

## **Clare Melford, co-founder and Chief Executive Officer, GDI (The Global Disinformation Index)—written evidence (FON0071)**

### **House of Lords Communications and Digital Select Committee inquiry: The future of news: impartiality, trust and technology**

I am writing to you as CEO and co-founder of GDI - a UK based non-partisan, not-for-profit organisation founded to provide a market mechanism enabling advertisers to reduce the unintended monetisation of deceptive and highly adversarial online content.

You have recently received testimony during the hearings on The Future of News which painted an inaccurate picture of the work of GDI and indeed the Brand Safety industry as a whole. Thank you for offering GDI the opportunity to submit this letter to the committee to clarify our work. We would of course be happy to brief you or the Committee if you have further questions.

#### **GDI and Government Funding**

GDI has not received funding from the UK Government since 2022. All current GDI funding is from private foundations and from our commercial data licensing arrangements, with a small grant from the EU Horizon Europe scientific programme.

Between 2018 and 2022 GDI did receive funding from the Countering Disinformation and Media Development programme of the Russia unit within FCDO. This funding was to develop a method of detecting adversarial narratives at scale to help advertisers avoid inadvertently monetising websites operated by the Kremlin, its affiliates, or content promoting state-sponsored disinformation. The work also included a series of market reviews of news websites in countries of interest to the Russia unit at FCDO. In total with funding from the FCDO and other funders we carried out over 35 such country studies in countries such as [Latvia](#), [Georgia](#), [South Africa](#), and [Indonesia](#). The grant from the FCDO to support this work expired in March 2023. We have received no further funding from the UK government since then.

#### **GDI's Brand Safety Work**

GDI's other work is focused on bringing transparency to the digital advertising market. In the past two decades, two trends have shaped our information space and dramatically impacted the business model of quality journalism globally.

The first trend is the *algorithmic amplification* of content by search engines and social media platforms. These algorithms are designed to optimise users' feeds for engagement above all else. They are designed to present to users the content which is most likely to drive engagement, in order to maximise the number of ads users are shown and thus the platform's revenue. Inherent in this business model,

which drives much of today's internet, is the promotion of extreme content at the expense of range and balance. This has contributed to loss of income for journalism worldwide, as it is often the most adversarial content that is the most engaging for users.<sup>1</sup>

The second trend is the rise of *programmatic advertising*. Prior to the technical developments of the last two decades, the right of an advertiser to choose where their adverts were placed was a given. Indeed advertisers chose site by site on which websites they wanted to advertise. Since the arrival of what is known as programmatic advertising two decades ago, advertisers have had much less control and visibility over where their online adverts appear. A typical advertising campaign for a large advertiser could involve buying placements on tens of thousands of websites. It is done automatically by algorithms that target specific users wherever they browse, rather than the context of the content they are viewing. It is impossible for an advertiser to know the content of all of the sites next to which its adverts appear. An airline may end up advertising alongside a news article about an aeroplane crash, or a pharmaceutical company may end up advertising alongside conspiracy theories about the COVID vaccine. As Sir Mark Thompson said in 2018 when he was CEO of the New York Times:

*"The world of digital advertising is a nightmarish joke. You couldn't think of a more dangerous environment for a brand."*

As these problems with brand safety exploded due to the rise of the algorithmic prioritisation of engaging content and the programmatic advertising technology, many advertisers withdrew from placing adverts on news content at all. News has become a "do not buy" category for many brands. This has further exacerbated the decline in ad revenue for journalism, putting at risk a plural free press. Advertisers need more transparency and control to place ads on news sites safely, and this service is provided by the brand safety industry.

By using brand safety tools, advertisers can take steps to ensure their brands are not supporting Russian disinformation about the Ukraine war, election conspiracy theories, climate change denial, or hate speech. Brand safety tools for news websites make it safe for advertisers to advertise on news sites that match their brand values.

GDI is one of many data providers in this brand safety ecosystem.

### **GDI's Service**

The digital advertising market represents a [\\$700 billion industry globally](#). The "brand safety" sector generates by some [estimates revenues of \\$3 billion](#) annually. Although we are a small player (less than \$4m in annual income), the services

---

<sup>1</sup> This loss of income and rupture to the traditional funding model of journalism is what has led countries like Australia, Canada and now the UK government (via the Digital Markets Competition & Consumers Bill) to intervene via legislation to create a revenue sharing model between platforms and publishers.

GDI offers play a part in helping advertisers navigate the toxicity of the internet and protect brand reputations.

We do this by providing risk data of online news to the advertising industry using a combination of AI and human review.

- GDI provides risk assessments of online news to the advertising industry.
- The advertising technology companies then use this data to make more informed choices over the advertising they buy online on behalf of their advertising clients.
- The companies that licence GDI data, not GDI itself, make their own ultimate purchase decisions and have total control over how that data is used. GDI has no control over how its data is used by companies that licence it.

GDI is able to charge for the data we produce given the market demand for greater transparency in the online advertising market. Providing this data to advertisers and their ad technology partners allows them to ensure their brands do not inadvertently end up supporting hostile state information operations, hate speech, or other content which is not aligned with their brand values or audience choices.

### **GDI's Review Process**

Publishers have the opportunity to appeal their ratings. The review [form](#) is clearly marked on our contact information page [see screenshot below], a single click from the home page, directly next to our contact information.

