.

¹²⁴ KIM SCHEPPELE, *The Opportunism of Populists and the Defense of Constitutional Liberalism*, 'German Law Journal', Vol. 20, n.º 3, 2019, 314-331, at 314; MAX SCHAUB and DAVIDE MORISI, *Voter Mobilization in the Echo Chamber: Broadband Internet and the Rise of Populism in Europe*, 'European Journal of Political Research', Vol. 59, n.º 4, 2020, 752-773.

¹²⁵ SCHAUB and MORISI, *Voter*, cit. (footnote 124), 752-773.

¹²⁶ KYLIE ANDREWS, *Ask an Expert: Why Are There 24 Hours in a Day?*, 'ABC Science', 15 November 2011, available at <https://www.abc.net.au/science/articles/2011/11/15/3364432.htm>, last accessed 26 July 2022.

¹²⁷ MICHAEL BITTMAN, JUDITH BROWN and JUDY WAJCMAN, *The Cell Phone, Constant Connection and Time Scarcity in Australia*, 'Social Indicators Research', Vol. 93, 2009, 229-233, at 229.

Meanwhile, citizens are continually bombarded with a variety of notifications on their devices, such as SMS, MMS, emails, world news, social media updates, appointments, birthdays, fitness, medication, etc. Furthermore, search engines (e.g., Google, Qwant, Yahoo, Bing) provide access to large amounts of information. It is often challenging to process search results because there is true and false information.

Although this seems sufficiently complicated, it becomes more complex when time scarcity is considered as well. Even though the Internet, social networks, and new technologies have accelerated knowledge access and the communication process, they have also challenged the limited human capacity to distribute attention by providing citizens with a surplus of data that does not save time, but instead, it deprives people of time¹²⁸. By instantly releasing a panoply of information, these tools end up creating a *time-saving illusion*¹²⁹.

Citizens access information as fast as they can click, but at the same time, they are faced with the difficulty of selecting the most relevant information based on their interests and the complexity of distinguishing between reality and fiction. A surplus of data also wastes time and energy for a citizen who is committed to accessing relevant and truthful information, which results in a *time paradox*¹³⁰.

3.6. Motivations of perpetrators

Although it is difficult to unravel the identity of all the authors creating disinformation, as they are mostly anonymous, it is possible to understand their continuing motivations¹³¹. First, the deliberate spreading of falsehoods within the public sphere is intended to maliciously influence an electoral process by diverting the vote from one candidate, or referendum proposal, to another¹³². This type of

¹²⁸ MICHAEL GROSSMAN, *Technology and the Illusion of Saving Time*, 'Journal of Pediatric Nursing', Vol. 27, n.º 4, 2012, 423-424, at 423.

¹²⁹ GROSSMAN, *Technology*, cit. (footnote 128), 423.

¹³⁰ PHILIP ZIMBARDO and JOHN BOYD, *The Time Paradox: The New Psychology of Time That Will Change Your Life*, New York: Free Press, 2009.

¹³¹ See also JOÃO PAULO MENESES, *Sobre a Necessidade de Conceptualizar o Fenómeno das Fake News*, 'Observatorio', Special Issue, 2018, 37-53, at 46-47, available at <https://doi.org/10.15847/obsOBS12520181376>, last accessed 26 July 2022.

¹³² See, for example, TARLACH MCGONAGLE, 'Fake News': False Fears or Real Concerns?, 'Netherlands Quarterly of Human Rights', Vol. 35, n.º 4, 2017, 203-209, available at <https://doi.org/10.1177/0924051917738685>, last accessed 6 September 2022; MARIANNA SPRING and LUCY WEBSTER, *European Elections: How Disinformation Spread in Facebook Groups*, 'BBC', 30 May 2019, available at <https://www.bbc.com/news/blogs-trending-48356351>, last accessed 26 July 2022.

interference in democratic elections, which serves anti-democratic interests, occurs because of false information's power to manipulate public opinion¹³³. Fabricated facts converge to build a certain fiction, which helps a specific leader rise in power¹³⁴.

Furthermore, the strategy of disinformation entails high economic cost, taking into consideration that information manipulation utilises sophisticated technologies and highly specialized knowledge¹³⁵. In this sense, individuals who perpetrate these destructive campaigns act in pursuit of exorbitant profits, while lacking the values of truth and democracy¹³⁶.

False information is also spread to promote undemocratic ideologies¹³⁷. For example, the denial of established truths, like spreading the claim that the Earth is flat or climate change is fictitious, is only the tip of the (melting) iceberg. A deep dive into the problem demonstrates the threat that these instruments of manipulation pose to the subsistence of human rights and Western democratic values¹³⁸.

Moreover, attempts by one state (whether successful or unsuccessful) to interfere with the electoral processes of another state are rooted in a surreptitious struggle for power between nations¹³⁹. Indeed, this type of 'international aid' to help a

¹³³ MCGONAGLE, *Fake News*, cit. (footnote 132); SPRING and WEBSTER, *European*, cit. (footnote 132).

¹³⁴ MCGONAGLE, *Fake News*, cit. (footnote 132); SPRING and WEBSTER, *European*, cit. (footnote 132).

¹³⁵ ANDY GREENBERG, *A Brief History of Russian Hackers' Evolving False Flags*, 'Wired', 21 October 2019, available at <https://www.wired.com/story/russian-hackers-false-flags-iran-fancy-bear/>, last accessed 26 July 2022.

¹³⁶ About the business of disinformation, see, among others, SIMON OXENHAM, *I Was a Macedonian Fake News Writer*, 'BBC', 29 May 2019, available at <https://www.bbc.com/future/article/20190528-i-was-a-macedonian-fake-news-writer>, last accessed 26 July 2022; CARL MILLER, *The Big Business of Disinformation*, 'Wired', 10 June 2017, available at <https://www.wired.co.uk/article/carl-miller-disinformation-gets-commercialised>, last accessed 26 July 2022.

¹³⁷ ALICE MARWICK and REBECCA LEWIS, *Media Manipulation and Disinformation Online*, New York: Data & Society Research Institute, May 2017, 3, available at <https://datasociety.net/output/media-manipulation-and-disinfo-online/>, last accessed 26 July 2022.

¹³⁸ UNITED NATIONS, *Ignoring Historical Links to Modern Racism, Xenophobia Only Emboldens Extremist Ideologies, Experts Tell Third Committee, Calling for 'Honest Debate'*, General Assembly, Third Committee, Seventy-second Session, 37th & 38th Meetings, 31 October 2017, available at <https://www.un.org/press/en/2017/gashc4215.doc.htm>, last accessed 26 July 2022.

¹³⁹ EUROPEAN PARLIAMENT, *Resolution of 10 October 2019 on Foreign Electoral Interference and Disinformation in National and European Democratic Processes* [2019/2810(RSP)], available at https://www.europarl.europa.eu/doceo/document/TA-9-2019-0031_EN.html, last accessed 27 July 2022; RICHARD STENGEL, *We're in the Middle of a Global Information War. Here's What We Need to Do to Win*, 'Time', 26 September 2019, available at <https://time.com/5686843/global-information-war/>, last accessed 26 July 2022.

leader rise to power is not carried out to benefit the citizens of the 'aided' state but to serve hidden interests that are disengaged from the values of human rights, the rule of law, and democracy¹⁴⁰. Ultimately, these campaigns are intended to compete for world hegemony¹⁴¹.

3.7. Real-life consequences

If the massive dissemination of false information was merely a theoretical problem, the risks linked to it would only be cautionary. However, recent history has been written in harsh lines, demonstrating that disinformation has tangible consequences¹⁴².

In fact, this influence has already cast doubt on the validity of democratic elections¹⁴³. For example, the utilisation of false political messages during the British campaign for the European Union (EU) membership referendum in 2016 raised major concerns about the voting process¹⁴⁴. Rather than discussing opposing arguments for 'leave' and 'remain' campaigns, it is important to contemplate the central message displayed in both digital platforms and public spaces (e.g., painted

¹⁴⁰ PAUL CARR, SANDRA SANCHEZ and MICHELLI DAROS, *Citizen Engagement in the Contemporary Era of Fake News: Hegemonic Distraction or Control of the Social Media Context?*, 'Postdigital Science and Education', Vol. 2, 2020, 39-60, at 39, available at <https://link.springer.com/article/10.1007/s42438-019-00052-z>, last accessed 26 July 2022.

¹⁴¹ CARR, SANCHEZ and DAROS, *Citizen*, cit. (footnote 140), 39.

¹⁴² TANDOC, LIM and LING, *Defining*, cit. (footnote 68), 149.

