



MAKERERE

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REGULATION OF FAKE NEWS ON SOCIAL MEDIA IN UGANDA: A CASE STUDY OF
FACEBOOK

BY

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DECLARATION

I, TWINOMUGISHA Leonard, declare that this dissertation titled, “*Regulation of fake news on social media in Uganda: A case study of Facebook,*” is my own work and that it has never been submitted for any award at any other institution of learning. It does not incorporate previously published material except where due reference has been made. The dissertation was done under the supervision of Dr. Sara Namusoga from the Department of Journalism and Communication, Makerere University.

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SUPERVISOR'S APPROVAL

I hereby confirm that this thesis by Leonard Twinomugisha, titled ‘‘*Regulation of Fake News on Social Media in Uganda: A Case Study of Facebook*’’ has been submitted for examination with my approval as supervisor.

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DEDICATION

To my dear wife Pamela Mbabazi, my children Kyererezi Leona Mutuzo and Emanzi Lucius Ivar who have been a source of inspiration and support in this journey. My parents, brothers and sisters have also been part of my entire life journey and therefore have been a push factor to most goals that I aim at. I also dedicate this work to some of my lecturers in the Makerere University Department of Journalism and Communication and classmates who have been very cooperative and supportive throughout this journey.

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LIST OF ACRONYMS

AI	Artificial Intelligence
CIB	Coordinated Inauthentic Behaviour
CIC	Citizen Interaction Centre
EU	European Union
GCIC	Government Citizen's Interaction Centre
ICT	Information and Communication Technology
MoES	Ministry of Education and Sports
MoICT	Ministry of Information and Communication Technology
NRM	National Resistance Movement
UCC	Uganda Communications Commission
UNESCO	United Nations Educational, Scientific and Cultural Organization
VPN	Virtual Private Network

ABSTRACT

This study sought to establish which self-regulation mechanisms deal with circulation of fake news on social media in Uganda using a case study of Facebook. It adapts the Four Theories of the Press to the context of social media platforms, in order to provide insights into the self-regulation mechanism Facebook uses to deal with circulation of fake news; how the government of Uganda regulates social media platforms; and how the government of Uganda regulates fake news circulating on social media platforms.

Findings show that Facebook employs (a) enforcement of community standards and policies, (b) oversight board, and (c) user reporting or flagging as self-regulatory mechanisms for dealing with fake news circulating on its platform. Findings indicate that the government employs the statutory regime to regulate social media platforms in Uganda. Based on the findings of document analysis and interviews which were the methods used, after analysis of data from both methods, the study concluded that the statutory regulation was an ineffective regime for regulating social media platforms in Uganda. For that reason, the study proposed a blend of statutory regulation and self-regulation as opposed to co-regulation. This is because self-regulation was more effective than co-regulation due to measures taken by individual tech companies to self-regulate, though both regimes were limited by the absence of an industry coalition of tech companies. Findings indicated that the government employed statutory regulation for dealing with fake news circulating on social media platforms in Uganda. While the findings of document analysis and interviews, indicated that statutory regulation alone was an ineffective regime for dealing with fake news circulating on social media platform in Uganda, the study proposed a blend of informal regulation, self-regulation and statutory regulation as the most effective approach of dealing with fake news circulating on social media platforms in Uganda.

Key Words: Regulation, Fake News, (Misinformation, Disinformation, Mal-information, Propaganda), Social Media, Self-Regulation, Statutory Regulation, Co-Regulation

CHAPTER ONE

INTRODUCTION

1.0 Introduction

Since the fake news controversies following the “Brexit” vote in the UK, Donald Trump’s 2016 election victory in the US, and 2017 Kenya’s decision to nullify its national election result, regulation of social media platforms has drawn increasing academic attention (Garbe, Selvik & Lemaire, 2023; Iosifidis & Andrews, 2020; Wardle & Derakhshan, 2017). The question of how to counteract the damage done by fake news has become a pressing issue for giant tech companies such as Facebook, academia and governments across the globe (Garbe et al., 2023). The study locates that global debate within the Ugandan Context with a focus on Facebook as a case through which the challenges of regulating fake news can be examined.

The study argues that when self-regulation is properly enforced through transparent industry standards and supported by statutory oversight specific to a country or region, it is central to mitigating the circulation of fake news on social media.

The argument is premised on studies showing that contemporary “post-factual” society is particularly vulnerable to fake news. This is due to declining confidence in objective facts and increasing confidence in information that has an emotional connotation. Consequently, social media users choose or create their own “facts” while dismissing content they do not agree with as fake news (Iosifidis & Nicoli, 2020; Hossová, 2018; Posetti & Matthews, 2018; Digital, Culture, Media and Sports Committee, 2017).

While scholars have discussed the most urgent problems in content moderation in the Global North, fewer scholars have paid attention to content regulation in the Global South (Garbe, Selvik & Lemaire, 2023; Garbe, Selvik & Lemaire, 2021; Iosifidis & Andrews, 2020). African countries appear to have shifted their focus towards state-centric approaches to regulating content (Garbe, Selvik & Lemaire, 2021). An alternative solution is to look into Facebook as a medium through which fake news is disseminated (Goldberg, 2017). This study employs the latter approach – looking into Facebook as a platform through which fake news is disseminated. However, there are concerns that giant tech companies like Facebook have persistently been uncooperative in

regulating local content in African countries (Garbe et al., 2021; 2023). This study sought to find out the extent to which self-regulation can deal with fake news circulating on Facebook. To do this, the study assumed that self-regulation occurs at two levels – individual tech company level and industry coalition of tech companies’ levels. For that reason, the study sought to establish the self-regulatory mechanisms Facebook employs for dealing with fake news circulating on its platforms in Uganda. Another critical assumption was that social media regulation was critical for dealing with fake news circulating on social media platforms in Uganda. For that reason, the study sought to establish not only regulation of social media platforms but also fake news circulating on social media platforms in Uganda. The study dares to distinguish between the two, however, a thin line separates social media regulation and fake news regulation because in the Ugandan context, the debate of fake news regulation became popular with the emergence of social media making the two quite analogous (CIPESA, 2024) .

1.1 Background

Facebook has been riddled with controversies involving political manipulation (the 2016 U.S. election and UK’s Brexit vote), user privacy (the Cambridge Analytic data scandal), and content integrity, such as fake news and hate speech (Garbe et al., 2023; Hemphill & Banerjee, 2021; Iosifidis & Andrews, 2020; Wardle & Derakhshan, 2017). As Hemphill and Banerjee (2021) observe, the nature of these controversies has led to congressional scrutiny and critics calling for federal regulation of the giant tech company’s activities.

According to the United Nations Educational, Scientific and Cultural Organization (UNESCO), the spread of fake news is made possible largely through social media platforms, which begs the question: To what extent are big tech companies providing regulation and self-regulation services? In their nature as intermediary platforms rather than content creators, these businesses have to date generally been subject to only light-touch regulation except in the area of copyright. However, due to the growing pressure on them and the risks to free expression posed by over-regulation, there are increased steps in the frame of self-regulation (UNESCO, 2018).

In Uganda, Social Media platforms such as Facebook, have become critical spaces for political mobilization, journalism and public debate (CIPESA, 2021). While these platforms present the opportunity of expression, they pose a challenge of accelerated spread of misinformation and fake

news resulting into a dilemma of platform regulation and state regulation (Tambini, 2021). A critical moment in Uganda's history was the constitutional ruling in *Charles Onyango-Obbo and Andrew Mwenda Vs Attorney General* (Constitutional Petition.15 in 1997) where the "false news" offense was dropped, with an argument that it violated freedom of expression, citing that the state cannot be the sole arbitrator of the truth and that democracy requires open debate (Muwema, 2018, para.6).

Despite that historical context, and an inspired call to government of Uganda to rely on the self-regulation of the media, Walulya & Namasinga, (2020), observe that social media was perceived as a potential threat to government stability, resulting into the introduction of restrictive laws such as the Computer Misuse Act 2011, which increase state surveillance on the public, in a guise of maintaining public morality and national security (Walulya & Selnes 2023).

The introduction of the Excise Duty (Amendment) Act 2018 and the 2021 Facebook ban are perfect examples of the tensions between state control and regulation of social media (CIPESA, 2021) while the Facebook ban also retaliates the contest between global platform self-regulations and country specific sovereign regulation of social media platforms (Meta, 2021).

Some studies on self-regulation of social media platforms have focused analysis on digital and media literacy and fact checkers (Cusumano et al. (2021a; Cusumano et al., 2021b; Napoli, 2018). Other studies have analysed the challenges of self-regulation (Cusumano et al. (2021a; Cusumano et al., 2021b; Napoli, 2018). Such studies have found that self-regulation need not only happen exclusively at the level of social media companies but also at the industry level. A few studies on co-regulation of social media platforms have focused analysis on broad themes, such as designing an effective co-regulatory model (Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014). Such studies have found that countering the vulnerabilities of government and the industry requires co-regulation, but co-regulation itself is not a cure-all solution. Many studies on statutory regulation of social media platforms have also analysed various themes (Garbe, Selvik & Lemaire, 2023; Walulya & Selnes, 2023; Wadero, 2022; Namasinga, 2021; Xinhua, 2021). Such studies have found that the state is the dominant actor in shaping content regulation across African countries, including Uganda.

Despite the growing number of studies on social media regulation (Garbe, Selvik & Lemaire, 2023; Walulya & Selnes, 2023; Wadero, 2022; Cusumano et al., 2021a; Cusumano et al., 2021b; Namasinga, 2021; Xinhua, 2021; Iosifidis & Andrews, 2020; Dittrich, 2019; Finck, 2018; Napoli, 2018; Cannon & Chung, 2014), there remains limited understanding about the extent to which self-regulation can deal with fake news circulating on social media platforms. Studies on self-regulation mechanisms to deal with fake news are scarce (Meta, 2024n; Dittrich, 2019). Such studies have shown that an individual social media company or companies within the industry develop their own standards and guidelines together with relevant stakeholders. Facebook has developed community standards for what is and isn't allowed on the platform. Self-regulation mechanism in the European Union (EU) can take on various forms from voluntary, measured by the industry, to more supervised forms of industry-led rulemaking with the involvement of other stakeholders.

The study operationalized how government of Uganda and social media companies regulate fake news on their platforms in terms of the informal regulation, self-regulation, co-regulation and statutory regulation respectively. A growing number of studies on regulation of fake news on social media have analysed informal regulation (Bélair-Gagnon et al., 2023; Themistokleous, 2021; Vianna & Carvalho-Mendonça, 2021; Buckingham, 2020; Dittrich, 2019; Goldberg, 2017), self-regulation (Cusumano et al., 2021a; Cusumano et al., 2021b; Meta, 2020a; Meta 2020b; Iosifidis & Andrews, 2020; Dittrich, 2019), co-regulation (Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014), and statutory regulation (Bertuzzi et al., 2023; Cusumano et al., 2021a; Cusumano et al., 2021b; Mbaine, 2020; Enli, et al., 2019; House of Commons, 2017; Goldberg, 2017). This study focuses on Facebook as a case to understand the extent to which self-regulation can deal with circulation of fake news on social media platforms.

1.2 Problem Statement

There is growing concern about the circulation of fake news on Facebook and other social media platforms. Across the globe, governments have proposed different regulatory models, such as self-regulation, co-regulation and legislation, for digital platforms. However, little is known about regulation of fake news on social media despite the growing number of studies on digital regulation. The few available studies have focused analysis on regulation of digital platforms (Enli et al., 2019; Digital Culture Media Sports Committee, 2019; Finck, 2018). Whereas Walulya and Selnes (2023) argue that government attempts to curtail online communication through legislation and presidential directives, there also remains limited scholarly information on the interaction between the statutory framework of Uganda and social media internal moderation policies. This study extends knowledge on regulation of fake news on social media by establishing what self-regulation mechanisms can deal with circulation of fake news on social media in Uganda using a case of Facebook. The study assesses self-regulation mechanisms that Facebook uses to deal with circulation of fake news. To localize the findings from the self-mechanism that Facebook uses, the study also does an assessment on how the government of Uganda regulates fake news spread on social media.

1.3 General Objective

The general objective of this study is to establish whether self-regulation can deal with circulation of fake news on social media in Uganda using a case study of Facebook.

1.4 Specific Objectives

1. To assess the self-regulation mechanisms Facebook uses to deal with circulation of fake news
2. To assess how the government of Uganda regulates social media platforms.
3. To establish how the government of Uganda regulates fake news on Facebook.

1.5 Research Questions

1. What self-regulation mechanism does Facebook use to deal with circulation of fake news?
2. How does the government of Uganda regulate social media platforms?
3. How does the government of Uganda regulate fake news on Facebook?

1.6 Significance

This study contributes to knowledge on social media and regulation of fake news by finding out the extent to which self-regulation can deal with circulation of fake news on social media platforms in Uganda. The findings of the study provide scholars, policymakers, legislatures and social media users with insights into the extent to which self-regulation can deal with circulation of fake news on social media platforms. It is hoped that the findings provide social media users, policymakers and regulators with insights into how the government of Uganda regulates social media and fake news circulating on such platforms.

1.7 Justification

While Facebook and other social media platforms have brought many freedoms across the world and an unprecedented ability to communicate, they also carry the insidious ability to distort, to mislead and to produce hatred and instability. Such platforms function on a scale and at a speed that is unprecedented in human history (Digital Culture Media Sports Committee, 2019). Enli et al. (2019) argue that regulation is a key strategy for states to protect against abuse of media freedom and freedom of expression. Uganda's growing public sphere and continuous tensions between the state and the attempts to curb harmful online content places this study at the center of Uganda's digital transformation. ACME (2025) observes that regulation issues lag Uganda's technological advancement and lead to reactive measures while dealing with digital related cases. The reason for undertaking this study is to generate empirical literature on regulation of fake news circulation on social media using a case of Facebook in Uganda. This enabled this study to propose a model for regulation of fake news circulating on social media platforms in Uganda. Besides some scholars have asserted that there is evidence that "Facebook is one of the most widely used social media platforms in the world to share disinformation" (Omilusi 2025, Pg. 16). This study is important because it provides new knowledge about the extent to which self-regulation can deal with fake news circulating on Facebook, looking at self-regulation mechanisms Facebook uses to deal with fake news, and how the government regulates fake news and social media platforms in Uganda.

1.8 Study Scope

The study scope entails content and geography. In this study, the geographical scope covers the entire country. Uganda was selected because different countries employ different approaches for

dealing with fake news circulating on social media platforms. In terms of content scope, the study will focus on self-regulation and circulation of fake news on social media in Uganda using a case of Facebook. Specifically, the study will focus on assessing self-regulation mechanisms Facebook uses to deal with circulation of fake news; and how the government of Uganda regulates fake news on social media.

1.9 Defining key words

According to Wardle and Derakshan (2017) misinformation refers to harmful information created or shared without the intent to cause harm whereas disinformation refers to the fact that negative intention is present when false information is created or shared; on the other hand, mal-information is true information being disseminated with the aim to cause harm (Bradshaw & Howard 2019).

Election periods are often comprised of indiscriminate sharing of fake news and propaganda by organised online groups and digital influencers (Omilusi, 2025). Whereas propaganda has been defined in many ways to imply that it is information that has been distorted to influence action which is close to disinformation, scholars like (Chomsky & Herman, 1988) proposed a holistic definition that looks at propaganda as a model which filters news through five key filters, ownership, advertising, sourcing and fear which work to promote the interest of the wealthy and political elites.

This study consolidates the above definitions to imply or use the term fake news to mean either or all the above depending on the context. This is adopted based on the revelations that scholars raised from the 2016 Presidential elections in the United States that presented the aspect of fake news (Wang 2020) and other factual debates like source of fake news, spreading behaviour of fake news, individual's intent of spreading fake news and the complication of detecting fake news. According Gorwa (2019) and Tambini (2021), the US 2016 election forced governments and social media companies to rethink its definition while calling for new approaches of content governance. Presented with this conceptual debate, this study adopts fake news to mean information disorders, distortion or alteration with or without intention and seeks to find out what extent self-regulation can curb the spread of fake news in Uganda. Fake news is conceptualized within Uganda's digital environment where politically motivated falsehoods circulate during elections (Walulya & Selnes, 2023).

Social media refers to the networked digital platforms that enable users to create or share user-generated content (Wang 2022). According to National Information Technology Authority-Uganda (2013), social media is a set of online technologies, sites and practices used to share opinions, experiences and perspectives.

Regulation is used to mean the combination of statutory and self-imposed rules/mechanisms governing behaviours on social media. Mbaine (2021), notes that regulation entails state controls, laws, policy guidelines and industry driven guidelines [such as Facebook Community Guidelines and Over Sight Board decisions].

Self-regulation refers to social media's internal mechanisms for moderating content, including technological methods and algorithmic detections, highlighting Gorwa's (2019) "platform governance triangle" in which platforms like Facebook share regulatory functions with governments and users.

Statutory Regulation refers to formal legal instruments enacted by the government of Uganda to control [social] media communications (Mbaine, 2021).

Co-regulation as used in this study is where government agencies informally or formally influence social media platform's decisions through directives or memorandums of understanding, as adopted from Tambini (2021) to describe a negotiated interaction between state and platform's [Facebook] self-governance [which describes to some extent Uganda's digital-regulatory landscape].

CHAPTER TWO

THEORETICAL AND LITERATURE REVIEW

2.0 Introduction

This chapter presents the theoretical and literature review. In the theoretical review, the Four Theories of the Press are employed as a theoretical framework by reviewing studies that have applied such theories to the social media context. In the literature review, studies broadly on social media and fake news are reviewed. In addition, the chapter also reviews self-regulation mechanisms of social media platforms, especially those that Facebook employs to deal with fake news circulating on its platforms, how the governments and social media companies regulate both social media and fake news circulating on such platforms.

2.1 Theoretical Review

2.1.1 Four Theories of the Press

This study is anchored within the Four Theories of the press as a theoretical framework for understanding how self-regulation can deal with fake news circulation on social media platforms.

As the name suggests, the Four Theories of the Press introduced four theories, namely, the Authoritarian, Libertarian, Social Responsibility and Soviet Communist concepts of what the press should be and do. These four concepts were Siebert, Peterson, and Schramm's (1956) response to their basic question of why the mass media appear in widely different forms and serve different purposes in different countries. The authors argued that the press always takes on the form and coloration of the social and political structures within which it operates (Siebert et al., 1956).

Since 1956 the media environment has become far more complicated and the four theories of the press provide a convenient starting point because the typology identifies contrasting models of media systems. These theories provide a reflection of the media's role in society by suggesting the press systems are linked to different political systems and philosophies. This perspective reorients the analysis of how the media, especially social media platforms, relate to society in terms of political values, professional ethics, and intellectual history. The method of contrasting different paradigms of social media and society is not only useful theoretically but provides an important

didactic tool for training journalists (Christians et al., 2010; Nordenstreng, 2006; Siebert et al., 1956).

With the growth of the media, there was inevitably a need to articulate the roles and tasks of the mass media in society, including the relationship between media and politics (Nordenstreng, 2006). This need seems to re-emerge with the advent of social media platforms that provide myriad roles in digital commerce and information. One of the lasting contributions of the Four Theories has been the media's responsibility to society (Christians et al., 2010; Siebert et al., 1956). Firdaus (2012) argues that whilst print media is only one of several different types of media, a discussion of press and society must be done with a consciousness of the intertwining and overlapping nature of digital media today. Therefore, a discussion of the dynamic relationship between media, society and culture can be approached from multiple angles. On one hand, there are macro-level questions of political-economy and media practices. On the other hand, there are micro-level concerns of social and individual media reception. From a media-as-power perspective of political economy, corporate policies of these giant tech companies, such as Facebook, determine media content and control the social media platforms that transmit this content. From a media-as-industry perspective, Firdaus (2012) explains that technological advancements have blurred the boundaries that demarcated the domain of printed and electronic media as newspapers have printed and online versions.

Christians et al. (2010) argued that the question of the role of media in a democratic society is so central, and yet both media and democracy are challenged by great changes, ranging from communication and information technology (ICTs) to global economy. All these changes challenge scholars to examine critically the role of media in a democratic society and what this role should be. This view is elaborated by Firdaus (2012) when he argues that models of the press are always formed around the social and political heritage of the time and place, and the ensuing relationship that exists between society and the state. New theories and models address the limitations of earlier models. These limitations are often that existing systems contain some inherent flaws, or that they lose some of their relevance as society-state relationships change over time.

