

Achievements by the Action Coalition on Meaningful Transparency

The year in review and plans for
the future

Prepared for the Action Coalition on
Meaningful Transparency by Brainbox

www.meaningfultransparency.tech/

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Disclaimer

This briefing document has been prepared for the membership of the Action Coalition on Meaningful Transparency, but should not be understood to represent the views or endorsement of all ACT members or any individual member.

Introduction

The Action Coalition on Meaningful Transparency (referred to as “the ACT”) commenced in February 2022. It is one of multiple action coalitions established pursuant to the Danish Government’s Tech for Democracy initiative and associated “year of action” programme.

The Action Coalition is a broad based network of academics, civil society organisations, companies, governments, and international organisations. We are working together to make digital transparency more meaningful, engage a broader audience of stakeholders, foster greater coordination, and protect human rights.

What do we mean by transparency?

The ACT takes an expansive view of “transparency” when it comes to regulatory frameworks for technology companies. Notably, transparency regulation must also include transparency over government activities in relation to technology companies.

Historically, “transparency” for tech companies has mainly been focused on and understood through periodic “transparency reports”. By contrast, recent regulatory regimes for tech companies have taken a broader approach, including a range of obligations. These can include:

1. Vetted researcher access to data
2. Disclosure of public datasets
3. Automated/API access to platform data
4. Internal self-audit by companies
5. Third party professional audit regimes
6. Transparency reporting (public-facing periodic summaries and analysis)
7. Operational reporting on systems
8. Risk assessment and human rights due diligence
9. Transparency of algorithmic systems
10. Procedural transparency and predictability
11. Regulator/government transparency
12. User-facing transparency, including transparency of terms of service and notice and appeal regimes
13. Usability, accessibility, and formats and languages for transparency disclosures.

Acting now but planning ahead

Transparency regimes – whether self-regulatory, co-regulatory, or state-based – are highly important globally and they are at various stages of design and implementation. Most notably, the European Digital Services Act has been finalised, with gradual implementation occurring in the coming months. Commentators generally, and the Commission in particular, anticipate a degree of “Brussels effect” to arise from the DSA, meaning DSA implementation will have not just regional but global impacts.

As other countries act to implement their own platform regulation and transparency frameworks, the Coalition can share knowledge, facilitate connections, and build capacity around the world. As such, the Coalition will continue to act urgently in response to regulatory developments, while recognizing opportunities for long-term impact in areas such as:

- Regulatory design
- Regulatory implementation
- Regulatory review and iteration
- Monitoring and participation in regulatory regimes, especially where predicated on civil society input.

Given these opportunities in the short and longer-term, there are substantial benefits to a multi-stakeholder approach that facilitates input from various groups and builds upon established infrastructure for long term collaboration in support of innovative, iterative, and meaningful digital transparency efforts.

Objectives

The ACT’s objectives include the following:

- Clarifying relevant definitions and terminology.
- Mapping existing and identifying missing efforts.
- Sharing lessons learned.
- Identifying opportunities for alignment and coordination.
- Encouraging and supporting participation of majority world actors in these efforts.
- Producing recommendations for companies, donors, researchers, and governments.

In this update, we provide a summary of key work streams and notable achievements for 2022 to demonstrate how we are pursuing these objectives.

KEY ACHIEVEMENTS, 2022



COALITION ESTABLISHMENT

Including advisory group recruitment, terms of reference, website to raise awareness, and shared infrastructure for communications



ONLINE TRANSPARENCY PORTAL

Portal design and concept testing, including concluding a supplier selection process, and preliminary mapping and taxonomy work



OUTREACH AND RECRUITMENT

Conducting active outreach and recruitment to build a diverse and global membership for the ACT (now 70+ members)



BRIEFING ON AUDIT UNDER THE DSA

A comprehensive briefing to DG CONNECT on audit implementation (shared with ACT members, for publication in 2023)



EVENTS

Participation in and leadership of various events, including with GNI, IGF, World Press Freedom Day, RightsCon, 360/Open Summit



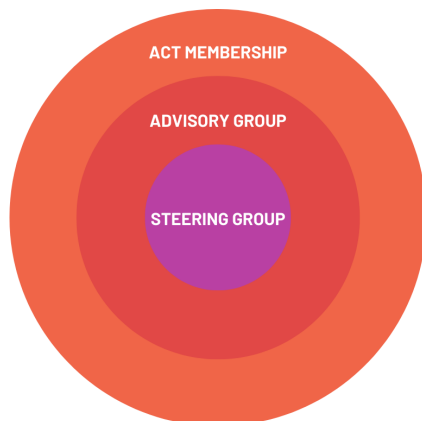
2023 PLAN

Establishing an events and publications plan for 2023 informed by expert consultation, including a set of priority topics and subjects

About the Coalition

The Action Coalition's structure is one of its key strengths. The ACT is structured around several key components. These are:

- the Steering Group,
- the Advisory Group,
- the broader membership, and
- the project lead.



