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Name: Dr Gillian Koh

Deputy Director (Research) Institute of Policy Studies, Lee Kuan Yew School of Public Policy, National University of Singapore

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DELIBERATE ONLINE FALSEHOODS: CHALLENGES AND IMPLICATIONS

**Submission to the Parliamentary Select Committee on Deliberate Online Falsehoods
c/o The Clerk of Parliament, Singapore**

Gillian Koh¹

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This is a response to the invitation issued on 16 January 2018 by the Parliamentary Select Committee on Deliberate Online Falsehoods to examine and provide views on how best to understand the causes and consequences of this phenomenon that is shared with malicious intent, and suggest ways to counter the circulation and impact of such materials.

2. The work of the Select Committee is supported by a Green Paper that was presented to Parliament by the Minister of Law on 5 January 2018 which sets out the government's position on issues that arise from the use of evolving digital media to spread falsehoods, the impact of these materials, the objectives of those who spread them, the steps taken by some countries to address the problem, and the incidence and impact of the spread of such falsehoods on Singapore in the past. It also sets out the terms of reference for the Select Committee.

3. The Green Paper provides a thorough scan of the issues and there is no need to rehearse it here except to highlight three key points that are relevant to this submission: First, attempts at exerting foreign influence over Singapore are not new. What has and can change are the foreign entities that seek to do so, their objectives, methods and the stakes involved.

4. Second, as a result of the first point, there are already strict rules against foreign interference in Singapore's political system. As mentioned in the Green Paper, the Political Donations Act, the Societies Act, and the Public Order Act are the current tools that target foreign interference. It should also be mentioned that there are also several powerful laws against any speech or action that is prejudicial to good order and social harmony here, another strategy behind and effect of online falsehoods the Select Committee is concerned about. They are the Sedition Act and ultimately, the Internal Security Act.

¹ The author wishes to thank Tan Min-Wei, Drew Shih and Dhevarajan Devadas for the kind assistance in preparing this submission, but she takes sole responsibility for the views expressed here.

5. Third, what is new is the availability of Internet-based media which means that communication of any material can spread with much greater ease and speed than before. The ability to publish views, news, information, misinformation and disinformation, as well as circulate them lies in the hands of all who have access to the Internet through a computer or a smart phone. While the credibility of these materials will vary based on readers' assessment of who might have created or circulated them, the key point here is that the identities of those who do so can remain anonymous or masked behind pseudonyms. More critically, it is the design feature of the Internet that there is no single point of control and oversight; that there is no single source of content and no single kill-switch for the system and the material on it.

6. It must be said however that Singapore also has strict rules for the regulation of mass media, both Internet-based and all other platforms prior to the emergence of the former, designed to ban and block material that can sow discord, threaten internal security in Singapore as well as material that may offend the sensibilities of citizens. These can be found in the Broadcasting Act, the Newspaper and Printing Presses Act, the Films Act, the Public Meetings and Entertainment Act and the Undesirable Publications Act. The most recent significant piece of legislation in this regard requires news websites that hit a certain average level of circulation with articles that cover Singapore to place a deposit with the government for a license to operate. This deposit can be forfeited if the news website resists an order to take-down any offending article when required to do so by the government.

7. Given the foregoing, the focus of this submission is on dealing with the creation and circulation of material through online media designed to influence Singapore's polity and policies covertly by foreign actors, or designed to profit those who generate and circulate it, that may or may not be based on falsehoods. In doing so, it is clear that Singapore is not operating in a state of tabula rasa.

8. Rather, the challenge is to respond to the new threat of deliberate online falsehoods in a way that does not curb the freedom of expression much further, or create an instinct of dependency by citizens on the government to respond to their every discomfort with what they read and hear. The default of Singapore's governance system must be to encourage the development of informed, discerning citizens, who strive not to give offence or take offence even within the cultural diversity that we find among ourselves.

9. Also, it would not be desirable for us to recommend a solution that locks ourselves in a virtual communications prison whether out of fear of foreign influence, or, perhaps, an ungenerous lack of trust in citizens' inability to be canny or thoughtful enough in responding to what they read. We should be careful not to over-react as that too can be part of a wily strategy by less-than-friendly entities to drive Singapore into a scenario that is contrary to what we aspire towards - a wired, open, creative, competitive and integral node of the global economy and community.

Focus on Election-Related, Foreign-Generated Material

10. For those reasons, this submission confines its discussion of countermeasures to the spread of deliberate online falsehoods by foreign actors – be they states or non-

state entities – who do it covertly, and only within the context of a parliamentary or presidential election, or a referendum in Singapore.

11. Further justifications for the narrow scope of this submission are: First, elections and national referendums are occasions when all voting-age citizens engage in consequential political decision-making – these are important exercises of popular sovereignty and self-determination that must not be undermined either by foreign entities or even by how we design our political institutions and processes.