¹⁴³ In this regard, see WARDLE and DERAKHSHAN, *Information*, cit. (footnote 76), 4; EUROPEAN COMMISSION and the HIGH REPRESENTATIVE OF THE UNION FOR FOREIGN AFFAIRS AND SECURITY POLICY, *Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: Report on the Implementation of the Action Plan against Disinformation* [JOIN (2019) 12 final], 14 June 2019, available at https://eeas.europa.eu/sites/eeas/files/joint_report_on_disinformation.pdf, last accessed 27 July 2022; EUROPEAN PARLIAMENT, *Resolution on the Use of Facebook Users' Data by Cambridge Analytica and the Impact on Data Protection* [2018/2855(RSP)], 25 October 2018, available at https://www.europarl.europa.eu/doceo/document/TA-8-2018-0433_EN.html, last accessed 27 July 2022; INGO WOLFGANG SARLET and ANDRESSA DE BITTENCOURT SIQUEIRA, *Liberdade de Expressão e seus Limites numa Democracia: O Caso das Assim Chamadas "Fake News" nas Redes Sociais em Período Eleitoral no Brasil*, 'Revista Estudos Institucionais', Vol. 6, n.º 2, 534-578, 2020, available at <https://doi.org/10.21783/rei.v6i2.522>, last accessed 13 September 2022; HUNT ALLCOTT and MATTHEW GENTZKOW, *Social Media and Fake News in the 2016 Election*, 'Journal of Economic Perspectives', Vol. 31, n.º 2, 2017, 211-236, at 211-212; MCGONAGLE, *Fake News*, cit. (footnote 132).

¹⁴⁴ About the legal issues raised by the EU referendum, see, among others, EWAN MCGAUGHEY, *Could Brexit Be Void?*, 'King's Law Journal', Vol. 29, n.º 3, 2018, 331-343.

on a bus that drove across Britain). In favour of 'leave', the message says, 'let's give our [National Health Service] NHS the £350m the EU takes every week'¹⁴⁵. By suggesting that if 'leave' wins, the money could be spent on the National Health Service, this campaign had an appealing message that not only included an exorbitant amount of money but also touched upon health, one of the most important issues to the public. It is difficult to resist the persuasiveness of this message, but its falseness is a 'Gordian knot' that cannot be untied¹⁴⁶.

Disinformation campaigns also incite citizens to dramatically transform their worldviews by generating intolerance and polarizing their positions¹⁴⁷. If a society is more cohesive, it also becomes more resilient in handling external interference¹⁴⁸. In contrast, if a society is fractured from increasing social antagonisms, it is also more open to the forces that drive disinformation¹⁴⁹. Therefore, these ill-intentioned strategies trigger political and ideological polarization¹⁵⁰.

The intentional diffusion of falsehoods has led to violence in different parts of the globe as well. In India, for example, false rumours spread through social media (e.g., WhatsApp), concerning child abduction and organ harvesting, resulted in public lynching and death in 2017¹⁵¹.

False news also undermines quality journalism and threatens public scrutiny by the press¹⁵². When confronted with unfavourable, yet accurate news, like reporting illegal acts, some public officials and public figures try to create an aura

¹⁴⁵ About these facts, see, for example, MAXIMILIAN HÖLLER, *The Human Component in Social Media and Fake News: The Performance of UK Opinion Leaders on Twitter During the Brexit Campaign*, 'European Journal of English Studies', Vol. 25, n.º 1, 2021, 80-95, available at <https://doi.org/10.1080/13825577.2021.1918842>, last accessed 9 September 2022.

¹⁴⁶ HÖLLER, *The Human*, cit. (footnote 145).

¹⁴⁷ PAUL BUTCHER, *Disinformation and Democracy: The Home Front in the Information War*, Discussion Paper, European Politics and Institutions Programme, Brussels: European Policy Centre, 30 January 2019, 3, available at https://www.epc.eu/content/PDF/2019/190130_Disinformationdemocracy_PB.pdf, last accessed 26 July 2022.

¹⁴⁸ JAN DELHEY *et al.*, *Social Cohesion and Its Correlates: A Comparison of Western and Asian Societies*, 'Comparative Sociology', Vol. 17, 2018, 426-455.

¹⁴⁹ DELHEY *et al.*, *Social*, cit. (footnote 148), 426.

¹⁵⁰ DOMINIC SPOHR, *Fake News and Ideological Polarization: Filter Bubbles and Selective Exposure on Social Media*, 'Business Information Review', Vol. 34, n.º 3, 2017, 150-160.

¹⁵¹ TIMOTHY MCLAUGHLIN, *How WhatsApp Fuels Fake News and Violence in India*, 'Wired', 12 December 2018, available at <https://www.wired.com/story/how-whatsapp-fuels-fake-news-and-violence-in-india/>, last accessed 26 July 2022.

¹⁵² A. G. SULZBERGER, *The Growing Threat to Journalism Around the World*, 'The New York Times', 23 September 2019, available at <https://www.nytimes.com/2019/09/23/opinion/press-freedom-arthur-sulzberger.html>, last accessed 26 July 2022.

of wrongfulness and lack of independence around the news by alleging its falseness to deceive citizens and prevent them from truly understanding who governs them¹⁵³.

3.8. Misleading potential

When considering the capacity of false news to delude, the most impactful narratives share some common features. First, the stronger the topic's connection with the public interest, the greater the possibility is for deception¹⁵⁴. In fact, information that does not address the community's issues of interest goes easily unnoticed, so its falseness does not seem to threaten democracy.

Second, the degree of a targeted person's notoriety also interferes with its potential to deceive¹⁵⁵. If a person's public image is extensive, the information will be more appealing for the community¹⁵⁶. Hence, public personalities, such as opposing political candidates, tend to be more exposed to these negative campaigns¹⁵⁷.

Third, the level of prominence given to false news on digital platforms, such as social media, also plays an important role in this context¹⁵⁸. A publication's high popularity tempts readers to trust its credibility¹⁵⁹. However, in the age of algorithms, bots, clickbait, and artificial intelligence, popularity is vulnerable to manipulation, which means that it is not reliable to conclude that certain information is true¹⁶⁰.

Fourth, the provision of evidence to demonstrate the truth of information must also be taken into account. If Saint Thomas only believed in what his eyes allowed him to see, as one of the most important, reliable senses, it may prove a fallacious method by today's standard. Even though citizens may suspect of false news' truthfulness when it consists of simple text, doubts will disappear if there

¹⁵³ SULZBERGER, *The Growing*, cit. (footnote 152).

¹⁵⁴ E.g., BEN GILBERT, *The 10 Most-Viewed Fake-News Stories on Facebook in 2019 Were Just Revealed in a New Report*, 'Business Insider', 6 November 2019, available at <https://www.businessinsider.com/most-viewed-fake-news-stories-shared-on-facebook-2019-2019-11#3-aoc-proposed-a-motorcycle-ban-8>, last accessed 26 July 2022.

¹⁵⁵ KATE FARHALL *et al.*, *Political Elites' Use of Fake News Discourse Across Communications Platforms*, 'International Journal of Communication', Vol. 13, 2019, 4353-4375, available at <https://ijoc.org/index.php/ijoc/article/view/10677/2787>, last accessed 26 July 2022.

¹⁵⁶ FARHALL *et al.*, *Political*, cit. (footnote 155), 4353-4375.

¹⁵⁷ FARHALL *et al.*, *Political*, cit. (footnote 155), 4353-4375.

¹⁵⁸ ALEXANDRE ALAPHILIPPE *et al.*, *Automated Tackling of Disinformation: Major Challenges Ahead*, Brussels: European Parliamentary Research Service, 2019, 14-25, available at [https://www.europarl.europa.eu/thinktank/en/document/EPRS_STU\(2019\)624278](https://www.europarl.europa.eu/thinktank/en/document/EPRS_STU(2019)624278), last accessed 26 July 2022.

¹⁵⁹ ALAPHILIPPE *et al.*, *Automated*, cit. (footnote 158), 14-25.

¹⁶⁰ ALAPHILIPPE *et al.*, *Automated*, cit. (footnote 158), 14-25.

is also a video or image attached that corroborates the falsehood. Unfortunately, videos that manipulate human senses, called ‘deepfakes’, are on the rise, deceiving a large number of citizens¹⁶¹.

Fifth, another relevant aspect to consider is the false information’s likelihood of being true¹⁶². If the simple act of reading suggests implausibility, the information’s potential to mislead is substantially reduced¹⁶³. While satirical content tends to not be taken seriously, convincing fictional stories have a greater chance of gaining citizens’ trust¹⁶⁴.

Finally, false information seems to be more believable when it echoes a person’s idiosyncrasies, stereotypes, fears, bias, or prejudices, and this has been thoroughly explored by disinformation campaigners¹⁶⁵. Moreover, when false news perpetrators have illegitimate access to personal data, their knowledge for manipulating citizens’ emotions, fears, prejudices, and worldviews expands, allowing them to increase people’s likelihood of believing their lies¹⁶⁶.

4. The epidemiological effect of disinformation on democratic societies

The right to freedom of expression is one of the primary pillars of any democratic society¹⁶⁷. This guarantee is essential to maintain a ‘robust’, ‘inhibited’, and ‘wide-open’ public sphere and preserve the ‘free flow of ideas’ within the ‘marketplace’, which leads to the validation of good ideas and the rejection of bad ideas, such as undemocratic speech and strategies for its promotion¹⁶⁸.