One of the core tasks for the project lead has been to activate these groups, coordinate their regular meetings, and facilitate input in an effective way. Establishing these groups is a key achievement of the ACT this year. The [Terms of Reference for the ACT are available here](#).

Civil society Steering Group

Our civil society Steering Group brings an extraordinary breadth and depth of expertise. They are also closely involved in a range of formal and informal technology policy initiatives around the world, in both global majority ("global south") and global minority ("global north") countries and jurisdictions. The Steering Group includes the following organisations:

- the [Center for Democracy & Technology](#) (USA),
- the [Center for Technology & Society](#) at Fundação Getulio Vargas (Brazil),
- the [Centre for Communications Governance](#) at the National Law University Delhi (India),
- the [Center for International Governance Innovation](#) (Canada),
- the [Digital Forensic Research Lab](#) at the Atlantic Council (USA),
- the [Global Network Initiative](#) (USA),

- the [Institute for Strategic Dialogue](#) (UK),
- [Internet Lab](#) (Brazil),
- the [Partnership on Countering Influence Operations](#) at the Carnegie Endowment for International Peace (USA), and
- [Research ICT Africa](#) (South Africa)

The Steering Group engages with an Advisory Group of public and private sector representatives, including international organisations, platform companies, and government representatives.

Advisory Group

The Advisory Group features a diverse set of experts in their individual capacities, including from companies and government backgrounds, chosen by the Steering Group. The Advisory Group is given opportunities to weigh in on ACT work-plans and outputs and provide guidance to the Steering Group as appropriate. Current members of the Advisory Group include:

- Aiden Kim / Elyse Lee, Naver Z
- Alex Walden, Google
- Caroline Greer / Lisa Hayes, TikTok
- Collin Kurre, Ofcom
- Edward Teather / Lama Souma, CEIMIA, Global Partnership on AI
- Guilherme Canela de Souza Godoi, UNESCO (Freedom of Expression Office)
- Jeremy West, Digital Economy Policy Division, OECD
- Kristina Kirk, Christchurch Call, Department of Prime Minister and Cabinet (New Zealand)
- Ľuboš Kukliš, former chair of ERGA and EPRA
- Mette Finneman, Danish Government Tech Ambassador's Office
- Miranda Sissons / Alex Warofka, Meta
- Pedro Vaca Villareal, Special Rapporteur for Freedom of Expression of the Inter-American Commission on Human Rights (IACHR)
- Richard Gaines, Wikimedia Foundation
- Wafa Ben-Hassine, Omidyar Network

Broader Coalition membership

The ACT brings together members of the steering and Advisory Groups, with a range of other interested individuals and organisations to work collaboratively on digital transparency. Altogether, the ACT totals around 70 members. Members can contact each other using a Google group.

An important principle of the Action Coalition is that members are not bound to endorse the outputs of the ACT. All outputs will make it clear

that they do not purport to represent the views or endorsement of all ACT members. This is a means of allowing the ACT to make rapid progress, while preserving the diversity of opinion that is so desirable in platform policy and in multi-stakeholder initiatives generally.

Project lead

The work of the Action Coalition is coordinated by the Brainbox Institute, a consultancy and think tank based in Aotearoa New Zealand. Brainbox acts as the project lead, subject to the oversight and supervision of the Global Network Initiative and the ACT Steering Group. Brainbox is also responsible for conducting the Meaningful Transparency Project more generally, as explained below.

The Meaningful Transparency Project

The Meaningful Transparency Project includes both the ACT initiative, and a parallel independent stream of conversations with GNI members, which inform the ACT insofar as GNI confidentiality arrangements allow. In parallel, GNI and the Brainbox Institute facilitate candid conversations among GNI's academic, investor, civil society, and ICT company members about the nature of the obstacles to additional transparency and collaboration around company and government data use. This year, Brainbox led sessions in Stockholm, Sweden, and Washington, DC. Takeaways from these conversations will feed into the work of the ACT and in December 2022 we shared a summary of one of these conversations with ACT members.

Funding and duration

The ACT is funded by the Omidyar Network. Initial funding for the Meaningful Transparency Project, was contributed by Meta and Google. Moving forward into 2023, the ACT has secured a financial contribution from the New Zealand Government on behalf of the Christchurch Call to the transparency portal project's development costs.

