



Authors and researchers: Dr. Seval Yaman, Mehmet Onur Çevik and Nilgün Yılmaz

Research assistants: Dr. Öznur Akcalı-Yılmaz, Furkan Arıgün and İsmail Sizer

Design: www.designbythink.co.za

**The Global Disinformation Index** is a not-for-profit organisation that operates on the three principles of neutrality, independence and transparency. Our vision is a world free from disinformation and its harms. Our mission is to catalyse industry and government to defund disinformation. We provide disinformation risk ratings of the world's news media sites. For more information, visit <a href="https://www.disinformationindex.org">www.disinformationindex.org</a>.

About Özgürlük Araştırmaları Derneği (Freedom Research Association): Freedom Research Association (FRA) was founded in August 2014 by a group of academics, business people, journalists and legal experts to conduct public policy research with a liberal and scientific approach. FRA envisions a free and prosperous Turkey. The mission of FRA is to promote evidence-based policy making among decision-makers and an informed public debate in Turkey. Freedom Research Association is strongly dedicated to individual liberties, rule of law, peace, fair and competitive markets. We believe that a free and prosperous Turkey can only be founded upon universal human rights, rule of law and a competitive free market economy which deters cronyism. "Institutional Reform" is a key focus area of FRA's research. Main aims of FRA's projects on this area are as follows: To explore the suitable ground on which Turkey's institutions can operate with reference to universal standards To propose necessary reforms which need to be done in processes and structures, based on international best case examples.







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## **Executive summary**

Since the news business has expanded to the online world, transformations in news production and distribution have exposed the industry to new disinformation risks.

News websites have financial incentives to spread disinformation, in order to increase their online traffic and, ultimately, their advertising revenue. Meanwhile, the dissemination of disinformation has disruptive and impactful consequences. The disinformative narratives surrounding the COVID-19 pandemic are a recent – and deadly – example. By disrupting society's shared sense of accepted facts, these narratives undermine public health, safety and government responses.

GDI defines disinformation in terms of "adversarial narratives that create real world harm", and the GDI risk rating is based on a range of indicators related to the risk that a given news website will disinform its readers by spreading these adversarial narratives. These indicators are grouped under the index's **Content** and **Operations pillars**, which respectively measure the quality and reliability of a site's content and its operational and editorial integrity. A site's overall risk rating is based on that site's aggregated score across all the indicators, and ranges from zero (maximum risk level) to 100 (minimum risk level).

The GDI risk rating methodology is not an attempt to identify and label disinformation sites or trustworthy news sites. Rather, GDI's approach is based on the

idea that a combined set of indicators can reflect a site's overall risk of carrying disinformation. The ratings should be seen as offering initial insights into the Turkey media market and its overall levels of disinformation risk, along with the strengths and challenges the sites face in mitigating disinformation risks.

The following report presents the findings pertaining to disinformation risks for the media market in Turkey, based on a study of 31 news domains. These findings are the result of the research led by the GDI with Freedom Research Association between September 2022 and February 2023. The goal of this report is to present an overview of the media market as a whole and its strengths and vulnerabilities. Individual site ratings contribute to GDI's various aggregate data products, and in most cases, are not released publicly to avoid naming and shaming media outlets facing high levels of risk.

The need for a trustworthy, independent rating of disinformation risk is pressing. This risk-rating framework for Turkey will provide crucial information to policymakers, news websites and civil society, enabling key decision-makers to stem the tide of money that incentivises and sustains disinformation. Moreover, the results of the current study will contribute to GDI's mission to disrupt the business model of disinformation, by being earmarked for sharing with ad tech industry stakeholders and other parties acting to defund disinformation.

### Key findings: Turkey

In reviewing the media landscape for Turkey, GDI's assessment found that:

#### Nearly two-thirds of the domains in the study demonstrated a high or maximum risk of disinforming their online users.

- Of the 31 domains sampled, nine showed a low or medium level of disinformation risk, while the remaining 22 showed a high or maximum level of disinformation risk.
- There was only one domain that presented a low level of disinformation risk, scoring well in both the Operations and Content pillars.

# Low scores in operational variables such as accuracy, source, byline and editorial policies increased disinformation risk in the media.