¹⁶¹ ALAPHILIPPE *et al.*, *Automated*, cit. (footnote 158), 23-25.

¹⁶² Recently, a deepfake video of Volodymyr Zelensky, the Ukrainian President, addressing the nation and encouraging citizens to ‘lay down arms’ has been widely shared on social media. MATTHEW HOLROYD and FOLA OLORUNSELU, *Deepfake Zelensky Surrender Video is the ‘First Intentionally Used’ in Ukraine War*, ‘Euronews’, 16 March 2022, available at <https://www.euronews.com/my-europe/2022/03/16/deepfake-zelenskyy-surrender-video-is-the-first-intentionally-used-in-ukraine-war>, last accessed 26 July 2022. About deepfakes, see DAN ROBITZSKI, *New AI Generates Horrifyingly Plausible Fake News*, ‘Futurism’, 30 May 2019, available at <https://futurism.com/ai-generates-fake-news>, last accessed 26 July 2022.

¹⁶³ ROBITZSKI, *New*, cit. (footnote 162).

¹⁶⁴ ROBITZSKI, *New*, cit. (footnote 162).

¹⁶⁵ ALAPHILIPPE *et al.*, *Automated*, cit. (footnote 158), 21-22. See, in particular, JOANA GONÇALVES-SÁ, *In the Fight Against the New Coronavirus Outbreak, We Must Also Struggle with Human Bias*, ‘Nature Medicine’, Vol. 26, 2020, 305, available at <https://doi.org/10.1038/s41591-020-0802-y>, last accessed 26 July 2022.

¹⁶⁶ ALAPHILIPPE *et al.*, *Automated*, cit. (footnote 158).

¹⁶⁷ FREDERIK SCHAUER, *Free Speech and the Argument From Democracy*, ‘Nomos’, Vol. 25, 1983, 241-256, available at www.jstor.org/stable/24219368, last accessed 26 July 2022.

¹⁶⁸ HARRY KALVEN JR., *Uninhibited, Robust, and Wide-Open: A Note on Free Speech and the Warren Court*, ‘Michigan Law Review’, Vol. 67, December 1968, 289-302; DAVID SCHULTZ, *Marketplace of*

According to Jónatas Machado, in a democratic society, it is necessary to have a multifunctional approach concerning the freedom of expression in order to ensure its consistency when confronted with other paramount rights¹⁶⁹. Apart from the free marketplace of ideas, freedom of speech is essential for the creation of a public sphere, self-determination, the search for truth, the formation of public opinion and political will, peace maintenance, as well as for counteracting abuse of power¹⁷⁰.

Freedom of expression fosters the pursuit of truth, and the free trade of ideas makes it easier to distinguish between facts and falsehoods¹⁷¹. Within a free marketplace, falsities are more likely to be purged¹⁷². Public debate on issues of public interest, committed to an indispensable principle of truth¹⁷³, is crucial for having well-informed citizens, as an essential condition to ensure freedom to participate in political and public life according to the values of democracy and human rights¹⁷⁴.

However, despite their many advantages, the World Wide Web, new technologies and social networks have opened Pandora's Box, unleashing a set of problems that threatens democracy's foundations¹⁷⁵. These tools have been serving as a springboard for the mass diffusion of disinformation and undemocratic ideas¹⁷⁶. A great flood of falsehoods is easily originated, which impedes the free marketplace's role of purging bad ideas, such as those based on undemocratic values¹⁷⁷. If these impurities

Ideas, 'The First Amendment Encyclopedia', updated June 2017 by David L. Hudson, available at <https://www.mtsu.edu/first-amendment/article/999/marketplace-of-ideas>, last accessed 26 July 2022.

¹⁶⁹ JÓNATAS MACHADO, *Liberdade de Expressão: Dimensões Constitucionais da Esfera Pública no Sistema Social*, Coimbra: Coimbra Editora, 2002, 237-291.

¹⁷⁰ MACHADO, *Liberdade*, cit. (footnote 169), 237-291.

¹⁷¹ EUGENE VOLOKH, *In Defense of the Marketplace of Ideas/Search for Truth as a Theory of Free Speech Protection*, 'Virginia Law Review', Vol. 97, n.º 3, 2011, 595-601, available at <https://www.jstor.org/stable/41261524>, last accessed 26 July 2022.

¹⁷² VOLOKH, *In Defense*, cit. (footnote 171), 595-601.

¹⁷³ GILA SHER, *Epistemic Friction: An Essay on Knowledge, Truth, and Logic*, Oxford: Oxford University Press, 2016, 162.

¹⁷⁴ IRENE CATE, *Speech, Truth, and Freedom: An Examination of John Stuart Mill's and Justice Oliver Wendell Holmes's Free Speech Defenses*, 'Yale Journal of Law & the Humanities', Vol. 22, n.º 1, 2010, 35-81, available at <https://digitalcommons.law.yale.edu/yjlh/vol22/iss1/2>, last accessed 26 July 2022; HENRY MILNER, *Civic Literacy: How Informed Citizens Make Democracy Work*, Hanover: University Press of New England, 2002.

¹⁷⁵ M. MAYER and J. E. TILL, *The Internet: A Modern Pandora's Box?*, 'Quality of Life Research', Vol. 5, 1996, 568-571, available at <https://doi.org/10.1007/BF00439230>, last accessed 26 July 2022.

¹⁷⁶ UNITED NATIONS, *Ignoring*, cit. (footnote 138).

¹⁷⁷ PHILIP NAPOLI, *What If More Speech Is No Longer the Solution? First Amendment Theory Meets Fake News and the Filter Bubble*, 'Federal Communications Law Journal', Vol. 70, n.º 1, 2018, 55-104.

are not expelled but continually expand, then the marketplace will inevitably become contaminated¹⁷⁸.

In this polluted environment¹⁷⁹, citizens tend to believe in false news and often suspect the truthfulness of real news, confusing true and false content¹⁸⁰. This makes them vulnerable to interferences in their political will, causing them to become easy targets for anonymous, undemocratic forces at play¹⁸¹. Moreover, the feeling of time scarcity and information overload further complicates this state of affairs so it is more difficult to access reliable information¹⁸². As a result, the marketplace of ideas is continuously contaminated with falsehoods, which seriously jeopardizes a person's right to receive information and ideas¹⁸³.

Causing intentional confusion between truth and falsehood also hinders a person's right to impart information and ideas, especially concerning the press¹⁸⁴. False news aims to discredit reliable information of public interest by neutralizing its impact and impeding citizens' ability to vote accordingly¹⁸⁵. The press plays a key role when it comes to providing authentic news, which is essential for forming public opinion¹⁸⁶. Journalism is a necessary filter between the citizen and given events, as it guarantees the accuracy of the information at stake¹⁸⁷. However, on

¹⁷⁸ JÓNATAS MACHADO and IOLANDA R. BRITO, *Liberdade de Expressão, Informações Falsas e Figuras Públicas: O Perigo de Manipulação da Esfera de Discurso Público*, 'Boletim da Faculdade de Direito', Vol. 95, n.º 1, 2019, 65-72; NAPOLI, *What If*, cit. (footnote 177). However, some scholars argue that the free marketplace of ideas comprises ideas but does not extend to facts. See ARI WALDMAN, *The Marketplace of Fake News*, 'Journal of Constitutional Law', Vol. 20, n.º 4, 2018, 845-870, available at <https://scholarship.law.upenn.edu/jcl/vol20/iss4/3>, last accessed 26 July 2022.

¹⁷⁹ GREGORY BRAZEAL, *How Much Does a Belief Cost?: Revisiting the Marketplace of Ideas*, 'Southern California Interdisciplinary Law Journal', Vol. 21, n.º 1, 2011, 1-46, at 35.

¹⁸⁰ NAPOLI, *What If*, cit. (footnote 177).

¹⁸¹ ANDREA BUTLER, *Protecting the Democratic Role of the Press: A Legal Solution to Fake News*, 'Washington University Law Review', Vol. 96, n.º 2, 2018, 419-440, available at <https://journals.library.wustl.edu/lawreview/article/id/6227/#!>, last accessed 26 July 2022.

¹⁸² MICHAEL BITTMAN, JUDITH BROWN and JUDY WAJCMAN, *The Cell Phone, Constant Connection and Time Scarcity in Australia*, 'Social Indicators Research', Vol. 93, 2009, 229-233, available at <https://doi.org/10.1007/s11205-008-9367-8>, last accessed 26 July 2022. See also HEMB, *Death by*, cit. (footnote 83).

¹⁸³ ANDREI RICHTER, *Fake News and Freedom of the Media*, 'Journal of International Media & Entertainment Law', Vol. 8, n.º 2, 2018-2019, 1-33.