The Meaningful Transparency Project includes dedicated funding for civil society organisations from majority world jurisdictions. In 2023, subject to consultation with the Steering Group, this funding will be used to support participation in the ACT. It will also be used for dedicated research on relevant topics, consistent with ACT's focus on a diverse global community.

The Action Coalition is currently funded through June 2023, however we will be looking for opportunities to extend our work, In particular:

- We have established a diverse coalition and community of experts of 70+ members collaborating towards shared objectives which we hope to sustain, strengthen, and grow beyond June 2023.
- Along with State-based regulation, there are a range of ongoing co-regulatory, self-regulatory and delegated legislative measures occurring globally which will benefit from input that has been informed by a diverse group of experts.
- We have established systems such as the shared calendar, the website, and Google groups which will endure beyond June 2023.
- The transparency mapping portal is a "living resource" with continued updates and maintenance as a useful community resource.
- We have identified key topics, questions, and focus areas that are critical to the work of the ACT. Our hope is to address these topics through events and research outputs by the ACT, its members, or its partners. These topics are too numerous to be covered in the period ending June 2023.

Countries around the world will continue to progress through the development of regulatory models, the implementation of that regulation, and ongoing examination of how that regulation is operating. As such, the potential duration of the ACT could continue for a number of years.

Key workstreams

The ACT's work is broadly split into three areas:

1. Coordination and amplification of existing work and existing initiatives.
2. Hosting and supporting events and discussions, including outreach to potential members and other initiatives.
3. Producing outputs, resources and recommendations for stakeholders and ACT members.

In this document, we give a summary of what is included in each workstream, some key achievements for 2022, and what you can expect from the ACT in 2023.

Coordination and amplification

Tech company transparency is a busy space with extensive work already being conducted globally by a range of different people, institutions and initiatives. The ACT is conscious of the need to amplify this existing work and better coordinate it, rather than duplicating or detracting from existing transparency initiatives.

This workstream includes the following:

- Developing an online portal mapping transparency initiatives, events, and outputs (products and reports).
- Operating a shared Google calendar of transparency events.
- Google groups for updates and communications.
- Collaboration with the Action Coalition on Responsible Technology and other Action Coalitions as opportunities arise, including participating in meetings hosted by the Tech for Democracy Initiative.
- Establishing and operating a Twitter account (@AC_transparency) to amplify outputs from the ACT and its members.

Key achievements for 2022 include:

1. Establishing a system of Google groups for shared communications.
2. Establishment of a shared calendar to keep track of relevant events.
3. Distribution of an RFP for a shared transparency portal to track events, entities, initiatives, and outputs related to transparency. We have nominated a preferred provider and initiated a development process.
4. Holding 100+ meetings online throughout 2022 for recruitment and strategy purposes.
5. Networking with key civil society and policy figures in Washington DC.
6. Brainbox and GNI staff members involved in leadership of the ACT are participating in the GIFCT's transparency working group.

Plans for 2023 include:

- Developing, sharing, promoting, and updating the transparency portal.
- Hosting monthly events and outreach to facilitate productive discussions and promote the ACT.
- Continuing to act as a coordinator and connector across the transparency space generally.

- Publishing a document to contribute to a shared understanding of core concepts, outlining key pillars for meaningful transparency and identifying categories of transparency within the broader tech transparency movement.

Events and outreach

Throughout 2022, ACT members have been contributing to and hosting events, both independently and together. Moving into 2023, the ACT's focus will shift heavily toward hosting webinars and panels on key transparency issues, using the platform for coordination established in 2022. Importantly, these events will focus on fostering participation by majority world organisations and individuals.

This workstream includes the following:

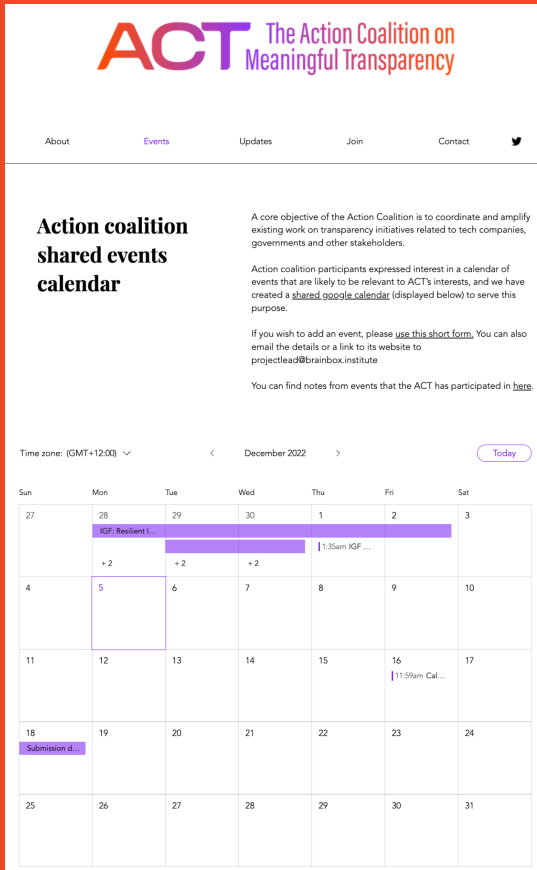
- Hosting discussions publicly and privately
- Recruiting ACT members and promoting ACT activities
- Online webinars and in-person events around existing conferences and meetings
- Deliberate focus on supporting and encouraging majority world and global south participation