Jakubowicz (1998) argues that media regimes differ from country to country, depending on the nature of media policy and public definition of the media. Public definition of the media encompasses many dimensions (relations of media to society or state, social and cultural values, organizational and technological features, conditions of distribution, reception and use, social relationship of sender and receiver) and has direct implications for their legal regulation. In authoritarian societies, media regulation usually serves to subordinate the media to the interests of the ruling minority. In democratic societies, regulation is usually confined to protection against abuse of media freedom (protection against defamation, protection of privacy, national security and order, obscenity and insult to public morals, blasphemy and racism), with most other things left to market mechanisms. Likewise, regulation may be introduced to guarantee media freedom (access to information). There may also be interventionist regulation serving to promote the public interest, viewed as enhancement of media pluralism, prevention of undue concentration, facilitation of access to the media, etc.

This study employed the Four Theories concepts, especially Social Responsibility to understand the extent to which self-regulation can deal with fake news circulating on social media platforms. It extends the Four Theories concepts beyond the press to include digital platforms by viewing social media not as technology companies but as media companies. Napoli (2018) argues that one of the most troubling tendencies of the digital media is the extent to which the notion “media,” and the normative and regulatory baggage that generally comes with this term, has been divorced from the platforms by which news and information are increasingly produced, disseminated, and consumed. The author notes that a primary characteristic of social media platforms has been their resistance to being characterised as media companies, insisting instead that they are technology companies.

2.1.1.1 Authoritarian media theory

In the authoritarian media theory, power is exercised in a hierarchical or top-down approach and media is used to serve the government in power (Oluwasola, 2020). This conception presupposes that authoritarian media systems are monolithic, representing only the opinions, ideology and culture of the ruling power (Firdaus, 2012). For that reason, authoritarian media systems can be applied to pre-democratic forms of society and also to present day undemocratic or autocratic military regimes (Oluwasola, 2020).

As Firdaus (2012) observes, authoritarian media systems are characterized by subordination of social media companies and/or users to government. Government control can be moderate with emphasis on certain ideological and policy issues, or all encompassing. Social media companies and/or platform users are not free to create or disseminate content that may in any way undermine the government or local sensitivities. Government control of social media companies and/or users may come in the form of legislation or even violent force.

2.1.1.2 Libertarian media theory

The libertarian media theory is the exact opposite of the authoritarian theory. The theory proclaims complete freedom of public expression and of economic operations of the media and rejects any interference by government in any aspect of the media (Oluwasola, 2020). The rationale is that in an environment where ideas and opinions can be disseminated and received freely, the best ideas and the soundest opinions will prevail over bad ones. This model employs the concept of a “free marketplace of ideas” where ideas were seen as a commodity to be freely traded in the market (Firdaus, 2012).

In libertarian media theory, social media are completely free of government control, even to the point of allowing attacks on the establishment (Firdaus, 2012). The theory asserts the right of social media companies and/or users to publish anything they want without fear of censorship. The theory emphasizes the need to protect the independence of social media companies and/or users from state interference (Oluwasola, 2020). This view is further supported by Firdaus (2012) when he noted that freedom of expression is a highly valued principle that allows digital media to disseminate information without interference of censorship, or containment of fake news and propaganda from government. The individual is free to read fake news circulating on social media, and free not to read it, just as he or she is free to believe or not believe it.

2.1.1.3 Social responsibility media theory

Social responsibility theory lies between both authoritarian theory and libertarian theory because it gives total media freedom on one hand but with the provisions for external controls on the other hand (Oluwasola, 2020). Critics of the libertarian media theory argue that there is a need for

government to intervene in regulation of media and by extension social media companies due to commercialism, political imbalances and monopoly tendencies (McQuail, 2010; Benson, 2008).

The basic assumption of the social responsibility media theory is that social media companies and/or platform users must be free but with a responsibility to serve public good whether by way of government control or self-regulation (Oluwasola, 2020; Napoli, 2018). As Firdaus (2012) observes, social responsibility theory places greater value on social media informing, educating and aiding social progress of the people, than it does on freedom of expression. The theory maintains that the media has a moral obligation to safeguard social peace and stability, and to create an informed citizenry. This obligation would be met through self-regulation of the media through media councils and codes of ethics, as well as public opinion and consumer reactions. At the same time, while the media is privately owned, government monitoring is allowed to ensure that it truly serves the people.

2.1.1.4 Soviet communist media theory

The Soviet-Communist media theory, prevalent in the old Soviet Union is a derivative of the authoritarian media theory. The Soviet Communist model is seen as an extreme application of authoritarian ideas in that media are totally subordinated to the interests and functions of the state. In the Soviet Union, the media, directly owned and controlled by the ruling party, reflect the party's ideological position. In this theory, the press was mandated to promote the socialist system and to maintain sovereignty of the working class through the communist party. The press was under direct state control and treated as an arm of government. Apart from the government of the day, only the conformist and legal members of socialist party could use the media; and the media were used to support development and change towards attainment of goals of the communist party (Christians et al., 2010).

The Four Theories of the Press have been challenged. Critics argue that theories do not offer four theories, but one theory with four examples, that is, classical liberalism (Nerone, 1995). It is in classical liberalism that the political world is divided into individual versus society or state. Liberalism, and by extension the Four Theories assume that individuals have freedom of the media if they are free to discuss political matters in media, especially social media platforms without state suppression. By the mid-twentieth century, liberalism had reached a philosophical impasse mainly

caused by the fact that the press had become an institution, separate from the people and became feasible to talk about the public rights – the right to know, the right to free expression – rather than the press rights. As such, the press had responsibility and the public had rights (Christians et al., 2010).

2.2 Literature Review

2.2.1 Social Media and Fake News

Disinformation and propaganda are as old as politics itself (Dittrich, 2019). The spread of Gutenberg's printing press from the mid-15th century onwards was indispensable to the rise of professional journalism, but the technology also enabled amplification of propaganda and hoaxes which sometimes implicated the media institutions as the perpetrators. But the 21st century has seen the weaponization of information on an unprecedented scale. Fake news can be distributed faster, more cheaply and to a larger audience than ever before. New powerful technology makes the manipulation and fabrication of content simple, and social media dramatically amplifies falsehoods peddled by states, populists and politicians, and dishonest corporate entities, as they are shared by uncritical publics (Dittrich, 2019; UNESCO, 2018).

The internet has transformed the way people connect and organise online, bringing in new voices and empowering grassroots advocates. However, the internet based social media platforms have also made it possible for malicious actors to share harmful content like fake news, particularly disinformation, and to target public spaces online to manipulate or corrupt public debate (Meta, 2020b; Meta, 2020b). Governments, academics and giant tech companies are debating how to hold social media platforms accountable, particularly in their efforts to tackle fake news and protect fundamental rights like freedom of expression (Meta, 2020b). With the data collected by digital platforms and profiling of their users, it has become possible to deliver curated misleading political ads, conspiracy theories or foreign political propaganda to customised audiences (Dittrich, 2019; House of Commons, 2019).

So, what is fake news? As noted in the definition of key terms section 1.9, there is no consensus on the definition of fake news. Baptista and Gradim (2022) define fake news as a type of online disinformation with misleading and/or false statements that may or may not be associated with real events, intentionally designed to mislead and/or manipulate a specific or imagined public through

the appearance of the news format with an opportunistic structure (title, image, content) to attract the reader's attention in order to obtain more clicks and shares and, therefore, greater advertising revenue and/or ideological gain. Hossová (2018, p. 28) defines fake news as "information of a sensational nature that can provoke outrage, fear, hatred, or mobilize the audience to a certain activity. However, this information is untrue, fictitious or distorted." Lazer et al. (2018) define fake news to be fabricated information that mimics news media content in form but not in organizational process or intent. In turn, fake news outlets lack the news media editorial norms and processes for ensuring the accuracy and credibility of information. Therefore, fake news is parasitic on standard news outlets, simultaneously benefiting from them and undermining their credibility; making most of the information disorders to have a component that characterizes as fake news.

UNESCO attributes this difference in views of what fake news is to a lack of a commonly understood meaning of what fake news is (UNESCO, 2018). This is because news means verifiable information in the public interest, and information that does not meet these standards does not deserve the label "news" in the first place. Consequently, Wardle and Derakhshan (2017) refrain from using the term "fake news" for two reasons. They argue that firstly, the term is inadequate to describe the complex phenomenon of information disorders, and secondly, it is appropriated by politicians around the globe to describe news organizations whose coverage they find disagreeable. In this way, it has become a mechanism by which the powerful clamp down upon, restrict, undermine and circumvent the free media and press (Wardle & Derakhshan, 2017).

Using the dimensions of harm and falseness proposed by Wardle and Derakhshan (2017), this study defined fake news as information disorders (see section 1.9), that often manifest through misinformation, disinformation and mal-information. Misinformation is when false information is shared but no harm is meant. Disinformation is when false information is knowingly shared to cause harm. Mal-information is when genuine information is shared to cause harm, often by moving information designed to stay private into the public sphere. Dittrich (2019) contends that the emphasis on the intention to deceive is important. It delineates disinformation from mere misinformation. Misinformation can be incorrect or misleading information, which is distributed or shared inadvertently. Disinformation, whether politically or economically motivated, has always played a role in political and media discourse. According to the House of Commons (2019),

fake news in all forms has been hugely magnified by internet technology and the ubiquity of social media. Fake news reduces the common ground on which public debate can take place based on objective facts and has a polarising effect on election campaigns, threatening the very fabric of democracy. To change this situation, there is a need for governments and social media companies to enforce regulatory measures to deal with fake news circulating on their platforms.

2.2.2 Self-regulation mechanisms Facebook uses to deal with fake news

Facebook, like other social media platforms, uses self-regulation to manage users' behaviour on the platform. To understand the self-regulation mechanism Facebook employs to deal with fake news circulating on its platforms, the study operationalized self-regulation mechanisms broadly as the methods or instruments and tools that the platform uses to self-censor. Dittrich (2019) argues that various forms of self-regulation mechanisms are being used today by EU member states in a dozen industries. Under the self-regulatory mechanism, an individual media company (Meta, inclusive of Facebook, Instagram and WhatsApp) or companies (Facebook, X and TikTok) within the digital platforms industry develop their own standards and guidelines together with relevant stakeholders, such as business associations, social partners or NGOs. According to Meta (2024e), Facebook developed community standards for what is and is not allowed on its platform. These standards are based on feedback from users and the advice of experts in fields like technology, public safety and human rights, hence the label "community standards".

Community standards are one of several self-regulation mechanisms. According to Dittrich (2019) self-regulation mechanisms in the EU can take on various forms ranging from voluntary measures by the industry to more supervised forms of industry-led rulemaking with the involvement of other stakeholders. In the EU Code of Practice on Disinformation and Political Advertising, social media platforms have committed themselves to adopting stronger measures to fight disinformation. Signatories of the Code of Practice, among them social media companies operating in the EU, have committed themselves to better detection and identification of bots and agreed not to prohibit research into disinformation and political advertising on their platforms. Social media companies have signed up to publish annual public reports on their efforts against disinformation. However, these measures have not created enough transparency about how the companies are dealing with disinformation and have not led to publicly verifiable results about their success (House of Commons, 2019).

2.2.3 How government regulates social media platforms

The study operationalized how government and social media companies regulate their platforms in terms of three regimes, namely: self-regulation, co-regulation and statutory regulation. To achieve this end, the study reviewed studies on these three regulatory regimes to understand how social media and government regulate social media platforms in Uganda. Dittrich (2019) posed a pertinent question when he asked what approach is best suited for the EU to deal with the spread of fake news on social media platforms. He provides arguments in favour of the co-regulatory approach to achieve these ends instead of the current self-regulatory or direct statutory regulation approach. This suggests that governments and social media companies employ these three approaches and/or regimes to regulate fake news circulating on their platforms.

A limited number of studies have broadly analysed regulation of social media platforms (Iosifidis & Andrews, 2020). For instance, Iosifidis and Andrews (2020) examine the pressure for a new regulatory framework for the information intermediaries such as Facebook, both within and outside the media industry in Europe. The range of issues brought about by the operations of the information intermediaries now engage a wider focus than media policy per se, including data and privacy policy, national security, hate speech and other issues. For example, Facebook has joined the call for new regulatory frameworks for online content that ensure tech companies are making decisions about hate speech and fake news in a way that minimizes harm but also respects the fundamental right to free expression (Iosifidis & Andrews, 2020; Meta, 2020b).

The development of regulatory frameworks faces four main challenges (Meta, 2020b). First, the cross-border nature of social media and/or fake news is a defining feature of many platforms, so tech companies generally maintain one set of global policies rather than country-specific policies that would interfere with that experience. Second, among different interactions or social media communication types (one-to-one, one-to-many), norms for acceptable online content may vary and are enforced both formally and informally. Third, tech companies' enforcement of content standards will be imperfect given the dynamic nature and scale of online content. The ability to review content for policy or legal violations will always be limited due to lack of context. Finally, publisher liability laws that punish publication of harmful content are unsustainable for social media platforms which are intermediaries not publishers. Tech companies seeking assurance that

their users' content is lawful would need to review and approve each post before allowing it to appear on their site.

2.2.3.1 Self-regulation of social media platforms

Cusumano et al. (2021a) refer to self-regulation as the steps social media companies or industry organizations take to pre-empt or supplement government rules and guidelines that govern their activities. These include internal mechanisms for moderating content, technological methods and algorithmic detections as described in the definitions Section 1.9 Gorwa's (2019). Cusumano et al. (2021a) argue that at the individual social media company level, self-regulation ranges from a company monitoring its own possible regulatory violations to proactive corporate social responsibility (CSR) initiatives that aim to improve its public image. At industry organization level, self-regulation involves forming collective institutions like industry associations that perform regulatory functions, such as granting licenses and permits, often in collaboration with government agencies (ibid).

Studies on self-regulation of social media platforms have focused analysis on various themes (Cusumano et al., 2021a; Cusumano et al., 2021b; Iosifidis & Andrews, 2020; Stasi, 2019; Enli et al., 2019; Napoli, 2018). To explore the feasibility of self-regulation, Cusumano et al. (2021b) examined the history of self-regulation before and after the widespread adoption of the internet. History provides several lessons for today's social media platforms. One, social media companies need to anticipate when government regulation is likely to become a key factor in their businesses. In other industries (i.e. television and radio broadcasting or movies), there often occurred a regulation vacuum in the early years. Then government stepped in to regulate or pressure firms to curb abuses. Two, companies in new industries tend to avoid self-regulation when the perceived costs imply significant reduction in revenue or profits. Three, proactive self-regulation was often more successful when coalitions of firms in the same sector worked together. Four, companies or industry coalitions get serious about self-regulation primarily when they see a credible threat of government regulation, even if it may hurt short-term sales and profits. This implies that social media companies risk creating a "tragedy of the commons" when they put their short-term, individual self-interest ahead of the public good or the industry overall and in the long run destroy the environment that made them successful in the first place.

Despite the “tragedy of the commons” being the main weakness of self-regulation, there are benefits of employing as a regime to regulate social media platforms. For instance, Cannon and Chung (2014) observed that proponents of self-regulation argue that social media companies and industry will implement protective standards and the pitfalls of government regulation are avoided. Industry members are uniquely positioned to identify the most effective and efficient means of protecting the safety of their users. Regulatory updating is more efficient under the self-regulatory regime because industry members are better able to predict further technologies and business developments and to design standards that can accommodate change. Industry tends to comply more readily with rules designed and imposed by their peers to deal with fake news circulating on social media platforms.

2.2.3.2 Co-regulation of social media platforms

Finck (2018) refers to co-regulation as a regulatory approach that creates collaboration between public authorities and private bodies to regulate private activity while accounting for its particularities and safeguarding public policy objectives. This reinforces co-regulation definition as used in this study (Tambini 2021), to describe a negotiated interaction between state and platform’s self-governance.

A dearth of studies has analysed co-regulation as a regime for regulating social media platforms (Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014). For instance, Cannon and Chung (2014) noted that countering the vulnerabilities of government and industry requires co-regulation, but co-regulation itself is not a solution. Designing a co-regulatory model that works effectively – addressing the blind spots in the market, properly identifying where to intervene or refrain, and increasing feasibility by relieving regulatory burden and building in flexibly, where possible – requires careful consideration of the attributes of the social media platforms being targeted for regulation. By looking towards co-regulation, Finck (2018) continues the search for an appropriate regulatory paradigm. He acknowledges the complex interaction between the State, the market, and increasingly also technology.

2.2.3.3 Statutory regulation of social media platforms

Cusumano et al. (2021a) refer to statutory regulation as an approach that can take the form of legislation and penalties for violations or an indirect form of taxes, subsidies, permits, licenses, and similar measures. This is made possible through formal legal instruments enacted by governments (Mbaine, 2021).

A growing number of studies have analysed statutory regulation as a regime for regulating social media platforms (Garbe, Selvik & Lemaire, 2023; Walulya & Selnes, 2023; Wadero, 2022; Namasinga, 2021; Xinhua, 2021). For instance, Garbe et al. (2023) estimated the salience of discussion of legal and technological approaches to content regulation using a corpus of news articles worldwide (N = 7787) mentioning hate speech and fake news in 47 African countries. Their findings suggest that, discussions of technological strategies are more salient in regimes with little respect for media freedom and fewer legislative constraints. These findings suggest that state or government is the dominant actor in shaping content regulation across African countries and point to the need for a better understanding of how regime-specific characteristics shape regulatory decisions.

Some studies on statutory regulation have focused analysis on censorship of social media platforms (Walulya & Selnes, 2023; Wadero, 2022; Namasinga, 2021; Xinhua, 2021). Censorship is defined by Walulya and Selnes (2023, p. 6) as “suppressive measures employed by governments to limit freedom of expression and of the media,” including the internet-based media such as social media platforms.

Ugandan government has used punitive laws, direct and indirect threats, sanctions and physical authority to censor social media platforms. Namasinga (2021) analysed cyber laws and methods employed to suppress internet freedom. Findings indicate a plethora of cyber laws which government uses to intimidate, arrest, prosecute and instil fear among journalists and their sources, something that inhibits independent journalism. This implies that government of Uganda employs statutory regulation as a regime to regulate social media platforms. Drawing on extant research on Internet suppression, the author found traces of digital authoritarianism in Uganda as government deploys a collection of restrictions that target media organizations, journalists and its critics.

Uganda's statutory regulation of social media is largely ad hoc in nature but relies on three major legal instruments which include the *Computer Misuse Act (2011)*, the *Excise Duty (Amendment) Act (2018)* and the *UCC Online Data Communicators Regulations (2019)*. The three among others, define the legal environment in which social media users and intermediaries operate.

The *Computer Misuse Act (2011)* is the foundational instrument on digital offences. Whereas it was put in place to prevent the unauthorised use of computers and information systems in a broader sense, it extended its boundaries to online communications. Sections 24 and 25 of the law criminalise offensive communication and cyber harassment, which have been used to prosecute individuals for content posted on Facebook and Twitter (CIPESA, 2021). Walulya and Selnes (2023) argue that the Act grants a broad enforcement spectrum that encourages arbitrary interpretation of what constitutes offensive content.

The *Excise Duty (Amendment) Act (2018)*, infamously known as the social media tax imposed a charge on users accessing social media platforms such as Facebook, Twitter and WhatsApp (CIPESA 2019). Although the social media tax was later repealed in 2021, it metamorphosed into a big levy on all internet data (Mwesigwa & Nakangu, 2023).

The UCC Online Data Communicators Regulations (2019) introduced mandatory registration and licensing for individuals that publish online information via blogs, online journalists and social media influencers. Enforcing these regulations has created uncertainty among online content creators who risk prosecution for noncompliance (CIPESA, 2021). McQuail (2010) describes such laws as regulatory over reach.

Recently, the government of Uganda blocked Facebook after the tech company deleted hundreds of accounts of the National Resistance Movement (NRM) supporters it suspected to be fake during the 2021 general election. President Museveni accused Facebook of being biased and discriminatory in their standards since the opposition had been spreading fake news on social media and inciting people (Xinhua, 2021). The Acting Director for Industry and Content Development at Uganda Communications Commission, when appearing before the Parliament's Committee on Human Rights, explained that talks between Facebook and Uganda haven't yielded any tangible results because the tech company refused to restore deleted accounts (Wadero, 2022).

