

Differing Anti-disinformation Approaches Between the United Kingdom and Sweden

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Abstract

This paper investigates the methods that Sweden and the UK take to combat disinformation. Leaving disinformation to spread and not acting against it can manipulate public opinion, but also undermine trust in governing institutions. Countering disinformation is therefore central to protect democracy and preserve truth. However, countries diverge in how they might frame this problem, which then impacts how they act on it. The research question of this paper asks “In what way do the anti-disinformation approaches of Sweden and the UK differ?”

As there is a major research gap in anti-disinformation measures, there is only scarce research on the applicability of theories to this topic. Therefore, two theories of international relations, namely realism and liberalism, were used as a lens to try and explain the influence that state framing can have on state behaviour in anti-disinformation. Out of this, three hypotheses were formulated, focusing on the impact that perceiving an external threat can have on how a government might restrict free speech. However, there was no significant correlation between the perceiving of threats and how governments acted towards freedom of speech. Still, differences between framing and behaviour of the two cases, as well as structural differences were identified.

Keywords: Misinformation, Disinformation, Liberalism, Realism

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1. Introduction

Through recent developments such as globalization and digitalization the world is growing closer together rapidly. More access to technologies and information is being provided, with the general amount of information increasing as well. Especially online and through social media, the number of sources and distributors are rising. Parallel to that, publishing and spreading information is also becoming easier, which can lead to mistakes and misinformation, that is often published on purpose with a certain goal in mind. Misinformation which is deliberately intended to mislead is called disinformation (American Psychological Association, 2022).

Because of these developments and further technological advances, the threat that disinformation emits has grown significantly. Spreading false information is not just a tool for fraud or to share and find supporters for conspiracies. In larger scales and over time, it is also being used to manipulate public events and discourse, often to push certain agendas and influence public opinion. This process is called social engineering. Although involved actors and intentions for this vary, it always poses a specific threat for governments, as it is often aimed at discrediting authorities. Within states this is often carried out by extremist groups or individuals, but it can also take place on international levels. In recent years, there has been a rising number of cases where governments or other state-backed entities have tried to gain influence or propagate their agendas in other countries (Alba & Satariano, 2019). The most notable example for this is the wave of disinformation surrounding the war between Russia and Ukraine, of which a large part is spread by the Russian government to gain supporters in countries all over the world (Hansen, 2017).

To counter this, many governments have established projects or institutions that focus specifically on preventing or countering this issue. They usually educate citizens by informing and warning them of currently circulating disinformation, as well as spreading awareness of the national governments' perspective on the correct information. While these practices are common approaches in countering disinformation within states, the way governments frame their anti-disinformation measures often differ.

With its Psychological Defence Agency, Sweden is actively trying to combat disinformation, but focusing specifically on foreign information influences. In this context, Sweden pointed out and identified external security threats, especially Russian influences (Psychological Defence Agency, 2022). On the other hand, the UK has a different approach. It is also trying to combat disinformation within its borders with projects such as the Counter-Disinformation Unit (CDU). However, these projects do not actively or only rarely mention external security threats. Instead, the major goal of the CDU was to counter disinformation to keep stability within the UK and ensure national security (United Kingdom Department for Science, Information & Technology, 2023). Since it was under strong pressure from the public due to privacy issues, it was recently rebranded to the National Security Online Information Team (Aldane, 2024). With this change, the NSOIT's objectives and priorities were also realigned, demonstrating the importance of the orientation and framing of anti-disinformation measures. Additional to having these established agencies or taskforces, both governments ratified policies that contribute to their approaches to counter disinformation. Therefore, the two cases that will be analysed and compared in this study are Sweden and the United Kingdom.

The implications of the findings of this study can be important to understand the different approaches and policies certain governments advocate for on the topic of countering disinformation. Especially considering that in the context of modern technologies this threat has become much more relevant, understanding why states have varying perspectives and foci is significant for further research. Given that there are different approaches to counter disinformation, certain measures are more effective to defend predefined initiatives, such as the defence from a perceived threat. Additionally, researching what drives a government's anti-disinformation approach is also relevant in understanding what influences policymaking in this area. There is existing knowledge on this topic, however research typically examines types of disinformation and does not focus on the measures a government might take. This paper fills the gap of research examining the drivers behind which measures are taken. Understanding this can bring more efficient, government-specific anti-disinformation approaches.

Examining the measures that are being taken against disinformation is a relatively new field of research, specifically looking at the framing and driving factors. To be able to understand and put this into

perspective, theories of international relations are used as a lens to look at the policies and projects of the cases. Because of scarce research using theories in anti-disinformation, the applicability of those theories on the used framework is tested throughout the research.

Therefore, the research question is “In what way do the anti-disinformation approaches of Sweden and the UK differ?”. To be able to answer this question, the methodology section of this paper establishes a scale based on previous knowledge and theories, that is used to measure and determine the focus of how states frame disinformation. Further sub-questions investigate how the governments frame their anti-disinformation measures, what they prioritize and what the implications of their approaches are.

2. Theoretical Background

To understand these influences better, certain theories are required. Within the chosen inductive approach, these theories will be applied to the case studies and tested, as well as simply providing perspectives on the topic.

In geopolitical questions that try to explain why governments act differently or have different perspectives, the theories of international relations are often applied. The differences of liberalism and realism especially have been discussed extensively, with states turning away from a Liberalist stance of reliance on the market and companies, to a more Realist stance of pursuing self-sufficiency due to rising geopolitical tensions (Rasmussen & Den Uyl, 2020). This shift also needs to be examined in the context of disinformation, which is a central point this paper investigates. With that, the focus of the two governments on countering disinformation can be explained by either a more passive liberalist approach, or a proactive realist approach.

