

**GOOGLE'S
DISINFORMATION
AND MEDIA POLICIES
IN TERMS OF
FREEDOM OF
EXPRESSION AND
ACCESS TO ACCURATE
INFORMATION**

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Acknowledgments

Emre Kızılkaya

GNI winners who responded to our questions.

For citation:

Google's Disinformation and Media Policies in Terms of Freedom of Expression and Access to Accurate Information, Teyit, August, 2023.



This publication was produced with the financial support of the European Union provided under the Etkiniz EU Programme. Its contents are the sole responsibility of Teyit and do not necessarily reflect the views of the European Union.

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What is Teyit?

Teyit is a fact-checking organization that aims to make critical thinking a shared value for stakeholders in the information ecosystem. In an effort to improve the information ecosystem, Teyit conducts fact-checking and empowerment activities in collaboration with various stakeholders.

Since 2016, it has been analyzing suspicious information on the Internet, conducting educational activities to improve digital literacy and critical thinking skills, and helping to develop sustainable solutions to disinformation by bringing together various stakeholders.

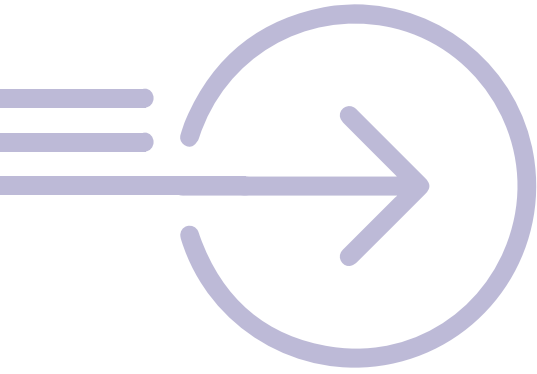
Although Teyit has a wide target audience, one of its main goals is to make special efforts in providing access to accurate information for journalists, NGOs, academics, and decision makers.

Teyit's organizational and editorial processes are monitored within the framework of the International Fact-Checking Network (IFCN) principles. This ensures that Teyit's activities are impartial and fair, that its resources, financial structure, and organization are transparent, and that its methodology is accessible to the public. Independent auditors monitor Teyit's adherence to these principles.

What is DEPİM? (Center for Monitoring Disinformation Policies)

Teyit carries out its activities to prompt policymakers to address the problem of disinformation, take action on the right to information, hold platforms accountable, and propose new measures through the **Center for Monitoring Disinformation Policies**.

DEPİM also intends to monitor the impact of the new legislation passed by the Grand National Assembly of Turkey in 2022, which punishes the dissemination of disinformation with up to 3 years in prison.



1. Introduction

Disinformation has become a critical problem in the digital age, as the widespread use of modern communication tools means that false or misleading information can spread quickly and cause great harm. The spread of disinformation has the potential to undermine the right to information, which is critical for individuals to make the right choices and participate fully in democratic society. This report assesses the issues of disinformation and the right to accurate information in the context of human rights and business in general, and analyzes Google's responsibility in Turkey in particular.

Disinformation poses serious threats to human rights, particularly in relation to freedom of expression and the right to information. The dissemination of false or misleading information can suppress alternative opinions and fuel an atmosphere of fear and insecurity. This limits people's ability to exercise the right to freedom of expression and the right

to information. Moreover, disinformation can reinforce existing inequalities by specifically targeting vulnerable and marginalized groups.

Although governments, individuals, and civil society have a primary responsibility to find solutions to disinformation, corporations also have a responsibility. The business community has an obligation to respect human rights, including the right to information. Digital platforms must ensure that their activities do not contribute to the spread of disinformation and harm the information ecosystem. This responsibility should include developing the necessary policies and procedures to identify and remove false or misleading content, promoting media literacy and critical thinking, and working with various stakeholders to address the main causes of disinformation. Governments, businesses, and other stakeholders should develop solutions to protect human rights. Adopting a strategy based on cooperation and human rights can create a free, open, and informed digital community for all.

When it comes to the right to accurate information, digital platforms and search engines play a central role. Therefore, this report will focus on Google's methods to protect the right to accurate information in Turkey and address the shortcomings and violations. It will assess the extent to which Google is implementing measures to combat disinformation and protect

freedom of expression in line with business and human rights principles. Additionally, the media should be considered as important partners of online platforms in terms of freedom of expression and the right to accurate information. Therefore, this report will also evaluate the steps Google has taken to protect the right to accurate information by supporting media and news outlets.

The goal of this report is to provide international and transnational institutions with a comprehensive understanding of Google's policies in Turkey and their impact on the information ecosystem.



2. The relationship between the problem of disinformation and the right to information

Disinformation and the lack of accurate information have negative effects on society in many areas including economy, human rights and public health.

Various techniques of disinformation are employed to distort public opinion and undermine the legitimacy of democratic practices, such as spreading false narratives and manipulating facts during elections.. During the 2016 U.S. presidential election,¹ disinformation techniques used on social media platforms² were shown to influence voting behavior.³ The spread of disinformation prevents constructive debate and the adoption of a pluralistic perspective in critical processes such as elections by increasing social polarization. As a result, trust in democratic institutions and public officials declines, while frustration and indifference toward politics increases in society.