This implies that Ugandan government employed statutory regulation as opposed to co-regulation and self-regulation as a regime for regulating social media platforms.

2.2.4 How governments regulate fake news circulating on social media platforms

The study operationalized how government, social media companies and/or users regulate fake news on their platforms according to the informal regulation, self-regulation, co-regulation and statutory regulation respectively. This view is supported by Vianna and Carvalho-Mendonça (2021) when they noted that regulation of fake news can be categorised as (a) information regulation, (b) self-regulation, (c) co-regulation, and (d) statutory regulation. To this end, the study reviewed studies on the four regulatory regimes for dealing with fake news circulating on social media platforms.

2.2.4.1 Informal regulation of fake news circulating on social media platforms

Informal regulation refers to the regulatory approach of involving platform users for dealing with fake news circulating social media. Goldberg (2017) avers that the problem of fake news is with the users of social media platforms as opposed to the originators of fake news or the social media platforms themselves. He argues that the ability to distinguish between good and bad information is a solution to the problem of fake news that must be adopted by the individual users.

A growing number of studies have analysed informal regulation as a regime for dealing with fake news circulating on social media platforms (Bélair-Gagnon et al., 2023; Themistokleous, 2021; Vianna & Carvalho-Mendonça, 2021; Buckingham, 2020; Dittrich, 2019; Goldberg, 2017). For instance, Goldberg (2017) poses a pertinent question when he asks whether enhancing digital media literacy would offer a distinctive and more promising approach to dealing with fake news opposed to, or in conjunction with, regulation and law.

Some studies on informal regulation have analysed digital and media literacy (Themistokleous, 2021; Buckingham, 2020; Goldberg, 2017). For instance, Vianna and Carvalho-Mendonça (2021) focused analysis on fake news, its effects in the context of political disputes and regulatory frameworks as an alleged solution. They demonstrate that digital literacy appears as the most adequate solution to mitigate this problem, without affecting freedom of expression in the public discursive sphere. Findings indicate that digital literacy is an adequate tool not only to mitigate the

effects of fake news but also for the realization of citizens' digital citizenship. This approach has the advantage of keeping people's freedom of expression and opinion strong, not limit freedom of expression. In addition, however, it has also shown particular effectiveness as a long-term solution to the problem, since, instead of preventing disinformation from reaching the individual (an objective whose full implementation is materially impossible), it enables the subject to critically evaluate the received content.

Themistokleous (2021) found that digital literacy can be the solution to growing contemporary challenges such as disinformation, fake news, online hate speech, cyber bullying, and online safety. Policy-making by Independent Regulatory Authorities (IRAs) of communication services in the perspective of digital literacy reflects a change in the role of regulators and exemplifies the evolution of the relevant regulatory framework towards a widening role for the regulators in the sector. IRAs are key institutions in educating audiences to critically engage with media and exercise effective choice and judgment. To this extent the informal regulatory regime is not a tool of repression through monitoring the available content but rather is instrumental in empowering citizens to effectively and efficiently face the challenges online and make intelligent choices. These shifting requirements of regulators and media governance as a whole are further propelled by the convergent media, global culture and demonstrate the dire necessity for media users to constructively engage with media, positioned within policy support. This new reality needs to be viewed as a fundamental element of the regulatory toolkit in the broader media ecosystem. Buckingham (2020) suggests the need to move beyond a binary view of digital media as offering risks and opportunities for young people, and the narrow ideas of digital skills and internet safety to which it gives rise. The author proposes that we should take a broader and more critical approach to the rise of 'digital capitalism', and to the ubiquity of digital media in everyday life. In this sense, the paper argues that the well-established conceptual framework and pedagogical strategies of media education can and should be extended to meet the new challenges posed by digital and social media.

Other studies on informal regulation have analysed fact checkers (Bélair-Gagnon et al., 2023; Brandtzaeg et al., 2018; Lazer et al., 2018; Wardle & Derakhshan, 2017). For instance, Brandtzaeg et al. (2018) investigate the use and impact of services for fact-checking and verification. The findings suggest that while journalists were largely unfamiliar with, or ambivalent about such

services, they judged them as potentially useful in the investigative journalistic process. A comparison of journalists' perceptions with those of social media users reveals that social media users are similarly ambivalent. Some users accentuate the usefulness of such services, while others express strong distrust. This finding suggests that both journalists and social media users have not embraced fact-checking as an informal regime for regulating fake news on social media platforms. There is much discussion on source-checking versus fact-checking when assessing the credibility of information. In evaluating the prevalence of fake news, Lazer et al. (2018) advocate focusing on the original sources rather than individual stories, because the defining element of fake news is the intent and processes of the publisher. A focus on sources of fake news also allows the researcher to avoid trying to evaluate the accuracy of every single news story. This view is supported by Wardle and Derakhshan (2017) when they argue that the source can provide the strongest evidence about whether something is accurate. People relying on social media for information need to investigate the source before they look at the content itself.

Bélaire-Gagnon et al (2023) explored how platforms, news publishers, and fact checkers describe the trade-offs they make in partnerships to counter misinformation. Findings indicate that resources and news values constitute key aspects of these partnerships. The partnerships contribute to knowledge of what it means to fight misinformation (focusing on debunking, resource-allocation inequalities), and what type of misinformation matters for the public. The study highlights two problems in the field of misinformation – coordination, (technical integration of different efforts by multiple actors, and cooperation (different organization goals). According to Facebook, dealing with fake news, especially misinformation, is an ever-evolving problem, and Facebook cannot do it alone. Facebook works with International Fact-Checking Network (IFCN)-certified fact checkers who identify, review and rate viral misinformation across Facebook, Instagram and WhatsApp. Since 2016, Facebook's fact-checking program has expanded to include more than 80 organizations fact-checking in more than 60 languages globally. The focus of Facebook's fact-checking program is to address viral misinformation – probably false claims, especially those that have the potential to mislead or harm. Fact-checking partners are able to review content, including organic and boosted posts across Facebook, Instagram and WhatsApp.

2.2.4.2 Self-regulation of fake news circulating on social media platforms

As earlier suggested, self-regulation as regime for dealing with fake news circulating on social media platforms refers to the steps individual social media companies or industry association of social media companies take to pre-empt or supplement government rules and guideline that govern platform activities (Cusumano et al., 2021a; Cusumano et al., 2021b).

A growing number of studies have analysed self-regulation as a regime for dealing with fake news circulating on social media platforms (Cusumano et al., 2021a; Cusumano et al., 2021b; Meta, 2020a; Meta 2020b; Iosifidis & Andrews, 2020; Dittrich, 2019; Cannon & Chung, 2014). For instance, Cusumano et al. (2021a) found that that self-regulation need not only happen exclusively at the individual company level. When it is their collective interest, coalitions of companies with the same market and with similar business models may agree to abide by a jointly accepted set of rules or codes of conduct.

Studies on self-regulation of social media platforms have analysed various themes (Meta, 2020a; Meta, 2020a; Stasi, 2019). Stasi (2019) looked at the content that users are exposed to from two perspectives. He argues that content exposure can be looked at from an active perspective (what users can or cannot post and share on their accounts and those of others) and from a passive one (what users do or do not see and access when using social media). The active perspective is regulated by tech companies' community rules or policies. In electoral times, active content exposure can also be regulated by rules on campaigns, which traditionally establish more stringent requirements in terms of transparency. Both the active and passive perspectives are intertwined, as limits on the first will necessarily impact on the second.

Facebook has (a) developed specific policies against coordinated inauthentic behaviour (CIB) and other deceptive behaviour, (b) built automated detection tools to find and remove fake accounts and other violations, (c) strengthened collaboration with tech companies, civil society, and government to help tackle this problem from multiple angles. Since 2017, the platform has gone from taking down one network engaged in influence operations to removing over 100 networks globally ahead of major democratic elections around the world (Meta, 2020a). For instance, Facebook took down two unconnected networks in China and Russia for violating its policy against CIB. The Chinese influence operations ran across multiple social media platforms, and was

the first one to target US domestic politics ahead of the 2022 mid-terms and Czechia's foreign policy toward China and Ukraine. The Russian network, the largest of its kind the platform has disrupted since the Ukraine war began, targeted primarily Germany, France, Italy, Ukraine and the UK, with narratives focused on the war and its impact through a sprawling network of over 60 websites impersonating legitimate news organizations (Facebook, 2022). Facebook also made significant changes on how its platform works to make it harder for these networks to operate undetected, while increasing transparency for the public around political ads, pages and state-controlled media (Meta, 2020a).

Over the past five and half years, Facebook has shared its findings about CIB it detects and removes from its platform. As part of its regular CIB reports, the tech company shares information about all networks it takes down over the course of a month to make it easier for people to see progress it is making in one place (Meta, 2021). In January 2021, Facebook removed a network of accounts and pages in Uganda that engaged in CIB to target public debate ahead of the election. They used fake and duplicate accounts to manage pages, comment on other people's content, impersonate users, and re-share posts in groups to make them appear more popular than they were. The information and/or influence operation was linked to the Government Citizen Interaction Centre at Uganda's Ministry of Information and Communication Technology (Aljazeera, 2021; Kafeero, 2021). Facebook (2017, p. 4) defines information operations as

Actions taken by organized actors (governments or non-state actors) to distort domestic or foreign political sentiment, most frequently to achieve a strategic and/or geopolitical outcome. These operations can use a combination of methods, such as false news, disinformation, or networks of fake accounts aimed at manipulating public opinion.

Such a network of fake accounts or false amplifiers is defined by Facebook (2017, p. 5) as "coordinated activity by inauthentic accounts with the intent of manipulating political discussion by discouraging specific parties from participating in discussion, or amplifying sensationalistic voices over others".

2.2.4.3 Co-regulation of fake news circulating on social media platforms

Cannon and Chung (2014) refer to co-regulation as a regulatory approach in which government and industry association of social media companies work together to define and enforce standards for dealing with fake news circulating on their platforms. Dittrich (2019) observed that the European Commission negotiated the European Code of Practice on fake news with stakeholders, including an industry association of social media companies and is considering further reaching regulation.

A dearth of studies has analysed co-regulation as a regime for dealing with fake news circulating on social media platforms (Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014). In a co-regulatory regime, Dittrich (2019) argued that the EU would set out principles and objectives in a legislative act with regards to tackling fake news circulating on social media platforms. An industry association of social media companies would then in a Code of Conduct commit to introducing measures against fake news based on these principles. The Code of Conduct would be developed by the social media companies together with industry stakeholder under the guidance and monitoring by the European Commission. The Code of Conduct should be developed towards the following objectives: (1) to increase transparency of distribution of content; (2) to improve content management; and (3) to improve independent public knowledge about the social dynamics on social media platforms. Transparency of distribution of content entails both transparency about the algorithm curation of content as well as transparency about the manipulation and abuse of social media platforms by fake accounts and CIB. Improving content management entails principles and guidelines for human as well as automatic content moderation and for professional fact-checking organizations. Improving public knowledge about social dynamics on social media entails independent access to academic research to granular data (ibid).

The European Commission's assumption that self-regulation or co-regulation can replace top-down legislative intervention in the digital platform forms the backdrop of Finck's (2018) study that examined these three options to determine their respective suitability. The study concludes that legislation, as well as self-regulation, raises significant problems when applied to social media platforms. Co-regulation emerges as the most adequate option if certain conditions are complied with. This view is supported by Dittrich (2019) when he argues in favour of the co-regulation approach instead of the current self-regulatory approach or direct regulation to deal with fake news

circulating on social media platform. In a co-regulation environment, the EU would set out principles and objectives in a legislative act with regards to tackling fake news. And social media platforms, in a Code of Conduct developed together with stakeholders, would commit to introducing measures against fake news based on these principles.

2.2.4.4 Statutory regulation of fake news circulating on social media platforms

Statutory regulation refers to a regulatory approach that can take the form of legislation and penalties for violations or an indirect form of taxes, subsidies, permits, licenses, and similar measures (Cusumano et al., 2021a; Cusumano et al., 2021b).

There is a plethora of studies on statutory regulation that have focused analysis on various themes (Bertuzzi et al., 2023; Cusumano et al., 2021a; Cusumano et al., 2021b; Mbaine, 2020; Enli, et al., 2019; House of Commons, 2017; Goldberg, 2017). For instance, Bertuzzi et al. (2023) assess recent efforts within the European Union to regulate harmful content online. The European Media Freedom Act, 2024, and the Digital Services Act, 2024, provide for the creation of various coordinators, boards, and monitoring bodies that can ensure compliance with their guidelines and regulations, but civil society and media platforms themselves have important roles to play too. The success of the Code of Practice will depend on actions taken by the media platform that pledged to support it. According to the House of Commons (2017), some EU countries have legislated against harmful content on social media platforms. Germany and France asked tech companies to remove hate speech within 24 hours. When this self-regulation did not work, Germany passed the Network Enforcement Act, commonly known as NetzDG, which became law in 2018. This legislation forces tech companies to remove hate speech from their sites within 24 hours, and fines them twenty million pounds if it is not removed. As a result of this law, one in six of Facebook's moderators now work in Germany, which is practical evidence that legislation can work.

Goldberg (2017) notes that it is worth recalling two now largely forgotten statutes and cases from 1999. The first is from Zimbabwe and the second is from Uganda. The Zimbabwean case involved the false news provision in Section 50(2) (a) of the Zimbabwean Law and Order (Maintenance) Act. The Ugandan case involved the Penal Code Article 50, which states:

(1) Any person who publishes any false statement, rumour or report which is likely to cause fear and alarm to the public or to disturb the public peace is guilty of a misdemeanor (2) It shall be a defense to a charge under subsection (1) if the accused proves that, prior to publication, he took such measures to verify accuracy of such statement, rumour or report as to lead him reasonably to believe that it was true.

In contrast, Mbaine (2020) found that statutory regulation in Uganda has failed in spite of having the backing of the law, because it was opposed by the journalists and ignored by the very government that set it up. He recommends that Uganda adopts the co-regulatory system between the public and the media, which gives power to the public and the media to enforce media accountability to Ugandan society, while at the same time being mindful of the need to protect freedom of expression and freedom of the media.

The UK Parliament through its Select Committee on Digital, Culture, Media and Sport (DCMS) observed that Facebook's handling of personal data, and its use for political campaigns are prime areas for inspection by regulators. The platform operates by monitoring both users and non-users' data through its advertising tools. It further increases its value by entering into reciprocal data-sharing arrangements with major app developers, who run their businesses through the Facebook platform. Also, Facebook should not be able to evade all editorial responsibility for the content shared by its users across its platform (House of Commons, 2017).

Increasingly, giant tech companies such as Facebook are making these determinations as more fake news and hate speech flows through their platforms. While Facebook generally respects regulations and laws of the countries in which it operates, the platform is also free to establish its own rules about permissible content (Facebook, 2020a). As such, there is potential conflict regarding the level of state involvement and co-regulation versus a more industry-driven self-regulation. In relation to the US model for media regulation, with its preference for self-regulation, the European model is more concerned with public interest and has more extensive experience with co-regulation (Enli et al., 2019).

2.2.5 Summary

The review identified the following research gaps in previous literature about the extent to which self-regulation can deal with fake news circulating on social media platforms. A plethora of studies have attempted to analyse the link between fake news and social media platforms (Baptista & Gradim, 2022; Meta, 2020b; Meta, 2020b; Dittrich, 2019; House of Commons, 2019; Hossová, 2018; Lazer et al., 2018; UNESCO, 2018; Wardle & Derakhshan, 2017).

Despite the growing number of studies focusing analysis on social media regulation (Cusumano et al., 2021a; Cusumano et al., 2021b; Iosifidis & Andrews, 2020; Dittrich, 2019; Stasi, 2019; Enli et al., 2019; Finck, 2018; Cannon & Chung, 2014), there remains limited understanding of how the government of Uganda regulates social media platforms. Such studies have focused analysis on the three approaches to regulation of social media platforms. These approaches correspond to self-regulation (Cusumano et al., 2021a; Cusumano et al., 2021b; Iosifidis & Andrews, 2020; Stasi, 2019), co-regulation (Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014), and statutory regulation (Garbe, Selvik & Lemaire, 2023; Walulya & Selnes, 2023; Wadero, 2022; Namasinga, 2021; Xinhua, 2021). This study contributes to knowledge on social media regulation by assessing how the government regulates social media platforms in the context of Uganda. While most of these studies have been done in the developed countries, few have focused on developing African countries like Uganda (Walulya & Selnes, 2023; Wadero, 2022; Namasinga, 2021; Xinhua, 2021; Mbaine, 2020).

Notwithstanding the increasing number of studies focusing analysis on regulation of fake news circulating on social media platforms (Bélair-Gagnon et al., 2023; Vianna & Carvalho-Mendonça, 2021; Brandtzaeg et al., 2018; Wardle & Derakhshan, 2017), there remains limited understanding of how government regulates fake news circulating on social media platforms in Uganda. Such studies have focused analysis on four regimes for regulating fake news circulating on social media platforms. These regimes include: informal regulation (Bélair-Gagnon et al., 2023; Themistokleous, 2021; Vianna & Carvalho-Mendonça, 2021; Buckingham, 2020; Dittrich, 2019; Goldberg, 2017), self-regulation (Cusumano et al., 2021a; Cusumano et al., 2021b; Meta, 2020a; Meta 2020b; Iosifidis & Andrews, 2020; Dittrich, 2019; Cannon & Chung, 2014), co-regulation (Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014), and statutory regulation (Bertuzzi et al., 2023; Mbaine, 2020; Enli, et al., 2019; House of Commons, 2017; Goldberg, 2017). This study

contributes to knowledge on fake news regulation by assessing how government regulates fake news circulating on social media platforms in Uganda.

CHAPTER THREE

METHODOLOGY

3.0 Introduction

This chapter outlines the research design and approach, study population and sampling technique, as well as data collection methods, data analysis and data quality control. It also presents the ethical and gender considerations and limitations of the study.

3.1 Research Design

Creswell (2013) defines a research design as “the plan for conducting the study”. The study employed the case study research design. According to Yin (2017), a case study research design investigates a contemporary phenomenon in-depth and within its real-world context, especially when the boundary between the phenomenon and context may not be evident. The choice of the research design was relevant for an in-depth analysis of fake news, a contemporary phenomenon, within its real-world context of social media platforms. The design is also appropriate to answer questions that begin with “how” or “why” when the researcher needs to understand or explain a phenomenon (Yin, 2017; Wimmer & Dominick, 2011). Since the researcher sought to answer how the government regulates fake news circulating on social media platforms, the design was appropriated to achieve this end.

A case study research design has both advantages and disadvantages (Creswell, 2013; Bryman, 2012; Wimmer & Dominick, 2011). The design was valuable because it enabled the researcher to obtain a wealth of information about the extent to which self-regulation could deal with fake news circulating on Facebook in Uganda. The design also afforded the researcher the ability to deal with a wide spectrum of evidence, including both secondary and primary data sources, such as published literature and in-depth interviews (Kumar, 2011). The disadvantage of the case study research design was that it produced large quantities of data from in-depth interviews and document analysis. The production of the large quantities of data was overcome by planning and factoring the time needed to process and analyse the data (Creswell, 2013; Bryman, 2012; - Wimmer & Dominick, 2011).

3.2 Research approach

To study the problem of regulation of fake news circulating on Facebook, the study used the qualitative approach to inquiry. Creswell (2013, p. 44) defines qualitative research as beginning with “assumptions and the use of interpretive theoretical frameworks that inform the study of the research problem addressing the meaning individuals or groups ascribe to a social or human problem”. In other words, the study places emphasis on the process of research as flowing from philosophical assumptions, to interpretive lens, and on the procedures involved in studying social problems.