2.1 *Classical realism and Neorealism*

For realism, the nation-state is the central actor. Its decision-makers are rational in the pursuit of national interests. The international system is anarchy, and it is the goal of all governments to survive in this competitive environment, as they can only rely on themselves (Donnelly, 2000). These are the basic theoretical assumptions of realism. The backgrounds of this have been explained in different paths. Some ideas of classical realism, mainly represented by Hans Morgenthau in the late 1940s, trace the states' actions back to human nature. Although other scholars of this period were more oriented towards liberalism or focused on morals, Morgenthau put emphasis on power and that every political action is justified with power (Morgenthau, 1948). An example for a feature of Morgenthau's idea of power is social cohesion, or a sense of collectiveness. Disinformation undermines this, so the state would be expected to ensure that information reaching the public is trustworthy and factual.

These basic assumptions then evolved into the idea of neorealism. With his book “Theory of International Politics”, Kenneth Waltz rejects the assumption that state leaders strive for power because of human nature, but rather from the structure of the international system itself. With the anarchic system and the absence of a leader, states always rely on their relative power compared to other states. Because of that, they strive for power, but also to be self-sufficient and autonomous (Waltz, 1979). This means that state behaviour is heavily influenced by the structure of the international system.

Waltz's idea of realism provides a very broad explanation of any action a government might take. In the case of a country's anti-disinformation approach, it would have the purpose of stabilizing national security and to keep the country from being misinformed. With that, the country does not lose power within the international system, would be less vulnerable and more resilient. Adding to Waltz's theory however, Stephen Walt introduced another idea. The model he uses stays the same, the international system works in the same anarchic way and states have the same characteristics as neorealism. However, the deciding difference lies in the drivers of state behaviour. Walt argues that states do not solely act to maintain power within the structure of the international system, but because they actively perceive a threat from the outside (Walt, 2019). States act on the premise that they need to feel threatened by another actor, and its behaviour will be driven by that threat, even if this means intervening or restricting something else.

2.2 Liberalism

Opposite of that, liberalism focuses less on security and rejects the realistic idea of power when explaining state behaviour. It shares the same basic assumptions with neorealism, the international system is anarchic, and states pursue self-interests rationally (Meiser, 2018). However, liberalism, specifically Robert Keohane's and Joseph Nye's neoliberalism, argues that international cooperation is feasible with interdependences. Interdependences such as trading and investment bring mutual benefits to involved states, fostering dialogue and mitigating conflict among states. International and non-governmental organizations, as well as multinational corporations influence international relations in liberalism (Rosenau, 1980). Economically, liberalism generally opposes government intervention and restrictions in the economy (Meiser, 2018). As liberalism is also tightly connected to democracy and its norms, freedom of speech is of high value within the theory of liberalism. Free speech is vital in maintaining democratic societies and individual liberty (Dworkin, 1996). In the context of disinformation, this means that state intervention in the information landscape is less likely in liberal frameworks.

2.3 Framework of the study

Both theories see the state as the central actor, they are mainly concerned with how states frame and think, as well as the resulting state behaviour. However, in combatting disinformation there is a multitude of other actors involved, the biggest part being traditional or social media outlets. They provide a platform, acting as source and distributor for both correct and false information. As media sources can influence what information is distributed on their channels and platforms, governments and the media need to be in close contact for anti-disinformation to work. Considering the different interests that the media has, especially large social media companies, governments can take different approaches at this relationship. States can either focus on combatting the threats that come from disinformation by restrictions and policies addressing the media and free speech or prioritize the right to freedom of speech and benefits from less restrictions. These two approaches are represented by the theories. Therefore, the way states work with the media and major social media platforms, and if the presented theories can be applied on this, is being investigated in this paper.

These theories were being used as a framework throughout the study, and their applicability to the cases was tested. The state framing is either oriented towards a more liberalist approach, or more towards a Waltian realist approach. A realist approach that is less focused on direct threats, such as Waltzian realism, acts as a middle-ground.

In line with this theoretical background, the hypotheses for this paper are:

1. If a threat of disinformation is perceived, then restrictions of freedom of speech are set up to combat that threat.
2. If there is a general concern about national security, then restrictions of freedom of speech are set up.
3. If there is no threat on disinformation perceived and the general concern about national security is low, then there are no restrictions on freedom of speech.

3. Methodology

3.1 Research Design

The research design is based on qualitative case studies. The two cases selected for this are Sweden and the United Kingdom. To answer both the research question and the sub-questions, those empirical case studies are then compared in a most-similar systems design. Sweden and the UK have similar government structures, being both parliamentary democracies and constitutional monarchies. Still, anti-disinformation approaches can differ between states. That difference can come from the way that

governments frame disinformation and its dangers. This state framing makes up the independent variable of the research. The dependent variable is the resulting state behaviour. To measure these variables and answer the research question, data from multiple sources is collected. This data is then analysed in Atlas.ti. The applicability of theories will also be tested, examining if they can explain the impact that state framing can have on state behaviour for the topic of anti-disinformation.

3.2 Presentation of cases

With its Psychological Defence Agency (PDA), Sweden is actively trying to combat disinformation. The agency was created because they identified and pointed out external security threats trying to influence the Swedish population. Historically, Sweden already had departments on information during the world wars and especially during the Cold War (Braw, 2022). Although the work of the departments was similar to how it is today, it was mostly to analyse public opinion. These departments continued to exist over the following decades but were only partially responsible or overlapping in their tasks. The current climate of disinformation and the perception of threats then led to the establishment of a centralized agency in 2022 (Braw, 2022). With technological advances and the resulting dangers from disinformation increasing, the Swedish government has recognized how this can be utilized for political influence. They address this issue not only with policies, but with an actual centralized institution, as the PDA is Sweden's main way to combat disinformation.