¹⁸⁴ BUTLER, *Protecting*, cit. (footnote 181), 419-440.

¹⁸⁵ IAN MACMULLEN, *Survey Article: What is "Post-Factual" Politics?*, 'The Journal of Political Philosophy', Vol. 28, n.º 1, 2020, 97-116, at 113-114, available at <https://doi.org/10.1111/jopp.12212>, last accessed 26 July 2022.

¹⁸⁶ BUTLER, *Protecting*, cit. (footnote 181), 419-440.

¹⁸⁷ BUTLER, *Protecting*, cit. (footnote 181), 419-440. According to the UN Secretary-General, António Guterres, journalists provide the 'antidote' to the pandemic of misinformation surrounding

social media, this filter does not always exist because journalists are no longer the main providers of news¹⁸⁸.

Since citizens are continuously updated with 'news', they tend to lean on the information provided, assuming it is true, which gives rise to an *illusion of enlightenment*¹⁸⁹. Citizens rely on the free flow of information without realising that they are immersed in a polluted, compromised marketplace and no longer free¹⁹⁰. Speeches and counter-speeches on topics of public interest fail to provide the most accurate information and ideas, which misleads people. Instead of being formed, public opinion becomes deformed¹⁹¹.

Therefore, two different visions of the world arise, including authentic reality based on truth, and on the other hand, there is fiction that only consists of lies. In a democracy, it is essential to perceive authentic reality as often as possible, which allows citizens to process facts and understand society's evolution¹⁹². False news perpetrators aspire to manipulate citizens, so they live in technological caves¹⁹³ where their senses are deluded to not correspond with reality¹⁹⁴. In other words, what their eyes and ears perceive is a lie.

As a result, citizens exercise their right to vote, but they are unaware that their perceptions of the world are no longer reliable¹⁹⁵. With a *truth-blind society*, there is a serious risk of electing undemocratic leaders, as citizens are intentionally induced (through disinformation campaigns) to prefer a particular candidate.

the COVID-19 crisis. See UNITED NATIONS, *Journalists provide 'antidote' to COVID-19 misinformation, UN chief says ahead of World Press Freedom Day*, 'UN News', 1 May 2020, available at <https://news.un.org/en/story/2020/05/1063012>, last accessed 26 July 2022.

¹⁸⁸ UNITED NATIONS, *Journalists*, cit. (footnote 187).

¹⁸⁹ HÖLZLE, *Verstrickung*, cit. (footnote 5), 11; HALL, ARISS and TODOROV, *The Illusion*, cit. (footnote 5); MORREAU, *Democracy*, cit. (footnote 5).

¹⁹⁰ NAPOLI, *What If*, cit. (footnote 177).

¹⁹¹ LANCE MASON, DAN KRUTKA and JEREMY STODDARD, *Media Literacy, Democracy, and the Challenge of Fake News*, 'Journal of Media Literacy Education', Vol. 10, n.º 2, 2018, 1-10, available at <https://doi.org/10.23860/JMLE-2018-10-2-1>, last accessed 26 July 2022.

¹⁹² CHERILYN IRETON and JULIE POSETTI (eds.), *Journalism, 'Fake News' & Disinformation: Handbook for Journalism Education and Training*, Paris: UNESCO Series on Journalism Education, 2018, available at <https://en.unesco.org/fightfakenews>, last accessed 26 July 2022.

¹⁹³ BARRELL, *Bubbles*, cit. (footnote 58). Still before the era of 'deepfakes', Eli Pariser had already referred to 'filter bubbles'. See ELI PARISER, *The Filter Bubble: What the Internet is Hiding From You*, London: Penguin Books, 2011.

¹⁹⁴ IRETON and POSETTI, *Journalism*, cit. (footnote 192).

¹⁹⁵ VICTORIA TURK, *Deepfakes Are Already Breaking Democracy. Just Ask Any Woman*, 'Wired', 18 November 2019, available at <https://www.wired.co.uk/article/deepfakes-pornography>, last accessed 26 July 2022.

Due to their democratic appearance and appealing discourse, charismatic leaders easily convince citizens that they understand and can solve all their problems. However, their detachment from the truth is sufficient to demonstrate the threat they pose to democracy.

Thus, false news turns citizens into the prisoners of Plato's cave, because they also contemplate the shadows while believing their authenticity¹⁹⁶. However, the new cave is even more hazardous, considering that it does not exist within the boundaries of a physical location. The individual cannot leave the technological cave simply by walking to the exit because (at least) his mobile device follows him anywhere. The more exposed citizens become to the cave's darkness, the greater their belief will become that the shadows are all there is.

5. The (re)discovery of sunlight: the truth

People's imaginary vision is confined within the technological cave, as they watch the display of shadows (false news) on the wall (virtual screens), unaware that reality lies outside. This encourages the contemplation of Socrates' warning that democracy tends to turn into the worst regime, a tyranny¹⁹⁷. To reiterate, for the philosopher, 'fair studies and practices and true speeches' are the 'best watchmen and guardians in the thought of men'¹⁹⁸. When the soul of a young man is empty, 'false and boasting speeches and opinions' run up and seize 'that place in such a young man'¹⁹⁹.

Yet, in the allegory of the cave, Plato subtly provides a remedy for the men's 'ignorance', that is, the primary reason democracies elect tyrants. His remedy entails the (re)discovery of light from the world of ideas outside of the cave²⁰⁰. In other words, ignorance must be replaced by knowledge that is based on accurate information. The shadows of falsehoods only fade with light that is derived from the truth²⁰¹.

¹⁹⁶ LEMANN, *Solving*, cit. (footnote 56); FROELICH, *A Not-So-Brief*, cit. (footnote 56).

¹⁹⁷ BLOOM, *The Republic*, cit. (footnote 1), 193-194.

¹⁹⁸ BLOOM, *The Republic*, cit. (footnote 1), 238.

¹⁹⁹ BLOOM, *The Republic*, cit. (footnote 1), 238.

²⁰⁰ BLOOM, *The Republic*, cit. (footnote 1), 194-195.

²⁰¹ FROELICH, *A Not-So-Brief*, cit. (footnote 56).

5.1. Public Consciousness

The first step to tackling disinformation is to raise public awareness about the threat it poses to democracy²⁰². In 2018, the Cambridge Analytica scandal majorly contributed to calling attention to strategies concerning the manipulation of citizens, as it was publicly revealed that a private company had harvested fifty million Facebook profiles, breaching data and exploiting emotions to predict and influence choices at the ballot box without citizens being aware²⁰³. This important leak demonstrated that manipulative strategies are effective and every citizen is a potential target, regardless of their educational background²⁰⁴.

In democratic societies, placing the problem at the core of public concerns has prompted social networks to assume some level of responsibility²⁰⁵. Still, these technological platforms need to enact further regulatory measures, especially to prevent sophisticated fabrications of visual content (deepfakes)²⁰⁶ from being easily spread. At the same time, there is a pressing need to build resilience in the minds of citizens, so that they will be better prepared to identify these threats and resist undemocratic interferences that concern their freedom.

²⁰² EUROPEAN COMMISSION, *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Tackling Online Disinformation: A European Approach* (COM/2018/236 final), 26 April 2018, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018DC0236>, last accessed 26 July 2022.

²⁰³ JULIA WONG, *The Cambridge Analytica Scandal Changed the World – But It Didn't Change Facebook*, 'The Guardian', 18 March 2019, available at <https://www.theguardian.com/technology/2019/mar/17/the-cambridge-analytica-scandal-changed-the-world-but-it-didnt-change-facebook>, last accessed 26 July 2022; CAROLE CADWALLADR and EMMA GRAHAM-HARRISON, *Revealed: 50 million Facebook Profiles Harvested for Cambridge Analytica in Major Data Breach*, 'The Guardian', 17 March 2018, available at <https://www.theguardian.com/news/2018/mar/17/cambridge-analytica-facebook-influence-us-election>, last accessed 26 July 2022.

²⁰⁴ CASS SUNSTEIN, *Conspiracy Theories and Other Dangerous Ideas*, New York: Simon & Schuster, 2016, ix.

²⁰⁵ MICHELLE CASTILLO, *Facebook's Mark Zuckerberg: "I'm Responsible for What Happened With Data Privacy Issues"*, 'CNBC', 4 April 2018, available at <https://www.cnn.com/2018/04/04/mark-zuckerberg-facebook-user-privacy-issues-my-mistake.html>, last accessed 26 July 2022.

²⁰⁶ HANNAH SMITH and KATHERINE MANSTED, *Weaponised Deep Fakes: National Security and Democracy*, Barton: Australian Strategic Policy Institute, 2020, available at <https://www.aspi.org.au/report/weaponised-deep-fakes>, last accessed 26 July 2022.