Moreover, research books have highlighted the strengths and weaknesses of the qualitative research approach (Creswell, 2013; Bryman, 2012; Wimmer & Dominick, 2011). Such research books suggest that the qualitative approach increases the researcher’s depth of understanding of the phenomenon under study. While carrying out the interviews, the approach provided with an opportunity to further probe participants for details on the complexities of regulating social media platforms. It was vital because the phenomenon under research has not been previously investigated in the context of Uganda. Likewise, the qualitative methods are flexible and allow the researcher to pursue new areas of interest. This was beneficial because the study previously had two specific objectives but because of the thin line between regulation of fake news and regulation of social media platforms, flexibility was employed and a third objective emerged. This helped to deal with regulation of fake news and regulation of social media platforms independently. However, some weaknesses are associated with the qualitative approach. The research project may produce nothing of value if it is not properly planned (Creswell, 2013). This was not a simple limitation as the research presented large volumes of content about how Facebook self regulates. This was mitigated by employing a structured approach to data analysis as noted by Whimmer & Dominick (2011) that qualitative data analysis calls for careful interpretation. The study opted for qualitative research because there was a need for a complex, detailed understanding of the issue.

3.3 Study Population

A study population is defined by Clark et al. (2021, p. 167) as “the overall units from which the sample is to be selected.” The term “units” is used because it is not only people who were being sampled. The study population consisted of various units, including social media platforms, documents to be analysed and participants to be interviewed. Therefore, the study population comprised all the popular social media platforms in Uganda, considering they all have internal content moderation mechanisms. It also consisted of documents published by the selected social media platform (Facebook) relating to self-regulation of fake news circulating on its platform. The study population also comprised government and civil society actors involved in the regulation of fake news circulating on social media platforms in Uganda.

3.4 Sampling and Sample Size

A sample is defined by Clark et al. (2021, p. 166) as “a small and representative part of a bigger whole or population.” In other words, a sample is a subset of the population. It is “the segment of the population that is selected for investigation” (Bryman, 2012, p. 187).

The study employed purposive sampling to select units from the population. According to Bryman (2012, p. 416) “purposive sampling places the investigator’s research question at the heart of the sampling considerations.” In this case, the goal of purposive sampling was to sample the social media platform and interview participants in a strategic way, so that those included in the sample are relevant to the research questions posed. The study employed purposive sampling to select Facebook as a case of the social media platforms in which fake news circulates. This was informed by the fact that Facebook is among the social media platform that has been on a ban in Uganda since 2020, therefore makes a good sample on issues of social media platform regulation. The study also selected documents published by Facebook about self-regulation mechanisms to deal with fake news circulating on its platforms. These documents included Facebook community Facebook white papers, community standards and policy documents. These documents were crucial to understand the self-regulatory mechanism employed by Facebook to deal with fake news on its platforms.

The study also selected actors, both government and civil society, involved in the regulation of fake news circulating on social media platforms. These actors included: the Director of ICT in the

Office of the President (1); the Special Presidential Assistant in-charge of Communication and/or Director Government Citizen Interaction Centre (1); the Director in-charge of Media in the Office of the President (1); the Senior Public Relations Officer at Uganda Communications Commission (1); Commissioner of Communication and Information Dissemination at

Ministry of ICT and National Guidance (1); a lecturer at the Department of Journalism and Communication, Makerere University (1); Proprietor Parrots Media (1); and a Fact-Checker at Debunk Media Initiative (1). These actors were selected because they were knowledgeable about the phenomenon under study. All together 8 people were interviewed.

3.5 Data Collection Methods and Instruments

This study employed in-depth interviews and document analysis as data collection methods and an interview guide; and a document analysis guide as data collection instruments. The interview guide (see Appendix A) was further refined to develop a matrix that categorised participants, the research question that was being addressed by each participant and the key focus of the interview, which ensured that structured comprehensive data was collected (see Appendix B.) On the other hand, a document analysis guide in form of a matrix was developed structured by document type, source, key content, category and findings (see appendix C). This instrument helped the researcher to systematically organise and later analyse the documents. The researcher chose to separate the collection tools because document analysis was suitable for addressing majorly the first research question while in-depth interviews were well suited to address the second and third research questions as seen below:

1. What self-regulation mechanism does Facebook use to deal with circulation of fake news?
2. How does government of Uganda regulate social media platforms?
3. How does government of Uganda regulate fake news on Facebook?

3.5.1 Document Analysis

Document analysis is defined as “a systematic procedure for reviewing or evaluating documents both printed and electronic” (Bowen, 2009, p. 27). This definition shows that the scope of documents that can be analysed is broad. This study considered the Meta website and blogs as sources of documents related to policies and community standards (see Appendices C, D, and E).

Clark et al. (2021) observed that the term “document” covers many different kinds of data. There is a diverse set of documents as data sources, including diaries, autobiographies, newspapers, magazines, websites, blogs and photos. This study considered documents published on the Facebook website and official blogs (see Appendix D).

The documents considered for analysis were only those relevant to answer the research questions and included the following: Facebook white papers, community standards and policy documents. The white papers included (1) Recommended Principles for Regulation or Legislation to Combat Influence Operations, and (2) Charting a Way Forward: Online Content Regulation. The community standards and policy documents included: account integrity and authentic identity, inauthentic behaviour, privacy violation, deception and fraud, hate speech, violence and incitement, and misinformation. Documents related to enforcement of Facebook community standards and policies were also analysed.

Document analysis presented a rigorous opportunity of interdependence where most of the documents led to others or required sequential understanding by reading other documents. This prompted the researcher to further expand the document analysis instrument (see appendix C) into a document linkage map chart (see appendix D) that traced the interdependence and linkages between the documents. For example for the researcher to understand how technology detects violations, how review teams work, reducing distribution of problematic content, and penalties for sharing fact-checked content, policy documents were included: (1) Recommended principles for regulation or legislation to combat influence operation; (2) Charting a way forward on online content regulation; (3) deception and fraud; (4) hate speech; (5) misinformation; (6) inauthentic behaviour. Other documents analysed were CIB reports, including Facebook self-regulation mechanisms to deal with fake news circulating on its platform. The common factor was that these types of documents already existed on Facebook’s websites and blogs, so they were not merely generated by the researcher. These documents enabled the researcher to understand the self-regulatory mechanisms Facebook employed for dealing with fake news circulating on its platform. This was achieved by charting out the documents and creating a document-linkage map that traced the chain of evidence and how each document contributed to the self-regulatory mechanisms that Facebook employed (see appendix D).

Since these documents constituted a very heterogeneous set of data source, the tool focused on official documents published by Meta about how it self-regulates its platforms. The criteria for evaluating the quality of document included: authenticity that looked originality and source, credibility looking at author credentials, representativeness which looked at scope and sample diversity, and meaning which aimed at relevance to the research questions (Bryman, 2012) (see appendix E).

There were advantages and disadvantages of using document analysis as a data collection method. Documents were not necessarily easier to process or analyse for the purpose of data collection. The search of documents relevant to the study was a lengthy process, and once they had been collected it took considerable interpretive skills to analyse their meaning. Documents made sense in relation to other documents and these chains of meaning needed attention in their own right (Clark et al., 2021; Bryman, 2016).

3.5.2 In-depth Interviews

Boyce and Neale (2006, p. 2) define in-depth interviewing as “a qualitative research technique that involves conducting intensive individual interviews with a small number of respondents to explore their perspective on a particular phenomenon”. Interview techniques that included active listening and probing the participants, paraphrasing and summarising the participant’s researcher’s responses to ensure the researcher understood and recorded the interview with consent, were employed. This enabled the researcher to collect in-depth information on participants’ opinions, experiences, knowledge about how the relevant actors (i.e., government and tech companies) regulate fake news circulating on social media platforms.

The process of in-depth interviewing involved developing an interview guide from the research questions, sampling participants, collecting data and analysing it (Boyce & Neale, 2006; Creswell, 2013). Identifying and sampling the research participants has already been described under the sampling section. Developing the in-depth interview guide entailed devising rules to guide the administration of the interviews, devising the interview questions from the research questions to be explored during the in-depth interview, and using recording device to capture the interview for later transcription. A free online Artificial Intelligence-powered tool called Riverside was used strictly for the transcription process. The AI tool accuracy was dependable with exceptions on

words mentioned in local languages. The local language transcription limitation was dealt with by re-listening while making edits on the transcript. This enabled the researcher cut down the amount of time used in handling the interviews.

The in-depth interview technique was not without strengths and weaknesses. The main strength of the technique is that it enabled the researcher to generate a wealth of information about how actors regulate social media and fake news circulating on these platforms. Another strength was that the technique is flexible and enabled the researcher to ask follow up questions. The main weakness of the techniques was that, unlike document analysis, it is sensitive to bias which I eliminated by strictly following the research instruments. (Wimmer & Dominick, 2011).

3.6 Data quality control

The quality of the research was established using criteria such as reliability and validity. Bryman (2012) argues that a number of different stances have been taken by qualitative research. One stance is to assimilate reliability and validity into qualitative research with little change of meaning other than playing down the salience of measurement issues. Another stance is to judge qualitative studies according to different criteria from those used by quantitative researchers. Lincoln and Guba (1985) and Guba and Lincoln (1994) in Bryman (2012) propose trustworthiness and authenticity as two primary criteria for assessing qualitative research. Trustworthiness is made up of four criteria, namely: credibility (parallels internal validity); transferability (parallels external validity); dependability (parallels reliability) and conformability (parallels objectivity). Apart from trustworthiness, the authenticity raises a wider set of issues concerning the wider political impact of research.

The study established credibility of findings by triangulation and validation of findings from document analysis with data from interviews (see Appendix F). Triangulation may entail using more than one data collection method or source of data in the study of regulation of fake news circulating on Facebook. The researcher ensured dependability by keeping complete records of the research process, such as interview transcripts, data analysis and selection of research participants, in an accessible manner.

3.7 Data analysis

The study employed qualitative data analysis of in-depth interview transcripts and documents. Qualitative content analysis (see Appendix F) was the approach used to qualitatively analyse documents. It involved searching for underlying mechanisms employed by Facebook to self-regulate its platform as well as fake news circulating on its platform. The process through which the categories and/or themes were identified is not straightforward (Clark et al., 2021; Bryman, 2012). The qualitative content analysis identified mechanisms related to the following categories: (a) enforcement of community standards and policies; (b) oversight board; (c) fact checking; and (d) user reporting or flagging.

The in-depth interviews were transcribed and analysed to understand how both government and tech companies regulate their platforms, as well as fake news circulating on their platforms. The approaches used for regulating social media platforms were categorised into three categories: (a) self-regulation; (b) co-regulation; and (c) statutory regulation. This was because it was not only government of Uganda that regulates social media platforms. Tech companies made attempts with government to co-regulate their platforms and to self-regulate their platforms. Similarly, the regimes for regulating fake news circulating on social media platforms were categorised into four, namely: informal regulation, self-regulation, co-regulation and statutory regulation (see Appendix F). This was because the main actors involved in regulation of fake news circulating on social media were platforms users, tech companies and government of Uganda.

To answer the research questions, the transcripts were manually and qualitatively coded using Microsoft word document and the codes grouped into the categories identified. The portion of the transcripts were words, sentences, paragraphs, or entire transcript. As such, these portions were the unit of analysis for qualitative data analysis. The tool that was developed manually for analysing data summarized findings by connecting them directly to the research questions. Codes such as: self- regulation mechanisms, co-regulation, statutory regulation and informal regulation.

The data was presented using quotation of text from the in-depth interviews and document analysis as presented in Chapter Four under presentation of findings with screen short excerpts.

3.8 Ethical Considerations

Studies have identified various ethical issues ranging from harm to participants, informed consent and invasion of privacy (Sim & Waterfield, 2019; Creswell, 2013; Bryman, 2012; Wimmer & Dominick, 2011). Such studies have shown that harm to participants – whether social or psychological – may arise from breach of confidentiality and/or anonymity. The researcher ensured confidentiality by utilizing data and information collected from participants for study purposes only, such as publication of final dissertation (Sim & Waterfield, 2019). The researcher achieved anonymity by asking participants if they would like attribution of research information or not. The researcher achieved the issues of informed consent by giving prospective participants as much information as might be needed to make an informed decision about whether or not to participate in the study. The information entails the purpose of the study, how long the interview is likely to last, and any potential benefits and risks associated with taking part, as well as rights to decline participation, to terminate participation at any point or withdraw information after participation in the study. I address the issues of invasion of privacy and voluntary participation by obtaining verbal informed consent from prospective participants (Bryman, 2012; Wimmer & Dominick, 2011).

3.9 Gender considerations

This study considered gender issues of participation and representation. It recruited both males and females as participants of in-depth interviews. However, based on the purposive sampling method, the researcher focused on the role of the participants and relevancy to the study, without being biased by what gender they were.

3.10 Limitations

This qualitative research relied on document analysis and in-depth interviews to investigate the extent to which self-regulation could deal with fake news circulating on social media platforms. The document analysis technique was limited in establishing the self-regulatory mechanisms at the industry level. This is because the social media industry associations in African countries, especially Uganda was non-existent. While the EU had established self-regulation and co-regulation standards for social media platforms to follow, such voluntary guidelines were related to the EU law and therefore applicable to European countries only.

Another limitation was in the gender consideration aspect. While the sampling technique considered adopted did not primarily consider gender, two females and six males were recruited based on the relevancy of the role and its relevance to the topic that was being studied. This doesn't bear much effect on the findings; however, it limits the study from a generalization opportunity that may include understanding the topic in juxtaposition with gender and regulation of social media and fake news, which also is not the focus of this study.

CHAPTER FOUR

PRESENTATION OF FINDINGS

4.0 Introduction

The chapter presents findings from the document analysis and in-depth interviews. The study set out to: (1) assess what self-regulatory mechanisms Facebook uses to deal with the circulation of fake news; (2) assess how the government of Uganda regulates social media platforms; and (3) establish how the government of Uganda regulates fake news circulating on Facebook. The study findings are organized according to the research questions and presented using quotes of text from the interviews and document analysis.

4.1 Self-regulatory mechanisms Facebook uses to deal with circulation of fake news

This section answers research question 1 on what self-regulation mechanisms Facebook uses to deal with the circulation of fake news. Document analysis shows that Facebook uses diverse self-regulatory mechanisms to deal with the circulation of fake news. These include: (a) enforcement of community standards and policies; (b) oversight board; (c) fact-checking; and (d) user reporting. These mechanisms are further explained under the corresponding sub-sections below.

4.1.1 Enforcement of community standards and policies

The study established that Facebook self regulates through enforcement of community standards. Facebook enforces community standards and policies in two steps: (1) detecting violations and (2) taking action. Detecting violations (fake content and accounts) is done using technology and review teams. Most of this happens automatically, with technology working behind the scenes to remove violating content. Other times, it is a combination of both automated and human action. This happens when technology detects potentially violating content but sends it to review teams to check and take action on it.

The goal of Facebook's community standards is to regulate freedom of expression based on four core values, namely: (a) authenticity: making sure the content that users see on the platform is authentic and verifiable; (b) safety: making sure the platform is a safe place; (c) privacy: protecting personal privacy and information; (d) dignity: all people are equal in dignity and rights.

Taking action entails a three-part approach: (a) remove; (b) reduce; and (c) inform. Removing content entails taking down violating content, restricting accounts, disabling accounts, and removing pages and groups. This finding suggests that self-regulation mechanisms were removing content, pages, and groups or restricting/disabling accounts violating community standards and policies. Reducing content entails reducing the distribution of problematic content and penalties for sharing fact-checked content. This finding suggests that self-regulation mechanisms were reducing the distribution of content labelled “false” or “altered” by third-party fact-checkers. Inform entails providing context to sensitive or misleading content. This finding suggests that self-regulation mechanisms were informing platform users through providing context to sensitive or misleading content.

Figure 1

Screenshot from Enforcement of Community Standards, Meta

We remove misinformation where it is likely to directly contribute to the risk of imminent physical harm. We also remove content that is likely to directly contribute to interference with the functioning of political processes. In determining what constitutes misinformation in these categories, we partner with independent experts who possess knowledge and expertise to assess the truth of the content and whether it is likely to directly contribute to the risk of imminent harm. This includes, for instance, partnering with human rights organizations with a presence on the ground in a country to determine the truth of a rumor about civil conflict.

4.1.1.2.1 Misinformation policy

The study established that Facebook has a policy that defines content that is flagged as a piece of misinformation. The policy rationale is that misinformation is different from other types of speech addressed in the community standards because there is no way to articulate a comprehensive list of what is prohibited. Therefore, a policy that simply prohibits “misinformation” would not provide useful notice to the people who use the platform services and would be unenforceable. Facebook’s policy articulates different categories of misinformation and tries to provide clear guidance about how it treats the speech when it is seen. Facebook removes misinformation where it is likely to directly contribute to the risk of imminent physical harm. It also removes content that is likely to directly contribute to interference with the functioning of political processes and certain highly deceptive, manipulated media.

Figure 2

Screenshot from Misinformation Policy, Meta

We remove misinformation where it is likely to directly contribute to the risk of imminent physical harm. We also remove content that is likely to directly contribute to interference with the functioning of political processes. In determining what constitutes misinformation in these categories, we partner with independent experts who possess knowledge and expertise to assess the truth of the content and whether it is likely to directly contribute to the risk of imminent harm. This includes, for instance, partnering with human rights organizations with a presence on the ground in a country to determine the truth of a rumor about civil conflict.

4.1.1.2.2 Inauthentic behaviour policy

The policy rationale for inauthentic behaviour is that Facebook does not allow people to misrepresent themselves on Facebook, use fake accounts, artificially boost the popularity of content, or engage in behaviour designed to enable other violations under the community standards. Facebook does not allow entities to engage in, or claim to engage in, coordinated inauthentic behaviour (CIB), and defined as the use of multiple Facebook assets working in concert to engage in inauthentic behaviour, where the use of fake accounts is central to the operation. Facebook does not allow entities to engage in, or claim to engage in, foreign or government interference, which is CIB conducted on behalf of foreign or government actors. Facebook does not allow governments that have instituted sustained blocks of social media to use their official departments, agencies, and embassies to deny the use of force or violence events in the context of an attack against the territorial integrity of another state in violation of Article 2(4) of the UN charter.

Figure 3

Screenshot from CIB Reports, Meta

Policy Rationale

In line with our commitment to authenticity, we don't allow people to misrepresent themselves on our services, use fake accounts, artificially boost the popularity of content, or engage in behaviors designed to enable other violations under our Community Standards. Inauthentic Behavior refers to a variety of complex forms of deception, performed by a network of inauthentic assets controlled by the same individual or individuals, with the goal of deceiving Meta or our community or to evade enforcement under the Community Standards.

4.1.1.2.3 Fraud and deception policy

The policy rationale for fraud and deception is that to prevent fraudulent activity on the platform that can harm people or businesses, Facebook removes content and takes action on behaviors that intend to defraud users or third parties. It therefore removes content that purposefully intends to deceive, willfully misrepresent, or otherwise exploit others for money or property. Facebook allows people to raise awareness and educate others, as well as condemn these activities, unless this includes content that contains sensitive information, such as personally identifiable information.

Figure 4

Screenshot from Fraud and Deception Policy, Meta

Policy Rationale

We aim to protect users and businesses from being deceived out of their money, property or personal information. We achieve this by removing content and combatting behavior that purposefully employs deceptive means - such as wilful misrepresentation, stolen information and exaggerated claims - to either scam or defraud users and businesses, or to drive engagement. This includes content that seeks to coordinate or promote these activities using our services. We

4.1.1.2.4 Privacy policy

The policy rationale for privacy violations is that privacy and protection of personal information are fundamentally important values for Facebook. Facebook safeguards users' personal identities and information. Facebook removes content that shares, offers, or solicits personally identifiable information or other private information that could lead to physical or financial harm, including financial, residential, and medical information, as well as private information obtained from illegal sources. Facebook recognizes that private information may become publicly available through

news coverage, court filings, press releases, or other sources. When that happens, Facebook may allow the information to be posted. Facebook also provides people with ways to report imagery that they believe to be in violation of their privacy rights.

4.1.2 Oversight board

Facebook created an oversight board to resolve issues of what to take down, what to leave, and why on its platform. The board is an external body that platform users can appeal to if they disagree with Facebook’s content enforcement decision. The purpose of the board is to protect freedom of expression by making independent decisions about important pieces of content and issuing policy advisory opinions on Facebook’s content policies. The responsibility of the board is to determine what can stay up and what must come down, which is exercised through the establishment and enforcement of rules such as community standards and policies that govern what is allowed and not allowed on the platform.

Figure 5

Screenshot from Oversight board overview, Meta

The purpose of the board

The board is an external body that people can appeal to if they disagree with Meta’s content enforcement decisions on Facebook, Instagram, or Threads. We’re committed to implementing the board’s content decisions, and their recommendations help shape how we govern our policies.