Opposed to Sweden, the UK is examined, which is another country that actively built out their anti-disinformation capacities in the last years. The government also followed policies and state-backed projects such as the Counter-Disinformation Unit. Projects and policies are mainly to keep stability in the UK and ensure national security (United Kingdom Department for Science, Information & Technology, 2023). Within the UK's policies, there is a focus on increasing safe usage of online services and platforms, such as through the Online Safety Act of 2023, as well as building media literacy (Tyler-Todd & Woodhouse, 2024). However, the state of the UK's anti-disinformation has been rapidly changing, with the CDU being forced to rebrand, being under pressure from the public due to privacy concerns (Aldane, 2024), to the recently established NSOIT. At the same time, the UK also established the Defending Democracy Taskforce, another anti-disinformation government agency, also being assigned with different tasks. This rather convoluted state of institutions and policies on countering disinformation is unlike the consolidated Swedish approach, making this structural aspect an interesting point of comparison as well.

These two cases are fitting models for the goal of understanding the different approaches in anti-disinformation, as well as for applying them to the theories. They differ in how they are structured in their approaches, with Sweden being centralised and the UK having different policies with seemingly different objectives. The key aspect that was researched is how they frame disinformation, and whether or not that influences how policies and institutions act.

3.3 Data collection

To be able to address the topics thoroughly, extensive data collection was required. For this study, qualitative data was collected through triangulation. In data triangulation, multiple different data sources are collected, so that the research question can be answered as detailed as possible (Noble & Heale, 2019).

As the central data source, government and policy papers were investigated. Documents that describe a government's outlook and policies are the most likely to have answers to the research question, which is why there was a focus on this type of data. The different agencies that both Sweden and the UK have set up to combat disinformation also publish agendas and updates on their work. Both governments have a broad online representation with articles and public documents. Examining parliamentary debates and other governmental exchanges that are accessible to the public can also lead to answers on the research question, especially when measuring the support for a certain policy.

“Hansard” is the official title of the transcripts of parliamentary debates in the UK, which can also be found online. On the government website of the UK it is possible to see written questions by Members of Parliament (MPs), which were then answered by representatives of the Secretary of States. These exchanges provide another insight into the government, which was used to further examine backgrounds and support of policies. In Sweden the Riksdag, the Swedish parliament, offers a similar open data

library as the Hansard. It provides documents on policies, videos and transcripts of parliamentary debates, and the possibility to search for certain keywords.

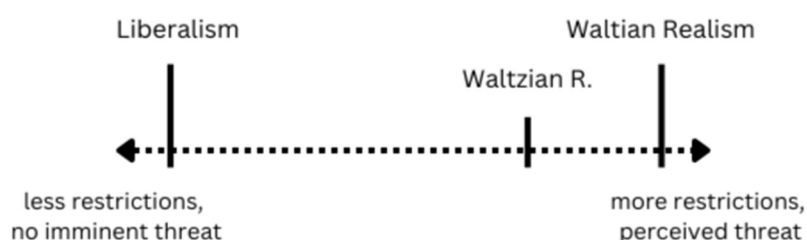
Documents were collected from both databases. Searching for keywords such as “disinformation” in the Hansard, as well as “psykologiska försvaret”, psychological defence in Swedish, on the Riksdag database, lead to many documents concerning the topic of anti-disinformation. Additionally, due to the rapidly changing climate of this discourse, only government documents published since 2021 were included. Out of those, the documents that didn’t exclusively focus on measures against anti-disinformation were excluded. Here, it needs to be mentioned that with few exceptions, the Swedish parliamentary records are not available in English. They were translated using the translation software DeepL.

Another form of data collected are reports and media articles. They provided a more neutral overview of situations, but also different perspectives. Additionally, they presented more specific insights on policy processes or debates from government officials, or reported on opinions and views from ministers and parliamentarians. Especially for media articles however, it is crucial that the sources are well balanced and that they report reliable information. For both the UK and Sweden it is therefore important that the media articles are unbiased. In the final analysis, an article published in the political news magazine *New Eastern Europe*, and multiple reports and articles from FullFact were included. To ensure the validity and reliability of these documents, research was done on the credibility of these sources first.

3.4 Method of data analysis

The method of analysis was a congruence analysis. This means that the empirical case studies were used to test whether or not the theoretical framework and the hypotheses could be applied to the topic, measures against disinformation (Sinkler, 2011). To answer the research question, certain concepts and themes had to be identified and analysed from the collected data. Atlas.ti was used to analyse the data manually. A qualitative case study requires in-depth and reliable results, which is not achievable with automated content analysis methods.

Applying the theoretical background on anti-disinformation suggested possible approaches, which are also represented in the hypotheses. A government might take a liberalist approach in which it does not perceive a threat is less restrictive and prioritizes freedom of speech. Or it might tend more towards realism, being more restrictive and focusing on national security. A Waltian realist approach, where a threat is identified and countering that threat is the priority, is the opposite to a liberalist approach. These approaches contain both the independent and the dependent variable. The independent variable, the state framing of anti-disinformation, can be visualised on a scale, with liberalism and a focus on freedom of speech on the left side and Waltian realism and a focus on threats on the right side. Waltzian realism, where a government focuses on national stability and security as well, tends more to the right on this scale, but generally establishes a middle-ground here, as it does not prioritize a specific objective. For this scale to be measurable, there are multiple aspects that need to be analysed.

Figure 1*Focus of State Framing*

In a first coding round, the mentioning of specific objectives such as threats or freedom of speech were coded in the data, so that the focus of each document, policy and agency could be identified. For a realist approach, mentions of the concept of threats were coded. For a liberalist approach, emphasis on free speech and mentions of the absence of restrictions were coded. These mentions were then counted and compared, so it is possible to identify a focus. These codes are further described in Table 1.

Table 1*First coding round*

| First Coding Round | | |
|---------------------------|-------------------------|--|
| | Code | Explanation |
| Realism | Perceived threat | Used to determine what the governments are focusing on; formulations of perceived threats are coded |
| Liberalism | Emphasis on free speech | Used to determine what the governments are focusing on; formulations that hint at an emphasis on free speech are coded |

The second coding round was designed to deduct where each government would place on the scale (see Figure 1). Firstly, the support of executive and legislative branches for policies directed at disinformation was examined, analysing how consistent it is. For this, coding documents including government exchanges and specifically parliamentary debates were coded. To be able to measure this support, formulations that either support or criticise a policy were coded. For this code to be cited, there had to be directly formulated criticism or support (see Table 2). As an example, just numbers of results of votes in the parliament were not included. These results were also counted and categorized into policies that either have more support, or more criticism. Much support for a policy focusing on a specific concept indicated either a strong liberalist or a strong realist approach. Additionally, documents that included no clear opinions at all were not included in the results.