- The average score for the Operations pillar was 39 out of 100. Most domains lacked information on accuracy, sources, byline policies, funding and editorial guidelines.
- Among operational variables, Accuracy policies scores were the lowest. Only two domains scored at or above 50 on pre-publication fact-checking and post-publication corrections; all other domains scored below 32 out of 100.
- Almost all domains scored less than 50 in terms of including bylines (average score of 41) and sources (average score of 34) in their content.
- Financial transparency is a concern for the Turkish media, as only 6 out of the 31 domains scored above 50 regarding disclosing funding source information.
- As opposed to other Operations pillar variables, comment policy and ownership scores were high in Turkey; the latter is a legal obligation in Turkey (Press Law No. 5187, Article: 4).

## Disinformation risk was much lower in the Content pillar, compared to outlets' operational qualities.

- Turkish domains' high scores in the Fact-based lede and Headline accuracy indicators illustrate a general trend of fact-based reporting and limited use of clickbait.
- Sites in the study performed well, on average, on indicators that reflect the presence of adversarial narratives.
- While domains showed high average performance (i.e., above 70) in most Content pillar indicators, the Byline information and Sources indicators were clear exceptions, with each averaging below 50.
  These factors increase the risk of disinformation and can be an obstacle to accountability.

#### Small steps towards better operational transparency can significantly reduce the disinformation risk in the market.

- Eight domains were rated with a medium risk of disinformation. Despite their good overall Content scores (above 70), three of these domains scored below 50 in the Operations pillar.
- Domains can improve their mid-range performance by addressing shortfalls, such as their operational policies, and thus move up to a low-risk category.

# The Turkish media market: Key features and scope

# Turkey's online media market has grown immensely in the last two decades.

The internet penetration rate today is more than 80 percent.<sup>2</sup> The proportion of advertising investments relative to Turkey's GDP rose from 6.1 in 2012 to 6.7 percent in 2020.<sup>3</sup> In 2021, advertising and media investments totalled 27.9 billion Turkish lira<sup>4</sup> (approximately USD 1.47 billion). Digital media advertising accounted for most of this spending, at 18.9 billion Turkish lira (approximately USD 996 million), and represented more than double the 7.2 billion lira spent on television advertising.<sup>5</sup> The Turkish digital advertising market was the tenth largest in Europe as of 2021.<sup>6</sup>

The growth in the online media market reflects the changes in the country's news consumption patterns over the last decade. The 2022 *Konda Report* showed a decline in the traditional media audience. While the share of people who stated that they watch news on television was 96 percent in 2012, it decreased to 72 percent in 2021. Similarly, the report showed a steady decline in newspaper readership for the past ten years. In 2021, three out of four adults say they do not read newspapers.<sup>7</sup>

According to the 2022 Reuters Digital News Report, social media has recently replaced TV as the most widely used source of news.<sup>8</sup> The main social media sources for the news are YouTube (43 percent) and

Instagram (40 percent). Konda's data from 2019 shows that the rate of those who answered "Yes" to "The Internet is the first place to look when I need information" has increased dramatically in recent years. The decline in audience share, falling trust in mainstream media and the sudden shift to social media to obtain news may contribute to a higher risk of disinformation in the country.

Trust in the media has also declined in Turkey. Turkey ranked first in the world when it came to self-reported exposure to fake news, according to the 2018 *Reuters Digital News Report*. Almost half of Turkish respondents (49 percent) reported that they were exposed to false news in the week before the survey was conducted. In 2021, a report on *Turkey's Changing Media Landscape* by the Center for American Progress showed that 70 percent of the public find the Turkish press "biased and unreliable", and 56 percent of the public believes the press is not free and is controlled by the government. 12

These changes in media consumption patterns and declining trust in the news are not unique to Turkey – indeed, they follow global trends. At the same time, the Turkish media market faces multiple economic, political and professional challenges, such as media concentration, polarisation and challenges to freedom of the press.

Turkish newsrooms face financial challenges related to changes in the industry as well as economic and political dynamics in the country. Recent media digitalisation has put financial pressure on news outlets, as editors face pressure to produce news at a faster pace and increase views and clicks every day.

In the wake of Turkey's 2001 financial crisis, <sup>13</sup> and through to at least 2011, <sup>14,15</sup> the TMSF (*Tasarruf Mevduat Sigorta Fonu* - Savings Deposit Insurance Fund), a government organisation under the Prime Minister's office, placed significant newspapers, television stations and radio stations and their assets into receivership. <sup>16</sup> When these sites were sold off, the ownership landscape in the media industry significantly shifted. <sup>17</sup> In some cases, assets were redistributed to media owners aligned with the ruling party.