<h4><b>Our Details</b></h4> <p>Email: <a href="mailto:info@disinformationindex.org">info@disinformationindex.org</a></p> <p>LinkedIn: <a href="#">The Global Disinformation Index</a></p>	<h4><b>Other Inquiries</b></h4> <p>Do you represent a publisher? Are you aware of a disinformation risk rating from The Global Disinformation Index (GDI) and would like to submit a rating review request? Please fill out <a href="#">this form</a> to initiate the review process.</p> <p>For media inquiries, please reach out to <a href="mailto:media@disinformationindex.org">media@disinformationindex.org</a>.</p>
---	---

The review process takes 2-3 weeks. Sites are regularly reviewed and ratings may change based on changes in content.

### **Advertisers' Right to Choose**

The advertising industry is at the core of Britain's free-market economic system. London has long been the capital of the global advertising market, home to many household names of world renown. The service GDI provides is simply an ancillary one to this sector: helping advertisers navigate an increasingly complex market by making decisions that help bolster their success. In the same way that corporations spend time, resources, and creativity on logos and brand identities, they employ our data to help them ensure that their advertising decisions are

aligned with their commercial objectives. The World Federation of Advertisers [brand safety guidelines](#), developed by many of the world’s largest advertisers, has set out what content those advertisers wish their ad tech partners to avoid on their behalf.

GARM: Brand Safety Floor + Suitability Framework



CONTENT CATEGORY	BRAND SAFETY FLOOR – Content not appropriate for any advertising support
Adult & Explicit Sexual Content	<ul style="list-style-type: none"> <li>• Illegal sale, distribution, and consumption of child pornography</li> <li>• Explicit or gratuitous depiction of sexual acts, and/or display of genitals, real or animated</li> </ul>
Arms & Ammunition	<ul style="list-style-type: none"> <li>• Promotion and advocacy of Sales of illegal arms, rifles, and handguns</li> <li>• Instructive content on how to obtain, make, distribute, or use illegal arms</li> <li>• Glamorization of illegal arms for the purpose of harm to others</li> <li>• Use of illegal arms in unregulated environments</li> </ul>
Crime & Harmful acts to individuals and Society, Human Right Violations	<ul style="list-style-type: none"> <li>• Graphic promotion, advocacy, and depiction of willful harm and actual unlawful criminal activity – Explicit violations/demeaning offenses of Human Rights (e.g. human trafficking, slavery, self-harm, animal cruelty etc.),</li> <li>• Harassment or bullying of individuals and groups</li> </ul>
Death, Injury or Military Conflict	<ul style="list-style-type: none"> <li>• Promotion, incitement or advocacy of violence, death or injury</li> <li>• Murder or Willful bodily harm to others</li> <li>• Graphic depictions of willful harm to others</li> <li>• Incendiary content provoking, enticing, or evoking military aggression</li> <li>• Live action footage/photos of military actions &amp; genocide or other war crimes</li> </ul>
Online piracy	<ul style="list-style-type: none"> <li>• Pirating, Copyright infringement, &amp; Counterfeiting</li> </ul>
Hate speech & acts of aggression	<ul style="list-style-type: none"> <li>• Behavior or content that incites hatred, promotes violence, vilifies, or dehumanizes groups or individuals based on race, ethnicity, gender, sexual orientation, gender identity, age, ability, nationality, religion, caste, victims and survivors of violent acts and their kin, immigration status, or serious disease sufferers.</li> </ul>
Obscenity and Profanity, including language, gestures, and explicitly gory, graphic or repulsive content intended to shock and disgust	<ul style="list-style-type: none"> <li>• Excessive use of profane language or gestures and other repulsive actions that shock, offend, or insult.</li> </ul>
Illegal Drugs/Tobacco/e-cigarettes/Vaping/Alcohol	<ul style="list-style-type: none"> <li>• Promotion or sale of illegal drug use – including abuse of prescription drugs. Federal jurisdiction applies, but allowable where legal local jurisdiction can be effectively managed</li> <li>• Promotion and advocacy of Tobacco and e-cigarette (Vaping) &amp; Alcohol use to minors</li> </ul>
Spam or Harmful Content	<ul style="list-style-type: none"> <li>• Malware/Phishing</li> </ul>
Terrorism	<ul style="list-style-type: none"> <li>• Promotion and advocacy of graphic terrorist activity involving defamation, physical and/or emotional harm of individuals, communities, and society</li> </ul>
Debated Sensitive Social Issue	<ul style="list-style-type: none"> <li>• Insensitive, irresponsible and harmful treatment of debated social issues and related acts that demean a particular group or incite greater conflict;</li> </ul>

Advertisers have a right to decide where their adverts go. Publishers have no automatic right to expect advertisers’ money. Everyone has the right to free speech, but no one has the right to profit from that speech, and advertisers certainly aren’t compelled to buy ads alongside content they feel might harm their brand by association. Brand safety is not censorship, it’s good business. Fully informed transactions between buyers and sellers are a key tenet of a [free market](#).

I would greatly appreciate the opportunity to present more of our work to you and the Committee. I have long been an admirer of the Committee’s work to ensure that our 21st century digital sphere is free-speech respecting and rooted in British values.

29 April 2024