Another key aspect of this research is examining how the governments' relationships to the media and social media platforms are. In line with the theories, a more restricted media and social media landscape points toward a realist approach, less restrictions emphasizes freedom of speech and freedom of press, tying into liberalism. Therefore, also in the second round of coding, the relationship of the governments to the media, and cooperations with large social media companies were coded in the documents (see

Table 2). It was then examined if these results contain any restrictions or government interventions. This indicated how a government deals with its relationship towards the media and social media platforms.

If more policies of a case that focus on threats would have high support and there are high restrictions on the media and free speech, that case then scores far on the right side of the scale. If there is high support for policies prioritizing the concept of freedom of speech and there are low restrictions, then it would score far on the left side of the scale (see Figure 1).

Table 2

Second coding round

| Second Coding Round | |
|--------------------------------------|---|
| Code | Explanation |
| Support for Policy | Direct formulations of support for a policy are coded, e. g. in a parliamentary debate; e. g. "... a new authority for psychological defence was established on 1 January, it is very welcome." |
| Criticism of Policy | Direct formulations of criticism for a policy are coded, e. g. in a parliamentary debate; e. g. "I accept the point made that the Counter Disinformation Unit sounds rather suspicious" |
| Relationship with Media/Social Media | Descriptions of the relationship between a policy and the media/social media platforms are coded, emphasis on government interventions and restrictions |

4. Results

4.1 Results on Sweden

4.1.1 The anti-disinformation landscape

For both cases, only documents that were specifically tied to measures against disinformation were coded, as it is the goal of this study to identify the focus that the anti-disinformation has. In Sweden, this anti-disinformation landscape is very centralized, as there are no laws in place specifically targeted to combat disinformation. Policies criminalize some acts connected to the spreading of propaganda or publishing information, such as the use of violence or threats to influence public opinion, inciting ethnic conflict or publishing misinformation about the Swedish military (Hofverberg, 2019). Although some of these policies have the range to affect and be used against types of disinformation, they were not ratified with the purpose of countering disinformation.

For that, the Psychological Defence Agency (PDA) was established. Psychological Defence is the defence from disinformation used as a tool to influence (Kozłowski, 2024). The PDA is tasked with identifying, analysing, and countering this disinformation, it must however have certain characteristics for the PDA to engage. The influence must be from outside of Sweden and with clear intention to undermine the Swedish government or citizens (Kozłowski, 2024). Its tasks also include providing media literacy training for civilians and inform about current disinformation dangers (Psychological Defence Agency, 2024). Aside from legislation and the PDA, the Civil Contingencies Agency (MSB) is

also assigned with increasing media literacy, spreading awareness of the influences that mis- and disinformation can have on citizens. However, with the creation of the PDA, increasingly more tasks of the MSB have been shifted there, further centralizing Sweden’s anti-disinformation program.

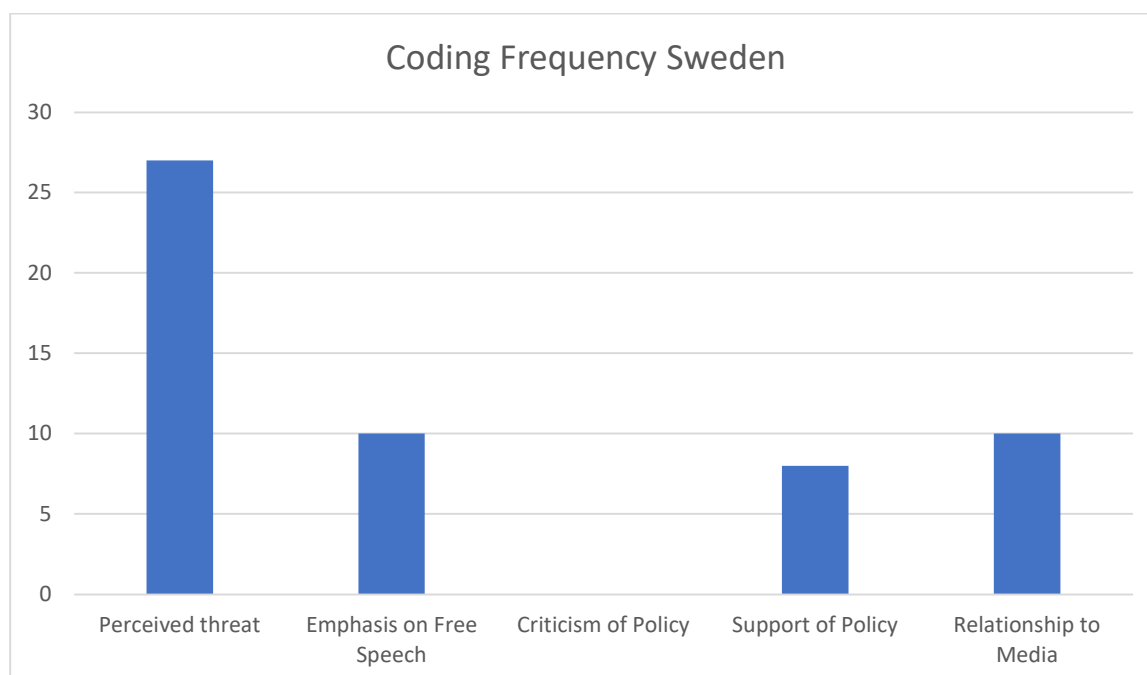
This covers the anti-disinformation landscape of Sweden. Once again, it is important to note that the PDA is the central actor, being the only entity in the Swedish anti-disinformation landscape with the exclusive purpose of countering disinformation. Therefore, it is also the only measure where a focus can be identified, as the others have multiple objectives.