The erosion of democracy has created further challenges. According to V-Dem's *Democracy Report 2021*, Turkey demonstrated the third largest decline in the liberal democracy index from 2010 to 2020.<sup>18</sup> The country has seen various restrictions on the internet, <sup>19</sup> while news outlets that are perceived as critical to the government have faced fines, <sup>20</sup> raids, <sup>21</sup> investigations <sup>22</sup> and shut-downs. <sup>23</sup> The political climate has been characterised as divisive and polarised, and both government-allied and independent media face accusations of operating with political agendas.

# Disinformation risk ratings

This study looks specifically at a sample of 31 news websites in Turkish.

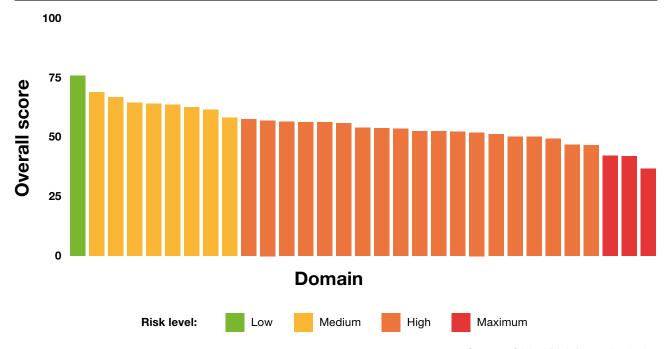
#### Market overview

The sample was defined based on the sites' reach (using each site's Alexa rankings, Facebook followers, and Twitter followers), relevance, and the ability to gather complete data for the site. The sample articles were published between March and December 2022. The methodology categorises sites as minimum-, low-, medium-, high- or maximum-risk based on their overall index score.<sup>24</sup>

Table 1. Media sites assessed in Turkey (in alphabetical order)

News outlet	Domain	News outlet	Domain	
News outlet	Domain	News outlet	Domain	
Ahaber	www.ahaber.com.tr	Milliyet	www.milliyet.com.tr	
Aydinlik	www.aydinlik.com.tr	Mynet	www.mynet.com	
Bengü Türk	www.benguturk.com	NTV	www.ntv.com.tr	
Birgün	www.birgun.net	OdaTv	www.odatv4.com	
CNN Türk	www.cnnturk.com	Onedio	www.onedio.com	
CRI Turk	www.criturk.com	Sabah	www.sabah.com.tr	
Cumhuriyet	www.cumhuriyet.com.tr	Sözcü	www.sozcu.com.tr	
Diken	www.diken.com.tr	Sputnik	www.tr.sputniknews.com	
Dirilis Postasi	www.dirilispostasi.com	T24	www.t24.com.tr	
DuvaR	www.gazeteduvar.com.tr	Tele1	www.tele1.com.tr	
Euronews	www.tr.euronews.com	TGRT Haber	www.tgrthaber.com.tr	
Evrensel	www.evrensel.net	Yeni Akit	www.yeniakit.com.tr	
Halk TV	www.halktv.com.tr	Yeni Asya	www.yeniasya.com.tr	
Hürriyet	www.hurriyet.com.tr	Yeni Safak	www.yenisafak.com	
Kürdistan 24	www.kurdistan24.net	Yeni Yasam	www.yeniyasamgazetesi3.com	
Milat	www.milatgazetesi.com			

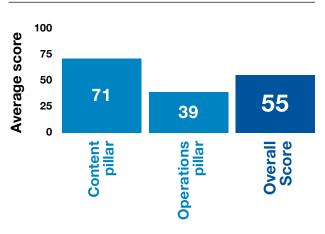
Figure 1. Disinformation risk ratings by site



The findings for Turkey's domains in the sample show that only one out of 31 sites classified as low-risk, eight as medium-risk, 19 as high-risk, and three sites fell into the maximum-risk category. The average overall

score of Turkey's online media was 55 out of 100 in terms of disinformation risk. These results show that more than two-thirds of Turkish domains (22 out of 31) had a high or maximum level of disinformation risk.