We encounter disinformation that threatens public safety and health, especially during emergencies,⁴ natural disasters, climate crises, and pandemics such as COVID-19.⁵ In some cases, disinformation causes panic, prevents effective intervention, and encourages harmful behavior.

In addition, lack of access to accurate information can fuel discrimination and hate speech and incite violence against vulnerable⁶ or marginalized groups. A lack of accurate information can impair

individuals' ability to make rational decisions in many areas of life, including education, health, and finance, and can jeopardize the public welfare.

In essence, citizens who lack access to accurate information are exposed to risks that can have life-threatening consequences.



3. Platforms and policies against disinformation

3.1) Policy recommendations of international institutions against disinformation problem in platforms

Policy pushes aimed at organizing platforms according to a specific set of rules usually come from the European Union and the European Commission. These policy pushes, aimed at defending

the right to accurate and transparent information, serve as reminders of the potential risks posed by platforms.

In 2018, the European Commission issued a document entitled “Code of Practice on Disinformation”⁷ on disinformation for online platforms. This code calls on platforms to take precautions to identify and remove disinformation, make political ads more transparent, and encourage users to report misinformed content. This set of rules, which requires platforms to meet their obligations to prevent disinformation, is a first in the world. As the codes are regularly updated, they also serve to improve the platforms' cooperation with the European Commission as well as fact-checking organizations.

In 2018, the European Commission and the High Authority of the Union also adopted the Action Plan against Disinformation,⁸ which calls on tech companies to be more transparent about political ads and take precautions against disinformation. As part of this plan, the Commission issued a directive in May 2021 to strengthen the “Code of Practice on Disinformation”.

Additionally, the Digital Services Act⁹ package proposes mandatory responsibilities across the EU to protect the fundamental rights of users of

online platforms. Protecting European values such as human rights, freedoms, democracy, equality and the rule of law is the primary goal.

The measures mentioned above are just a few examples of the efforts of the European institutions.¹⁰ Many enforcement mechanisms have been developed¹¹ and efforts are underway to remind platforms of their responsibilities to their users. In general, the decisions and policy recommendations of international institutions show that the need to regulate platforms and crack down on disinformation to ensure access to accurate information is now widely recognized. These efforts, which also aim to protect freedom of expression, have the potential to create an online environment that is safe for all users.

3.2) Actions concerning the platforms in Turkey and its harmful effects on the right to information

Turkey also has various laws and regulations governing the activities of online platforms, particularly social media. In July 2022, Turkey's Grand National Assembly passed a law requiring social media platforms with more than 1 million daily users to appoint a local representative in Turkey.¹² This representative would be responsible for responding to requests from Turkish

authorities to remove and ban content that violates Turkish laws. Platforms that fail to comply with this requirement face various sanctions and penalties, including bandwidth compression that renders their services effectively inaccessible, or fines.

In addition to this law, there are other regulations that affect the activities of platforms in Turkey. For instance, the Turkish Penal Code contains clauses that criminalize the dissemination of false information, insulting state officials, and insulting religious values. The Law for Regulating Online Publications and Combating Crimes Committed by Such Publications¹³ regulates online publications and requires platforms to obtain a license from the Radio and Television Supreme Council (RTÜK) to conduct their activities in Turkey.

In 2022, another law¹⁴ was passed that caused concern. Although it is a law to combat disinformation, it contains several clauses that directly affect social media companies. First, the law requires that the representative of a foreign-based social media service with more than 1 million daily users be a real person, and a Turkish citizen residing in Turkey. The reports submitted to BTK (Information and Communication Technologies Institute) should include information on content with highlighted or limited visibility, algorithms,

advertising and transparency policies. Social media services will be required to comply with the Institution's request for additional information. Social media services that do not comply with content removal or blocking decisions may be banned from advertising for up to 6 months.

However, all of these regulations, which expect platforms to cooperate with the government, risk making it more difficult for users to access information and restricting freedom of expression. Due to financial concerns, platforms could take actions that would jeopardize users' freedom of expression in Turkey. People who criticize these regulations argue that they are too broad and serve to hinder freedom of expression and restrict access to information. They also point out that having a local representative in Turkey could make it easier for the government to apply pressure to remove any content deemed harmful, including legitimate political discourse.

Law on Amending the Press Law and the article added to the Turkish Penal Code that provides for a prison sentence of up to 3 years for those who spread disinformation also created controversy and showed that the government is taking a punitive and pressure-based perspective on the right to access accurate information.

It is impossible to approach these legal regulations for search engines and social media platforms without considering the debate on freedom of expression in Turkey. Thus, the debates about what platforms and search engines have to do have been postponed over concerns about censorship and restriction.

Nevertheless, the impact of search engines like Google and social media platforms on the right to information in Turkey should be carefully analyzed and the discussion should go beyond the pressure of censorship and bans.



4. Google's role in access to news and information

In Turkey, the internet penetration rate was 82% of the population in early 2022. Kepios' analysis shows that the number of internet users in Turkey increased by 3.9 million (5.9%) between 2021 and 2022.