5.2. Ongoing counteractive strategies

When considering not only the constant mutation of the threats but also how the majority of proposals impose risks, it seems legitimate to conclude that a final solution for the problem has not been found yet. Leading social media platforms have been developing tools (i.e., self-regulation mechanisms) to impede the spread of disinformation²⁰⁷. In this way, the reliability of the news can be verified through algorithms and artificial intelligence²⁰⁸. However, content regulation may easily lead to censorship²⁰⁹. In particular, automatic removal of content should be considered an exceptional measure given its high potential to restrict freedom of expression. Thus, mechanisms aimed at tackling disinformation have aroused a difficult dilemma between the need to immediately remove false information capable of causing severe damage and the need to avoid the normalization of content removal that would originate an illegitimate interference with freedom of expression²¹⁰.

Furthermore, serious doubts have been raised about the legitimacy of an algorithm and artificial intelligence to define what is true or false²¹¹. The regulation of public discourse is far from being unanimously advocated for in democratic societies²¹². The certification of news by third-parties (e.g., fact-checking organizations)

²⁰⁷ SHELLY BANJO, *Facebook, Twitter and the Digital Disinformation Mess*, 'The Washington Post', 20 May 2019, available at <https://information-professionals.org/selected-washington-post-articles-week-ending-may-21st-2019/>, last accessed 27 July 2022.

²⁰⁸ WILL KNIGHT, *Facebook is Making Its Own AI Deepfakes to Head Off a Disinformation Disaster*, 'MIT Technology Review', 5 September 2019, available at <https://www.technologyreview.com/2019/09/05/65353/facebook-is-making-ai-deepfakes-to-head-off-a-disinformation-disaster/>, last accessed 27 July 2022.

²⁰⁹ SANDRA BARON and REBECCA CROTOFF, *Fighting Fake News*, Workshop Report, Information Society Project at Yale Law School and the Floyd Abrams Institute for Freedom of Expression, 21 October 2017, 13, available at <https://law.yale.edu/fighting-fake-news-workshop-report>, last accessed 27 July 2022; ROSA MARÍA GARCÍA SANZ, *La Dificil Relación del Instituto de la Opinión Pública y los Procesos de Comunicación Pública en Internet: La Desinformación Desafiando las Garantías Constitucionales*, 'Revista de Derecho Político', N° 106, 2019, 77-104, at 82.

²¹⁰ In the context of the European Union, the future *Digital Services Act* will play a key role in finding the right balance between these conflicting goals.

²¹¹ DAVID LAZER *et al.*, *The Science of Fake News*, 'Science', Vol. 359, 2018, 1094-1096; Alex HERN, *When Algorithms Rule Our News, Should We Be Worried or Relieved?*, 'The Guardian', 28 August 2014, available at <https://www.theguardian.com/technology/2014/aug/28/algorithms-google-facebook-censorship>, last accessed 27 July 2022.

²¹² Among others, see REBECCA K. HELM and HITOSHI NASU, *Regulatory Responses to 'Fake News' and Freedom of Expression: Normative and Empirical Evaluation*, 'Human Rights Law Review', Vol.

arouses serious concerns regarding reliability, especially when one considers that these entities tend to lack transparency, which is essential for maintaining their independence from people in power and their commitment to democratic values and human rights²¹³. Yet, self-regulatory measures have proved insufficient, as false news continues to be disseminated through social media²¹⁴.

Apart from these general measures, false news has also received attention from some European National Parliaments. On 18 February 2019, the United Kingdom's House of Commons published the Digital, Culture, Media and Sport Committee's Final Report in an eighteen-month inquiry on 'disinformation' and 'fake news'. In this leading report, the Committee recommended that 'participating in social media should allow more pause for thought', adding that 'techniques for slowing down interaction online should be taught, so that people themselves question both what they write and what they read – and that they pause and think further, before they make a judgment online'²¹⁵.

In terms of national legislation, Germany passed a law (*NetzDG*, generally known as Network Enforcement Act), in 2018²¹⁶, concerning the removal of social media's banned content (e.g., hate speech) within twenty-four hours, and this deadline must be complied with to avoid considerable fines²¹⁷. Also, the French

21, n.º 2, 2021, 302-328, available at <https://doi.org/10.1093/hrlr/ngaa060>, last accessed 4 August 2022; RASMUS KLEIS NIELSEN, *How to Respond to Disinformation While Protecting Free Speech*, 'Reuters Institute for the Study of Journalism – University of Oxford', 19 February 2021, available at <https://reutersinstitute.politics.ox.ac.uk/news/how-respond-disinformation-while-protecting-free-speech>, last accessed 4 August 2022.

²¹³ ALEXANDRA ANDORFER, *Spreading Like Wildfire: Solutions for Abating the Fake News Problem on Social Media Via Technology Controls and Government Regulation*, 'Hastings Law Journal', Vol. 69, 2018, 1409, 1418-1422.

²¹⁴ KATE PROCTOR, *UK Anti-Fake News Unit Dealing With Up to 10 False Coronavirus Articles a Day*, 'The Guardian', 30 March 2020, available at <https://www.theguardian.com/world/2020/mar/30/uk-anti-fake-news-unit-coronavirus>, last accessed 27 July 2022.

²¹⁵ HOUSE OF COMMONS DIGITAL, CULTURE, MEDIA AND SPORT COMMITTEE, *Disinformation and Fake News: Final Report*, Eighth Report of Session 2017-19, 18 February 2019, 88, available at <https://publications.parliament.uk/pa/cm201719/cmselect/cmcmds/1791/1791.pdf>, last accessed 27 July 2022.

²¹⁶ This law was amended in 2021. Among other objectives, the amendment sought to 'increase the information content and comparability of social media providers' transparency reports and improve the user-friendliness of the reporting channels for complaints about unlawful content'. JENNY GESLEY, *Germany: Network Enforcement Act Amended to Better Fight Online Hate Speech*, 'Library of Congress', 2021, available at <https://www.loc.gov/item/global-legal-monitor/2021-07-06/germany-network-enforcement-act-amended-to-better-fight-online-hate-speech/>, last accessed 27 July 2022.

²¹⁷ *Netzwerkdurchsetzungsgesetz vom 1 September 2017 (BGBl. I S. 3352), das zuletzt durch Artikel 3 des Gesetzes vom 21. Juli 2022 (BGBl. I S. 1182) geändert worden ist*, 'Bundesministerium der

Parliament approved a law that empowered the judiciary to immediately remove false news during election campaigns²¹⁸.

In Portugal, the Parliament approved a Resolution, in 2019, stressing the relevance of media literacy and calling on the Government to take measures to counter disinformation²¹⁹. In 2021, it also approved the Portuguese Charter of Human Rights in the Digital Era, enshrining, in Article 6, the right to protection against disinformation. However, this norm raised serious doubts about its compliance with the Portuguese Constitution, as it represented a threat to freedom of expression, which led the President of the Republic to ask the Constitutional Court to verify the constitutionality of Article 6 of the Charter²²⁰. In this context, the Parliament amended the law, overcoming the main concerns. Thus, on 3 August 2022, the President of the Republic promulgated the amendment to the Portuguese Charter of Human Rights in the Digital Age²²¹.

Some other legal initiatives in the EU must also be mentioned. On 15 June 2017, the European Parliament adopted a Resolution on online platforms and

Justiz', 1 September 2017, available at <https://www.gesetze-im-internet.de/netzdg/BJNR335210017.html>, last accessed 5 August 2022. See also FATHIN UNGKU, *Factbox: Fake News' Laws Around the World*, 'Reuters', 2 April 2019, available at <https://www.reuters.com/article/us-singapore-politics-fake-news-factbox/factbox-fake-news-laws-around-the%20world-idUSKCN1RE0XN>, last accessed 27 July 2022.

²¹⁸ *Loi n° 2018-1202 du 22 décembre 2018 relative à la lutte contre la manipulation de l'information*, 'Légifrance', 27 October 2021, available at <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000037847559/?isSuggest=true>, last accessed 3 August 2022. See also MICHAEL-ROSS FIORENTINO, *France Passes Controversial 'Fake News' Law*, 'Euronews.', 22 November 2018, available at <https://www.euronews.com/2018/11/22/france-passes-controversial-fake-news-law>, last accessed 27 July 2022.

²¹⁹ *Resolução que recomenda ao Governo a adoção de medidas para aplicação em Portugal do Plano Europeu de Ação contra a Desinformação*, 'Assembleia da República', 6 March 2019, available at <http://debates.parlamento.pt/catalogo/r3/dar/s2a/13/04/079S1/2019-03-26/2?pgs=2&org=PLC>, last accessed 27 July 2022.

²²⁰ About the Portuguese Charter of Human Rights in the Digital Age, including the issues raised by Article 6, DOMINGOS SOARES FARINHO, *The Portuguese Charter of Human Rights in the Digital Age: A Legal Appraisal*, 'Revista Española de la Transparencia', N.º 13, Julio-Diciembre 2021, 85-105, available at <https://doi.org/10.51915/ret.191>, last accessed 27 July 2022; MARIANA MELO EGÍDIO, *Pandemia e Desinformação – O Caso Português: Alguns Exemplos de Exercício Abusivo de Direitos no Espaço Digital*, 'e-Publica', Vol. 8, n.º 3, 2021, 63-77, at 71-73, available at <https://e-publica.pt/article/34114>, last accessed 27 July 2022.