Figure 2. Overall market scores, by pillar



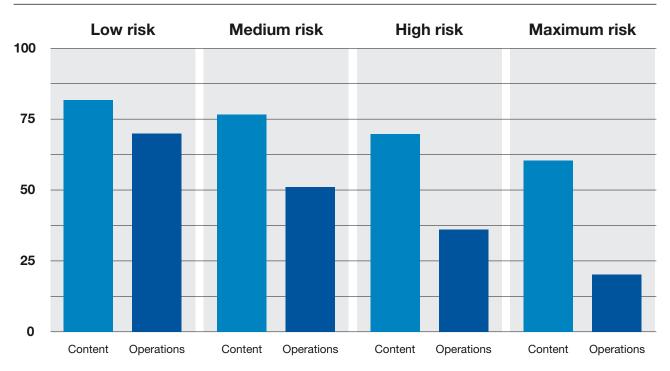
In Turkey, no domain received a minimum-risk rating, while only one domain was rated as low-risk. Due to its mainstream tradition, this site scored well in Content pillar variables such as Negative targeting (98) and Article bias (90). Most of the articles assessed for this site did not negatively target groups or individuals, and their writing style was unbiased, neutral and unsensational, with fact-based ledes and headlines. However, the site performed less well in the indicators assessing the consistent use of bylines, the articles' source structure and attribution of elements such as quotations, statistics and external media. Contributing to its low-risk rating, this domain received the highest Operations pillar score in the sample, which measures the transparency of mechanisms to prevent disinformation risk, such as editorial policies and safeguards. This site scored 72 in Sources and byline policies, and 63 in Accuracy policies. Moreover, it scored well in other operational variables, including providing information about its Funding (67), Ownership (100) and User-generated comment policies (100).

Eight domains fell in the medium-risk category. These domains generally provided reliable and unbiased content, as the average Content pillar score was 76 for this group. The lowest indicators within this pillar were Byline information (41) and Sources (36). Despite fairly high scores in the **Content pillar**, the medium-risk domains showed lower performance in the **Operations pillar.** The average score of eight domains in the **Operations pillar** was 51. These domains lacked key operational policies, which impacted their scores for Editorial guidelines (41), Sources and byline policies (33) and Accuracy policies (20). Transparency about their funding structure also presents room for improvement (24). On a positive note, most of the sites that currently fall in the middle range for disinformation risk can easily move into a lower-risk group with improvements in the transparency of their operational and editorial policies.

Nineteen domains (61 percent of the sample) received a high risk rating. Their average score in the **Operations pillar** was 36. The highest-risk domains within the sample consisted largely of sites that scored poorly on the *Sources and byline policies* (4), *Accuracy policies* (6), *Editorial guidelines* (25) and *Funding* (25) indicators. The *Ownership* indicator averaged 68 out of 100 for this group. The high-risk domains performed better in the **Content pillar** (69). The lowest rating in this pillar is the *Sources* indicator (34), mostly because they tend to publish content already covered by news agencies using their bylines.

The three remaining domains fell into the maximum-risk category. Their average **Content pillar** score was 60, as they published fairly biased and sensational content, frequently used negative targeting, and often failed to properly source their information. These sites had an average score of 20 in the **Operations pillar**. The lowest scores within **Operations pillar** indicators were the *Accuracy policies* (3) and *Sources and Byline policies* (4) indicators.

Figure 3. Average pillar scores by site risk rating level



#### Pillar overview

#### **Content pillar**

The **Content pillar** focuses on the reliability of the content provided on the site. Analysis for this pillar is based on an assessment of twenty anonymised articles for each domain. These articles are drawn from the most frequently shared pieces of content during the data collection period and a sample of content pertaining to topics which present a disinformation risk, such as politics and health. All article scores are based on a scale of zero (greatest risk) to 100 (least risk).

The most notable aspect of the results is that the average **Content pillar** score (71) is significantly higher than that of the average **Operations pillar** score (39). While sites' content mostly avoided narratives establishing or implying an out-group/in-group dynamic, the articles did contain negative targeting noticeably more frequently. In fact, sites performed best on average in the *Out-group and in-group dynamic* indicator (85), suggesting that articles did not often imply the inferiority or superiority of specific groups based on their identity. However, sites scored much worse in *Negative targeting* (75), as more than a third of the sample scored below 70 in the indicator.

Sensational language (72) and Sensational visuals (76) were also present on a number of sites. No site scored 90 or above in either indicator. While these two indicators had similar average scores, several sites scored poorly in one indicator but fairly well in

the other. Ten sites demonstrated a difference of more than 10 points between the two indicators' scores. The site with the second worst *Sensational language* score earned an above-average *Sensational visuals* score. One might assume that these two disinformation risk factors go hand-in-hand; in contrast, data from Turkey's media market suggests the reality is more complex.