According to We Are Social and Kepios data,¹⁵ the main reason for using the internet is to obtain information (80.7%) and to get information about the latest developments (70.8%). According to the same report, the most visited website in Turkey is google.com, and google.com.tr is the seventh most visited. The second most visited YouTube is not included in this report as it is independently operated by Google.

Google is known as the most used search engine in the world and also offers various products and services such as e-mail (Gmail), online document creation and storage (Google Docs), online advertising (Google AdWords) and video sharing (YouTube). Google operates under Alphabet Inc.,¹⁶ a holding company created to manage Google and its partners.

Individual users and media in Turkey and around the world use Google most often to find news articles, websites and other online sources, to obtain information and to gather news. Google's search algorithm is designed to provide the most related and authorized content based on users' search queries, which makes Google an important tool for journalists and media outlets to search and confirm information. In addition to the search engine, people also use services such as Google News and Google Alerts to keep up with the latest

developments and updates. Google News compiles news articles from various sources and presents them in one place, making it easier for users to stay informed about the latest news. And Google Alerts sends notifications to users when new articles or content are published on specific topics or keywords.

The data also show the role of Google in the reception and dissemination of information. As the most used search engine in the world and in Turkey, Google should fulfill its responsibility and ensure that individuals have access to accurate information and support the role of media organizations in disseminating information.



5. Criticisms against Google on the right to access accurate information

Google, one of the world's best-known technology companies, has been criticized for its shortcomings in developing strategies to combat disinformation and protect freedom of expression in accordance with human rights. Google is often criticized for its business decisions that exacerbate human rights issues such as the right to accurate information and the problem of disinformation. This criticism suggests that there is growing concern about the responsibility of technology companies to respect human rights in their business. For instance, Google's search results and advertising policies are found to lead to serious human rights violations, such as discrimination and hate speech, and contribute to the spread of disinformation.¹⁷ In addition, Google has been accused in some countries of collaborating with governments on practices that arguably violate freedom of expression.

Concerns about privacy,¹⁸ tax evasion,¹⁹ and labor rights violations²⁰ are also among the allegations against Google. However, as we address actions that could affect the right to accurate information and related concerns, we will not address these issues.

Search engine bias:

When analyzed for possible bias against certain websites or political views, it is found that Google search engine algorithms can be biased. Experts have argued that Google search results, which

can reinforce entrenched beliefs and limit access to alternative perspectives, create an "echo chamber" effect.²¹ Because Google search engine algorithms play a critical role in controlling users' access to information, they can limit users' access to different perspectives and create reservoirs of information that fuel entrenched beliefs. Moreover, censoring or pushing back on certain perspectives could undermine freedom of expression and democratic discourse. In 2019, for instance, during India's general election, Google was accused of manipulating search results to favor certain political parties.²² Similarly, during the 2016 U.S. presidential election, Google was criticized for search results that allegedly disseminated biased or inaccurate information.²³

Transparency issues and detrimental ad policy:

It is reported that Google's Display Network, which places ads on more than 2 million websites and numerous mobile apps, generated \$31 billion in revenue for the company in 2022.²⁴ Given this revenue, the privacy policies Google provides to nearly 1 million publishers are a cause for concern. The anonymity granted to publishers could lead to abuse, disinformation, and significant financial losses due to fraud, and could adversely affect public health and democracy. According to research by ProPublica,²⁵ Google spreads disinformation and promotes an unhealthy digital environment

while hiding publishers' information and making profits from advertising.

Google ads have been criticized for indirectly promoting disinformation, funding harmful content, and facilitating profit-making from illegal activities. The fact that Google is the only major advertising platform that hides most of its ad-selling partners makes it less transparent than its competitors, and its practice of hiding basic information about affiliated accounts is also a source of criticism. This lack of transparency also extends to the websites and apps on which Google places ads, as well as the people and companies behind them. It seems that Google is not fully implementing the transparency standards that are accepted and adopted throughout the industry. Once a new publisher signs up to Google's ad network, they are automatically hidden and remain anonymous.

In a comprehensive data analysis as part of the same research, ProPublica found that 70% of account IDs in Google's seller file were associated with one or more websites or apps, and 11% of those accounts were accounts about which Google provided public information. However, 30% of these accounts are not disclosed by Google, and no information is provided about where Google advertisers' money might be spent. This lack of transparency hinders the right to accurate information and ethical advertising practices.

Furthermore, a lack of transparency could compromise users' right to privacy and exacerbate the problem of disinformation by allowing malicious parties to target users with false or misleading information.

Unfair competitive advantage:

The concentration of power in a few technology companies hinders competition and limits access to various sources of information by exacerbating the problem of disinformation. Google's dominance of the search engine market has led to accusations of unfair competition, particularly in online advertising and search results.²⁶ Google's manipulation of search results and favoritism of its own services could harm small businesses and limit users' access to various sources of information. Google faced fines and investigations by the European Union for unfair competition, including allegations of favoring its Shopping service in search results.²⁷

Censorship:

Access to information is also closely related to freedom of expression and the right to share opinions without fear of censorship. Google's cooperation with the governments of some countries,²⁸ particularly China, on censorship raises serious concerns about the company's commitment to freedom of expression and human rights. Google may be complicit in human rights abuses and suppression of opposition by complying

with censorship requests. This could exacerbate the problem of disinformation by limiting access to different perspectives and blocking channels to appeal false or misleading information.

