GDI

Global Disinformation Index

Ad Tech Policy and Enforcement Gaps:
Challenges and Solutions

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Executive summary

The purpose of this report is to analyse current ad tech policies and their enforcement in the present policy landscape.

It will provide recommendations on how to strengthen initiatives aimed at protecting our online spaces from harmful content.

This Global Disinformation Index (GDI) report presents the following key findings and recommendations:

- Current ad tech publisher disinformation policies, which outline the types of content that are unsuitable for ads, are based on definitions that are insufficient and do not fully capture the complex narratives and tactics employed by disinformation actors.

- Ad tech companies are not sufficiently enforcing supply quality policies that specifically address narrative-led disinformation.

- Sites that consistently infringe on supply quality policies should be completely demonetised. Removing ads only from infringing content allows offending websites to continue to profit from digital advertising.

- GDI research has found that many online ad tech policies within the EU are neither comprehensive nor consistently enforced.

- The conflict in Ukraine has brought tremendous focus and pressure to this issue but addressing disinformation is an intricate task. Fact-checking, media literacy programs, and the self-regulation of platforms are insufficient solutions to the problem.

- Policymakers must tackle the monetisation of disinformation to remove the financial incentive to create harmful digital content.

- Regulators of national media must broaden their scope to address shortcomings in ad and e-commerce policies.

- The EU must develop a quality risk-rating framework for disinformation that is informed by the work of civil society organisations (CSOs) and adopted across the ad tech industry.

Introduction

Governments and regulatory bodies all over the world are developing frameworks to tackle the monetisation of disinformation in response to ad tech's failed attempts at self-regulation.

This report takes stock of these attempts across four main components:

1. Using GDI's adversarial narrative approach to address the online disinformation landscape.

2. An assessment of existing ad tech policies on disinformation.

3. An evaluation of publisher policy responses and enforcement gaps.

4. Recommendations for harms-based approaches that stakeholders can use to combat disinformation.

Understanding an adversarial narrative approach

Today's constantly evolving online threat landscape is complex and nuanced. This landscape features tools and actors that can lead to abusive and harmful behaviours which often slip through the gaps of current monetisation and content moderation policies.

Overly simplistic definitions of disinformation rooted in fact-checking and "verifiably false information" are insufficient to enable demonetisation of harmful content. These definitions also create gaps for intentionally misleading narratives, especially when those narratives are crafted using cherry-picked elements of the truth. Examples of this in practice include quoting only one side of a conversation out of context, or only presenting certain selected events in a timeline.

GDI views disinformation through the lens of **adversarial narrative conflict** — which goes beyond fact-checking or overly simplistic true vs false dichotomies. Simple definitions based on truth or falsehood don't pass the most basic "Santa Claus test." If disinformation were defined as simply lying on the Internet, content moderation would remove every mention of Santa Claus from the web.

Similarly, Breitbart News' infamous "crimes by illegal aliens" section of their website technically passes every fact-checking practice. And yet, by selectively reporting on crimes in this way Breitbart is promoting a false narrative that immigrants commit crimes at a higher rate than native-born Americans. This is highly adversarial towards immigrants and creates an obvious risk of harm. This kind of content seeks to enrage and divide online audiences, and may fuel hate crimes and anti-immigrant violence. These examples bring us to a much more precise and useful definition of disinformation.

Adversarial narratives are typically characterised by two key elements:

- They create or exacerbate an in-group/out-group dynamic by being adversarial against:
  - at-risk individuals or groups — including but not limited to, on the basis of religion, race, sexuality, etc.
  - democratic institutions; for example, the voting system, the media, the judiciary, etc.
  - the current scientific or medical consensus; for example, climate change denial, anti-vaccination content, etc.

- They create a risk of harm.

COVID-19 disinformation provides another recent, and potentially deadly, example of this model:

- **Described as:** adversarial narratives promoting false and misleading information related to the coronavirus (COVID-19) pandemic — for example, "coronavirus is a biological weapon" created by China or "Big Pharma" to catalyse a "Great Reset."

- **Communities and individuals at risk from these narratives include:**
  - women, who globally make up a majority of the healthcare workforce;
  - elderly people;
  - people with disabilities or pre-existing health conditions;
  - certain ethnic or immigrant groups and the LGBTQ community who may be accused of spreading the virus;
  - public health institutions.