Another striking feature is the large variation in scores within the **Content pillar** indicators. While the *Article bias* (76), *Negative targeting* (75), *Out-group and in-group dynamic* (85), *Sensational language* (72), *Sensational visuals* (76), *Fact-based ledes* (82), and *Headline accuracy* (75) scored above the **Content pillar** average (71), the *Sources* (34) and *Byline* (41) indicators scored below 50.

The *Sources* indicator was the poorest performing **Content pillar** indicator. All outlets scored below 50, and one outlet scored 18 out of 100. This result suggests that almost all the articles in the study sample were built on few clearly-identified sources.

The results for the *Byline* indicator reveal an interesting aspect of the Turkish media market. With the exception of columnists, the author of almost all news articles was anonymous. These low scores in the *Sources* and *Bylines* indicators also suggest that Turkish media is at risk of "churnalism." This new concept for the digital media refers to the practice of repeating or reusing material obtained from sources such as press releases or syndicated news reports, rather than conducting original research and reporting.

Figure 4. Average Content pillar scores by indicator

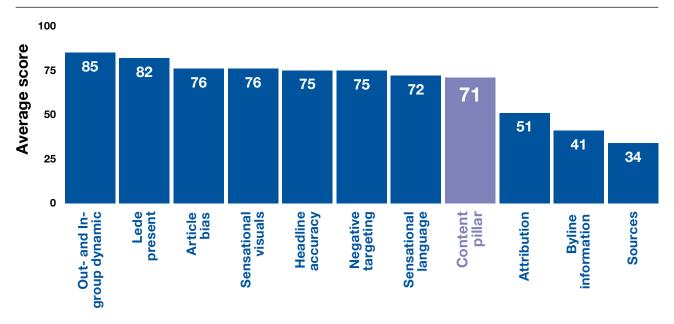
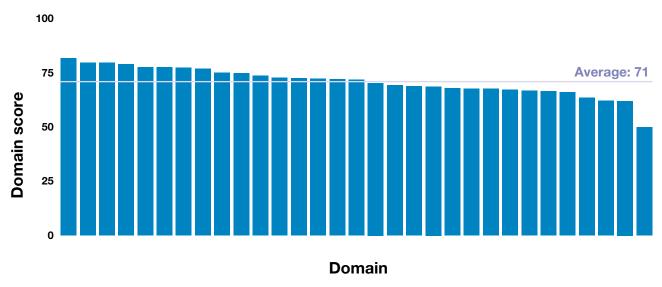


Figure 5. Content pillar scores by site



#### **Operations pillar**

The **Operations pillar** assesses the operational and editorial integrity of a news site in terms of both its published policies and adherence to those policies. All scores were based on a scale of zero (greatest risk) to 100 (least risk), based on data collected by the country reviewers according to the information available on the site and elsewhere online at the time of the study.

In light of the results of the **Operations pillar**, Turkish domains scored poorly (i.e., averaged scores below 30) in terms of publishing *Accuracy policies* (11), *Sources and bylines policies* (14), *Funding sources* (26), and *Editorial guidelines* (28) on their websites. These low scores indicate that Turkish domains lacked financial transparency and did not always adhere to journalistic best practices.

The lowest average indicator score in the **Operations** pillar is the *Accuracy policy* indicator, which assesses policies regarding pre-publication fact-checking and post-publication corrections. Most sites had no publicly-available processes or policies in these categories. Only two of the domains scored at or above 50; all the others scored below 32. The three remaining

indicators – Sources and bylines policies, Funding sources and Editorial guidelines – were where Turkish domains scored the lowest. No domain scored above 50 in all three of these indicators.

Results for the *Ownership* indicator were strikingly different; the average ownership score of Turkish domains was 72. Only 6 out of 31 domains scored below 50 in the *Ownership* section. One reason for this score may be a legal obligation; the laws in Turkey require outlets to disclose their ownership information and inform their readers.

Comment policies was the Operations pillar indicator in which Turkish domains scored the highest on average (86). The reason for this result may be methodological, as sites without a comment section do not feature this source of disinformation risk and earn automatically high scores. Several mainstream media domains eliminated the comment sections available to their readers in the past. Meanwhile, other domains strictly regulate their comment sections to avoid any legal responsibilities that may arise from conflicts (like threats or insults). In other words, the comment sections are regulated in detail to avoid liability in a potential dispute.