The disinformation problem is closely related to broader issues of corporate accountability and responsibility. Users who perceive companies as untrustworthy or self-serving may view information from these sources as less credible or worth sharing. These concerns and allegations are important to remind Google's ethical responsibilities and to underscore the need for greater transparency and accountability in the tech industry.



6. Right to accurate information issues in Turkey caused by Google

6.1) Knowledge panels disseminate disinformation and Google takes no responsibility

The knowledge panels²⁹ are automatically generated and compile information from a variety of sources on the web. In some areas, such as movies or music, Google works with partners that provide authorized data on specific topics and combines that data with other open web sources.

The knowledge panels are automatically updated as online information changes. The person listed in the knowledge panel can claim the panel and ask for changes. However, Google does not verify the information in the panels or use any control mechanisms.

In fact-checking,³⁰ Teyit came across a widespread false claim that highlights the problems that arise from unverified knowledge panels and Google's unwillingness to monitor its features and services. Some posts on social media claimed that Neptün Soyer was 14 years old when she married Izmir Metropolitan Mayor Tunç Soyer. The knowledge panels found in Google search results about Neptün Soyer were cited as evidence for this claim.

This claim spread while child abuse was being publicly discussed in Turkey and was used to attack politicians who are

critical of the regime. Many people were outraged and raised their voices against child abuse after the photos and audio recordings revealed that the daughter of Yusuf Ziya Gümüşel, the founder of the Hiranur Foundation, was made to wear a wedding dress at the age of six. When Tunç Soyer criticized forcing a six-year-old child to marry in a tweet, it was claimed that his wife Neptün Soyer was 14 years old when they got married. However, Neptün Soyer was actually 22 years old when she married Tunç Soyer.



Because knowledge panels are generated automatically by compiling information from a variety of sources on the web, the sources may include

unverified information. In addition, because the information in the panels is based on unreliable sources, it can be updated by anyone.

The main problem is that Google has no control mechanism to verify the websites that provide information. As mentioned above, the only way to change the incorrect information in the knowledge panel is to contact Google. That is, if Google cannot be contacted, there is no way to change the incorrect information in knowledge panels. It is not known which websites are considered reliable and are used by Google as a reference for these knowledge panels.

Another example that proves that Google's knowledge panels hinder the right to access accurate information is the case of Ekrem İmamoğlu, Istanbul Metropolitan Mayor. Some social media accounts and news portals claimed that Ekrem İmamoğlu was listed in Google search results as a "former" mayor. On December 14, 2022, the verdict was announced in the lawsuit against Ekrem İmamoğlu for insulting the members of the Supreme Election Board.

Ekrem İmamoğlu's advisor, Murat Ongun, also stated that they asked to change the term "former" mayor. The person who is listed in the knowledge panel can make a request and ask for changes in the panel. However, it is not possible for



Google search engine and Google News in November 2020.

The report shows that independent media in Turkey is gaining traction in the digital world, with 33.5 million users compared to 47.8 million monthly users of pro-government media. While the reach of pro-government media has not increased much recently, independent media saw significant growth in its digital user base as of March 2021.

everyone to contact Google as quickly as others. Unfortunately, Google does not take into account the speed at which disinformation can spread and the potential risks it can pose.

In addition, Google executives should acknowledge their responsibility for the accuracy of information highlighted in the search engine and take action to address this issue. The problem is that platforms take action only after serious crises have occurred. Platforms should take preventive action rather than taking action only after an information crisis has been caused by their features.

6.2) Google highlights pro-government news portals

For the report titled “The New Mainstream Media’ is Rising (And It Seeks Support)”,³¹ published by the International Press Institute (IPI), 84,430 lines of data were collected from the

Despite this change, Google’s Most Read News results for Turkish search terms and trending queries disproportionately feature pro-government media. 90.6% of results come from three pro-government news outlets.

Google News’ algorithm gives 73.8% of visibility to pro-government media, but only 26.2% to independent media. These statistics are critical to understanding the limited visibility Google provides to independent media in Turkey, despite their large digital reach, strong social media engagement, and rapid growth rates compared to pro-government organizations.

Moreover, Google search results risk amplifying hate speech and disinformation campaigns launched by pro-government organizations to undermine democratic civil society. The company’s algorithmic decisions

in Turkey are remarkably different from those in countries like the U.S. where reputable media organizations and local publishers are much more prominent in news content. The report notes that this inconsistency raises questions about Google's commitment to supporting a just and inclusive media environment in Turkey, which is essential to a healthy and democratic society.

According to the Journo's News Consumer Survey³² published in 2022, the most commonly used digital platforms for news gathering in Turkey are news portals at 40.9% and Google at 34.3%.