4.1.2 Results of the first coding round

The documents about the PDA have shown its general mission is to build defence. It officially states that it was established to combat and counter “Foreign Malign Information Influence”, threats. In a document including a very thorough interview of the head of the operational department of the PDA, the code “perceived threat” was cited eight times. The main objective was identified to be “countering the malign influence of foreign information that is targeting Sweden” (Kozłowski, 2024). An emphasis on freedom of speech was cited only once in that document. In two other documents, a government statement on the instructions of the PDA, and a description of its mission by the PDA itself, “perceived threat” was cited six times, further underlining that its tasks focus on combatting perceived threats. In these documents an emphasis on free speech was also cited twice, as it is emphasized that it needs to be upheld throughout the measures of the PDA (see Figure 2).

Figure 2

Coding Frequency of Sweden



4.1.3 Results of the second coding round

The second coding round also revealed tendencies towards a realist approach. First, there was no criticism of the PDA coded in the data. This means that none of the types of government documents clearly critiqued the establishment of the PDA. Although it faced minor challenges, specifically tied to its relationship with the government, no document questioned the legitimacy and need of its existence. In ten government documents mentioning anti-disinformation and the PDA, including reports, debates and issued statements, direct support towards it was coded eight times. There is a clear emphasis on the importance of an organization focusing on anti-disinformation. The resulting establishment of the PDA is appreciated by Members of the Riksdag.

The PDA's relationship to the media or social media companies was coded ten times. This was mostly pointed out in official documents elaborating the tasks of the PDA. They define the frame in which the PDA can interact with the media, setting up what it is allowed to, for example: "The Authority shall be able to support media companies in identifying, analysing and responding to undue influence on information to the extent that such support is requested." (Ministry of Defence, 2021), as well as the importance of it, e. g. "Media play an important role in society's ability to manage crises and heightened state of alert." (Swedish Defence Commission, 2023). The quote, "The government wishes to underline that freedom of expression, freedom of the press and free media are obvious starting points for psychological defence." (Department of Justice, 2021) expresses limitations on the PDA's possible actions towards the media, as the emphasis on freedom of speech and press is reiterated. This is also shown in the codes, with none of the media-related quotes mentioning restrictions or censorship.

Additionally, the PDA describes other cooperations with media outlets or journalists, e. g. "Swedish media might contact us if they need support in the area of our responsibility" (Kozłowski, 2024) or "We also set up training for journalists on ... handling foreign malign influence operations" (Kozłowski, 2024). Furthermore, an example of when the PDA worked with the media to combat foreign influences is mentioned, "we decided to engage with Swedish public media to expose the group's support for extremism and undemocratic values" (Kozłowski, 2024). Here, the Agency cooperated with the media to disseminate correct information throughout Sweden and counter the spread of disinformation.

4.2 Results on the UK

4.2.1 The anti-disinformation landscape

The UK's anti-disinformation landscape is less centralized than in Sweden, and there are multiple institutions and policies in place. Especially on media literacy, where Sweden has not implemented direct policies, the UK government has been very active in recent years. The Online Media Literacy Strategy by the Department for Digital, Culture, Media and Sport (DCMS) was very extensive and had multiple different objectives. Although one of these objectives is preventing disinformation, its reports and documents do not focus exclusively on it. Therefore, the Online Media Literacy Strategy by the DCMS is not included in the coding, as a specific focus of anti-disinformation cannot be identified here.

The recently ratified Online Safety Act introduced measures to make the UK one of the safest places to be online and could have included major measures to counter disinformation. However, as FullFact, a British charity organization that fact-checks information circulating online, pointed out, the final Act falls short on its promise to combat disinformation (FullFact, 2024). In the legislative document of the final Online Safety Act, "disinformation" is only phrased six times, also regarding media literacy. Therefore, the Online Safety Act will also not be included in the coding.

One government institution that is directly aimed at disinformation is the Defending Democracy Taskforce (DDT). Its objective is to "protect the democratic integrity of the UK", working with different actors to counter disinformation efforts aimed at damaging basic democratic processes (Tugendhat, 2022). Another institution is the National Security Online Information Team (NSOIT). Formerly the Counter-Disinformation Unit, it was rebranded in November 2023 due to being accused of suppressing free speech (Aldane, 2024). However, its tasks and competences stayed the same. The NSOIT is focused on risks to national security and public safety. It is tasked with identifying and responding to disinformation in areas of public interest (Whittingdale, 2023).

This is the overview of the convoluted anti-disinformation landscape of the United Kingdom. The coding includes the Defending Democracy Taskforce and the NSOIT, both the Online Safety Act and the Media Literacy Strategy were excluded.