Figure 6. Average Operations pillar scores by indicator

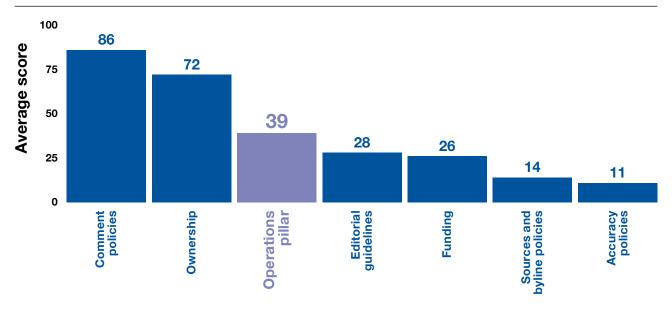
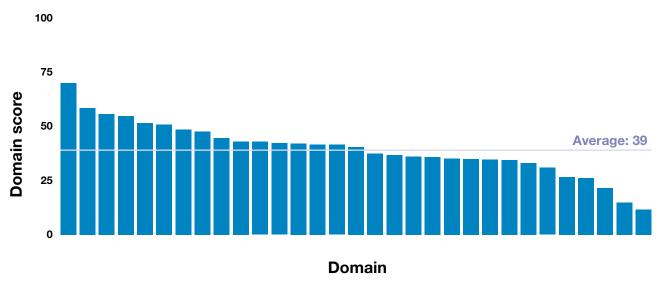


Figure 7. Operations pillar scores by site



## Conclusion

Our assessment of the Turkish media market shows that disinformation risk is a cross-cutting problem in Turkey's media market, as all the domains except one presented medium- (8 out of 31), high- (19 out of 31), or maximum- (3 out of 31) risk.

Domains gained higher scores in the **Content pillar**, with an average score of 71, than in the **Operations pillar**, with an average score of 39.

This study demonstrates that many of the disinformation risk factors in Turkey can be linked to a lack of financial transparency and a need to align with journalistic best practices. The **Operations pillar** of the index found that Turkish news domains only occasionally publish their funding sources. Lack of financial transparency is considered a disinformation risk factor because of the potential for conflicts of interest that can arise when financial incentives influence journalism.

Metrics of journalistic best practices also fell short. Many Turkish media outlets did not rely on sufficient sources, neither qualitatively nor quantitatively, and failed to clearly attribute statistics, quotations and external media to a source. Furthermore, articles in the sample did not consistently include byline information, which can create confusion regarding accountability for an article's veracity.

Additionally, the newsrooms seldom published accuracy, sources and byline policies on their websites. Industry dynamics such as the shift to digitalisation and the need for rapid content production and click-based revenues may incentivise speed over verification and accuracy policies and processes.

Scores for *Editorial guidelines* were relatively higher, compared to the *Accuracy* and *Sources & byline policies* indicators. However, they still remained below the average **Operations pillar** score. The lack of sufficient policies and guidelines to follow while carrying out journalistic activities are reflective of an increased risk of disinforming readers.

Besides the above disinformation risk factors, this study also found some positive results regarding Turkish media. The *Comment policy* and *Ownership transparency* indicators had high scores, which highlights that most Turkish domains are transparent and follow practices to mitigate these disinformation risk factors.

Furthermore, despite the excessive polarisation in different segments of the society in recent years<sup>27</sup> adversarial and polarising content characteristics were relatively rare. **Content pillar** scores that might be expected to reflect polarisation, such as *Out-group* and in-group dynamic, Negative targeting, Article bias, Sensational language and Sensational visuals tended to score above 70.

The findings suggest achievable changes that can bolster disinformation resilience, such as:

- Establishing and publishing on their websites pre-publication fact-checking policies.
- Having clear, publicly available policies and guidelines for content production.
- Being more transparent about sources of funding.
- Encouraging and rewarding best journalistic practices, such as using multiple and diverse sources, accurate attribution of external sources, or sharing more information about the authorship of articles.

## **Appendix:** Methodology

The Global Disinformation Index evaluates the level of disinformation risk of a country's online media market. The country's online media market is represented by a sample of 30-35 news domains, selected on the basis of online traffic and social media followers, as well as geographical coverage and racial, ethnic and religious community representation.

The index was composed of the **Content** and **Operations pillars**. The pillars were, in turn, composed of 16 indicators. The **Content pillar** included indicators that assess elements and characteristics of each domain's content to capture its level of adversariality, credibility, sensationalism, and impartiality. The **Operations pillar's** indicators evaluated the transparency and enforcement of policies and rules that a specific domain followed to ensure the reliability and quality of the news being published.