To monitor the processes that threaten the right to accurate information in Turkey, Journo analyzed the two main digital channels for accessing news in Turkey, news portals and Google, after the Feb. 6 earthquakes and in the run-up to the May 14 elections, using a data panel called "News Watcher".³³

The first results of the Google 'watchdog', which was designed to assess whether the search algorithm provides transparent and trackable data on news distribution, show that the U.S. based company still almost exclusively favors pro-government media in Turkey. The dashboard also allows users to download data on how much coverage news portals give to politicians, along with a sentiment analysis.

Google promotes clickbait and ignores violations by major news portals, and seems to insist on an algorithm that ignores the specifics of the media structure in Turkey and the pressures independent media face. Although we do not know how these algorithms are designed, the data from the reports show that pro-government media have an advantage in the search engine.

IPI Vice President and Journo Project Editor Emre Kızılkaya states in reference to the above report, "Unfortunately, the rules and quality standards that Google adheres to in the U.S. and Europe are still ignored in Turkey. As the research conducted by ProPublica with the cooperation of Teyit shows, Turkey is one of the countries where Google has the greatest commercial benefit by cultivating 'advertising partnerships' with those who spread disinformation and propaganda."

6.3) Google finances disinformation

Google's policy of banning advertising for content that makes unreliable and harmful claims prioritizes health, the climate crisis, elections, and democratic processes. However, research also shows that Google regularly places ads on sites that violate its policies.

ProPublica's research,³⁴ which focused on non-English language publications

in Europe, Latin America and Africa, scanned more than 13,000 pages in six languages from thousands of news sites. The study shows that Google ads fund websites that promote anti-vaccination, ignore the climate crisis and destabilize fragile democracies. ProPublica showed that while Google fights disinformation, it continues to profit from ads placed on content that spreads disinformation.

The study³⁵ shows that the percentage of Google ads on non-English sites that spread disinformation ranges from 30% to 90%. ProPublica reports that 45 of the first 50 websites (90%) identified by Teyit as spreading disinformation contain Google ads. This compares to 87% in Croatia, Serbia and Bosnia and Herzegovina, 80% in Brazil, 44% in Spain, 38% in Latin America and 30% in German-speaking countries.

Turkey has the highest percentage of publishers known to spread disinformation and make money from Google ads. According to Datareportal's 2022 report, Turkish is the fourth language that generates the most online content. Data provided to ProPublica shows that 73% of links containing disinformation in Turkish continue to profit through Google.

It is also noted that non-English language websites have much higher

ad rates. Only 13% of English-language websites that are considered unreliable in terms of content accuracy receive Google ads.

Africa provides further data to support this discrepancy between languages. 57% of English-language sites in South Africa, Nigeria, and Kenya with false information generate ad revenue from Google, compared to 66% for French-language content in the same region. These results show that this disparity persists not only between languages, but also between regions.

6.4) Claim Review doesn't always rank fact-checkers high on search results

Claim Review³⁶ is a tagging system that allows fact-checkers to tag their articles for search engines and social media platforms such as Google Search, Google News, Bing, Facebook and YouTube.

The platforms then use these tags to highlight verified articles. However, because Google ignores the media's SEO tricks, news portals that spread disinformation continue to rank highly. Although the research Teyit analyzes is often ranked highly, this is not true for all claims and analysis. The fact-checker community points out that similar problems occur in other languages.



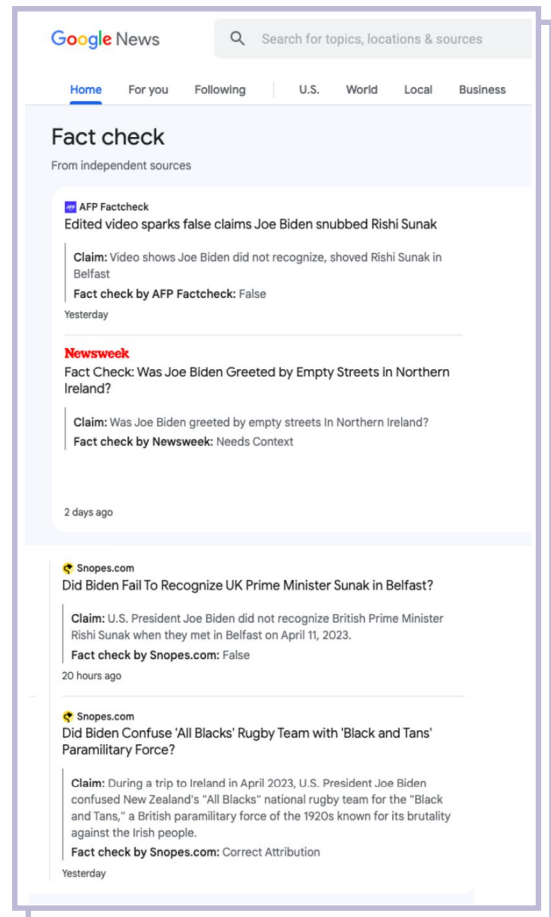
7. What Google does in the world but not in Turkey in terms of right to accurate information

7.1) Google News does not feature fact-checking articles in Turkey

Google News aims to make it easier for its users to access verified information by creating a separate fact-checking section in some countries.³⁷ However, this feature is not available to users and fact-checking organizations in Turkey. Since Google is widely used to get news in Turkey, it should highlight fact-checking articles as it does in the U.S. and other countries.