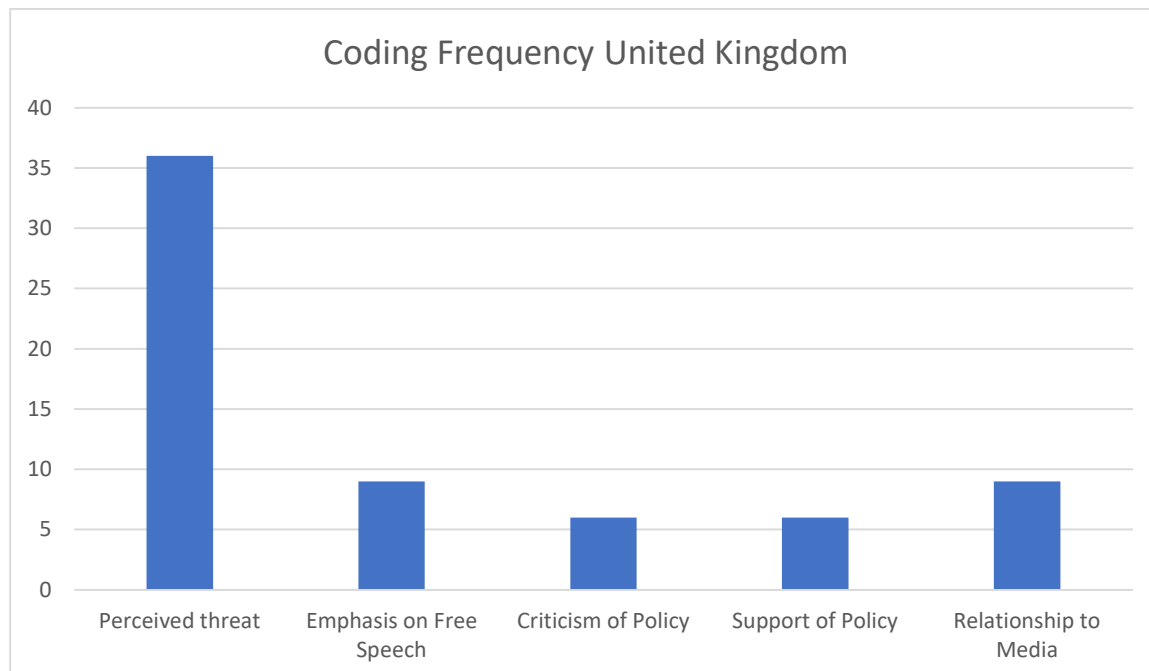
4.2.2 Results of the first coding round

Results on the DDT, which has been established to protect the UK from foreign threats to its democratic institutions and processes, were very one sided. The code "perceived threat" was cited 23 times, the code "emphasis on free speech" only twice. It is important to consider that 12 out of 23 citations of perceived threats specifically emphasize foreign or state threats (see Figure 3). During a speech in

December 2022, UK Security Minister Tom Tugendhat pointed out that the DDT’s “primary focus will be to protect the democratic integrity of the United Kingdom from threats and foreign influence”.

Figure 3

Coding frequency of United Kingdom



The NSOIT has shown less one-sided results. Its objective is to “tackle online attempts to manipulate the information environment” (Whittingdale, 2023). Concerning its focus, it has been stated that it is focused on threats from foreign states (Berry, 2024), but also that “preserving freedom of expression is an extremely important principle underpinning the team’s work” (Whittingdale, 2023). The coding also underlines these mixed results, with “perceived threat” cited 13 times, and “emphasis on free speech” seven times (see Figure 3).

4.2.3 Results of the second coding round

As for the DDT, there was no criticism of it or its tasks coded in the document. Support of the DDT was only cited twice. However, this is due to only one parliamentary debate on the DDT being in the documents. The cited support addresses the importance of the DDT, as it “has an important remit to defend our country and protect our sovereignty.” (Jarvis, 2023). Results on the NSOIT varied heavily. Although support of it was cited twice as well, criticism of the NSOIT was cited six times. Especially in a debate of the House of Lords, one of the chambers of the British parliament, multiple members expressed concerns about its possible further impact on freedom of speech. A lack of parliamentary oversight was called “unacceptable” (Clement-Jones, 2023), and one member even called for it to be closed down (Lilley, 2023). Additionally, the transparency and lack of outward communication was also criticized (Davies-Jones, 2024).

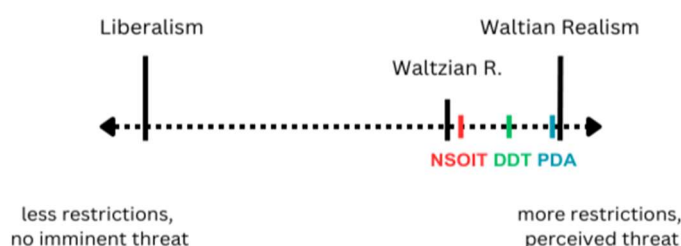
On their relationship with the media and social media platforms, there have been no mentions of how the DDT works with them in the documents. However, the NSOIT’s relationship with the media has been coded eight times throughout its documents. The NSOIT “does not place pressure on social media organisations and cannot oblige them to remove posts.” (Berry, 2023). More specifically, social media posts that breach a platforms terms and conditions can be flagged and shared with the platform. No action is mandated by the Government, it is entirely up to the platform (Whittingdale, 2023). As for traditional media, officials call for media outlets to explain how they make news and be more transparent

as well (Bhatti, 2024). However, there is no mention of any restrictions or guidelines on the media outgoing from the two institutions.

The coding frequency from the first coding round shows that the DDT's focus is clearly on threats. The PDA, and especially the NSOIT have shown less one-sided results, as an emphasis on free speech was coded here as well. Additionally, support for the PDA and its objectives has been cited multiple times, with no criticism of it being found in the documents. For the UK, there was no criticism cited in the documents of the DDT. However, criticism of the NSOIT was cited much more often than its support. On their relationships with the media, none of the three institutions mention directly restricting the media or social media platforms. While there are no details on how the DDT works with the media, the NSOIT and the PDA both cooperate with it. Although the PDA and NSOIT can flag and point out possible disinformation to the platforms, they do not have any power to actively engage.

Considering these results, each institution and their governments' frame can be determined and placed on the scale:

Figure 4
Results of state framing



5. Discussion

5.1 Interpretation of results

The scale (see Figure 4) showed that both governments share tendencies of an approach based on Waltian realism, as they perceive a very present foreign threat to their national security. Their institutions focus on threats, and regularly emphasize this when mentioning their objectives and tasks. Although, the code regarding the emphasis of freedom of speech was not frequently used which illustrated that advocating freedom of speech builds the framework for a governments' approach to maintain freedom of speech.

The focus on threats in all three institutions indicates that both governments perceive threats, with particular regards to their information landscape. They fear external influences through disinformation on the citizens and the government. A one-sided support on the Swedish PDA further shows the government's focus on countering this threat. In the case of Sweden, this perceived threat has forced them to act, which their recent accession to NATO has also shown in other aspects of national security. The Swedish government had shown to be very outspoken about the dangers from a foreign threat, and the anti-disinformation measures taken as very important steps to defend them from that. However, the results had shown freedom of speech was not affected by this. The perceived threat does not convince the Swedish government to equip the PDA with the competences to combat disinformation in the most efficient way, namely through restrictions, because it would undermine democracy in return.