- **Harm:** Noncompliance with public health measures. Attacks on at-risk groups targeted by online narrative. Erosion of trust and social cohesion that, according to a recent UNDP report, may trigger civil unrest, threaten livelihoods, and promote authoritarianism and ethnonationalism, among others.

Advertising publisher policies on disinformation

The recent move for regulatory intervention in Europe across the ad tech industry is intended to ensure the protection of fundamental rights online and set impactful measures for addressing illegal content and societal risks.

The Digital Services Act is the flagship piece of legislation that will create a benchmark for this regulatory approach.

GDI tracks more than 20 adversarial narrative topics (such as climate change denial, voter fraud, antisemitism) and continuously monitors the supply policies of 44 ad tech companies — companies that provide the software and tools that are used for the placement, targeting, and delivering of digital advertising. All digital news publishers now work with a range of ad networks and supply-side platforms (SSP) that facilitate the monetisation of their website. Ad networks aggregate supply across thousands or millions of websites, while SSPs provide a platform that allows publishers to manage their ad inventory. SSPs also

provide connections into ad exchanges, marketplaces that act as a centralised buying point for advertisers.

GDI research has found that most SSPs, ad exchanges and ad networks are lacking publisher policies that would enable them to demonetise the full spectrum of adversarial narrative topics. Some ad tech companies have no policies at all making it hard for them to tackle even the most basic disinformation content. Figure 1 provides the publisher policy coverage of seven selected ad tech companies.

We selected these companies as a representative sample of the 44 ad tech companies we examined. This selection is representative of some of the most high profile and repeat offenders.

The analysis was two-fold:

- First, whether the publisher policy, on the whole, closely matched the GDI adversarial narrative topic description.

- Second, whether the publisher policy, on the whole, would prevent the monetising of any content associated with a GDI adversarial narrative topic.

Figure 1. Sample of publisher policy coverage on six adversarial narrative topics

Overview, by disinformation topic, as of May 16, 2022

	G	CRITEO	Magnite	Taboola	PubMatic	REVCONTENT	xandr
Voter fraud	✔	✔*	✔*	✘**	✘	✘	
Antisemitism	✔	✔*	✔*	✘	✘	✔	
Climate change	✔	✔*	✔*	✘**	✘	✘	no data available
COVID-19	✔	✔*	✔*	✘**	✘	✘	
Anti-vaccination	✔	✔*	✔*	✘**	✘*	✘	
Misogyny	✔	✔*	✔*	✘	✘*	✔	

* Policy does not specifically address the disinformation topic
** "Fake news" policy only addresses a subset of disinformation

Source: Global Disinformation Index

Figure 1 shows the difference in policy coverage among a selection of prominent ad tech companies. Even when policies are in place and publicly available they are very often ambiguous and not comprehensive enough. Only Google has policies that specifically address the 6 selected disinformation narratives.

GDI's analysis of 44 ad tech companies in its database focused on 15 different disinformation topics. We found that 17 companies do not have policies covering any of these 15 narratives. 26 companies' policies adequately address at least 1 narrative. However, in most instances policy wording is vague and attempts to cover multiple different types of disinformation under the one policy.

Only three ad tech companies (Google, OpenWeb and Magnite) have a policy for each of the 15 selected disinformation narrative topics.

GDI's research shows that the supply quality policies ad companies have in place are often incomplete and are not comprehensive enough to address all types of disinformation. These policies are also rarely updated to capture new or evolving adversarial narratives. The conflict in Ukraine is a key example of this.

Figure 2 captures the relevant publisher policy coverage of six ad tech companies within GDI's sample group.

Figure 2. Ad tech companies publisher policies most relevant to the conflict in Ukraine

	Specific publisher policy?	Most relevant policy wording (as of May 16, 2022)
Google	✔	"Due to the war in Ukraine, we will pause monetization on content that exploits, dismisses or condones the war.
CRITEO	✘	Restricted content: "Is hateful or discriminatory to any groups or individuals based upon their race, sex, nationality, religious affiliation, age or sexual orientation"; or, "Promotes, glorifies or condones violence against others."
xandr	✘	No data available.
yahoo!	✘	Restricted content: "Content articulating views intended or reasonably likely to cause or incite hatred of any race, or ethnicity, gender, sexual identity, religion, creed, or protected class"; or, "Potentially sensitive content such as recent violent tragedies or natural disasters."
Yandex	✘	Restricted content: "Promoting discrimination based on gender, race, nationality, religious beliefs, social status or income."
PubMatic	✘	Restricted content: "Incendiary content with intent to provoke or entice military aggression; live action footage/photos of military actions and genocide or other war crimes outside of news reporting"; or, "Graphic promotion, advocacy and depiction of willful harm and actual unlawful criminal activity – such as murder, manslaughter, and harm to others."