7.2) Google is silent on SEO tricks in Turkey

Search engines analyze the keywords that users use to access content.



The machine learning techniques developed in this way form the search engine algorithms that allow us to find the "most relevant" result.

Every website that an average internet user clicks on in search of information makes money for both the publisher and Google. News outlets and publishers who want to get more clicks can use methods to rank higher in Google search results. These methods trick users and hinder their right to information.

In its own content quality guidelines, Google states that it does not allow methods such as "unnaturally frequent repetition of the same words or phrases" Nevertheless, Google turns a blind eye to the SEO tricks of pro-government media, and this practice unfortunately harms the media ecosystem in Turkey.³⁸ In various countries and languages, Google removes organizations that use such SEO tricks from its search engine.

For some major news portals in Turkey, it is enough to put these keywords in the headline, spot and news text. Journo's research³⁹ revealed that media in Turkey use "keyword stuffing" to rank higher in search results. For most high-volume keywords, a few pages, particularly Sabah, Hürriyet and Milliyet, are almost always highlighted by Google. This unfortunately reinforces a bias that hinders the right to access accurate information.

7.3) Google does not use transparency reports for political ads in Turkey

It can be said that personalized online ads have a strong impact on voter decisions. Ads personalized by various characteristics such as gender, age, and income group are user-specific and can influence citizens' decision-

making processes. Therefore, political ads are particularly important during election periods.

Google's ads appear everywhere, not just when people use the search engine. Google ads can be placed on all platforms via YouTube and AdSense / AdWords. This means that political ads can appear not only in the Google search engine, but also when you visit YouTube, for example. The greater the reach of political ads, the easier it becomes to influence voters and democratic processes.

Google Transparency Report⁴⁰ allows you to analyze political ads, the advertisers, on whose behalf the ad is placed, the budget spent, the ad data and the amount spent on a single ad. With its efficient filtering function, you can sort the ads by date and view more details.

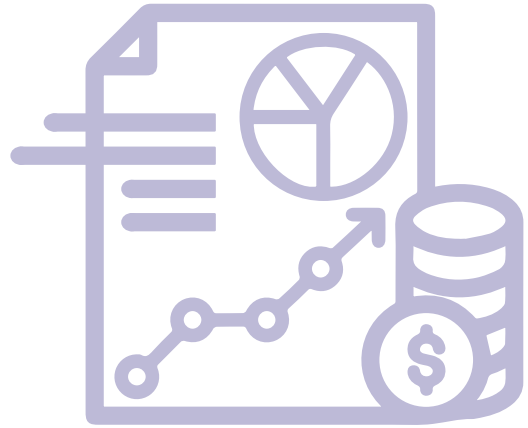
Google does not use the same transparency reports for political ads in Turkey as it does in other countries. This makes it very difficult to find out which politician or party is running what kind of propaganda with what budget during election periods in Turkey.⁴¹ Consequently, it is not possible to obtain information about the sponsored content that is shown to a large number of voters during election periods and aims to influence voting behavior. Such sponsored content often contains

false information. However, Google is taking steps to prevent this in the EU and the US. Given that elections in Turkey are often democratically critical, transparency of political ads becomes even more important.

7.4) Google News Showcase is not available in Turkey

Google News Showcase is a feature that will be useful for both publishers and readers. It helps publishers build a closer connection with their audience by providing readers with more information about important developments.⁴²

According to recent blog reports on News Showcase, Google has signed up more than 2,000 publishers worldwide in 23 countries since 2020, including Germany, Portugal, United Kingdom, Czechia, Italy, Romania, Poland, Slovenia, India, Japan, Brazil, Austria, England, Australia, Colombia, Argentina, Google News Showcase is launching in Italy Slovakia, Canada, Ireland, France, Spain, New Zealand and Mexico. The primary motivation was the Copyright Act in the EU states. The fact that the Google News Showcase feature is available in various countries around the world suggests that Turkey can also be included in the prioritized countries. Despite being the seventh most widely used language on the internet, this feature is not available in Turkey.⁴³



8. Google's financial activities in media of Turkey

8.1) Inequality in Google News Equity Fund

Google News Equity⁴⁴ was designed to support news organizations serving underrepresented communities and has announced its 2022 grants. Not a single Turkish company was among the 450 media organizations selected from 52 countries.

With a population of more than 80 million, Turkey has a wide range of communities that deserve to be represented in the media, and the lack of support for local media outlets raises concerns about Google's commitment to inclusion and equality. Independent media in Turkey face significant

challenges and require substantial financial support. However, Google has shown little willingness to provide this support, prioritizing market and advertising concerns over supporting underrepresented communities and promoting a more inclusive media environment.

Google's actions toward media outlets in Turkey are cause for concern. As a global leader in the technology industry, Google should be urged to support independent media and ensure that underrepresented voices are heard.

When this report was written, the Google Turkey team was asked how many media outlets from Turkey applied for the Google News Equity Fund, but unfortunately this information could not be shared.