In the UK the situation is similar. Both institutions identify a foreign threat, specifically in Russia. The DDT, with its objective to defend basic democratic values, is especially direct about this. State-based

foreign threats are great challenges to democracy and national security, and it is essential that these are protected, which is the DDT's central assignment. On the other hand, although also identifying foreign threats, the NSOIT focuses more on combatting any disinformation that could harm the UK. This difference can also be seen in the support the two institutions get.

Only a few documents included in the analysis on the UK were parliamentary debates. This is mainly due to the status of confidentiality that both institutions have. Operational details are not shared publicly, mainly from fear of giving an advantage to adversaries (Berry, 2023). Despite this, the NSOIT and the DDT have shown different results in the support they got throughout the parliament. The lack of criticism of the DDT shows the support for institutions and policies that work towards defending basic democratic values. Although the DDT is untransparent with its exact competences and tasks, it is straightforward in its objective. In recent years, the UK stated that protecting democracy was the "first duty of any Government" and that their democracy is a vulnerable area (Joint Committee on the National Security Strategy, 2024). This important area of vulnerability is what the DDT was established to defend. Aspects of this area, such as interference in elections or cyber threats to officials and representatives, are common and realistic challenges, also explaining lack of criticism towards the DDT.

The NSOIT on the other hand was seen critical, mainly in the form of scepticism. Its objective is not specifically to defend democracy, it addresses the issues of disinformation in general terms. Therefore, it is less direct with communicating what its benefits are. Negative reactions the NSOIT, then the CDU, faced came from concerns that it would go after and suppress the voice of specific individuals simply for criticising the government and its policies (Aldane, 2024). These concerns lead to the rebranding of the CDU to the NSOIT, as these accusations of it suppressing free speech kept emerging. Since it lacked transparency and its officials, unlike the DDT, were not able to directly communicate its benefits, the NSOIT still faces this criticism today (Attenborough, 2024).

When it comes to the relationship of the two institutions to the media they are fairly similar, as they both do not have any competences that would allow them to restrict media outlets or social media platforms. Although there is a definitive threat on democracy and national security perceived, the institutions themselves take no direct measures to hold the media accountable or ensure that they disseminate correct information. This is underlined by the internal criticism the CDU already faced after flagging certain posts, which is a relatively small intervention into free speech compared to what would be needed to effectively combat disinformation from spreading. The only measure taken here is that the NSOIT can flag posts on social media; however, the final decision to act is an independent choice of the relevant platform. This indicates that the threat in the UK, similarly to Sweden, is not perceived strong enough to restrict certain aspects of free speech.

5.2 Falsifying the hypotheses

By applying the theories of international relations as a lens to look at policies, they establish a framework which can be used to explain how state framing influences state behaviour. The theories of realism and liberalism were chosen, and after applying them to this framework, the hypotheses were formulated.

Considering the discussion of the results, the first two hypotheses must be rejected. In both Sweden and the UK there is a threat perceived. The perceived threat, which is emphasised to be a foreign threat outgoing from Russia, is seen as a danger to democracy by both states. The first hypothesis stated that with a perceived threat of disinformation, a government would be willing to restrict freedom of speech to combat that threat. This is in line with what the theory of Waltian realism suggests. Although both the Swedish PDA and the British DDT are directed at threats, both institutions had no competences to impose any restrictions on the media outlets, or hold them accountable. Therefore, the first hypothesis must be rejected.

The second hypothesis was based on the theory of Waltzian realism. It stated that a general concern about national security and disinformation would result in restrictions on freedom of speech; however, more generally, not to combat a specific threat. The British NSOIT stated that it is focused "exclusively on risks to national security and public safety" (Whittingdale, 2023), therefore emphasising not solely focusing on threats. This explains as to why it was placed closest to Waltzian realism on the previous

scale (see Figure 4). Still, the NSOIT does not have any competences to restrict or censor content and information. Consequently, the second hypothesis must also be rejected.

The third hypothesis was based on the theory of liberalism, and it suggested that if there is no threat perceived and the general concern about national security is low, then there are no restrictions on free speech. This hypothesis cannot be falsified, as the analysis has shown both governments to perceive a threat or expressed concern. Therefore, it remains unclear whether a government that expresses no concerns in this regard will not have any restrictions on free speech.

Both governments perceive threats, to their national security but also to their democracy. The institutions they establish are supposed to strengthen and defend those. However, giving those institutions the competences to influence what information can be spread, and what needs to be censored or restricted, would undermine freedom of speech, the central cornerstone of democracy. Although there is no clear line of how far government intervention can go until it would restrict free speech, the accusations towards the CDU show that freedom of speech seems to be untouchable in democratic states, as long as it is in a public environment. On the other hand, combatting disinformation could be more efficient if the government were to intervene directly into the information landscape, especially when wanting to counter foreign influences.

This issue points out the limitations of anti-disinformation measures that work reactive. Measures on anti-disinformation can be either reactive, a counter-reaction to the already spreading disinformation, or proactive (Svahn & Perfumi, 2023). These proactive measures are set up to prevent the disinformation from spreading at all. Although they were not included in the analysis, as they did not exclusively focus on disinformation, media literacy strategies are proactive measures that both governments take to prevent disinformation from spreading. They build on critical thinking capabilities of citizens and help them identify disinformation. However, increasing media literacy and other proactive measures are long-term projects, which are very challenging to implement considering how fast the information landscape is developing.