DEEP DIVE

- [How to appeal to the Oversight Board](#)
- [Oversight Board cases](#)
- [Oversight Board recommendations](#)
- [Creating the Oversight Board](#)
- [Oversight Board: Further asked questions](#)
- [Meta’s Bi-Annual Update on the Oversight Board](#)

4.1.3 Fact checking

Facebook deals with fake news circulating on its platforms in two steps: (1) detecting violations, and (2) taking actions. Detecting potential misinformation is done using a variety of signals and third-party fact-checkers. Fact-checkers review and rate the accuracy of stories through original reporting, including interviewing primary sources, consulting public data, and conducting analyses of media, including photos and video. Taking action once there is a rating from a third-party fact checker.

Figure 6

Screenshot about Fact Checking, Meta

Taking action against repeat offenders

Pages, Groups, Profiles, websites, and Instagram accounts that repeatedly share content rated False or Altered will be put under some restrictions for a given time period. This includes removing them from the recommendations we show people, reducing their distribution, removing their ability to monetize and advertise and removing their ability to register as a news Page.

- [> Content fact checkers prioritize](#)
- [> Fact checking program policies](#)
- [> Content ratings fact-checkers use](#)
- [> Penalties for sharing fact-checked content](#)

Taking action entails a three-part approach: remove, reduce, and inform. Facebook does not remove content rated “false” or “altered” by third-party fact-checkers. Facebook reduces the distribution of content rated “false” or “altered” by third-party fact-checkers to ensure fewer people see it. Facebook also shows labels on top of the content labelled “false” or “altered” by third-party fact-checkers. This finding suggests that the self-regulation mechanism to deal with the circulation of fake news was reducing the distribution of content labelled “false” or “altered” by third-party fact-checkers and showing labels on top of such content. Facebook reduces the distribution of pages and domains that repeatedly share or publish content that is rated “false” or “altered. Such pages or domains lose their ability to register as news pages on Facebook and their ability to advertise and monetize. Informing platform users entails providing context to sensitive or misleading content. Facebook shows a pop-up notice to anyone who tries to share a post that has been rated by a fact-checker so that they can decide for themselves what to read, trust, or share. Facebook notifies platform users, if they share content that is later determined by fact checkers to be false, that there is additional reporting. This finding suggests that the self-regulation mechanism to deal with the circulation of fake news was informing users by providing pop-ups to notify users that there is additional reporting on the content.

Figure 7

Screen short on fact checking, Meta

Reviewing content

Fact-checkers will review a piece of content and rate its accuracy. This process occurs independently from Meta and may include calling sources, consulting public data, authenticating images and videos and more.

The ratings fact checkers can use are False, Altered, Partly False, Missing Context, Satire, and True. These ratings are fully defined [here](#).

The actions we take based on these ratings are described below. Content rated False or Altered makes up the most inaccurate content and therefore results in our most aggressive actions, with lesser actions for Partly False and Missing Context. Content rated Satire or True won't have labels or restrictions.

4.1.4 User Reporting or Flagging

Facebook provides users with ways to report imagery that they believe to be in violation of their privacy rights. Facebook has four reporting steps: (1) universal entry point; (2) get started; (3) select a problem; (4) report submitted. This finding suggests that the self-regulation mechanism for dealing with the circulation of fake news was user reporting. Facebook uses it to combat the circulation of fake news. This in-built platform feature enables users to report things that they don't think should be on the platform. Facebook asks users to provide more detail about what they feel is wrong with what they are reporting.

4.2 How the government of Uganda regulates social media platforms in Uganda

This section answers the second research question on how the government of Uganda regulates social media platforms. The study found that the government of Uganda uses the statutory regime to regulate social media platforms. This suggests that government was responsible for regulating social media platforms in Uganda. Key Informant 4 observed that

Any government would be duty-bound to regulate activities within its jurisdiction in as far as they relate to law and order. In the absence of regulation there is anarchy.
(Key Informant 4, Interviews, March 2024)

This finding implies policy issues that relate to public order prompted government to regulate social media platforms in Uganda.

The study also found that the responsibility of regulating social media platforms included tech companies themselves. The Ugandan government was involved in direct regulation of social media platforms through the statutory regime. Tech companies co-operated with government to co-regulate their platform and they also self-regulated their platforms in Uganda. This implies that statutory regulation, co-regulation, and self-regulation were three main approaches and/or regimes for regulating social media platforms. To recommend the most effective regime to regulate fake news, the study established whether each of these regimes was effective in regulating social media platforms in the context of Uganda.

4.2.1 Statutory regulation of social media platforms

It emerged from the document analysis and interviews that Uganda employs statutory regulation to control social media platforms using similar laws to those that were enacted to regulate legacy media. According to Key Informant 7, “the laws that regulate the mainstream media are the same laws for regulating social media platforms in Uganda.”

This finding suggests that the way government of Uganda regulates social media platforms is ad hoc. This is mainly because the government does not draw a distinction between regulating social media platforms and legacy media. This one-size-fits-all regulatory approach poses a challenge to the regulation of social media platforms in Uganda.

In the past, the Ministry of ICT hinted on the possibility of creating a law that covers social media. But if at all there was to be such a law, then the ideal thing to do would be to consult all stakeholders and benchmark in areas it has worked or failed. The law should promote the good and minimise the dangers that come with social media (Key Informant 4, March 2024).

Currently, the Ministry of ICT is in the process of developing a social media law. It is, however, unclear whether the Ministry was developing a new law or amending an existing one to enable the government to regulate social media platforms in Uganda.

According to Key Informant 6, the Ministry of ICT has completed comprehensive amendments to broaden the scope of the law, which has to go to cabinet, before going to Parliament. He/she adds, “But what I can tell is that we are improving and tightening the legislative and policy framework. Because most of the laws we have are from the late 1990s, before digital media even came or took root in Uganda.” This suggests that the media policy, regulation and statutory frameworks were inadequate in regulating social media platforms in Uganda.

Other weaknesses that make statutory regulation an ineffective regime for regulating social media platforms in Uganda related to the changing nature of social media technology and the lack of independence of the regulatory body.

The changing nature of social media technology makes statutory regulation ineffective for regulating social media platforms in Uganda. Key informant 5 noted that social media platforms are difficult to regulate due to the evolving nature of technology.

Technology shifts all the time and allows people to get into the realms where government control is difficult to harness (Key Informant 5, March 2024).

This suggests that the Ugandan government has increasingly found it difficult to implement its ban on Facebook as users resort to VPN to access the platform. According to Key Informant 3, Facebook has been banned in Uganda. But does government have the capacity to implement the ban? It is difficult for the government to enforce its ban on Facebook in Uganda. Due to advances in technology, citizens with access to VPNs can access Facebook. Browsers like Edge that come with an in-built VPN.

Many governments across the world are playing catch up in terms of regulating digital platforms. And the Uganda government is no exception (Key Informant 6, April 2024).

The lack of independence of the regulator (UCC and Ministry of ICT and National Guidance) makes statutory regulation an ineffective for regulating social media platforms in Uganda. Social media regulation falls under UCC and the Ministry of ICT and National Guidance that regulates communication services in Uganda.

Key Informant 5 observed that social media regulators can be statutory bodies (UCC) as long as their independence is fairly guaranteed.

If there is an independent regulator, it helps because two aggrieved parties come to a round table to talk (Key Informant 6, Interview, April 2024).

This indicates the need to guarantee the independence of UCC as a regulator for the statutory regime to be effective in regulating social media platforms in Uganda.

Based on the findings of document analysis and interviews, the study concluded that statutory regulation was an ineffective regime for regulating social media platforms in Uganda. For this reason, the study proposed a blend of statutory regulation and self-regulation as opposed to co-regulation. This is because self-regulation was more effective than co-regulation due to measures taken by individual tech companies to self-regulate, though both regimes were limited by the absence of an industry coalition of tech companies to regulation social media platforms in Uganda.

4.2.2 Co-regulation of social media platforms

The study found that the government of Uganda and Facebook, with failed efforts, employed co-regulation as a regime to regulate its platform in Uganda. This finding suggests that the responsibility of regulating social media lies with both the platforms and the government. In this study, co-regulation is viewed as a regulatory approach that creates collaboration between social media companies and governments or regulatory authorities to regulate platform activities while accounting for their particularities and safeguarding public policy objectives.

Figure 8

Screenshot on co-regulation efforts by Meta

Last year, Facebook CEO Mark Zuckerberg called for governments to work with online platforms to create and adopt new regulation for online content, noting, "It's impossible to remove all harmful content from the Internet, but when people use

It emerged from the document analysis and interviews that co-regulation was an ineffective regime for regulating social media platforms in Uganda. The largely lacking industry association of social

media companies was a major weakness of co-regulation for regulating social media platforms in the country or continent.

Other weaknesses made co-regulation an ineffective regime for dealing with fake news circulating on social media platforms. Interviews showed that the limited cooperation between Facebook and government to co-regulate its platforms and the banning of the platform activities in Uganda made co-regulation an ineffective regime for regulating social media platforms in the country.

Key Informant 4 explained that government officials cited security threats as the reason behind the decision of banning Facebook activities in Uganda. While other social media platforms were reopened, Facebook remained banned.

Key Informant 4 noted that it would be insightful to cite what the head of state has consistently said: “Facebook interfered with the elections by blocking some messages and allowing others.”

Our accounts were deactivated. We had the hashtag #SecuringYourFuture. The opposition had the hashtag #RemovingTheDictator. Facebook switched off accounts for only one side of #SecuringYourFuture. But the accounts with #RemovingTheDictator were never affected. The opposition went into overdrive and this was a “scientific” campaign organised online (Key Informant 6, Interview 2024).

This finding suggest that Facebook was banned in Uganda for interfering with the political process of a sovereign state.

As earlier indicated, the document analysis revealed that Facebook does not allow users to misrepresent themselves, use fake accounts, artificially boost the popularity of content, or engage in behaviour designed to enable other violation of community standards and policy on inauthentic behaviour.

Facebook came up with the report that pro-government accounts were operating in an inauthentic way. It hired a company to conduct the analysis that raised so many red flags (Key Informant 2, Interview, February 2024).

This finding suggests that, while government banned Facebook in Uganda for election interference, Facebook was enforcing its community standards and policy on inauthentic behaviour. This explains why the talks between the Ugandan government and Facebook has not yielded any results as the platform activities remain banned in the country since 2021.

According to Key Informant 6, there were attempts by both the government of Uganda, through the Ministry of ICT and National Guidance, and Facebook to resolve the contention, but no tangible results emerged from the efforts. He/she explained that the two parties failed to agree on what the problem was. “Facebook was saying that these accounts were bots. But these were real people. Maybe they could also have been bots, but we needed to have had an engagement.

The disagreement between the Ugandan government and Facebook can be attributed to the different policy stances adopted by both parties for regulating social media platforms and limiting freedom of expression. Facebook and the government of Uganda recognised that whereas social media facilitate freedom expression, these platforms can be abused. This implies that both parties have legitimate concerns for regulating the activities on these platforms and limiting freedom of expression. Facebook limits freedom of expression based on its core values (authenticity, safety, privacy, and dignity), while the government limits freedom of expression based on public interest, public morals, security, and protecting other individual rights and reputations. This suggests that the limited cooperation between Facebook and the government of Uganda is exacerbated by different policy trajectories taken for limiting freedom of expression.

Based on the findings of interviews and document analysis, the study concluded that co-regulation was an ineffective regime to regulate social media platforms in Uganda. For this reason, the study proposed a blend between statutory regulation and self-regulation as regimes for regulating social media platforms in Uganda.

4.3.3 Self-regulation of social media platforms

The study found that Facebook employs self-regulation as a regime to regulate its platform. This finding implies that the responsibility of regulating Facebook lies with the platform itself. In this study, self-regulation of social media platforms is viewed in terms of the actions that tech companies or industry association of tech companies take to supplement government statutory

regulation of social media platforms in Uganda. Obviously, this implies that self-regulation takes place at the individual tech company level and the industry association of tech companies' level.

At the tech company level, the document analysis shows that Facebook's mechanism to self-regulate its platform included: (a) enforcement of community standards and policies; (b) oversight board; (c) fact-checking; and (d) user reporting. Facebook's community standards revolved around four core values, namely: authenticity, safety, privacy, and dignity. The core values corresponded to six broad policy areas: (i) violence and criminal behaviour; (ii) safety; (iii) objectionable content; (iv) integrity and authenticity; (v) intellectual property; and (vi) content-related requests and decisions.

It emerged from the document analysis and interview show that self-regulation was ineffective regime for regulating social media platforms in Uganda. The reason for this was that the unformed or largely missing industry association of tech companies at either the country-specific or regional level made self-regulation an ineffective regime for regulating social media platforms in Uganda and the African region level.

According to Key Informant 5, this is because self-regulation for media can [only] work in a situation where there is an industry that is well structured and institutionalized. This suggests that the digital media industry is not well structured and institutionalized in Uganda to enable Facebook to self-regulate its platform. Key Informant 5 further explained that self-regulation happens at three levels, namely, the individual level, the media level, and the industry-wide level. He explains that:

at the individual level, there are personal values and beliefs. At the media level, there are media accountability tools, such as letters to the editor, complaint system, disciplinary systems and policies and guidelines. At industry level, there are disciplinary committees that hear complaints, public engagement, public education and so forth. (Key Informant 5, Interview, March 2024).

Other weaknesses that make self-regulation an ineffective approach for regulating social media platforms relate to the enforcement of community standards and policies. Interviews indicate that Facebook's self-regulatory mechanisms were limited by the context-specific nature of societal values and beliefs, conflict of interest, as well as a lack of willingness to self-regulate. Facebook's

self-regulation mechanisms are enforced based on core values and policies that are not universally applicable to all societies across the world due to diverse cultural values and beliefs.

Key Informant 1 noted that

In Uganda, homosexuality and LGBTQ is prohibited by law but this is a value Facebook upholds. We may not agree with those values. [And so] what is unacceptable in Uganda is acceptable in the US. LGBTQ is acceptable in the US. But promoting LGBTQ in Uganda is unacceptable. (Key Informant 1, Interview, February 2024).

This suggests that Facebook upholds country-specific policies in which its company is domicile. As such, the Uganda laws on homosexuality and/or LGBTQ do not apply to the platform. The fact that LGBTQ content is not available in Uganda implies that government is actively involved in regulating social media platforms.

One of the challenges Facebook encounters in self-regulating its platforms relates to the dynamic nature and scale of online content. This implies that enforcement of community standards and policies will be ineffective due to the platforms limited ability to review content for policy or legal violation. Facebook's policies on hate speech, disinformation, child pornography and genocide are inadequately enforced. Key Informant 1 explained that

A local politician in Uganda can use hate speech to incite an ethnic group against another. But Facebook [doesn't have the context to deal with the hate speech and instead] views it as free speech. I can post anything in my local language. But the regulator and moderator cannot possibly review all the content that is posted (Key Informant 1, Interview, February 2024).

This finding suggests that Facebook does not have the technical capacity to review content in Ugandan local languages. However, the document analysis showed that Facebook has put in place user reporting as a self-regulation mechanism to deal with the context-specific nature of content posted on the platform. And so, perhaps, this is a mechanism that concerned parties in Uganda could make use of.

Conflict of interest is another weakness that makes self-regulation an ineffective regime for regulating social media platforms in Uganda. According to Key Informant 5 “Ultimately, these platforms are businesses. And every business would want as less regulation and oversight as possible.”

This finding suggests that since Facebook runs its platform as a business, this creates a conflict of interest with self-regulation. Key Informant 6 explained that

I don't think it is easy or fair for Facebook to regulate itself. It will have conflict of interests. How can Facebook regulate itself when the government is disputing some of the things it is doing? (Key informant 6, Interview, April 2024).

Based on the findings of in-depth interview participants and document analysis, the study concluded that self-regulation on its own without direct government involvement through statutory regulation was an ineffective regime for regulating social media platforms in Uganda. For that reason, the study proposes a blend of self-regulation and statutory regulation as regimes for regulating social media in Uganda.

4.3 How government of Uganda regulates fake news on social media platforms

This section answers research question three on how the government of Uganda regulates fake news circulating on social media platforms in Uganda. The study found that the government of Uganda employs the statutory regime to regulate fake news circulating on social media platforms.

The study also found that the responsibility of regulating fake news circulating on social media platforms included platform users and tech companies. This suggest that the government, tech companies and platform users were the main actors involved in regulation of fake news circulating in social media platforms in Uganda. The Ugandan government was involved in the direct statutory regulation of social media platforms. Tech companies cooperated with government to co-regulate fake news and they self-regulated fake news circulating on their platforms. Platform users were also involved in informal regulation of fake news circulating on social media platforms. This implies that statutory regulation, co-regulation, self-regulation and informal regulation were the four main approaches and/or regimes for regulating fake news circulating on social media platforms in Uganda.

4.3.1 Statutory regulation of fake news on social media platforms

Informants talked of three major regulations that the government of Uganda uses to regulate fake news on social media platforms. These included the Computer Misuse Act (2011), the Excise Duty Amendment) Act (2018) and the UCC Online Data Communicators Regulations (2019).

There are very many people who are character assassinating others and they are always charged under the cyber harassment which is under the Computer Misuse Act. So, the government is using cyber harassment for the Computer Misuse Act to regulate social media users. (Key Informant 8, Interview, April 2024).

Key informant 8 also noted that “...as online journalists, UCC started a law that targets us because of the news we break.”

Key informant 8 also noted that as social media users in business, they are faced with the social media tax.

But then we have people who are conducting businesses on social media. There is a law called Exercise Duty which is popular as a social media tax. Facebook today, is the biggest market. It's a mall, it's an arcade, depending on what you're doing. So, the laws we have also go for those people that are doing transactions on social media, not basically for information. (Key Informant 8, Interview, April 2024).

Key informant 6 revealed that government of Uganda has mechanisms to track online offenders and bring them to the book of the law.

What happens is that we [government] have tracking mechanisms, we are completely there. What people don't know, is that we can trace some of these things but you know we also have what we call the Computer Misuse Act. (Key Informant 6, Interview, April, 2024)

Key informant 3 noted that fake news circulating on social media platforms have no boundaries but statutory regulations apply within the borders of a country.

Key Informant 2 noted that

Due to the cross-border nature of social media, it is difficult to implement these laws on the platforms, especially because the users are global. Unless, these platforms [properly] enforce self-regulation mechanisms. (Key Informant 2, Interview, February 2024).

Interviews revealed that it is difficult for government around the world to regulate fake news on social media platforms due to lack of transparency and identity by tech companies. Key Informant 1 noted that

The lack of transparency and identity by social media makes it difficult to tie the liability of fake news to an individual user. If platforms could be compelled to associate posts with individuals, then that would lead users to become accountable for fake news in courts of law.

Facebook and all other digital platforms require users to provide a telephone number before subscribing. The question is, can the identity be revealed when a user crosses the line? (Key Informant 1, Interview, February 2024).

However, document analysis revealed that Meta responds to data request from governments based on their guidelines.

Figure 9

Screenshot on data sharing with governments by Meta

Meta responds to government requests for data in accordance with applicable law and our terms of service. Each and every request we receive is carefully reviewed for legal sufficiency and we may reject or require greater specificity on requests that appear overly broad or

The study found that the statutory regulation attempts by Uganda are excessively harsh.

The regulations we have today are draconian in nature. When government says it's [me] posting something that is against us [government], the only regulation they have is to block me, is to arrest me. (Key Informant 8, Interview, April 2024).

The study found out that in some cross-border cases, through international law and relations, social media and fake news is regulated by relying on diplomatic relations and laws that the government enjoys with some states.

We are also signatory to certain international conventions, like Universal Declaration of Human Rights, for example the UN Agenda 2030 and we also have, even you know we have what we call extradition treaties in some of these countries... some of them are good in the standards of content regulation which cuts across the world. (Key Informant 6, Interview, April 2024)

4.3.2 Co-regulation of fake news on social media platforms

The study found that the government of Uganda and Facebook employ co-regulation as a regime to regulate fake news circulating on its platform.

Interviews revealed that efforts for dialogue exist between Government of Uganda and Meta about content moderation.