²²¹ PRESIDENCY OF THE PORTUGUESE REPUBLIC, *Presidente da República Promulga Alteração à Carta Portuguesa de Direitos Humanos na Era Digital*, 'Official Site for Information of the Presidency of the Portuguese Republic', 3 August 2022, available at <https://www.presidencia.pt/en/news-agenda/all-news/2022/08/presidente-da-republica-promulga-alteracao-a-carta-portuguesa-de-direitos-humanos-na-era-digital/>, last accessed 4 August 2022.

the Digital Single Market, highlighting the relevance of ‘taking action against the dissemination of fake news’ and calling on ‘online platforms to provide users with tools to denounce fake news in such a way that other users can be informed that the veracity of the content has been contested’ [35]. It also called on the ‘Commission to analyse in depth the current situation and legal framework with regard to fake news, and to verify the possibility of legislative intervention to limit the dissemination and spreading of fake content’ [36]²²².

On 26 April 2018, the Commission’s Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, on ‘tackling online disinformation: a European approach’, sets out principles and objectives to guide action for counteracting disinformation, such as the need to create a more ‘transparent, trustworthy and accountable online ecosystem’²²³. It called on ‘online platforms to act swiftly and effectively to protect users from disinformation’, taking steps to ‘strengthening fact checking, collective knowledge, and monitoring capacity on disinformation’, as well as to ‘fostering online accountability’ and ‘harnessing new technologies’, such as artificial intelligence or cognitive algorithms²²⁴. Moreover, it emphasised the importance of guaranteeing the security and resilience of electoral processes by fostering ‘education and media literacy’, supporting ‘quality journalism as an essential element of a democratic society’, and countering ‘internal and external disinformation threats through strategic communication’²²⁵.

In October 2018, online platforms, leading social networks and the advertising industry agreed on a self-regulatory Code of Practice to address the spread of online disinformation. The Code aimed to improve transparency in political advertising and demonetize the purveyors of disinformation, as the main goals set out by the European Commission’s Communication presented in April 2018²²⁶. On 25 October 2018, the European Parliament adopted a Resolution concerning the use of Facebook users’ data by Cambridge Analytica and the impact on data protection²²⁷.

²²² EUROPEAN PARLIAMENT, *Resolution of 15 June 2017 on Online Platforms and the Digital Single Market* (2016/2276(INI)), available at http://www.europarl.europa.eu/doceo/document/TA-8-2017-0272_EN.html, last accessed 27 July 2022.

²²³ EUROPEAN COMMISSION, *Communication*, cit. (footnote 202).

²²⁴ EUROPEAN COMMISSION, *Communication*, cit. (footnote 202).

²²⁵ EUROPEAN COMMISSION, *Communication*, cit. (footnote 202).

²²⁶ EUROPEAN COMMISSION, *2018 Code of Practice on Disinformation*, 16 June 2022, available at <https://digital-strategy.ec.europa.eu/en/library/2018-code-practice-disinformation>, last accessed 27 July 2022.

²²⁷ EUROPEAN PARLIAMENT, *Resolution on the Use*, cit. (footnote 143).

It stressed the influence of the Cambridge Analytica scandal on data protection, elections, and false news²²⁸. On 29 October 2019, the European Commission published the first annual self-assessment reports by the signatories of the Code of Practice, that laid out the previous year's progress in the fight against online disinformation²²⁹.

On 28 November 2018, the Official Journal of the European Union published the consolidated text of the Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities, which highlighted the importance of media literacy²³⁰. On 5 December 2018, the European Commission and the High Representative of the Union for Foreign Affairs and Security Policy adopted the Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, which established an 'Action Plan against Disinformation'²³¹.

On 14 June 2019, the Report on the implementation of the 'Action Plan against Disinformation' pointed out that protecting 'our democratic processes and institutions from disinformation and manipulation poses a long-term challenge and requires continuous efforts'²³². On 20 June 2019, the European Council adopted several conclusions regarding the fight against disinformation, among

²²⁸ EUROPEAN PARLIAMENT, *Resolution on the Use*, cit. (footnote 143).

²²⁹ EUROPEAN COMMISSION, *Code of Practice on Disinformation One Year On: Online Platforms Submit Self-Assessment Reports*, 29 October 2019, available at https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_19_6166, last accessed 27 July 2022.

²³⁰ Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities (PE/33/2018/REV/1), available at <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>, last accessed 27 July 2022.

²³¹ EUROPEAN COMMISSION and the HIGH REPRESENTATIVE OF THE UNION FOR FOREIGN AFFAIRS AND SECURITY POLICY, *Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: Action Plan against Disinformation* [JOIN(2018) 36 final], 5 December 2018, available at https://www.ecas.europa.eu/sites/default/files/action_plan_against_disinformation.pdf, last accessed 27 July 2022.

²³² EUROPEAN COMMISSION and the HIGH REPRESENTATIVE OF THE UNION FOR FOREIGN AFFAIRS AND SECURITY POLICY, *Joint Communication*, cit. (footnote 143).

other matters, highlighting that ‘the evolving nature of the threats and the growing risk of malicious interference and online manipulation associated with the development of Artificial Intelligence and data-gathering techniques require continuous assessment and an appropriate response’²³³.

The European Parliament resolution of 10 October 2019, which concerned ‘foreign electoral interference and disinformation in national and European democratic processes’, explained that ‘interference in elections is part of a broader strategy of hybrid warfare interference’ and ‘undermines the right of people to have their say in the governance of their country, directly or through freely chosen representatives’²³⁴. It also emphasised the need to ‘improve media literacy and civic education through culture and schooling from an early age in order to allow those targeted by disinformation campaigns to identify the information provided as biased’, while encouraging Member States to include ‘specific courses on media literacy in their school curricula, and to develop information campaigns targeted on the segments of the population that are more vulnerable to disinformation’²³⁵.

After the onset of the pandemic, the EU has strengthened its actions to counter disinformation about Covid-19. On 10 June 2020, the European Commission and the High Representative of the Union for Foreign Affairs and Security Policy adopted the Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on ‘tackling COVID-19 disinformation – getting the facts right’, which highlighted the need to ‘respond to the threat posed by disinformation, misinformation and foreign influence operations in the COVID-19 crisis’, also proposing concrete actions to protect public health and Europe’s democratic societies²³⁶.

On 16 June 2022, the European Commission welcomed the publication of the strengthened Code of Practice on Disinformation, following the 2021

²³³ EUROPEAN COUNCIL, *Meeting* (20 June 2019) – Conclusions (EUCO 9/19), available at <https://www.consilium.europa.eu/media/39922/20-21-euco-final-conclusions-en.pdf>, last accessed 27 July 2022.

²³⁴ EUROPEAN PARLIAMENT, *Resolution of 10 October 2019*, cit. (footnote 139).

²³⁵ EUROPEAN PARLIAMENT, *Resolution of 10 October 2019*, cit. (footnote 139).

²³⁶ EUROPEAN COMMISSION and the HIGH REPRESENTATIVE OF THE UNION FOR FOREIGN AFFAIRS AND SECURITY POLICY, *Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: Tackling COVID-19 Disinformation – Getting the Facts Right* (JOIN/2020/8 final), 10 June 2020, available at https://ec.europa.eu/info/sites/default/files/communication-tackling-covid-19-disinformation-getting-facts-right_en.pdf, last accessed 27 July 2022.

Commission Guidance and taking into consideration the lessons learnt from the Covid-19 pandemic and Russia's invasion of Ukraine. This new Code, which builds on the first Code of Practice of 2018, establishes 'extensive and precise commitments by platforms and industry to fight disinformation and marks another important step for a more transparent, safe and trustworthy online environment'. At the outset of 2023, the 34 signatories, such as major online platforms (e.g., Meta, Google, Twitter, TikTok, and Microsoft), the online ad industry, ad-tech companies, fact-checkers and civil society, will provide the Commission with their first implementation reports. The effectiveness of this self-regulatory Code of Practice will be enhanced by the future Digital Services Act, which will impose substantial fines to very large platforms that constantly disregard the Code and do not undertake risk mitigation measures²³⁷.

The Digital Services Act, that will be directly applicable across the EU and will entry into force in the near future, aims at creating a 'safer digital space in which the fundamental rights of all users of digital services are protected'²³⁸. This upcoming regulation will reinforce individual fundamental rights online, persistently threatened by manipulative algorithmic schemes devoted to increase the spread of disinformation, apart from other hazards²³⁹.