Another policy that was not included in the analysis is the UK's Online Safety Act. It was intended to increase the accountability of social media platforms for their contents. For that, the Office of Communications (Ofcom) has been established as a regulatory institution for online safety. Ofcom has the power to require platforms to change their algorithms and service design, so they comply with their terms and conditions. However, these competences are mainly to mitigate risks of illegal activity and to protect children online. Especially in the final act published, social media companies are not held accountable for disinformation on their platforms (FullFact, 2023). To ensure freedom of speech, when it comes to disinformation the government leaves the companies to decide what can be posted on their platforms. They then ensure that there is consistency in how to manage content that is not allowed. Since there is no detailed regulation on what companies have to include in their terms and conditions, this does not combat the spread of disinformation (FullFact, 2023). Still, the Online Safety Act and the new regulatory competences of Ofcom make the UK one of the first countries to regulate social media companies (FullFact, 2023). The regulations are constantly being developed and consulted, with a new Ofcom committee underway and set to be established towards the end of 2024 (FullFact, 2024).

I urge the Minister to understand that, because although the Online Safety Act is good and important and does vital things, I do not think that it will be enough in this area. It used to be said, and is still true, that a lie is halfway around the world before the truth has got its boots on. (Penrose, 2024)

This quote from a British parliamentary debate underlines the concern about disinformation. Although the Online Safety Act does not address disinformation to the desired extent, there is demand for a stronger approach to combat these issues. This stresses that anti-disinformation is a developing field, as strategies and institutions are constantly being adjusted or extended. Additionally, when considering that there is a perceived threat through foreign influence, this also indicates a need for stronger defence and self-sufficiency, characteristics of realism.

When comparing this to the state framing of Sweden, a clear difference can be pointed out. Although the results have shown that both governments mention foreign threats to their national security, the Swedish government is a lot more direct about turning towards a realist approach. Their approach on

anti-disinformation stems from a general, more broad concern of an external threat. Reports of the Swedish Defence Commission have emphasised the serious threat that Russia poses to Sweden. However, they also criticised that this threat was managed with a lack of realism (Swedish Defence Commission, 2023). To change that, plans to extent defence capabilities have been proposed (Falkhaven, 2021), and Sweden joined NATO just this year.

“An aggressive Russia, with both the ability and the will to wage a prolonged war, is the threat that must shape the development of Sweden’s total defence.”(Swedish Defence Commission, 2023) This total defence is made up of civil and military defence. It also applies to the information landscape, as it is stressed that civil defence must increase its capabilities rapidly (Swedish Defence Commission, 2023). Civil defence includes multiple ways to enhance the collective resilience throughout Sweden (Government Offices of Sweden, 2024). The Psychological Defence Agency is a central actor for this objective, increasing society’s resilience to external pressures (Swedish Defence Commission, 2023).

6. Conclusion

This paper examined the ways in which the anti-disinformation approaches of Sweden and the UK differ. To do that, two theories of international relations, liberalism and realism, were used as framework to identify the focus of each case in their approaches. These theories were also applied to formulate three hypotheses. These hypotheses examined the way that state framing could influence state behaviour, namely how a perceived external threat could influence the way a government deals with free speech. The first and second hypotheses were falsified, as there were no restrictions or censorship, even though an imminent threat was perceived in both cases. The third hypothesis could not be tested, as there were threats perceived throughout all analysed policies.

To answer the research question, there are major differences between the anti-disinformation approaches of the two cases. First, their framing is different. Sweden’s entire approach to defence politics is driven by a currently perceived external threat, and this also carries over to their anti-disinformation measures. The PDA cooperates with the Swedish Armed Forces and the Swedish Security Service, as it is a defence institution established to protect Sweden from threats (Psychological Defence Agency, 2024). The UK takes a different approach. There also is a threat to their democracy perceived, and a need to defend it. However, rather than approaching anti-disinformation as defensive capabilities, the UK addresses disinformation in a more general way. Specifically, to ensure democratic values and national security. Another major difference is that the Swedish anti-disinformation landscape is very centralised, whereas the British counterpart is rather convoluted. The analysis has shown that although the UK’s DDT and NSOIT have similar tasks, there is no signs of cooperation between them. This could be due to their different goals. However, in Sweden the situation is only becoming more consolidated, with more tasks relating to anti-disinformation being transferred to the Swedish PDA (Department of Justice, 2021). Simply looking at the size and population of the two countries could explain that there are more policies and institutions in the UK. Still, the lack of cooperation between the institutions of the UK would need to be further investigated.

The states’ behaviours show less of a difference. Although the way their institutions are set up differs, their competences are the same. Both the Swedish and the British institutions can not directly intervene in the information landscape by imposing restrictions or censorship, as that would undermine free speech in their respective countries.

This answers the main research question, as these are the main differences between Sweden and the UK in how they combat disinformation. The theories applied in this research established a framework on how state framing influences state behaviour in anti-disinformation. As all three hypotheses were either falsified or could not be tested, the applicability of the specific theories on a government’s anti-disinformation approach needs to be questioned. Additionally, this paper has shown that there is a lack of research on how states tackle disinformation.

The following excerpt, "... everybody wants to talk about examples of disinformation but few people want to talk about how we arm ourselves against it." (McDonald, 2024) is from a British parliamentary debate and it illustrates the research environment on disinformation quite well. Many studies have examined what types of disinformation there are and where they come from, but rarely how to counter it and what measures a government can take. As it is a new field of research, the effectiveness of different measures needs to be researched further. There were no measures included in the analysis that entailed direct government intervention, e. g. restrictions on the media. Especially the effectiveness of those measures needs to be researched, and what possible consequences they could have in a democratic state. This paper directed first steps towards further research on anti-disinformation approaches, specifically in applying theories to explain them.

Research on the effectiveness of measures is needed, as states currently have only limited options in how to approach countering disinformation. There is a need for proactive measures such as increasing media literacy. Although both Sweden and the UK have such strategies in place, they need plans that focus exclusively on building out civilian capabilities to identify disinformation in the long term. The results have shown that the governments are becoming more aware of the scope of this threat. However, the measures they take against this do not seem to be in scale to the threat they perceive, especially reactive measures. Here, managing the online space while not undermining core principles of free speech has proven to be a central challenge.

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