#### Site selection

The market sample for the study was developed based on a mix of quantitative and qualitative criteria. GDI created a list of the 50 news websites with the greatest traffic in the media market. This list was internally vetted to gauge relevance and reach. Then the list was reduced to 35 sites, ensuring that the sample provided adequate geographical coverage and racial, ethnic and religious community representation. The final media market sample reflected the set of sites for which complete data could be collected throughout the review process. International news outlets are generally excluded, because their risk ratings are assessed in the market from which they originate.<sup>28</sup> News aggregators are also excluded, so that all included sites are assessed on their original content. The final media market sample reflects the complete set of between 30 to 35 sites for which complete data could be collected throughout the review process.

#### **Data collection**

The **Content pillar** indicators were based on the review of a sample of 20 articles published by each domain. Ten of these articles were randomly selected among a domain's most frequently shared articles on Facebook, typically within a two-month period. The remaining ten articles were randomly selected from a group of the domain's articles covering topics that are likely to carry disinformation narratives.

The sampled articles were anonymised by removing any information that allowed the analysts to identify the publisher or the author of the articles. Each anonymised article was reviewed by three country analysts who were trained on the GDI **Content pillar** codebook. For each anonymised article, the country analysts answered a set of 13 questions designed to evaluate the elements and characteristics of the article text and its headline. After the information was recorded based on the anonymised text, the analysts subsequently reviewed how the article was presented on the domain.

The **Operations pillar** was based on the information gathered during the manual assessment of each domain performed by the country analysts. The country analysts answered a set of 72 questions designed to evaluate each domain's ownership, management, and funding structure, editorial independence, principles and guidelines, attribution policies, error-correction and fact-checking policies, and rules and policies for the comments section. The reviewers answered a set of seven additional questions to capture documented incidents of editorial and ethical violations of the site's stated guidelines. The analysts gathered evidence to support their assessments as they performed each Operations and Enforcement review.

# Data analysis and indicator construction

The data gathered by the country analysts for the Content pillar were used to compute ten indicators. The Content pillar indicators included in the final risk rating were: Article bias, Attribution, Byline information, Headline accuracy, Out-group and in-group dynamic, Lede present, Negative targeting, Sensational language, Sensational visuals, and Sources. For each indicator, values were normalised to a scale of 0 to 100. The pillar score for each domain was the weighted average of all the scores for all of the pillar's indicators, and ranged from 0 to 100. Table 2 gives the weights.

**Table 2.** Content pillar indicator weights

Indicator	Weight
Article bias	1
Negative targeting	1
Out-group and in-group dynamic	1
Sensational language	1
Sensational visuals	1
Sources	0.5
Attribution	0.5
Headline accuracy	0.5
Lede present	0.25
Byline information	0.25

Source: Global Disinformation Index

For the **Operations pillar**, the answers gathered during the Operations and Enforcement reviews by the country analysts were translated into a set of sub-indicators. The six indicators were calculated as the averages of these sub-indicator scores. The resulting **Operations pillar** indicators were: *Accuracy policies*, *Comment policies*, *Editorial guidelines*, *Funding*, *Ownership*, and *Sources and byline policies*. For each indicator, values were normalised to a scale of 0 to 100. The domain score for the **Operations pillar** was the average score across indicators. The complete list of sub-indicators and indicators for both pillars is given in Table 3.