Key achievements for 2022 include:

- Convening sessions and panels on transparency issues at World Press Freedom Day, 360/Open Summit, and RightsCon.
- Co-hosting and participating in sessions on platform responsibility in times of conflict and transparency in the global south at the Internet Governance Forum
- Facilitating GNI discussion sessions on transparency in Stockholm and Washington
- Participating in sessions hosted by UNESCO, Brookings, Design 4 Democracy, the Global Partnership on AI, and a range of others on platform transparency.
- Establishment of an updated website to foster more frequent updates.
- Recruitment of ACT members and outreach to other potential members.
- Establishment of a shared calendar to keep track of relevant events.

Development of a draft events plan to cover topics related to transparency for the duration of the ACT, provisionally through to June 2023.

Establishing the ACT website

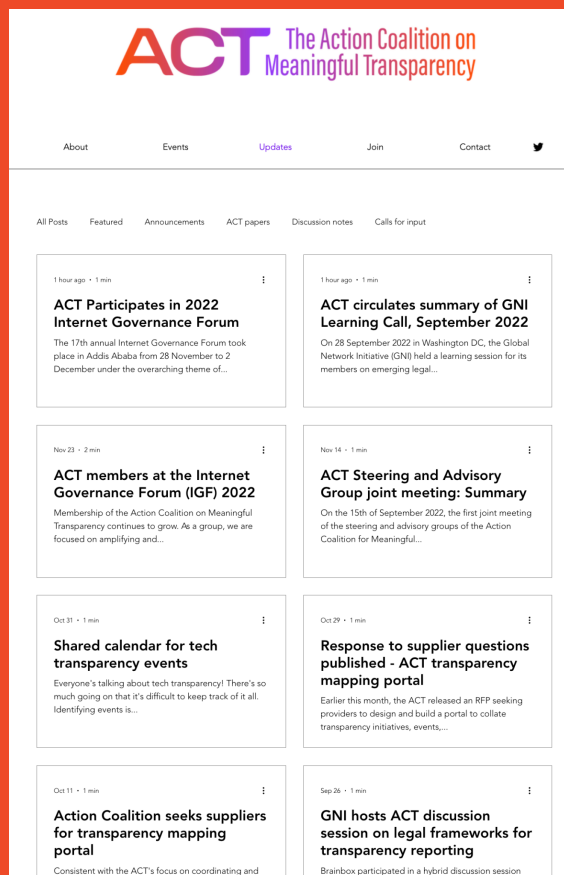


This year, Brainbox established the ACT website as a stand-alone page with key functions for organising events, coordinating members, and sharing updates about the Coalition and its outputs.

Brainbox is working with an external provider to develop a web portal that will incorporate information about events related to tech transparency. While the portal is under development, the ACT is operating a shared Google calendar, which can also be viewed on the website (left). Events can be submitted using a form available on the website.

Throughout 2023, the ACT will be accelerating the number of events it holds, and the outputs it produces. This will include amplifying the outputs from other initiatives on tech transparency, including other action coalitions.

From a project leadership perspective, the website enables Brainbox to operate a series of bespoke URL redirects to enable more efficient pinpoint communication with current and prospective members.



Plans for 2023 include:

- Continued recruitment efforts, aided by a high tempo of events and the release of the online mapping portal.
- [Frequent, high publicity events on key topics](#) with the distribution of discussion papers and associated outputs.
- Regular updates for ACT members.
- Continued engagement with key policymakers and other transparency initiatives.

Producing resources and recommendations

One of the core objectives of the ACT is to collate the knowledge of its members into usable outputs for various stakeholders, including companies, investors, donors, researchers, legislators and governments. Critically, this work also includes the amplification of existing work being done by members and others in the broader digital policy community. We have prepared a number of outputs in 2022 and anticipate these will be released in 2023 in conjunction with our schedule of events. The Meaningful Transparency Project includes dedicated funding for civil society organisations from majority world jurisdictions.