So that's what we have been doing mostly. You report to Twitter, report to Facebook and see if they act. Sometimes they have, other times they haven't. Key Informant 2, Interview, February 2024).

Key Informant 6 revealed that during the 2021 Facebook conflict with the government over some Ugandan accounts and content, efforts for mediation were in high gear from both ends. He/She revealed that that his or her office took lead in the talks with “a guy from Facebook, South Africa” to find co-regulatory actions.

On UCC's side, the executive director has previously said that the government is engaging Facebook. (Key Informant 4, Interview, March 2024).

The study found that the government banned Facebook operations in Uganda over failed co-regulation efforts.

Key Informant 1 observed that:

Government took a decision to ban Facebook based on two fundamental reasons. One is the failure of Facebook to cooperate with the government as far as investigations of serious crimes against the state are concerned. Even when there are lawful court orders, Facebook does not comply with government. Two is impartiality in a competitive political process [elections] or interfering in internal affairs of a sovereign jurisdiction (Key Informant 1, Interview, and February 2024).

The study found out that cooperation between the government of Uganda and social media platforms is critical in the use of co-regulation as a regime to regulate fake news circulating on Facebook.

The government of Uganda does not control the platform, but it has to agree with Facebook to regulate content. Government can say to Facebook that this post is promoting genocide, we shall be happy if you can put it down (Key Informant 2).

Participants reported that there is a need for engagement between African governments and big tech companies to come up with co-regulation measures.

I think there should be engagements between governments and big tech companies. But these engagements should be between African governments and big tech companies. There should be a common goal/interest that Africa wants to achieve in terms of regulating fake news (Key Informant 8).

4.3.3 Self-regulation of fake news on social media platforms

The study found that Facebook employs self-regulation by means of technological mechanisms to curb fake news as presented in section 4. 1.

At individual company level, the Document analysis shows that Facebook employs two steps (i.e., detecting and taking action) in dealing with the circulation of fake news on its platform. Facebook detects potential fake news using third-party fact-checkers.

Facebook employs a three-part approach (i.e., remove, reduce, and inform) to deal with fake news circulating on its platform. Facebook does not remove content rated by third-party fact-checkers but the platform reduces its distribution to ensure that fewer people see it. The study found that reducing distribution of fake news entails displaying labels on top of the content rated by third-party fact-checkers and issuing penalties for sharing fact-checked content. Facebook reduces the distribution of pages and domains that repeatedly share or publish fake news. In turn, this action on Facebook's part reduces the ability of pages and domains to advertise and monetize. In addition, Facebook informs platform users who try to share a post rated by a third-party fact-checker. This enables platform users to decide for themselves what content to read, trust, or share. Facebook also notifies users about additional reporting if they share content that is later rated (false or misleading) by a third-party fact-checker.

Interviews revealed that lack of robustness of internal mechanisms was a weakness of self-regulation as a regime for dealing with fake news circulating on Facebook. Key Informant 5 questioned that

How robust are the internal controls of these intermediaries? Is it possible that a user can get justice when there is a breach? (Key Informant 5, Interview, March 2024)

It emerged from the document analysis shows that Facebook established an oversight board to resolve issues of what to take down and what to leave based on enforcement of community standards and policies.

The decisions of the oversight board are limited to the community standards and policies on fake news. Key informant 5 explained that there are many things (including racism) that these giant tech companies leave out.

Document analysis revealed that Facebook has no specific policy on fake news. Nor does it have a policy on disinformation or malformation except that on misinformation. This is because “there is no way to articulate a comprehensive list of what is prohibited.” For that reason, such a policy on misinformation would be unenforceable. However, the policy on misinformation was limited in scope to categories of misinformation. For that reason, content related to physical harm or violence, harmful health misinformation, such as promoting harmful, miracle cures for health issues, voter or census interference, and manipulation is removed from the platform.

According to Key Informant 4, there is a need for social media to actively self-regulate their platforms and strengthen mechanisms to combat fake news.

Some of the self-regulation mechanisms include deleting accounts, deactivating accounts, bringing down content etc. (Key Informant 6, Interview, April 2024).

Key informant 3 observed that

Facebook has a good reporting mechanism. If you report an account, they take you through a list of community standards. They give you a list of questions to narrow down on the violation. They give you a list of violations to report. They give you a list of questions to narrow down the violation. They take you through a list of community standards. Then they delete the account because you have made the case. But many times, they don't believe it, so they end up suspending that account for three hours or for a day (Key Informant 3, Interview, March 2024).

4.3.4 Informal regulation of fake news on social media platforms

The study found that platform users employ informal regulation as a regime for dealing with fake news circulating on social media platforms in Uganda. The responsibility of regulating fake news circulating on Facebook lies with the individual users.

Document analysis showed that Facebook policies support media and digital literacy efforts as a core principle of regulating the circulation of fake news on its platform. On their part, Uganda's regulatory body, UCC, also supports media and digital literacy, according to Key Informant 4, who explains that this is done by empowering “the masses to know the risks involved in spreading fake news or consuming news without questioning.”

Both the document analysis and in-depth interviews showed that media and digital literacy were the informal mechanisms for regulating fake news circulating on Facebook. Key Informant 5 argued that the best tool against fake news is the population itself.

The biggest weapon against fake news is citizen empowerment through education and public awareness. Once this has been done, then the policies and laws come in to get things properly done. If a citizen receives information, are they going to question it? Citizens who don't have the capacity to question information get into trouble (Key Informant 5, Interview, March 2024).

The study found that Fact-checking was a crucial tool for empowering the population to detect fake news circulating on social media platforms. Key Informant 4 noted that there was a fact-checking intervention that came during the COVID-19 pandemic to serve a specific purpose.

During this period, UCC's response to fake news was to establish a fact-checking mechanism. Individuals seeking to cross-check the validity of information were getting a response message (Key Informant 4, Interview, April 2024).

UCC also responded to fake news by sensitising people. We sensitised people about the dangers and risks of misinformation, and how one can detect misinformation (Key Informant 4, Interview, April 2024).

The Study observed that Debunk Media Initiative, a fact-checking organization started in 2020 to debunk misinformation about the COVID-19 pandemic. It now deals with misinformation and fake news online by empowering the public through social media literacy, among other means.

CHAPTER FIVE

DISCUSSION OF FINDINGS

5.0 Introduction

This chapter outlines a discussion of key findings from in-depth interviews and document analysis according to the theoretical framework and studies reviewed in the literature. To answer the main research question, the study answered three specific research questions: (1) What self-regulatory mechanisms does Facebook use to deal with the circulation of fake news? (2) How does the government regulate social media platforms? (3) How does the government regulate fake news circulating on Facebook? The discussion is organized according to the research questions.

5.1 Establishing how self-regulation can deal with fake news on social media

This section discusses the main research question on establishing how self-regulation can deal with fake news circulating on social media platforms in Uganda. To understand the extent to which self-regulation can deal with fake news circulating on social media platforms, the study assumed that self-regulation occurs at two level: (a) the individual tech company, and (b) industry coalition of tech companies. For that reason, the study sought to assess the self-regulation mechanisms social media platforms employed to deal with fake news circulating on their platforms.

5.1.1 Self-regulation mechanisms Facebook employs to deal with fake news circulating on its platform

This section discusses research question one on what self-regulation mechanisms Facebook uses to deal with fake news circulating on its platform. Findings show that Facebook employed self-regulation as an approach for dealing with fake news circulating on its platform. Self-regulation was viewed in this study as the mechanisms that tech companies or industry coalition of tech companies take to supplement government regulation of fake news circulating on social media platforms in Uganda. This view is supported by past studies showing that self-regulation occurs at the individual tech company level and the industry coalition of tech company level (Cusumano et al., 2021a; Cusumano et al., 2021b; Dittrich, 2019). The social responsibility theory is employed to understand the extent to which self-regulation can deal with fake news circulating on social media platforms in Uganda. The theory assumes that social media companies and/or platform users

must be free but with a responsibility to serve public good whether by self-regulation or government control (Oluwasola, 2020; Napoli, 2018).

Findings of document analysis revealed that Facebook employs (a) enforcement of community standards and policies, (b) oversight board, (c) fact checking, and (d) user reporting or flagging as self-regulation mechanisms for dealing with fake news circulating on its platform. At the company level, Meta has developed community standards and policies as guidelines and rules to regulate fake news circulating on its platforms, including Facebook, Instagram and WhatsApp across the globe. As an external body, the oversight board enables platforms users to appeal if they disagree with Facebook's decisions on enforcement of community standards and policies on fake news circulating on its platform. Independent third-party fact checkers review and rate content published on the platform (Meta, 2024c; Meta, 2024e). Facebook enables its platform users to report or flag content that violates community standards and policies. User reporting or flagging is described as a ubiquitous mechanism of governance in the digital ages. Since 2004, when content governance began with the adoption of user reporting, the practice has been widely adopted, with millions of reports being received weekly by Facebook alone. Facebook's global approach relates with the normative theory at different levels. As it demonstrated self-imposed ethical regulations to curb fake news, it is consistent with the social responsibility theory which argues that media companies must uphold own responsibility to the public. (Siebert, Peterson & Schramm, 1956). Although user reporting is a standard practice across the industry, Facebook has been criticized for lacking a mechanism for visible public discussion (Meta, 2024d). This finding confirms Stasi's (2019) study indicating that exposure of users to fake news can be viewed from the active or passive perspectives. The passive perspective involves fake news content users see or do not see and access when using social media. The active perspective relates to content users can or cannot post and is regulated by Facebook's community standards and policies.

It emerged from the document analysis and interviews that the extent to which self-regulation can deal with fake news circulating on Facebook was limited. The extent to which self-regulation could deal with fake news was limited mainly by the unformed and largely missing country-specific or regional industry coalition of tech companies to set standards to supplement direct statutory regulation. This finding corroborates past studies showing that, though tech companies tend to avoid self-regulation when the cost significantly reduce profit margins, they need to anticipate

when government steps in to pressure them to curb abuses. Self-regulation was more successful than statutory regulation when a coalition of tech companies in the same industry work together to set standards (Cusumano et al., 2021b; Cusumano et al., 2021b). Rules and standards updating is effective and efficient under self-regulation as industry members are better placed to predict technology change. Moreover, industry members tend to comply with rules and standards designed and imposed by members to deal with fake news circulating on social media platforms in a specific country or region (Cannon & Chung, 2014). In the social responsibility media theory, social media companies have a moral obligation to safeguard social peace and stability through self-regulation to deal with fake news circulating on their platforms (Firdaus, 2012).

Facebook self-regulation mechanisms also reflect an element of the libertarian theory which calls for minimal interferences and free public sphere of ideas. By allowing users to share content before moderation and also relying on user reports to identify anomalies on the platform, Facebook gives a libertarian starting point before the social responsibility interventions. (McQuail, 2010).

The study found gaps in localization of self-regulatory mechanisms. Respondents noted that fact-checking in Uganda primarily focuses on English, excluding content shared in various local languages. This limits Facebook efforts to curb misinformation among broader users.

Interviews revealed that the lack of robustness of these internal mechanisms was a weakness of the regime for dealing with fake news circulating on Facebook. This highlighted the need for an independent oversight board to enable platform users to appeal Facebook's enforcement decision. These decisions are based on community standards and policies. In three steps, the user can appeal to the oversight board about Facebook's enforcement decision on content they posted or reported: (1) the user writes their appeal, explaining how Facebook got his or her decision wrong; (2) the oversight board selects the users' appeal for review; (3) final decision on selected appeals, the board will decide whether to overturn or uphold Facebook's original decision (Meta, 2024d). Surprising, the oversight board's decisions are also based on Facebook's community standards and policies. This suggests that the limited enforcement of community standards and policies was a weakness of self-regulation as an approach for dealing with fake news circulating on social media platforms in Uganda. In the social responsibility media system, the government of Uganda is allowed to monitor social media to ensure these platforms truly serve the people (Firdaus, 2012).

Self-regulation was limited to the extent to which Facebook's mechanisms were effective in dealing with fake news circulating on its platform. Among the main weakness of self-regulation was the absence of an industry coalition of tech companies to set rules and standards for dealing with fake news circulating on social media platforms. Whereas the lack of an industry association suggested that both self-regulation and co-regulation are ineffective regimes, the difference between them lay in the degree of government involvement in dealing with fake news circulating on social media platforms in Uganda. As Cannon and Chung (2014) observed, on one side of involvement, the government could provide an explicit legal grant of authority to tech companies or industry, subject to its oversight. On the other side of involvement, the government might refrain from issuing specific rules or mandating a course of action and instead negotiate voluntary commitments from key industry leaders to address certain problems or engage in certain activities.

5.2 How the government regulates social media platforms in Uganda

This section discusses research question two on how the government of Uganda regulates social media platforms. As earlier indicated, tech companies are not the only actors involved in regulation of social media platforms in Uganda. The government was involved in direct statutory regulation of social media in Uganda. Tech companies cooperate with the government to co-regulate social media platforms and they also self-regulate their platforms. For that reason, the study assessed self-regulation, co-regulation and statutory regulation as the three approaches for regulating social media platforms in Uganda.

5.2.1 Statutory regulation of social media platforms in Uganda

The study found that the government employs statutory regulation as a regime to regulate social media platforms and also indicated that it is largely enforcement driven, consistent with *Authoritarian Theory* of the press. Laws such as the Computer Misuse Act (2011), Excise Duty (Amendment) Act (2018) and the UCC Online Data Communicators Regulation enable the state to control and reprimand social media communications. In this view, the media including social media, operates under state supervision prioritizing national security and public order (Siebert et al, 1956).

This finding confirms past studies on statutory regulation indicating that government and the law are powerful enough to contain social media platforms. Giant tech companies, such as Meta a parent company of Facebook, Instagram, and WhatsApp, must not be allowed to expand without proper regulatory oversight. Not surprising, the government employs cyber laws and other methods, such as direct and indirect threats, sanctions and physical authority to censor social media platforms in Uganda (Namasinga, 2021; House of Commons, 2019). As Jakubowicz (1998) observed, media regimes differ from country to country, depending on the nature of policy and public definition of the media. In authoritarian societies, media regulation serves to subordinate social media platforms to the interest of the ruling minority. Even when the Ugandan government subscribes to different media systems, such as the libertarian or social responsibility, elements of the authoritarian media system may exist since it is in the state's interest to maintain control over social media platforms, such as Facebook (Firdaus, 2012).

Participants observed that the regulation approach to social media is often implemented selectively especially during the politically sensitive seasons. The enforcement tends to focus on political needs and government stability reinforcing the authoritarian assumptions that information flow must be guided to prevent societal disorder. (Walulya & Selnes, 2023).

Uganda's regulatory framework reflects elements of the *Soviet/Communist Theory* in instances where the state curtails social media activity in an undefined public interest, presenting itself as to protect public morality and to safeguard society by maintaining national values. These are communist principles which require the [social] media to serve state's collective goals, manifesting a move by the government to protect through restriction (McQuail, 2010).

It emerged from the document analysis and interviews that among the many weaknesses of statutory regulation was the lack of a law for regulating social media platforms in Uganda. This finding corroborates a past study indicating that social media laws should translate the abstract policy issues into enforceable "public interest" considerations and move beyond the limited scope and narrow perspective of regulation as the implementation of restrictive measures seeking to affect the economy and the market (Themistokleous, 2021). There may be interventionist regulation serving to promote the public interest, such as to enhance media pluralism, prevention of undue concentration, facilitation of access to the media and so forth (Jakubowicz, 1998). In

authoritarian media systems, government control of social media platforms may come in the form of legislation, or violent force (Firdaus, 2012), such as the banning of Facebook operations in Uganda (Wadero, 2022; Xinhua, 2021).

Interviews indicated that UCC regulates social media platforms using the existing media policy and regulatory and legal frameworks. Napoli (2019) argued that unlike legacy media that have assumed the responsibility of providing news and information, social media resist being characterized as media companies, insisting that they are technology companies. These contrasting viewpoints have implications for the application of media policy and regulatory and legal frameworks on social media platforms. This suggests that the media policy, regulation and legal framework was inadequate to regulate social media platforms in Uganda. Document analysis revealed that the nature of social media platforms as intermediaries implies that publisher laws and/or media laws are unsustainable for social media platforms. In democratic societies, regulation is usually confined to protection against abuse of social media freedom, with other things left to market mechanisms (Jakubowicz, 1998).

Findings of interviews indicate that government does not draw a distinction between social media and legacy media regulation in Uganda. This implies that the government of Uganda views social media platforms as media companies as opposed to technology companies. Napoli (2019) observed that viewing social media as media companies as opposed to technological companies foregrounds the media perspective (i.e., social media being information and news sources) at the expense of the technological dimension of social media platforms. This suggests that if the government of Uganda perceives social media companies as media companies, these platforms are subject to the policy, regulatory, and statutory framework under which the media industry operates. But if the government of Uganda sees social media companies as technology companies, then these platforms are not subject to the media policy, regulatory and legal frameworks. The view that social media are media companies as opposed to technology companies has implications for the definition of media and includes dimensions of social media related to technological feature, conditions for distribution, reception and use, social relationship of sender and receiver as well as social and cultural values among others (Jakubowicz, 1998).

The cross-border nature of social media platforms implies that tech companies maintain one set of global policies rather than country-specific policies, regulations and laws. The document analysis revealed that Facebook enforces community standards and policies that govern what is accepted or not accepted on its platforms. These community standards and policies are based on four core values: (a) authenticity, (b) safety, (c) privacy, and dignity. These core values are related to six broad policy areas – violence and criminal behaviour, safety, objectionable content, integrity and authenticity, respecting intellectual property, and content related requests and decisions (Meta, 2024e; Meta, 2020b). As part of communication services, social media platforms fall under the regulatory jurisdiction of UCC and the Ministry of ICT and National Guidance. Document analysis revealed that the lack of independence of the regulator makes statutory regulation an ineffective regime for regulating social media platforms in Uganda. According to Meta (2020a), the lack of independence of regulators indicates that there is a need to guarantee the independence of UCC, which is crucial for the statutory regime to be effective in regulating social media platforms in Uganda. This implies that government employs an authoritarian media system to regulate social media platforms in Uganda. In authoritarian media systems, government control of social media platforms emphasises certain ideological and policy issues (Firdaus, 2012).

5.2.2 Co-regulation of social media platforms in Uganda

The study found that the government of Uganda and Facebook employed co-regulation as a regime to regulate its platform in Uganda. This finding confirms past studies showing that co-regulation entails a mix of shared responsibility between the government and the industry coalition of tech companies, with different allocations of responsibilities for setting goals, formulating standards and rules, and enforcement. For instance, EU set out principles and objectives through legislation to regulate social media platforms in Europe. For instance, the European Media Freedom Act, 2024, and the Digital Services Act, 2024, provide for the creation of coordinators, boards and monitoring bodies that can ensure compliance with the guiding principles. These principles account for platform particularities and safeguard public policy objectives. An industry coalition of tech companies would then commit in a Code of Conduct to introduce measures against abuse of social media platforms based on these principles and objectives. The Code of Conduct would be developed by tech companies with industry stakeholders under the guidance of the European Commission (Bertuzzi et al., 2023; Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014).

Therefore, the social responsibility theory is employed to understand how the government and Facebook co-regulate social media platforms in Uganda. The theory lies between the authoritarian and libertarian theory and, therefore, it gives social media freedom on one hand, with provisions for external government control on the other hand (Oluwasola, 2020).

The weaknesses of co-regulation were the absence of a country-specific or regional law on social media and the unformed country-specific or regional industry coalition of tech companies to set rules and standards for regulating social media platforms in Uganda or African region. Surprisingly, this finding contradicts past studies recommending co-regulation as the most suitable regime for EU to regulate social media platforms (Bertuzzi et al., 2023; Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014). There is a need for a country-specific or regional law and industry coalition of tech companies to enhance co-regulation as a regime for regulating social media platforms in Uganda or African region.