12. The second justification is this: There is a dilemma about the regulation of media that is particularly acute in an election or referendum and it is this dilemma, as we understand in contemporary cases of deliberate online falsehoods, that foreign entities seek to exploit.

13. To explain: On the one hand, in an election or referendum, in a democratic system and society, voters' freedom to decide for themselves what they consider to be relevant information and opinion to guide them must be protected. This suggests the need to keep the regulation of media out. It is precisely the democratic principle that foreign entities seek to take advantage of. On the other hand, while it is hoped that voters will choose to read high-quality and verifiable information to help them in their electoral choices, it must be their right to learn of the interests that lie behind those who create and provide that information and opinion; the reasons why those who generated the material are trying to persuade voters towards a certain position or sway them towards a sentiment. This would apply to old world mainstream media too.

14. Throwing the new modalities of communication into the mix, there is, arguably, need for active monitoring and regulation of media to ensure that this transparency is secured as far as it is possible; it will not be foolproof. While it is true that voters will not ask that of every piece of communication they receive and read, the point is the democratic process is undermined if foreign entities seek to subvert that natural, national course of events. It would be important, therefore, to uncover strategies to subvert popular will or to stir the ground by any foreign entity, or political party for that matter, which will require intervention. The challenge then is to ask who should intervene and how should that be done in a way that reinforces the democratic system, not subvert it.

15. We have to bear in mind that if this monitoring is to be done, the sort of material that we will be looking for will necessarily be material that is put out and circulated covertly; that it would be propagated through technology to leave as few traces of culpability as possible because Singapore does, after all, have a well-established governance framework in media and civil society regulation that bans outward influence by foreign entities as explained earlier. It will also necessarily be covert because the most persuasive communications is that which convinces readers it is of their own accord that they have come to feel and think in the way that they do.

16. As we learn today, there are some foreign states that prefer the mode of digital technology to manipulate public opinion (for example, they use automated accounts to circulate the material further after they have seeded it in the public domain) but there are also foreign states that activate people, sometimes even those they have embedded in the local populace, to propagate their lines of argument.

17. The former strategy is the picture that emerges from the 16 February 2018 action by the Special Counsel of the United States' Attorney General's Office, Robert Mueller to charge 13 Russian nationals and three organisations for using "troll farms" to propagate false personas, social media pages and groups, and false information to interfere in the November 2016 American Presidential Election.

18. The second strategy has been attributed to People's Republic of China, which, in the Taiwanese Presidential Election of 2016 is alleged to have mobilised citizens to share messages of derision for the front-runner, pro-Independence politician and eventual winner, Tsai Ing-Wen and her supporters; for Taiwanese democracy; and for Taiwan's standing vis-a-vis Mainland China. These expressions were described by state media of China as "spontaneous manifestations" by young patriotic Chinese.

19. To reconcile this basic dilemma of regulating media and specifically, deliberate online falsehoods, at the time of an election or referendum, we need a mechanism that informs voters if there are any foreign entities behind material they read so that voters' right to choose what they wish to be exposed to remains intact.

20. Also, it is important to recognise that any state action that goes further -- withdrawing or taking down material will lead to its replication in reporting on the action and possibly even greater interest via the Streisand Effect -- the phenomenon whereby an attempt to hide, remove, or censor a piece of information has the unintended consequence of publicising the information even more widely.

21. Together, these considerations undergird the approach that global online, social media companies are proposing with the "honest advertising" strategy. The problem is that since Singapore with its small market has little leverage over these companies, whether it is Twitter, Facebook or Google to name the key players, we can only hope that these companies do adopt the strategy due to pressure from their larger markets but we cannot rely on it.

22. Putting in place a system in Singapore to monitor and report on foreign influence will still leave voters to decide if they will read the material that has been flagged for foreign influence. It can however provide fair warning not to indulge in circulating the material further. The mechanism can go on to check on the veracity of the information if the material is not purely based on opinion in the first place.

23. However, whether voters choose to read, think and respond in a way that upholds the national interest is outside the scope of this submission. Why? Suffice it to say that that too is a political decision for voters -- it can be a point of political contestation among politicians and political parties in an election -- but more specifically, it lies squarely on the on-going processes of nation-building, identity-formation and political socialisation of each generation of Singaporeans. These are, therefore, not issues related to the regulation of deliberate online falsehood. Of course, it is these processes of political socialisation that will be tested if foreign entities with malevolent intent choose to sow discord in the local community or subvert the governing frameworks of Singapore through their material.

24. This submission addresses all forms of communication whether propagated deliberately by persons, states, non-state organisations or technology (through

automated bots and computer algorithms programmed by platforms that host the material) and also private chat groups.