Source: Global Disinformation Index

Finding: Ad tech publisher policies must be updated and enforced. Most ad tech companies' publisher policies do not adequately address the breadth of disinformation narratives associated with the conflict in Ukraine.

Assessing publisher policy responses and infringements

GDI has observed that even where ad tech companies publisher policies exist they are not always fully enforced.

By monitoring ads displayed on disinformation websites and identifying which ad tech company served each ad, GDI has recorded numerous instances of publisher policy infringements. Figure 3 shows GDI's assessment of select ad tech companies' policy enforcement gaps across six prominent disinformation narrative topics. The data show that existing publisher vetting and content monitoring processes of several leading ad tech companies are failing to adequately tackle disinformation.

Figure 3. Infringements of company publisher policies

Overview, by disinformation topic, as of May 16, 2022

	Google	CRITEO	Magnite	Taboola	REVCONTENT	PubMatic	xandr
Voter fraud	● ✖	●* ✖	●*	●**			
Antisemitism	● ✖	● ✖	●*			●	
Climate change	● ✖	●*	●*	●**			no data available
COVID-19	● ✖	●* ✖	●*	●** ✖			
Anti-vaccination	● ✖	●*	●* ✖	●**			
Misogyny	● ✖	●	●*			●	

● *A policy is present and that narrative is covered.*   ✖ *One or more infringements detected by GDI.*

* Policy does not specifically address the disinformation topic
** "Fake news" policy only addresses a subset of disinformation

Source: Global Disinformation Index

Finding: GDI has found evidence of 11 ad tech companies (25% of the panel) infringing at least one of their own policies.[1] Furthermore, of the 44 ad tech companies GDI is currently monitoring, 33% either did not have policies publicly available or included coverage of adversarial narratives tracked by GDI (discriminatory content, anti-science content, etc.).

1 The data on policy infringements used to collect Figure 3 was collected from our DisinfoAds reports (2020-2022). The evidence included in the report of a policy violation (Figure 4, Figure 5 and Figure 6) was collected after the relevant policy had been publicly announced.

Ad tech companies policy enforcement failures

GDI identified a number of policy enforcement gaps linked to lack of vetting and content monitoring processes for disinformation by several leading ad tech companies. For example, Google has a clear publisher supply policy that deals directly with the monetisation of misogyny (see Figure 4). The policy specifically addresses content that "incites hatred against, promotes discrimination of, or disparages an individual or group on the basis of their... gender, gender identity, ..." The figure below provides an example of a gender-based adversarial narrative according to GDI's assessment framework.

Figure 4. Monetisation of misogyny

Source: Global Disinformation Index

Figure 5 shows an example of Google providing its ad services to the website Big League Politics despite a clear violation of its publisher policies. Again, using the adversarial narrative framework we see the intent to mislead by using cherry-picked elements of a particular story to promote anti-vaccination disinformation. This is a dangerous narrative which creates fear and could contribute to vaccine hesitancy.

Figure 5. Monetisation of anti-vaccination content

Source: Global Disinformation Index

The challenges of publisher policy enforcement

The following case study highlights the limitations of publisher policy enforcement.

Successful policy implementation is limited when supply quality policies are enforced at individual article-level rather than taking a total site approach. Removing ads from an individual story is inefficient to curtailing adversarial narrative amplification. This case study illustrates how Google's publisher policy on the conflict in Ukraine was repeatedly violated by OpIndia.com, and outlines the rationale for cutting services to persistent offenders.

GDI tracks anti-Ukrainian and anti-democratic adversarial narratives centring on the conflict in Ukraine. In monitoring the emergent and persistent conflict narratives, GDI has also tracked and observed intersections with antisemitism.

Google's publisher policy on the conflict in Ukraine (Figure 2) states that "due to the war in Ukraine, we will pause monetisation of content that exploits, dismisses or condones the war."