Other weaknesses made co-regulation an ineffective regime for dealing with fake news circulating on social media platforms. Among the major weaknesses of co-regulation was the limited co-operation between the government and Facebook to co-regulate its platform in Uganda. Document analysis revealed that user reporting or flagging was the platform feature that enabled users, including the government, to report content, accounts or pages they believed to violate Facebook's community standards and/or policies. On its part, Facebook takes down content, pages, groups, or restricts and disables accounts that violate its community standards and policies. This suggests that the limited co-operation between government and Facebook can be attributed to the different policy stances taken to limit freedom of expression and/or co-regulate its platform in Uganda. Facebook's community standards and policies are based on four core values (authenticity, safety, privacy, and dignity). For instance, the policy rationale for inauthentic behaviour is that Facebook does not allow users to misrepresent themselves on its platform. Therefore, Facebook does not allow entities to engage in Coordinated Inauthentic Behaviour (CIB). This term is defined as the use of multiple Facebook assets working in concert to engage in Inauthentic Behaviour, where the use of fake accounts is central to the operations. For that reason, Facebook remove fake account, artificially boosted content, and action on CIB, foreign or government interference (CIB) conducted on behalf of foreign or government actors (Meta, 2024b). This finding confirms past studies on CIB indicating that government banned Facebook after the tech company disabled or

deactivated accounts of pro-NRM government officials suspected to be fake accounts involved in CIB during the 2021 general elections (Wadero, 2022; Xinhua, 2021). This implies that the government of Uganda employed the authoritarian media system for regulating social media platforms in Uganda. In authoritarian media systems, power is exercised in a top-down approach, and social media platforms, such as Facebook, are characterized by subordination to the government of Uganda (Oluwasola, 2020; Firdaus, 2012).

5.3 How the Ugandan government regulates fake news on social media platforms

This section discusses research question three on how the government of Uganda regulates fake news circulating on social media platforms. As earlier discussed, tech companies are not the only actors involved in regulation of fake news circulating on social media platforms in Uganda. The government was involved in direct statutory regulation of fake news circulating on social media platforms in Uganda. Tech companies, government and platform users were responsible for dealing with fake news circulating on social media platforms in Uganda. Tech companies cooperated with government to co-regulate fake news and they self-regulated fake news circulating on their platforms in Uganda. For that reason, the study considered informal regulation, self-regulation, co-regulation and statutory regulation as four approaches for regulating fake news circulating on social media platforms in Uganda. To recommend the most effective regime, the study established whether each of these four regimes was effective for regulating fake news circulating on social media platforms in Uganda.

5.3.1 Statutory regulation of fake news on social media platforms in Uganda

The study found that the government of Uganda employs statutory regulation as a regime to regulate fake news circulating on Facebook as indicated in section 5.2.1 highlighting the laws are indiscriminately applied to both social media and fake news circulation in particular. This finding corroborates past studies on statutory regulation showing that the apparent threat of fake news has led many governments to legislate (Cusumano et al., 2021a; 2021b; Marsden et al., 2019; House of Commons, 2019). Statutory regulation as an approach for regulating fake news circulating on social media platforms can take several forms ranging from legislation against harmful content to penalties for violation. For instance, France and Germany passed legislation against harmful content on social media platforms. In Germany, the Network Enforcement Act, 2018, forces

Facebook to remove hate speech from its platform within 24 hours and fines €20 million if it is not removed. As a result of this law, one in six of Facebook's moderators now works in Germany, which is practical evidence that legislation can work (House of Commons, 2019). Hate speech is difficult for Facebook's technology and review teams to detect because idioms and nuances vary widely across cultures, languages, and regions (Meta, 2024a; Meta, 2022c). For that reason, authoritarian media systems can be applied to pre-democratic forms of society and also to present day undemocratic or autocratic military regimes. In democratic societies, regulation is usually confined to protection against defamation, protection of privacy, national security and order, obscenity and insult to public morals, blasphemy, and racism (Oluwasola, 2020; Jakubowicz, 1998).

It emerged from the document analysis and interviews that statutory regulation alone was an ineffective regime for dealing with fake news circulating on social media platforms in Uganda. Among the major weakness of the regime was the lack of a legal framework for dealing with fake news circulating on social media platforms in Uganda. This finding confirms past studies calling for a new regulatory framework for dealing with fake news circulating on social media platforms (Iosifidis & Andrews, 2020; Meta, 2020b). It is difficult to develop a regulatory framework due to the cross-border nature of fake news circulating on social media platforms. Facebook maintains one set of global policies rather than country-specific policies, regulation or laws (Meta, 2020b). According to Meta (2020a), the ubiquitous nature of social media platforms indicates that Uganda's regulatory approach or regime for addressing harmful content and dealing with fake news should respect the global scale of the social media platforms and the value of cross-border communication. Uganda government should aim to increase interoperability among regulators and regulations across East Africa and Africa at large.

Other weaknesses that make statutory regulation an ineffective regime for dealing with fake news circulating on social media platforms in Uganda relates to the changing nature of social media technology. The changing nature of technology implies that regulators should develop an understanding of the capabilities and limitations of technology in content moderation and allow internet companies the flexibility to innovate. According to Meta (2020a), the changing nature of technology indicates that UCC as a regulator of communication services in Uganda should understand the capabilities and limitations of technology in content moderation and allow social

media companies the flexibility to innovate. Any approach that works for one particular platform or type of content may be less effective or even counterproductive when applied to another platform. Regulators should ensure accountability in tech companies' content moderation systems and procedures as the best way to create the incentives for them to responsibly balance values like safety, privacy, and freedom of expression. The authoritarian media system conception is monolithic, representing only the ideology and culture of the ruling power (Firdaus, 2012). Therefore, the study concluded that statutory regulation was an ineffective regime for dealing with fake news circulating on social media platforms in Uganda. The study proposed a blend of informal regulation, self-regulation and statutory regulation as the most effective regimes for dealing with fake news circulating on social media platforms in Uganda. This is because the platform users are the originators and/or purveyors of fake news and because the social media are better placed to self-regulate the fake news circulating on their platforms. As such, informal regulation and self-regulation were more effective than co-regulation due to measures taken by users and tech companies to deal with fake news on their platforms. Self-regulation like co-regulation were limited by the absence of an industry coalition of tech companies to set standards for dealing with fake news circulating on their platforms.

5.3.2 Co-regulation of fake news on social media platforms in Uganda

The study found that with limited success, the government of Uganda and Facebook made attempts on co-regulation as a regime to regulate fake news circulating on its platform. In an ideal situation, as discussed earlier, the government of Uganda or the African Union sets out principles and objectives through legislation for dealing with fake news circulating on social media platforms in the country or continent. A country-specific or continent industry coalition of social media companies would then commit in a code of conduct to introduce measures against fake news circulating on platforms based on these principles and objectives set out the law. The code of conduct would be developed by industry stakeholders, including social media companies, civil society, academia and the general public under the guidance of regulatory or monitoring bodies that can ensure compliance with the policy and statutory guiding principles and objectives (Bertuzzi et al., 2023; Dittrich, 2019; Cannon & Chung, 2014). Therefore, the social responsibility theory is employed to understand how the government and Facebook co-regulate fake news circulating on its platform. In Uganda, the social responsibility media system gives total social

media freedom and/or freedom of expression on social media platforms on the one hand, and safe guards against abuses through external government control on the other hand (Oluwasola, 2020).

It emerged from the document analysis and interviews that co-regulation was an ineffective regime for dealing with fake news circulating on social media platforms in Uganda. Surprisingly, this finding contradicts a past study that recommended co-regulation as a preferred regime for dealing with fake news circulating on social media platforms in the EU (Marsden et al., 2019). Among the major weaknesses of co-regulation was the absence of a law on fake news and the unformed country-specific or regional industry coalition of social media companies to set rules and standards for dealing with fake news circulating on social media platforms. Not surprising, this finding contradicts past studies proposing co-regulation as the most suitable regime for EU to deal with fake news circulating on social media platforms Bertuzzi et al., 2023; Dittrich, 2019; Finck, 2018; Cannon & Chung, 2014). There is a need for a country-specific or regional law and industry association of social media companies to enhance co-regulation as a regime to deal with fake news circulating on social media platforms in Uganda or African region.

Other weaknesses make co-regulation an ineffective regime for dealing with fake news circulating on social media platforms. As earlier discussed, a major weakness of co-regulation was the limited co-operation between the government and Facebook in dealing with fake news circulating on its platform in Uganda. Interviews revealed that the Ugandan government took a decision to ban Facebook due (a) limited to cooperate in investigation of crimes against the state. Facebook did not comply with government even when there were lawful court orders and (b) election interference in a political process. This finding suggest that Facebook was banned in Uganda for interfering with the political process of a sovereign state. For the simple reason that the 2021 general election was “scientific”, the government of Uganda interpreted Facebook’s actions of deactivating and blocking accounts of its officials as meddling in the electoral process. In line with its Inauthentic Behaviour policy, Facebook does not also allow entities to engage in foreign or government interference or conduct CIB on behalf of foreign or government actors (Meta, 2024b). Document analysis revealed that Facebook removes content that is likely to directly contribute to interference with the functioning of political processes and certain highly deceptive, manipulated media. This finding corroborates past studies indicating the government of Uganda accused Facebook of being biased and discriminatory in enforcement of their community standards, since

the opposition has been spreading fake news on its platform (Wadero, 2022; Xinhua, 2021). According to social responsibility media system, there is need for government of Uganda to intervene in regulation of social media platforms due to their commercial interests, political imbalances or monopoly tendencies (McQuail, 2010; Benson, 2008).

Interviews showed that the government of Uganda and Facebook were in talks to resolve their lack of cooperation in dealing with fake news circulating on its platform in Uganda. This finding confirms a past study indicating that talks between the Ugandan government and Facebook have not yielded tangible results in terms of lifting on the ban as the tech company refused to restore the deactivated accounts (Wadero, 2022). This implies that cooperation between the government and tech companies is critical in the use of co-regulation as a regime to deal with fake news circulating on social media platforms platform in of Uganda. Surprisingly, this finding contradicts past studies showing that co-regulating was an effective regime for dealing with fake news circulating on social media platforms (Dittrich, 2019; House of Commons, 2019; Cannon & Chung, 2014). As earlier discussed, the need for a law or policy on fake news necessitates the use of social responsibility media theory to understand how the government of Uganda and Facebook co-regulate fake news circulating on its platform. Social responsibility theory presumes that social media platforms must be free but with the responsibility to serve the public good – whether by statutory regulation or self-censorship (Oluwasola, 2020).

Not surprising, interviews confirmed the document analysis finding. Document analysis revealed that the threat of fake news extends beyond any one platform, and no single tech company can tackle it alone. If malicious actors run campaigns off its platform and rely on independent websites and target journalists and traditional media, Facebook will be limited to taking action on the component of such campaigns on their platforms. That is why it is critical that there is a whole-of-society response (Meta, 2020a). This finding confirms a past study indicating that Facebook has strengthened collaboration with industry actors, such as tech companies, civil society, and governments, to help tackle the problem of CIB and influence operations (IO) from multiple angles at once. As one of the strategies used in information/influence operations, fake news can affect the entire information ecosystem, from individual consumers of information and political parties to governments, civil society organizations, and media companies. An effective response, therefore,

requires a whole-of-society approach that features collaboration on matters of security, education, governance, and media literacy (Weedon et al., 2017).

The limited enforcement of Facebook's community standards and policies made co-regulation an ineffective regime for dealing with fake news circulating on social media platforms. It emerged from the document analysis that Facebook has no policy on fake news. This study defined fake news as misinformation, disinformation and malinformation (Wardle & Derakhshan, 2017). While Facebook did not have a policy on fake news, its policies focused on Inauthentic Behaviour (disinformation), fraud and deception (malinformation) and misinformation. Facebook defined misinformation as inadvertent or unintentional spread of inaccurate information without malicious intent. Disinformation is inaccurate or manipulated information or content that is spread intentionally. This can include false news or involve subtler methods such as false flag operations, feeding inaccurate quotes or stories to innocent intermediaries, or knowingly amplifying biased or misleading information. Influence operations can use a mix of fake news, disinformation, or networks of fake accounts (false amplifiers), aimed at manipulating public opinion (Weedon et al., 2017). The policy on misinformation was limited in scope to categories of misinformation. Facebook removes misinformation where it is likely to directly contribute to (a) the risk of imminent physical harm or violence, (b) harmful health misinformation about vaccines, (c) public health emergencies, (d) miracle cures for health issues, and (e) voter or census interference. Facebook removes content that is likely to directly contribute to interference with the functioning of political processes and certain highly deceptive, manipulated media. Facebook removes content that shares, offers, or solicits personally identifiable information or other private information that could lead to physical or financial harm, including financial, residential, and medical information, as well as private information obtained from illegal sources.

5.3.2.1 The 2021 Facebook ban and the controversies of regulatory frameworks that resulted into Co-regulation failure

The ban of Facebook by the Uganda government in 2021 presents a case of contestations between state sovereignty and platform autonomy in regulating social media communications. The study established that the government of Uganda put a ban on Facebook after the platform deactivated pro-government accounts that were engaging in Coordinated Inauthentic Behaviours (CIB) during the 2021 general elections (Wadero, 2022, Xinhua, 2021). According to Key Informant 4, this

decision was justified on grounds of national security with the president claiming that “Facebook interfered with the elections by blocking some messages and allowing others”. This exposes how political considerations shape regulatory decisions.

Key Informant 6 also explained that “our [government] accounts were deactivated. We had a hashtag #Securing your Future, while the opposition had #Removing the Dictator, Facebook switched off accounts for only one side.” As observed by Omilusi (2025), social media disinformation can cause voter confusion and prevent people from participating in politics. This reveals a wide spread perception within government circles that Facebook’s enforcement of its community standards was politically biased.

On the other hand, Key Informant 2 observed that “Facebook came up with a report that pro-government accounts were operating in an inauthentic way. It hired a company that raised many red flags”. This however, indicates that Facebook follows its internal policies to regulate its platform (Meta, 2024b).

These conflicting positions demonstrate how differences in regulatory approaches, that is, state regulation, co-regulation and industry self-regulation can cause unending standoffs like that of Uganda and Facebook which has remained unresolved for years. The conflict however, serves as a perfect relevance to the *Four Theories of the Press* (Siebert et al, 1956) in Uganda’s digital communication arena.

Viewed in the lenses of the authoritarian perspective, Uganda government’s decision to ban Facebook reflects the state’s hunger to make social media usage subordinate to political authority, calling for digital platforms to move along with government interests in the name of “public order” (Oluwasola, 2020). The State’s interpretation of Facebook’s content moderation as interference highlights an authoritarian rationality that puts control of information first before open public sphere.

Another aspect of the normative theory is that Facebook’s removal of accounts is an indirect proof that already there is existence of a free market place of ideas in Uganda’s regulatory approach and that of Facebook. It is this liberty that is talked about in the *Libertarian Theory* that the government

of Uganda, whose political power is tangled with the communication regulatory framework, is afraid of and often views or defines it as a challenge to state authority.

Looking at the *Social Responsibility Theory* the standoff between Facebook and government of Uganda exposes the absence of real cooperating arrangements to balance communication freedoms with state accountability (Mbaine, 2020). In such a scenario, both government and cooperate industry companies like Facebook need to take social responsibility to the next level where well documented guidelines are in place to mitigate such scenarios. Key Informant 6 noted that “the two parties failed to agree on what the problem was. Facebook was saying these accounts were bots, but these were real people, may be there could have been bots, but we needed engagements”. This reflects a void where each side acted on its own weakening co-regulation efforts and shared responsibility (CIPESA, 2023).

The Uganda government explanation of the ban in terms of national security presents a controversial interpretation that upholds social order and ideological adherence over free digital communications, which is an aspect of the *Soviet/Communist Theory*. However, the avoidance of the ban by the users through VPN as Key Informant 3 noted, illustrates limitations to legal control in the digital world.

The 2021 ban is a typical example of the back and forth between global social media platforms and specific country’s regulatory sovereignty. It portrays the insufficiencies of statutory and co-regulation regimes in Uganda’s digital policy framework. As the study reveals, that while Facebook acted within its internal regulatory mechanisms to curb coordinated or influence operations, the government interpreted it as an infringement on sovereignty (CIPESA, 2023).

5.3.3 Informal regulation of fake news on social media platforms in Uganda

The study found that platform users employ informal regulation as a regime for dealing with fake news circulating on social media platforms in Uganda. In this study, informal regulation was viewed as an approach involving platforms users for dealing with fake news circulating on social media in Uganda. This finding is consistent with studies showing informal regulation as a regime of dealing with fake news circulating on social media platforms (Bélair-Gagnon et al., 2023; Themistokleous, 2021; Vianna & Carvalho-Mendonça, 2021; Buckingham, 2020; Goldberg,

2017). Therefore, this study employs libertarian media system to understand how platform users employ informal regulation for dealing with fake news circulating on social media platforms. The theory proclaims complete freedom of public expression and of economic operations of the media and rejects any interference by government in any aspect of the media (Oluwasola, 2020).

It emerged from the document analysis and interviews that informal regulation was an effective regime for dealing with fake news circulating on social media platforms in Uganda. Among the strengths of informal regulation that made it an effective regime for dealing with fake news circulating on social media platforms was related to media and digital regulation. Interviews indicated that the government of Uganda and Facebook support media and digital literacy as an informal regulatory mechanism for dealing with fake news circulating on its platform. Document analysis showed that Facebook policies support media and digital literacy efforts as a core principle of regulating the circulation of fake news on its platform (Meta, 2020a; Meta, 2020b). This finding confirms past studies on informal regulation indicating that digital literacy emerges as not only a policy issue but also an approach for dealing with fake news. This is because platform users as opposed to fake news the originators are the problem of fake news and therefore should be empowered to distinguish between genuine and fake news on social media platforms (Themistokleous, 2021; Goldberg, 2017). According to libertarian media systems theory, the platforms users are free to read and believe fake news circulating on social media platforms (Oluwasola, 2020; Firdaus, 2012).

This finding suggests that the government of Uganda supports education and public awareness efforts to realize critical and empowered citizenry in media and digital literacy. Although digital literacy and media literacy are not identical, they are overlapping. In this regard, digital literacy is understood as an essential component of the broader media literacy (Themistokleous, 2021). During the COVID-19 pandemic, there was a need to have an empowered population that could easily detect and dismiss fake news or desist from sharing false or unverified information. In this period, the circulation of fake news increased on Facebook as people shared false or misleading information about disease management, treatment, and vaccination. This finding confirms a past study indicating that regulators support media and digital literacy as a policy issue. Policy implementation by UCC from the perspective of digital literacy reflects a change in the role of regulators and exemplifies the evolving regulatory framework and widening role of regulators.

These shifting requirements of regulators and media governance as a whole are further propelled by convergent media and global culture and demonstrate the dire necessity for media users to constructively engage with media, positioned within policy support (Themistokleous, 2021).

Another strength of informal regulation was that platform users employed fact checkers for dealing with fake news circulating on social media platforms. This finding is consistent with studies on informal regulation indicating that social media companies partner with third party fact checkers to tackle fake news circulating on social media platforms. Facebook works with International Fact-Checking Network (IFCN)-certified fact checkers who identify, review and rate viral misinformation across Facebook, Instagram and WhatsApp (Meta, 2024c; Bélair-Gagnon et al., 2023). In this sense, fact checking was a crucial tool from the perspective of self-regulation as well as informal regulation as regimes for dealing with fake news circulating on social media platforms. Interviews revealed that fact checking was a crucial tool for empowering the population to deal with fake news circulating on social media platforms. During the COVID-19 pandemic many fact checkers mushroomed across the globe. As an example of such companies, Debunk Media Initiative started in 2020 to deal with fake news related to the pandemic.

As a result, the study concluded that informal regulation was an effective regime for dealing with fake news circulating on social media platforms in Uganda. For that reason, the study proposed a blend of informal regulation along with statutory regulation and self-regulation as opposed to co-regulation as regimes for dealing with fake news circulating on social media platforms in Uganda.

CHAPTER SIX

CONCLUSIONS AND RECOMMENDATIONS

6.0 Introduction

This chapter presents the conclusions, recommendations and areas of further study. Conclusions are drawn from the discussion of key findings from the in-depth interviews and document analysis as presented in the previous chapter. Recommendations are drawn from the conclusions of findings and organized according to the conclusions drawn for each research question.

6.1 Conclusions

The study sought to establish how self-regulation deals with fake news circulating on social media platforms in Uganda. It concluded that self-regulation is limited in dealing with the circulation of fake news. The main argument presented here is that self-regulation occurs at two levels – individual tech company and industry coalition of tech companies. Among the main weaknesses of self-regulation was the absence of a country-specific and/or regional industry coalition of tech companies to deal with fake news circulating on social media platforms. This meant that self-regulation was limited to the extent to which Facebook's mechanisms could deal with fake news circulating on its platforms in Uganda. These self-regulatory mechanisms, included: (a) enforcement of community standards and policies, (b) oversight board, (c) fact checking, and (d) user reporting and flagging.