This workstream includes the following:

- Preparing discussion documents and written outputs for companies, investors, donors, researchers, legislators, and governments.
- Identifying barriers to transparency and how to mitigate them.
- Clarifying definitions and terminology.

Key achievements for 2022 include:

1. Brainbox has prepared and sought input on a comprehensive document categorising “barriers” to transparency. This document will be circulated and released in 2023 with a view to collecting examples and identifying useful mitigations for regulatory design or operational practice.
2. The ACT has finalised a briefing note to the European Commission’s DG CONNECT on implementing audit under the Digital Services Act. This is being distributed to members in addition to invitations to DG CONNECT to engage directly. A similar briefing on a different topic will likely follow, along with an event to discuss audit mechanisms more generally.

3. Brainbox is investigating ways of preparing publicly available machine readable versions of the DSA and other transparency legislation to enhance the usability of these legal instruments, including by the addition of annotations and selective filtering.
4. Brainbox has secured additional funding, and identified a preferred provider for the transparency and mapping portal, which will be used to amplify existing transparency materials, as well as to distribute the ACT’s own outputs next year.

Plans for 2023 include:

- Publishing the briefing note on audit frameworks under the DSA to a wider audience and holding associated events.
- Publishing a discussion paper on “barriers” to meaningful transparency with a view to identifying examples and discussing appropriate mitigation measures.
- Publishing a paper on the pillars of ‘meaningful transparency’
- Preparing discussion papers and summary documents in preparation for, and subsequent to, events hosted throughout 2023.
- In 2023, subject to consultation with the Steering Group, the funding for majority world civil society organisation will be used to support participation in the ACT. It will also be used for dedicated research on relevant topics, consistent with ACT’s focus on a diverse global community.

Concluding comments

Since commencing our work as project lead in April 2022, we have been grateful for the interesting and important discussions we have had with ACT members and other stakeholders.

There is unanimous agreement that transparency sits high on the regulatory agenda across a range of topic areas, and plays an important role in platform governance.

Despite widespread enthusiasm for transparency, there is equally broad agreement that the current moment could lead to transparency frameworks that do not serve human rights, have unintended consequences, or produce disclosures that are not meaningful.

Stakeholders also widely acknowledge that consensus on the appropriate role of states in regulating the use and disclosure of information by online platform companies and other technology companies is still developing.

Multi-stakeholder approaches like the ACT can add significant value to these ongoing discussions. Looking ahead, we welcome continued participation in the ACT by existing and new members. We are focused on ensuring that ACT participation delivers tangible benefits to all parties.

During 2022, while hosting and participating in a range of events and work around tech transparency, we have also laid a platform for intensified outreach and activity in 2023.

Working with the ACT in 2023

(1) Join the Action Coalition on Meaningful Transparency

The best way to support the Coalition and participate in our work is to [sign up using the membership form](#).

ACT members are not bound to endorse ACT outputs and participation involves significant opportunities, with no minimum expectations. We also don't expect ACT members to speak for their organisation or to adopt institutional positions.

(2) Participate in ACT events

In 2023, we will be continuing the work we've already done on hosting events. Events will be primarily held online, but we'll also be looking for opportunities to organise events at existing conferences and meetings in person.

By signing up, you can make sure you receive notifications about ACT events and access our shared calendar.

(3) Share details of your events with us

We want to amplify your work using the ACT networks. You can [use this form](#) to share information about events you or your organisation are hosting.

You can specify in the form if an event is invitation-only, but the calendar plays an important role in enhancing transparency among the policy community and fostering global majority participation.

(4) Share resources and reports with us for amplification and distribution

During 2023, we will be working to collate a range of materials for entry into our online portal of transparency events, initiatives, entities, and outputs.

You can share reports with the wider ACT using the ACT members google group to amplify your work. The ACT can also work to amplify your organisational outputs using its communications networks.

(5) Share our resources with your networks

You can help spread the news about the ACT and its work by sharing our outputs and pointing to our website: meaningfultransparency.tech

(6) Contact the members or the project lead with any questions

As project lead, Brainbox is accountable for continuing the momentum built in 2022. You can contact us with any questions or reach out to existing ACT members.

Acknowledgements

Our sincere thanks to the following groups for their work and support in 2022: the ACT Steering Group and its members; the Global Network Initiative, its members and its staff; the Danish Government and its Tech for Democracy team; the Omidyar Network; members of the ACT Advisory Group; and to the members of the ACT.