In March, GDI highlighted anti-Ukrainian disinformation being monetised on OpIndia.com. Figure 6 captures Google serving an ad next to an article condoning Russia's invasion of Ukraine under the pretext of "denazification." This ad was served on March 8, 2022, when Google had already paused monetisation of Russian Federation state-funded media and ads to users based in Russia — but before Google's latest policy change on March 23, 2022 that paused "monetisation of content that exploits, dismisses, or condones the war."

Figure 6. Monetisation of anti-Ukrainian content on OpIndia.com
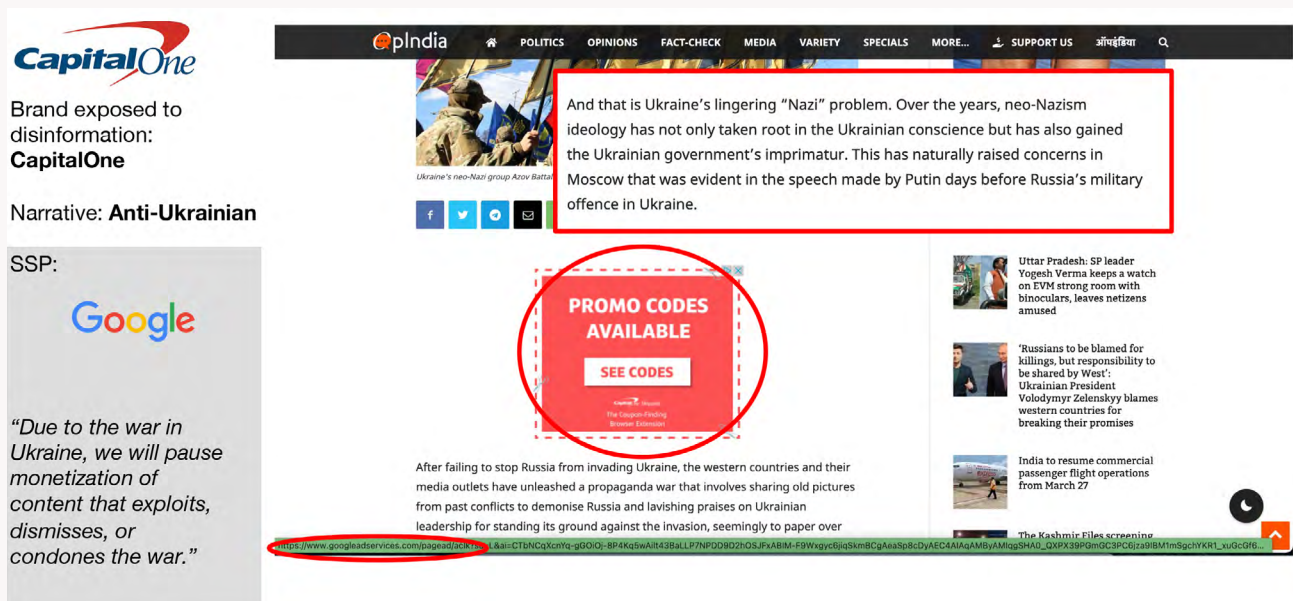
Source: Global Disinformation Index

After being shown in GDI's findings, Google subsequently demonetised the specific article but not the entire website, as illustrated in Figure 7.

Figure 7. Google continues to serve ads on OpIndia.com

Brand exposed to disinformation: **CapitalOne**

Narrative: **Anti-Ukrainian**

SSP:

"Due to the war in Ukraine, we will pause monetization of content that exploits, dismisses, or condones the war."

Source: Global Disinformation Index

Google's decision to continue serving ads on OpIndia allowed other articles with harmful content to still be monetised. Figure 8 illustrates that even in April, two weeks after Google's latest Ukraine ad publisher policy announcement, disinformation related to the Ukraine conflict was still being monetised by Google on OpIndia.

Figure 8. Google continues monetisation of anti-Ukrainian content on OpIndia.com

Brand exposed to disinformation:
Puma

Narrative: Anti-Ukrainian

SSP:

Google

"Due to the war in Ukraine, we will pause monetization of content that exploits, dismisses, or condones the war."