In addition, self-regulation was limited in dealing with the circulation of fake news due to limited enforcement of Facebook's community standards and policies. Both Facebook and the oversight board's decisions were enforced based on community standards and policies. However, these community standards and policies were based on four core values – authenticity, safety, privacy, and dignity – that were ineffective in dealing with fake news circulating on the platform. Moreover, Facebook policies on fake news are narrowly focused on misinformation, inauthentic behaviour (disinformation) or privacy (malformation), as well as fraud and deception. For this reason, the study proposed a blend of statutory regulation, informal regulation and self-regulation as opposed to co-regulation as regimes for dealing with fake news circulating on social media platforms in Uganda. The main weakness of self-regulation and co-regulation as regimes was the lack of an

industry association for dealing with fake news circulating on social media platforms in Uganda or African region as a whole.

To further answer the main research question, the study assumed that social media regulation was a critical aspect of dealing with fake news circulating on these platforms. For that reason, the study assessed how government regulates social media platforms in Uganda. The study concluded that, while government employed statutory regulation, the regime was ineffective for regulating social media platforms in Uganda. Among the many weaknesses of statutory regulation was the lack of a law for regulating social media platforms in Uganda. The changing nature of social media technology was another weakness that made statutory regulation an ineffective approach for regulating social media platforms in Uganda. Another argument presented in this study is that tech companies were not the only actors involved in regulation of social media and/or fake news circulating on these platforms in Uganda. The government was involved in statutory regulation of social media in Uganda. Tech companies cooperate with the government to co-regulate social media and they also self-regulate their platforms in Uganda. Therefore, statutory regulation, co-regulation and self-regulation were the three approaches for regulating social media platforms in Uganda.

In addition to self-regulation and statutory regulation, the study considered co-regulation as an approach for regulating social media platforms in Uganda. The study concluded that the government and Facebook employed co-regulation as a regime to regulate its platform in Uganda. Among the main weaknesses of co-regulation was the absence of a law on social media and the unformed country-specific or regional industry coalition of tech companies to set rules and standards for regulating social media platforms.

Furthermore, the study sought to assess how government regulates fake news circulating on social media platforms in Uganda. The study concluded that, while the government employed statutory regulation, the regime was ineffective for dealing with fake news circulating on social media platforms in Uganda. Among the major weakness of the regime was the lack of a legal framework for dealing with fake news circulating on social media platforms in Uganda. The changing nature and cross-border nature of social media technology were other weaknesses that made statutory regulation an ineffective regime for dealing with fake news circulating on social media platforms

in Uganda relates to. As earlier noted, the government, tech companies and platform user were the main actors involved in dealing with fake news circulating on social media platforms. The government was involved in direct statutory regulation of fake news circulating on social media platforms. Tech companies co-operated with government to co-regulate fake news and they self-regulated fake news circulating on their platforms in Uganda. Therefore, statutory regulation, co-regulation, self-regulation, and informal regulation were the four regulatory approaches for dealing with fake news circulating on social media platforms in Uganda.

In addition to self-regulation and statutory regulation, the study considered co-regulation and informal regulation as approaches for dealing with fake news circulating on social media platforms in Uganda. The study concluded that the government of Uganda and Facebook employed co-regulation as a regime to regulate fake news circulating on its platform. Among the major weaknesses of co-regulation was the absence of a law on fake news and the unformed country-specific or regional industry coalition of social media companies to set rules and standards for dealing with fake news circulating on social media platforms. The limited co-operation between the government and Facebook and limited enforcement of Facebook's community standards and policies were other weakness of co-regulation in dealing with fake news circulating on its platform. The study also concluded that platform users employ informal regulation as a regime for dealing with fake news circulating on social media platforms in Uganda. Among the strengths of informal regulation that made it an effective regime for dealing with fake news circulating on social media platforms was related to media and digital regulation. This suggests that the government of Uganda supports education and public awareness efforts to realize a critical and empowered citizenry in media and digital literacy.

To recommend the most effective regime, the study established whether each of these four regimes was effective for regulating fake news circulating on social media platforms in Uganda. It proposed a blend of statutory regulation, informal regulation and self-regulation as opposed to co-regulation and the most effective regimes for dealing with fake news circulating on social media platforms in Uganda. This is because self-regulation was more effective than co-regulation due to measures taken by individual tech companies to self-regulate, though both regimes were limited by the absence of an industry coalition of tech companies to regulation social media platforms in Uganda.

6.2 Recommendations

The study recommends that a country or region-specific association of social media companies be constituted to remedy the industry level regulation of platforms. This action will elevate the extent self-regulation and co-regulation can deal with fake news circulating on social media platforms in the Uganda and Africa at large. This can be achieved through innovation of digital platforms within Africa countries that come together to form an industry related association to deal with the challenge of fake news on social media platforms.

There is also need for African countries to come up with a regional law and standards for self-regulation and co-regulation that the industry association of social media platforms can voluntarily adopt to regulate fake news circulating fake news on social media platforms. There is need for bodies, such as United Nations, African Union and East African Community, to come up with international laws and regional laws to regulated social media platforms and fake news. This will counter the bottlenecks of individual governments across the world cooperating with Facebook to regulate fake news circulating on its platform.

The study recommends a blend of statutory regulation to remedy the weakness of self-regulation and co-regulation in regulating social media platforms in Uganda. This is because self-regulation employs measures at the individual company and industry levels. For that reasons, Facebook's self-regulatory mechanism can go a long way in regulating their platforms in Uganda.

The study recommends a blend of statutory regulation and informal regulation to remedy the weakness of self-regulation and co-regulation in dealing with fake news circulating on social media platforms in Uganda. Therefore, the government should continue using the statutory regulation and informal regulation as regimes for dealing with fake news circulating on social media platforms in Uganda.

There should be an informal regulatory regime for dealing with fake news, such as using fact checkers and empowering social media users to detect fake news through public awareness and education. This underscores the need for digital literacy among users of social media in Uganda. There is need for UCC and Ministry of ICT and National Guidance to promote media literacy and

for Ministry of Education and Sports to incorporate digital literacy, in primary and secondary school curricula, as the fourth pillar alongside reading, writing and math.

The regional law should provide for an independent regulatory authority empowered to provide oversight to the social media industry association in the context of African countries. There is need to guarantee the independence of UCC for the statutory regime to be effective in regulating social media platforms in Uganda.

6.2 Areas of further study

The scope of this study was fake news circulating on social media platforms. There is a need for a further study focusing on fake news circulating on legacy media (print and broadcast), as well as new media (websites and blogs) and public events. This is because politicians are sources of fake news. Due to their prominence, legacy media are bound to pick up false information (irrespective of the motive) embedded in the elite ideologies. As such, there is an overlap in circulation of fake news between public events, legacy media, websites, blogs and social media platforms.

Fake news is context specific and varies from one place to another. This shows that the definition of misinformation, disinformation, or fake news is content specific. There is need for a further study focusing on the local definitions of fake news, disinformation and misinformation, in order to provide the local context for their regulation in Uganda.

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APPENDIX A

IN-DEPTH INTERVIEW GUIDE

For regulators, legislators/politicians, technocrats/academia and users

1. *Biographical Information*

- a) *Name (full name):* _____
- b) *Organization or institution:* _____
- c) *Position in the organization or institution:* _____
- d) *Consent to use Names in the academic research. YES/NO* _____
- e) *Date of interview:* _____

Regulators

Regulation of Facebook/social media platforms

1. What are the policy issues/problems that prompted government to regulate social media platforms?
2. How does government regulate Facebook or social media platforms?
3. What regulatory regime is effective for regulating social media platforms?
4. Why is the chosen regime effective for regulating social media platforms?
5. Facebook was banned in 2021 by the Ugandan Authorities. How did Uganda arrive at banning Facebook?

Regulation of fake news

6. What are the policy issues/problems that prompted government to regulate fake news circulating on social media platforms?
7. How does government regulate fake news circulating on social media platforms?
8. What is the ideal regulatory framework for dealing with fake news circulating on Facebook?
9. How effective is informal regulation, self-regulation, co-regulation and statutory regulation in dealing with fake news circulating on Facebook?
10. Why is the chosen regime effective for regulating fake news on Facebook?
11. What self-regulatory mechanisms does Facebook use to deal with fake news?
12. How effective is Facebook's self-regulatory mechanisms in dealing with fake news on its platform?

Legislators/politicians

Regulation of Facebook/social media platforms

1. How does government regulate Facebook or social media platforms?
2. What regulatory regime is effective for regulating social media platforms?
3. How effective is self-regulation, co-regulation and statutory regulation ideal for regulating social media platforms?
4. Why is the chosen regime effective for regulating social media platforms?

Regulation of fake news

5. What are the policy issues/problems that prompted government to regulate fake news circulating on social media platforms?
6. How does government regulate fake news circulating on social media platforms?
7. How effective is informal regulation, self-regulation, co-regulation and statutory regulation in dealing with fake news circulating on Facebook?
13. Why is the chosen regime effective for regulating fake news on Facebook?

Technocrats/academia

Regulation of Facebook/social media platforms

2. What are the policy issues/problems that prompted government to regulate social media platforms?
3. How does government regulate Facebook or social media platforms?
4. What regulatory regime is effective for regulating social media platforms?
5. Why is the chosen regime effective for regulating social media platforms?
6. Facebook was banned in 2021 by the Ugandan Authorities. How did Uganda arrive at banning Facebook?

Regulation of fake news

7. What are the policy issues/problems that prompted government to regulate fake news circulating on social media platforms?
8. How does government regulate fake news circulating on social media platforms?
9. What is the ideal regulatory framework for dealing with fake news circulating on Facebook?

10. How effective is informal regulation, self-regulation, co-regulation and statutory regulation in dealing with fake news circulating on Facebook?
11. Why is the chosen regime effective for regulating fake news on Facebook?
12. What self-regulatory mechanisms does Facebook use to deal with fake news?
13. How effective is Facebook's self-regulatory mechanisms in dealing with fake news on its platform?
14. Is there anything else you would want to say in relation to the research topic?

Users

Regulation of Facebook/social media platforms

1. How does government regulate Facebook or social media platforms?
2. What regulatory regime is effective for regulating social media platforms?
3. How effective is self-regulation, co-regulation and statutory regulation ideal for regulating social media platforms?
4. Why is the chosen regime effective for regulating social media platforms?

Regulation of fake news

5. What are the policy issues/problems that prompted government to regulate fake news circulating on social media platforms?
6. How does government regulate fake news circulating on social media platforms?
7. How effective is informal regulation, self-regulation, co-regulation and statutory regulation in dealing with fake news circulating on Facebook?
14. Why is the chosen regime effective for regulating fake news on Facebook?
15. Is there anything else you would want to say in relation to the research topic?

Appendix B

Interview Guide Matrix

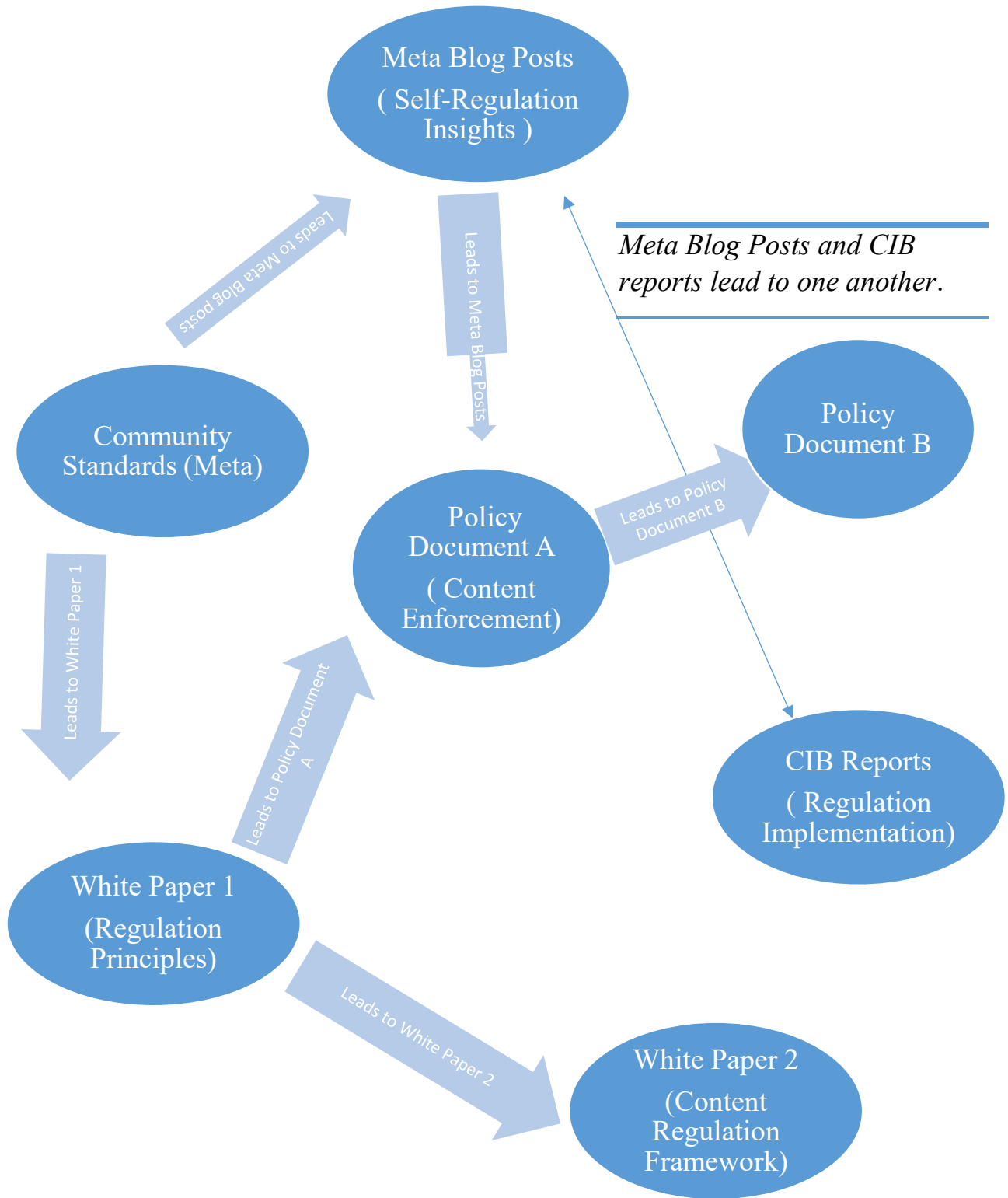
Participant Category	Research question being addressed	Key Focus of the interview
Director of ICT, Office of the President	Qn2: How government of Uganda regulates social media platforms	Government's approaches and roles in regulating social media platforms.
Special Presidential Assistant-GCIC	Qn3: How the government of Uganda regulates fake news on Facebook	Government's strategies and actions in dealing with fake news on Facebook.
Director of Media, Office of the President	Qn2: How the government of Uganda regulates social media platforms	Governments roles in regulating fake news and enforcement of national laws
Senior Public Relations Officer –UCC	Qn2: How Government of Uganda regulates social media platforms	Regulatory policies for social media platforms, UCC's involvement in regulating online content and fake news.
Commissioner, Ministry of ICT and National Guidance	Qn3: How Government of Uganda regulates fake news on Facebook	Ministry's viewpoint on regulating fake news, efforts taken to control misinformation, and policies of self-regulation that Facebook claims to have.
Lecturer, Department of Journalism and Communication, Makerere University	Qn1: What Self-regulatory mechanisms Facebook uses to tackle the circulation of fake news	Exploring academic insights of self-regulatory mechanisms used by Facebook and their efficiency to deal with fake news
Proprietor, Parrots Media	Qn3: How Government of Uganda regulates fake news on Facebook	Ugandan based online- media's perspective on government regulation and challenges of working with laws on online content and fake news
Fact-Checker, Debunk Media Initiative	Qn1: What Self-regulatory mechanisms does Facebook use to counter circulation of fake news	Perspective of how fact-checkers view Facebook policies to deal with fake news and how they collaborate with government of Uganda

Appendix C

Document Analysis Guide -Matrix

Document Type	Source	Key Content	Category	Findings
Facebook White Papers	Facebook Website	Principles for Combating influence operations	Policies	Discussions on transparency, Collaboration User empowerment
Community Standards	Facebook Policy documents	Hate Speech, Misinformation, Authentic identity requirements	Self- regulation	Processes of Content removal from Facebook and user penalties
CIB Reports	Inauthentic behavior detection	Inauthentic behavior detection and enforcement	Oversight mechanisms	Data driven approach, Technology and review teams

Appendix D: Document Linkage Map



Appendix E

Document Quality Evaluation Tool based on (Bryman, 2012).

Criteria	Evaluation Query	YES/NO	Remarks
Authenticity	<p>Is the Document from an official verifiable online Facebook/Meta source?</p> <p>Is the publication period appropriate to the timeframe of the research?</p>		
Credibility	Was the document authored by Facebook?		
Representation	Does the document cover satisfactory content in line with the research?		
Meaning	Documents relevancy to the research questions		
Document linkage	Does the document lead to another and how does it fit the findings from other documents?		

Appendix F

Analysis Guide Matrix

Triangulating Interviews with Document analysis

Research Question	Key Findings	Data source	Triangulated findings	Key theme/ Regulatory Regime
Qn1. What self-regulation mechanisms does Facebook use to deal with fake news?	<p>Content Modulation strategies</p> <p>Transparency and accountability measures</p> <p>Enforcement means and its challenges</p>	<p>Documents:</p> <p>Facebook Community standards</p> <p>Coordinated inauthentic behavior (CIB) Reports</p> <p>Deception and fraud Policy</p> <p>Interviews:</p> <p>Fact Checker at Debunk</p> <p>Lecturer at Makerere University</p> <p>Parrots Media Proprietor</p>	<p>Facebook uses AI algorithm and manual reviews for fake news regulation</p> <p>Transparency is ensured through periodic release of CIB highlighting cases of content removal and other enforcement actions,</p> <p>Oversight boards</p> <p>And third-party Fact checking</p> <p>User reporting and flagging</p> <p>The challenge lies with addressing unique cultural contexts in self-regulation efforts of Facebook and on the other hand limited local fact checking capacity.</p>	Self- Regulation
Qn 2: How does the Ugandan Government	Policy framework	Interviews:	Uganda has enacted laws targeting hate	Statutory-regulation

<p>regulate social media platforms?</p>	<p>Government efforts to collaborate with social media platforms</p> <p>Other means</p>	<p>Senior Public Relations Officer-UCC</p> <p>Commissioner of Communication at Ministry of ICT</p> <p>Director Media Office of the President</p> <p>Documents:</p> <p>Charting a way Forward on online content Regulation. Recommended Principles for regulation or legislation to combat influence operations.</p>	<p>speech and misinformation</p> <p>Key challenge is enforcement capacity due to limitations in laws</p> <p>Respondents emphasized update of laws to cater for proper regulation of social media platforms</p> <p>Unsuccessful efforts to collaborate with social media platforms were highlighted</p>	<p>Co-regulation</p> <p>Informal-regulation</p>
<p>Qn3: How does government of Uganda regulate fake news on Facebook?</p>	<p>Policy Framework</p> <p>Collaboration with Facebook/ Tech Companies</p> <p>Enforcement of laws on misinformation and other related laws</p> <p>Other means</p>	<p>Interviews:</p> <p>Director ICT Office of the President,</p> <p>Lecturer Makerere University</p> <p>Commissioner of Communications Ministry of ICT,</p> <p>Documents:</p> <p>Facebook CIB reports</p>	<p>Government uses its limited legal framework</p> <p>by manually monitoring user content and subjecting the authors to the law.</p> <p>Government empowers citizens against Fake News.</p> <p>Unsuccessful direct collaboration with Facebook to regulate fake news</p>	<p>Statutory-regulation</p> <p>Co-regulation</p> <p>Informal-regulation</p>

		Facebook Blog Posts on self- regulation	Participants advocated for Multi-stakeholder model involving social media companies, academia, private firms and government agencies.	
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