Outside of the EU, it is important to mention, for example, Vienna's Joint Declaration on Freedom of Expression and 'Fake News', Disinformation, and Propaganda, which was adopted on 3 March 2017 by the United Nations (UN) Special Rapporteur on Freedom of Opinion and Expression, the Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, the Organization of American States (OAS) Special Rapporteur on Freedom of Expression, and the African Commission on Human and Peoples' Rights (ACHPR) Special Rapporteur on Freedom of Expression and Access to Information. It clearly points out that 'States should take measures to promote media and digital literacy, including by covering these topics as part of the regular school curriculum and by engaging with civil society and other stakeholders to raise awareness about these issues'²⁴⁰.

²³⁷ About the paragraph, EUROPEAN COMMISSION, *Disinformation: Commission Welcomes the New Stronger and More Comprehensive Code of Practice on Disinformation*, 'Press Release', 16 June 2022, https://ec.europa.eu/commission/presscorner/detail/en/ip_22_3664, last accessed 27 July 2022.

²³⁸ EUROPEAN COMMISSION, *The Digital Services Act Package*, 5 July 2022, available at <https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package>, last accessed 27 July 2022.

²³⁹ EUROPEAN COMMISSION, *The Digital*, cit. (footnote 238).

²⁴⁰ UNITED NATIONS SPECIAL RAPPORTEUR ON FREEDOM OF OPINION AND EXPRESSION *et al.*, *Joint Declaration on Freedom of Expression and 'Fake News', Disinformation and Propaganda*, 3 March 2017, available at <https://www.osce.org/fom/302796>, last accessed 27 July 2022.

More recently, at the request of Ukraine, the United Nations Human Rights Council adopted, on 1 April 2022, a plan of action to tackle disinformation. The draft resolution, officially sponsored by Japan, Latvia, Lithuania, Poland, the UK and US, apart from Ukraine, highlighted the ‘primary role that governments have, in countering false narratives’²⁴¹.

5.3. The current state of affairs

Currently, we cannot say that democratic elections are safe from the perpetrators of disinformation campaigns²⁴². Western democracies remain at the mercy of manipulative strategies aimed at destroying democratic values²⁴³. Their techniques continuously improve, causing an invisible threat to emerge. However, our societies have already begun to strengthen their resilience for coping with these attempts to remove their democratic pillars²⁴⁴.

5.4. The urgent need to awaken citizens to the light of truth

Although democracies are experiencing challenging times, Socrates’ assumption that democratic regimes will inevitably turn into tyrannies will only come to fruition if society fails to counteract the causes underlying this malicious transition. Even though democracies have serious internal issues, the system’s core should not be defined by its problems, just as a human’s essence should not be solely understood by its weaknesses.

²⁴¹ UNITED NATIONS, *UN’s Rights Council Adopts ‘Fake News’ Resolution, States Urged to Tackle Hate Speech*, ‘UN News’, 1 April 2022, available at <https://news.un.org/en/story/2022/04/1115412>, last accessed 27 July 2022.

²⁴² Disinformation is now a permanent threat. In this sense, see RAÚL MAGALLÓN-ROSA, JUAN PEDRO MOLINA-CAÑABATE and JOSÉ MANUEL SÁNCHEZ-DUARTE, *Medidas Públicas y Privadas para Combatir la Desinformación. Un Análisis Comparativo*, ‘Boletim do Arquivo da Universidade de Coimbra’, Extra 1, 2022, 105-129, at 127, available at https://doi.org/10.14195/2182-7974_extra2022_1_5, last accessed 2 August 2022.

²⁴³ EUROPEAN PARLIAMENT, *Resolution of 10 October 2019*, cit. (footnote 139); SIMON PARKIN, *The Rise of the Deepfake and the Threat to Democracy*, ‘The Guardian’, 22 June 2019, available at <https://www.theguardian.com/technology/ng-interactive/2019/jun/22/the-rise-of-the-deepfake-and-the-threat-to-democracy>, last accessed 27 July 2022.

²⁴⁴ In France, Laurent Petit pointed out the importance of cultivating, from an early age, an ‘art of questioning’, based on research methods, as a strategy against disinformation and propaganda. LAURENT PETIT, *Pour Contrer Infôx et Propagande, le Fact-checking ne Suffit pas*, ‘Sorbonne Université’, 30 March 2022, available at <https://www.sorbonne-universite.fr/actualites/pour-contrer-infôx-et-propagande-le-fact-checking-ne-suffit-pas>, last accessed 2 August 2022.

In the twenty-first century, the pillars that underpin democracy need to be strengthened. It is imperative to deepen the protection of democracy's intrinsic values, such as human rights, the rule of law, justice, freedom, security, equality, and truth. The health of our democracies must be recovered because, despite its imperfections, it has proven to be the superior regime. In fact, before the House of Commons congregated on 11 November 1947, Winston Churchill was undeniably correct when he said,

[m]any forms of Government have been tried, and will be tried in this world of sin and woe. No one pretends that democracy is perfect or all-wise. Indeed it has been said that democracy is the worst form of Government except for all those other forms that have been tried from time to time²⁴⁵.

Still, in 2009, John Keane expressed that he was greatly concerned that democracies were moving towards serious problems, as if they were sleepwalkers²⁴⁶. Keane emphasised how much we would lose 'if the world foolishly allowed democracy to slip through its hands, to wither away, or to be killed off by its rising numbers of opponents'²⁴⁷. It is crucial to remain alert regarding any attempts to replace an authentic democracy with authoritarian regimes that have the appearance of a democracy²⁴⁸. A deficit of trust in democracy causes citizens to be more vulnerable to the appealing allure of populist discourse that is ultimately misleading²⁴⁹. A populist leader emerging as a 'saviour' of the people, who is committed to defeating the numerous problems of democracy²⁵⁰, takes advantage of the weaknesses of authentic democracies to implement a 'pseudo-democracy' that is devoid of its values²⁵¹.

In 2013, Conor Gearty urged citizens to read authentic democracy's fundamental texts before it is too late and society has forgotten their meaning²⁵². Neo-democracy – sometimes called, 'post-democracy', 'imitation democracy', or 'authoritarian

²⁴⁵ INTERNATIONAL CHURCHILL SOCIETY, *The Worst Form of Government*, 25 February 2016, available at <https://winstonchurchill.org/resources/quotes/the-worst-form-of-government/>, last accessed 27 July 2022.

²⁴⁶ KEANE, *The Life*, cit. (footnote 10), 819.

²⁴⁷ KEANE, *The Life*, cit. (footnote 10), 876.

²⁴⁸ CONOR GEARTY, *Liberty & Security*, Cambridge: Polity Press, 2013, 4-6.

²⁴⁹ CHRISTIAN DUSTMANN *et al.*, *Europe's Trust Deficit: Causes and Remedies*, London: Centre for Economic Policy Research, 2017, 3-7.

²⁵⁰ BLOOM, *The Republic*, cit. (footnote 1), 244.

²⁵¹ GEARTY, *Liberty*, cit. (footnote 248), 54-55.

²⁵² GEARTY, *Liberty*, cit. (footnote 248), 5.

legality²⁵³ – tries to instil the idea that outdated democracies are not up to the challenges posed by the global world, such as extremism, climate change, population growth, or the refugee crisis²⁵⁴. The existing political system cannot be replaced by regimes that are similar to democracy but will eventually prove to be disengaged from their genuine values²⁵⁵.

Truth is a key asset in every democracy²⁵⁶. If we do not want to sacrifice freedom, we must be willing to stand up for the truth, be intolerant of the spread of lies, and remain vigilant against manipulative strategies. Orwell's novel, *Nineteen Eighty-Four*, is becoming increasingly less like fiction and more akin to modern-day reality²⁵⁷. In this age of disinformation, anonymous forces continue their attempts to mislead citizens by shaping their thoughts, just as Winston Smith – Orwell's protagonist – was brainwashed into believing that 'two and two make five'²⁵⁸.

Truth is continuously being eroded. While electoral campaigns have always been permeable to disinformation tactics, the line that used to clearly mark the boundary between information and entertainment is increasingly blurring²⁵⁹. Discreet political approaches tend to be more outdated, so to captivate voters, some politicians act as if they are showbiz actors entertaining citizens with fiction rather than providing them with information of public interest²⁶⁰. Likewise, sensationalism is also closely linked to some forms of journalism and often neglects the truth to increase revenue²⁶¹. It is perhaps more concerning, however, that the public often prefers to be entertained rather than informed²⁶².

²⁵³ CONOR GEARTY, *The State of Freedom in Europe*, 'European Law Journal', Vol. 21, n.º 6, 2015, 706-721, available at <https://doi.org/10.1111/eulj.12160>, last accessed 27 July 2022.

²⁵⁴ GEARTY, *Liberty*, cit. (footnote 248), 4-6.

²⁵⁵ GEARTY, *Liberty*, cit. (footnote 248), 4-6.

²⁵⁶ VOLOKH, *In Defense*, cit. (footnote 171).