Source: Global Disinformation Index

This example provides evidence that demonetising at the page level may not be effective for a small segment of sites that have high "narrative density" — sites that consistently publish adversarial narratives across a large percentage of their published content. Ad tech companies continue to fund high risk sources of disinformation. Supply quality policies should be enforced at website-level rather than applying content moderation to individual articles. GDI has observed that on the open web, it tends to be a small group of persistent offenders with high adversarial narrative density that distribute disinforming content.

Conclusion and recommendations

The Internet and the digital world are rapidly evolving, and the time for policymakers, companies, and citizens to demand change is long overdue.

The potential to reform the disinformation ecosystem is close at hand but only if regulations and policies are enforced. International norms on best practices regarding our online space are in the process of being created by governments, private companies, citizens, and civil society organisations. GDI offers several recommendations for how these groups can combat disinformation and protect our online and offline world.

To create a stronger regulatory regime addressing online harms:

1. **Adversarial narrative framing should be included within regulatory initiatives** such as the Digital Services Act to tackle the scope of harmful content. The path to implementing the Digital Services Act must switch from the current definitional approach that attempts to cover specific common narratives and instead adopt a more universal adversarial narrative framing.

2. **Policies must target the monetisation of disinformation** and disrupt the financial incentive for creating such harmful content.

3. Disinformation content tends to be polarising and divisive, something that typically leads to increased engagement, page views and advertising revenue. **This financial incentive must be removed** — assessments of which sites are high risk for disinformation must be provided by neutral independent third parties with no stake in the current ad tech ecosystem.[2]

4. Independent assessments which rate disinformation risks of news sites could be used for **indicating quality signals in ranking and recommender algorithms, informing monetisation decisions and supporting media pluralism assessments.**

5. For a small number of news websites with a very high narrative density, page level demonetisation is not sufficient as the OpIndia case shows. **The highest-risk sites should be demonetised at the site level.**

6. **Regulation must take an industry-wide approach**, targeting the wider ad tech industry and serve to set a regulatory floor. This should be aimed at not just the Very Large Online Platforms (VLOPs) but also companies that GDI has identified as serving ads next to disinformation (Amazon, Criteo, Infolinks, Xandr, etc.).

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2 GDI has developed the Dynamic Exclusion List or DEL of global news publications rated high risk for disinforming. Those who manage online advertising on behalf of brands (the "ad tech companies") are now incorporating GDI's DEL into their bidding systems to exclude bids on domains rated as 'high risk of disinforming.' GDI's public reports on each media market highlight disinformation risks at the market level, while specific site results are incorporated into datasets that advertisers, ad tech companies, brand safety companies, and other industry stakeholders can use to direct purchasing decisions.

7. **It is vital that policies create an independent scrutiny mechanism** to assess the commitment level of relevant parties. This should involve the creation of a monitoring framework utilising the expertise of third-party nonprofits and the appointment of an independent auditor.[3]

Building accountability within the ad tech industry:

8. **A transparency measure to foster compliance could include a repository of policies for platforms and the ad tech industry.** GDI has been building a similar database that tracks the ad publisher policies of over 40 companies found inadvertently monetising disinformation.

Enforcement remains the key challenge going forward. The regulatory shift towards creating new transparency obligations will bring accountability to the ad tech industry, address the opaqueness associated with online advertising, and bring independent expertise into the assessment of online content.

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[3] Examples of this include the Open Terms Archive, which enables users rights advocates and regulatory bodies to track changes to terms of services. Scripta Manent is an online tool that measures changes between two dates of a contractual document of your choice. This is useful for consumers and regulators who can measure the reality of platforms' commitments.

Glossary

Ad publisher policy (supply quality policies)	Policies that outline what types of content are not allowed to show ads. This means that ad publisher policies dictate what content is allowed to be monetised by ad tech companies.
Ad tech company	Companies that provide the software and tools that are used for the placement, targeting, and delivering of digital advertising
Advertising policy	Policies that outline what types of ads are allowed to be served by an ad tech company.
Disinformation (adversarial narrative)	Disinformation is understood by GDI through the adversarial narrative framework as "Intentionally distributed narratives without a required chronology or sequence of content ('artefacts'), and which seek to enrage and divide Internet users" (Decker, 2019).
Narrative density	An indicator of how much content (on a site) related to a specific narrative is potentially disinformation.
Supply-side platform (SSP)	Ad tech platforms that specialise in helping ad publishers automate the management, selling, and optimisation of ad inventory.