8.2) GNI Innovation Challenge doesn't meet the needs of the media in Turkey

Google News Initiative (GNI) is a project launched by Google in 2018 to strengthen journalism, foster innovation in the industry, and improve media literacy. GNI provides programs and initiatives to support news outlets, journalists, and media professionals around the world.

The GNI Innovation Challenge is one of these important initiatives. Accepted

projects receive funding of up to \$150,000, which covers up to 70% of the total project costs. Officials from Google Turkey told Teyit that the GNI Innovation Challenge has provided nearly \$700,000 in financial support to media in Turkey over the past three years.

GNI's first financial support for media in Turkey went to pro-government media

In 2020, the GNI Innovation Challenge included Turkey in its open call for proposals for the first time. Demirören Media Group was the only applicant selected for the program. Demirören's project aimed to increase advertising revenue by keeping readers on the site longer and facilitating the categorization of text data to facilitate indexing for both internal use and search engine optimization.

Media and civil society criticized this financial support given to Demirören Media Group,⁴⁵ which is known for its pro-government publishing policies.

Following the reactions, Google hinted that it might give preference to alternative media in the next GNI Innovation Challenge.

In 2021, the Aposto and Mynet projects won the GNI Innovation Challenge. Project Dreamcatcher by Istanbul-based

technology and new media startup Aposto aimed to develop a method to give news publishers individual access to news articles through micro-licensing. Project Phantom by Mynet aimed to offer AI-based customer journey analytics and provide push notifications to ensure user interaction and engagement.

In 2022, the number of Turkish companies that won the GNI Innovation Competition increased to three: T24, Mynet, and Cüneyt Özdemir Medya / Dipnot.

T24 aims to create a subscription and customizable notification system (Push, WhatsApp, Newsletter, etc.) to deliver ad-free content desired by readers who do not want to see ads. Mynet, which won the competition for the second time, will develop a subscription management system that includes machine learning, decision support systems, subscriber and subscription package management, and payment modules via SaaS, designed specifically for publishers. Cüneyt Özdemir Medya / Dipnot has launched suppi.org, which aims to create a content distribution infrastructure, a content management system and a multi-screen user experience on multiple screens.

The Google Turkey team was asked about the number of outlets

participating in the GNI Innovation Challenge and the diversity of project proposals, but did not receive a detailed response.

In our in-depth interviews with two media outlets that received financial support from the GNI Innovation Challenge, Google's support was found to be invaluable to the media. They were generally pleased with the application and project development process. The funded outlets also pointed out that Google's approach to media in Turkey could be more inclusive. It was also emphasized that more support is needed.

An official from one of the outlets we interviewed said that the impact of the awarded projects in Turkey should also be evaluated. "In one year, for example, the Innovation Challenge in one region focuses on projects that create alternative sources of income for media outlets, while the competition in another region focuses on developing innovative products to strengthen local journalism. In general, we can say that these projects contribute directly and indirectly to 'healthy information gathering processes'. On the other hand, in the case of Turkey, we cannot yet say that the projects that won the competition have had a direct impact."

Another official we interviewed said, "Google's search results can harm diversity in the media. There is no effective feedback mechanism for search results. Unfortunately, some fake or misleading websites can get ahead of credible media."

In general, the outlets that won the GNI contest said Google teams were helpful in developing projects, capable of constructive communication, and had the sensitivity to extend project deadlines to fit the circumstances.

In an interview with Emre Kızılkaya of Journo,⁴⁶ Ludovic Blecher, the director of the GNI Innovation Competition, pointed out that the applications did not meet the criteria. He also underlines that the main problem is the editorial funding applications. While it is known that Google wants to support digitization with this competition and funding, it is also obvious that the conditions of the media in Turkey are not sufficiently understood. Considering Blecher's statement that the competition supports projects that promote sustainability, the fact that the main problem regarding sustainability in Turkey is strengthening human resources and editorial capacity is overlooked.

Google News Initiative's Dreams for Africa and the Middle East Fall Short of Reality

A recent research⁴⁷ analyzing the effects of GNI's one-year grants on supporting media organizations in Africa and the Middle East found that numerous funded projects ended up producing products that did not fully meet their original objectives. According to the research, Google presents journalistic innovation as something attainable solely through its own proprietary and technological capabilities. Newsrooms in these regions faced challenges in project development due to a lack of skilled technology staff and high hiring costs, which often led to outsourcing to companies outside the region.

The study highlights the challenges the newsrooms faced in achieving financial sustainability and underscores how GNI grants can potentially curtail their autonomy and innovation capacity. This is accomplished by forcing news organizations to align themselves with the priorities of technology companies such as Google.

Although Turkey is listed among the countries supported in the Middle East region, no newsrooms or projects are specifically mentioned. Therefore, a more in-depth examination of the progress of the projects accepted in Turkey is warranted.

8.3) Google's Journalism Emergency Relief Fund does not reveal how much support is given to local media outlets in Turkey

The Journalism Emergency Relief Fund (JERF) aimed to support small and medium-sized local media outlets during the pandemic COVID-19. The open call was issued in 2020 and 5,620 local media outlets from 115 countries were selected among 12,000 applicants. Five local media outlets from Turkey were selected. Of the 45 applicants from Turkey who requested support of approximately \$392,000, five were granted support.