²⁵⁷ DORIAN LYNKEY, *Nothing But the Truth: The Legacy of George Orwell's Nineteen Eighty-Four*, 'The Guardian', 19 May 2019, available at <https://www.theguardian.com/books/2019/may/19/legacy-george-orwell-nineteen-eighty-four>, last accessed 27 July 2022.

²⁵⁸ GEORGE ORWELL, *Nineteen Eighty-Four*, London: Penguin Books, 2008, 291.

²⁵⁹ THUSSU, *News*, cit. (footnote 116).

²⁶⁰ KATHRYN BROWNELL, *Showbiz Politics: Hollywood in American Political Life*, Chapel Hill: University of North Carolina Press, 2014.

²⁶¹ BARBIE ZELIZER (ed.), *The Changing Faces of Journalism: Tabloidization, Technology and Truthiness*, London and New York: Routledge, 2009.

²⁶² KEITH SUTER, *Global Order and Global Disorder: Globalization and the Nation-State*, Westport: Praeger, 2003, 165. See also SOPHIA ROSENFELD, *Democracy and Truth: A Short History*, Philadelphia: University of Pennsylvania Press, 2018, 8-9.

Who cares about the truth when lies are more appealing? While some may find this viewpoint tempting, it is crucial to be aware that the promise of a good laugh that involves lying about public interest issues will eventually cost us our freedom²⁶³. Disinformation perpetrators aspire to destroy our worldview and democratic identity in order to implant new values²⁶⁴. Based on the pretext of being the leaders that society has been searching for, they promise to defeat democracy's weaknesses (e.g., corruption, social injustice, or abuse of power) by providing a fake remedy that does not improve democracy but destroys it.

Perhaps more than ever before, society needs a guardian of the truth, like the journalist²⁶⁵. The press has an irreplaceable role in defending democracy²⁶⁶. Despite its difficulties, professional journalism must find an opportunity to impose itself once again²⁶⁷. It is essential to rebuild public trust in the independence of the media, which can contribute to a great extent to sensitize readers to the importance of paying for access to news²⁶⁸. For this purpose, it will be necessary to strengthen the guarantees of press freedom and the rights of journalists, as well as to adopt measures that prevent concentration of media ownership. Moreover, younger audiences need to be motivated to read news on issues of public interest, as they represent a whole new generation of citizens²⁶⁹.

The contamination of the public sphere with false news can only be countered by independent media outlets that embrace a visceral need to proclaim the truth, inspired by the historical significance of freedom of the press. Meanwhile, to maintain individual freedom, it is imperative to raise public awareness about the

²⁶³ BLOOM, *The Republic*, cit. (footnote 1), 103-104.

²⁶⁴ BLOOM, *The Republic*, cit. (footnote 1), 238.

²⁶⁵ KARL VICK, *Person of the Year 2018*, 'Time', 2018, available at <https://time.com/person-of-the-year-2018-the-guardians/>, last accessed 27 July 2022.

²⁶⁶ NISHANT LALWANI, *A Free Press Is the Lifeblood of Democracy – Journalists Must Not Be Silenced*, 'The Guardian', 5 July 2019, available at <https://www.theguardian.com/global-development/2019/jul/05/a-free-press-is-the-lifeblood-of-democracy-journalists-must-not-be-silenced>, last accessed 27 July 2022.

²⁶⁷ Pointing this idea, CHARLIE BECKETT, *'Fake News': The Best Thing That's Happened to Journalism*, 'POLIS: Journalism and Society at the LSE', 11 March 2017, available at <https://blogs.lse.ac.uk/polis/2017/03/11/fake-news-the-best-thing-thats-happened-to-journalism/>, last accessed 27 July 2022; TIAGO QUINTANILHA, MARISA SILVA and TIAGO LAPA, *Fake News and Its Impact on Trust in the News. Using the Portuguese Case to Establish Lines of Differentiation*, 'Communication & Society', Vol. 32, n.º 3, 2019, 17-33.

²⁶⁸ The *Reuters Institute Digital News Report 2022* indicates that only a minority of Portuguese respondents believe media are independent from economic or political influence. See NEWMAN *et al.*, *Reuters 2022*, cit. (footnote 87), 97.

²⁶⁹ NEWMAN *et al.*, *Reuters 2022*, cit. (footnote 87), 43.

threat of false information's mass dissemination²⁷⁰. To be ignorant of the truth deflates our freedom and increases our vulnerability to manipulations by undemocratic forces that seek to destroy the pillars of authentic democracy²⁷¹. There is an urgency to implement measures that increase media literacy²⁷², in order to improve resilience against dishonest scheming and impede people's *blindness to the truth*²⁷³.

6. Conclusion

A well-informed citizenry is vital for strengthening democracy's resilience²⁷⁴. The most effective vaccine against disinformation is wide-ranging public engagement with truth as a guiding principle²⁷⁵. In this new culture of instantaneous sharing and social media, the search for truth is every individual's responsibility. Ultimately, citizens are the most powerful guardians of authentic democracies²⁷⁶.

²⁷⁰ EUROPEAN COMMISSION, *Communication*, cit. (footnote 202).

²⁷¹ MORGAN, *Fake*, cit. (footnote 4).

²⁷² According to recent research, media literacy education reduces the effects of disinformation messages. See YOORI HWANG, JI YOUN RYU and SE-HOON JEONG, *Effects of Disinformation Using Deepfake: The Protective Effect of Media Literacy Education*, 'Cyberpsychology, Behavior, and Social Networking', Vol. 24, n.º 3, 2021, 188-193, available at <http://doi.org/10.1089/cyber.2020.0174>, last accessed 4 August 2022. See also KALEV LEETARU, *A Reminder that 'Fake News' is an Information Literacy Problem – Not a Technology Problem*, 'Forbes', 7 July 2019, available at <https://www.forbes.com/sites/kalevleetaru/2019/07/07/a-reminder-that-fake-news-is-an-information-literacy-problem-not-a-technology-problem/#790377e16a6f>, last accessed 27 July 2022.

²⁷³ CHARLIE BECKETT and SONIA LIVINGSTONE, *Tackling the Information Crisis: A Policy Framework for Media System Resilience*, Report of the LSE Commission on Truth Trust and Technology, London: London School of Economics and Political Science, 2018, available at <http://www.lse.ac.uk/media-and-communications/assets/documents/research/T3-Report-Tackling-the-Information-Crisis.pdf>, last accessed 27 July 2022; ENTIDADE REGULADORA PARA A COMUNICAÇÃO SOCIAL, *A Desinformação – Contexto Europeu e Nacional*, Lisboa: ERC, 2019, 45-50.

²⁷⁴ PAUL NEMITZ and FRITHJOF EHM, *Strengthening Democracy in Europe and Its Resilience Against Autocracy: Daring More Democracy and a European Democracy Charter*, Bruges: College of Europe, European Legal Studies, Research Papers in Law 1/2019, available at <https://www.coleurope.eu/research-paper/strengthening-democracy-europe-and-its-resilience-against-autocracy-daring-more>, last accessed 27 July 2022.

²⁷⁵ SHER, *Epistemic*, cit. (footnote 173), 162.

²⁷⁶ BRYONY HOSKINS, What Does Democracy Need from Its Citizens? Identifying the Qualities Needed for Active Citizenship and Making the Values Explicit, in Murray Print and Dirk Lange, *Civic Education and Competences for Engaging Citizens in Democracies*, Rotterdam: Sense Publishers, 2013, 23-35.

In Plato's allegory of the cave, the prisoner contemplated the light of truth in the real world, and then, he returned to the cave²⁷⁷. At first, the glare across his vision prevented him from immediately observing the shadows²⁷⁸. He attempted to arouse the other prisoners to witness the light by announcing that the shadows they had always known existed in a world of appearances, but they needed to leave the cave in order to perceive the truth²⁷⁹. Yet, the prisoners doubted his claims and ridiculed him. Slowly, the protagonist's eyes adjusted to the cave's darkness once more and he saw the shadows return²⁸⁰.

Therefore, we should not take too long to raise public awareness about the democratic implications of disinformation campaigns and their manipulative strategies to construct individual bubbles of fiction around each citizen in order to pit them against each other. Otherwise, citizens' eyes may begin to adjust to the shadows of falsehoods in their technological caves, while the truth of the real world (beyond the screens that spread disinformation) slowly fades from their memory.

It is imperative to foster a commitment to the truth in every individual, as this is vital for maintaining a strong democratic legacy for future generations. The anonymous forces behind disinformation campaigns aspire to imprison the public in technological caves in order to manipulate votes and promote undemocratic leaders in their rise to power. Citizens must be swiftly awakened to the light of truth before Socrates' warning becomes prophetic.

²⁷⁷ BLOOM, *The Republic*, cit. (footnote 1), 195-196.

²⁷⁸ BLOOM, *The Republic*, cit. (footnote 1), 195-196.

²⁷⁹ BLOOM, *The Republic*, cit. (footnote 1), 195-196.

²⁸⁰ BLOOM, *The Republic*, cit. (footnote 1), 195-196.