Table 3. Global Disinformation Index pillars and indicators

Pillar	Indicator	Sub-indicators	Unit of analysis	Definition	Rationale
	Article bias	None	Article	Rating for the degree of bias in the article. Biased writing misrepresents facts, is based on faulty logic, and/or fails to include or unfairly engages with different views on the story.	Indicative of neutral fact-based reporting or well-rounded analysis
	Negative targeting			Rating for whether and to what degree the story negatively targets a specific individual or group	Indicative of hate speech, bias or an adversarial narrative
	Out-group and in-group dynamic			Rating for whether and to what degree the story builds upon or establish that one group is inferior and/or that one group is superior based on identity and to what degree	Indicative of hate speech, bias or an adversarial narrative
	Sensational language			Rating for the degree of sensationalism in the article text	Indicative of neutral fact-based reporting or well-rounded analysis
Content	Sensational visuals			Rating for the degree of sensationalism in the visual presentation of the article	Indicative of neutral fact-based reporting or well-rounded analysis
	Sources			Rating for the quantity and quality of the story's sources	Indicative of fact-based reporting and high journalistic standards
	Attribution			Rating for whether the story's statistics, quotations, and external media are clearly attributed to a source	Indicative of fact-based reporting and high journalistic standards
	Headline accuracy			Rating for how accurately the story's headline describes the content of the story	Indicative of clickbait
	Lede present			Rating for whether the article begins with a fact-based lede	Indicative of fact-based reporting and high journalistic standards
	Byline information			Rating for how much information is provided in the article's byline	Attribution of stories creates accountability for their veracity
	Editorial guidelines	Editorial independence		Rating for the number of policies identified on the site (adjusted if there are episodes of editorial interference or conflict of interest)	Assesses the degree of editorial independence and the policies in place to mitigate conflicts of interest
		Adherence to narrative		Rating for the degree to which the site is likely to adhere to an ideological affiliation, based on its published editorial positions	Indicative of politicised or ideological editorial decision making
		Content guidelines		Rating for the number of policies identified on the site (adjusted if the site violates guidelines)	Assesses the policies in place to ensure that factual information is reported without bias
		News vs. analysis		Rating for the number of policies and practices identified on the site (adjusted if the site violates guidelines)	Assesses the policies in place to ensure that readers can distinguish between news and opinion content
	Accuracy policies	Pre-publication fact-checking		Rating for the number of policies and practices identified on the site (adjusted if the site violates guidelines)	Assesses policies to ensure that only accurate information is reported
Operations -		Post-publication corrections		Rating for the number of policies and practices identified on the site (adjusted if the site practices stealth editing)	Assesses policies to ensure that needed corrections are adequately and transparently disseminated
	Sources and byline policies	None		Rating for the number of policies and practices identified on the site (adjusted if the site violates guidelines)	Assesses policies regarding the attribution of stories, facts, and media (either publicly or anonymously); indicative of policies that ensure accurate facts, authentic media and accountability for stories
	Funding	Diversified incentive structure	Site	Rating for the number of revenue sources identified on the site (adjusted if there are episodes of editorial interference or conflict of interests)	Indicative of possible conflicts of interest stemming for over-reliance on one or few sources of revenue
		Accountability to readership		Rating based on whether reader subscriptions or donations are identified as a revenue source	Indicative of accountability for high-quality information over content that drives ad revenue
		Transparent funding		Rating based on the degree of transparency the site provides regarding its sources of funding	Indicative of the transparency that is required to monitor the incentives and conflicts of interest that can arise from opaque revenue sources
	Ownership	Owner-operator division		Rating based on the number of distinct executive or board level financial and editorial decision makers listed on the site (adjusted if there are episodes of editorial interference or conflict of interest)	Indicative of a separation between financial and editorial decision making, to avoid conflicts of interest
		Transparent ownership		Rating based on the degree of transparency the site provides regarding its ownership structure	Indicative of the transparency that is required to monitor the incentives and conflicts of interest that can arise from opaque ownership structures
	Comment policies	Policies		Rating for the number of policies identified on the site	Assesses policies to reduce disinformation in user- generated content
		Moderation		Rating for the mechanisms to enforce comment policies identified on the site	Assesses the mechanism to enforce policies to reduce disinformation in user-generated content

### **Risk ratings**

The overall index score for each domain was the average of the pillar scores. The domains were then classified on the basis of a five-category risk scale based on the overall index score. The risk categories were defined based on a reference dataset that was

standardised to fit a normal distribution with a mean of 0 and a standard deviation of 1. The standardised scores and their distance from the mean were used to determine the bands for each risk level, given in Table 4.

**Table 4.** Disinformation risk levels

Risk level	Lower bound	Upper bound	Standard deviation from mean
Minimum risk	80.28	100	> 1.5
Low risk	68.84	80.27	> 0.5 and ≤ 1.5
Medium risk	57.41	68.83	$> -0.5$ and $\le 0.5$
High risk	45.97	57.40	> -1.5 and ≤ -0.5
Maximum risk	0	45.96	≤ -1.5

## **Endnotes**

- 1 The GDI assessment framework is outlined in the annex of this report.
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- 14 See https://t24.com.tr/haber/ethem-sancak-erdoganigordukce-asik-oldum-boyle-bir-ilahi-ask-iki-erkek-arasindaolabiliyor,296777.
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- 24 The cut-offs for each risk rating are illustrated in "Table 4: Disinformation risk levels" in the appendix of this report.

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- 28 In select cases, international news outlets may be included in a study if the domestic market is small, the sites are considered highly relevant, the content on the site is specific to the market assessed, and GDI has not developed a risk rating for that site elsewhere.