The page⁴⁸ announcing the JERF grant winners shows the countries that applied for Google's support, how many outlets from those countries applied and how much budget they requested. It also shows the countries that were awarded the support and how much they received in total.

However, it is not possible to see how much support local media outlets in Turkey received from Google. This information, which is available for almost all other countries, is unfortunately not available for Turkey. The 5 local newspapers from Turkey that have received this support are Zonguldak Pusula, Eskişehir Haber, Trabzon Haber⁶¹.net, Manavgat Son Haber and Çorum Yayla Haber. Journo has attempted to

obtain this information by contacting the local newspapers, but has been unsuccessful in obtaining the desired information. Media outlets could not share this information due to the confidentiality agreement they signed.

Miscommunication between news outlets and Google

Local news outlets stated that they will use this support to improve infrastructure and server support. It seems that communication between Google and media organizations following the requests was poor.

Two of the five local news outlets contacted by Journo stated that no one from Google had contacted them.⁴⁹ Manavgat Son Haber stated that they learned that they had been selected for funding from Journo. They also stated that they applied to Google, but no one contacted them afterwards. Yayla Haber's team learned about the emergency fund through an email from Google. After filling out the form, they did not receive any message from Google indicating that the application was approved. They later received an email informing them that they were eligible for funding.

8.4) The problem of sustainable financial revenue between media outlets and platforms

The issue of sustainable finance between media outlets and Google is controversial. On the one hand, media outlets depend on Google for traffic and visibility; on the other hand, Google profits from the content produced by media outlets that attracts users to its search engine and other platforms.

The use of snippets has been a major point of contention between the media and Google. Snippets are short summaries of news articles that appear in Google search results, along with links to those articles. Media outlets argue that these snippets are a violation of copyright law and affect their traffic and advertising revenue. On the other hand, Google argues that snippets are necessary for users to access news content and that they serve media outlets by driving traffic to their websites.

To address this issue, the EU enacted the Copyright Directive in 2018.⁵⁰ It requires platforms such as Google to pay media outlets for the use of snippets and other forms of content. However, this move sparked controversy and it was argued that it would hinder innovation. In 2022, Google agreed to pay licensing fees to 300 media outlets in Europe.⁵¹ Google's decision to pay licensing fees is also significant for publishers in Turkey. It has been

reported that the General Directorate of Copyright is working on a similar law, which is not yet binding in Turkey, to amend Law No. 5846 on Intellectual and Artistic Works (FSEK) and revise Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed by Such Publications.⁵²

In general, sustainable financing between media outlets and Google should take into account the needs of both parties as well as the interests of users and society as a whole.



9. Google's efforts for fact-checking and media literacy

Google is taking steps to promote media literacy and help users develop critical thinking skills when consuming information online.

Be Internet Awesome: ⁵³

Google has developed a program called Be Internet Awesome to teach children digital citizenship and online safety skills. The program includes interactive games and resources to help children learn about privacy, security, and responsible online behavior.

Fact-Check Explorer: ⁵³⁴

Google has developed Fact Check Explorer, which allows users to search for fact-checking analysis from credible sources. This can help users identify and combat false or misleading information.

The Media Literacy Project: ⁵⁵

Google has supported a series of lessons and resources to help educators teach news literacy in the classroom. The program includes interactive lessons, quizzes, and other resources to help students develop critical thinking skills and evaluate information sources.

Global Fact Check Fund: ⁵⁶

Google and YouTube have agreed to fund fact-checking organizations through 2025 with financial support from the International Fact-Checking Network (IFCN). Google announced that \$12 million will be made available for global fact-checking efforts.



10. Recommendations

Enhance transparency:

Google should create more transparency about how its algorithms work and how content is ranked and displayed in search results. This can help increase trust in the platform and reduce the spread of false or misleading information.

Promote trusted sources:

Google should give priority to credible sources of information in its search results. This can help reduce the spread of false or misleading information and ensure that users have access to accurate and reliable information.

Enhance collaboration with fact-checkers:

Google should work with, support, and invest in fact-checking organizations to help them develop their technology and expand their services to help users

identify and combat false or misleading information. It is also important that this relationship is built on a sustainable financial model.

Digital literacy training:

Google should invest in educational programs that help users develop critical thinking skills and evaluate information sources. It should provide digital literacy resources, promote news literacy programs, and build partnerships with educators and fact-checking organizations.

Collaborate with stakeholders:

Google should also work with governments, NGOs and academic institutions to promote accurate information and combat disinformation. When different stakeholders work together, more holistic solutions can be found.

There should be equal treatment of different languages and regions:

It should be noted that Google does not follow the same practices in search results and financial support in all countries. Google should urgently implement these practices in all countries and show its will to support the right to accurate information.

By implementing these recommendations, Google can help promote accurate and reliable

information and combat the spread of false or misleading information. This can benefit users, society, and Google itself by promoting trust and reducing the negative impact of disinformation on democracy, public health, and other important issues.

Source

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