25. It will propose a method by which to signal to readers the likelihood that the source of the material is foreign so that Singaporean voters can make an informed choice about whether they wish to take the material seriously, with an advisory that further circulation is prohibited with penalties for not abiding by the prohibition. It will also propose that the material that is generated and put out by foreign entities is examined for fabrication of information. A further advisory can be made if it is likely or confirmed that the material contains falsehoods. Heavier penalties can be applied for this.

26. It will stop short of suggesting that other penalties should be placed upon foreign entities for such material as that may lie outside Singapore's jurisdiction in the legal sense, but also in the realm of foreign policy.

27. It should be noted that material created by Singaporeans located outside of the country should also be construed as material generated by foreign sources because it is better to cast a wider net, and likewise, material generated by foreign entities and persons located in Singapore. These decisions require judgment and the system rests in empowering a body that is deemed to be independent and impartial to exercise that judgment. Assessment of whether falsehoods were at play can take place through normal investigative processes, even after the election.

The Creation of an "Election Media Monitoring Commission" – Reinforcing, Not Subverting Democracy

28. It is proposed that an independent body called the "Election Media Monitoring Commission" be established. It should be empowered through state legislation to monitor any media content that the Commission judges to be election-related to establish first, whether it is generated by foreign entities and individuals; second, whether it contains fabricated information or material and third, whether it threatens good order and social harmony, from the period that a writ of election is issued by the President of Singapore till the final polling result is declared by the Returning Officer in the case of an election, or from the time notice of a referendum is issued till when it is concluded.

29. This Commission should comprise an odd number of former senior judges and professors who are guided by the same professional values of impartiality, integrity and rigour of their respective vocations, to weigh up the matters placed before it. The members are asked to make a statutory declaration that they have no interest and never been a member of any political party in the past before they are appointed. Nor will naturalised citizens be allowed on to the Commission to avoid any risk of the questioning of the Commission's judgment to arise.

30. The members of the Commission are nominated and then appointed by parliamentarians, which includes government Members of Parliament (MPs), opposition MPs and nominated MPs, six months after the start of each parliamentary term with the Commission's monitoring activities taking place during all parliamentary elections including general elections, by-elections, in presidential elections and national referendums.

31. It is recommended that the Commission be empowered by legislation to tap on all the resources of the state from the intelligence and cybersecurity agencies of the Ministry of Home Affairs, Ministry of Defence and IMDA, to conduct its monitoring of election-related material, for the sole purpose of identifying its provenance – a centralised task force. The Commission should be supported by a Secretariat from the Elections Department.

32. When the Commission is first created, it should take in expert knowledge to create a body of policy to guide its activities. This should be in five areas:

32.1. First, it should establish and declare the threshold in terms of circulation, over which the Commission can then decide if any material is election-related, has gained traction enough to shape public opinion and therefore, should fall under its scrutiny. It may have to ascertain appropriate thresholds for different forms of communications and allow for methods that might be suitable to closed-group private chat groups. It should have mechanisms to monitor election-related media but it should also have a hotline that allows for the public to share material they think the Commission should consider for scrutiny.

32.2. Second, it should establish its protocol for tapping the centralised task force to investigate the provenance of the material assuming other provisions are made for the constituent bodies within this task force to support the work of the Commission and, to work among themselves.

32.3. Third, in the case where there is evidence of the likelihood of or even outright confirmation that the material is generated by a foreign source, it should establish the protocol for making this known publicly and immediately on its own definitive media platform but also if it is technologically possible, the Commission should flag that there is evidence of foreign-generation of the material on the platforms where readers are likely to access the material.

32.4 Fourth, it should establish the protocol to tap state agencies to investigate and establish if the material contains fabricated information and for the Commission to flag this publicly on its own definitive media platform and the other platforms where the material is hosted as well, as soon as it is confirmed, regardless of whether the investigation is completed within the election period or not.

32.5. Fifth, if the Commission judges that the material found to be of foreign sources, is prejudicial to public order and social cohesion, it should create the protocol for raising the red flag to existing and appropriate authorities for action; in other words, it makes a formal report to those authorities.

33. The circulation threshold should be reviewed at the start of each new term of the Commission, but it is envisaged that the rest of the operating protocols should only be reviewed after longer periods of time, at a time of the Commission's choosing to take into account changes in technology and media, the threat level of foreign interference and effectiveness of the existing system. It cannot however be so often as then to be open to allegations of the lack of predictability or efforts to skew the political game.

34. With the guiding principle that the monitoring system is to ensure that Singapore's democracy and political institutions are not undermined, these protocols must also be designed and run in ways that uphold the spirit of democracy. The accent of this system is on allowing voters to decide what to read and how seriously to take the material with the best knowledge available at the time on whether it is an attempt at influencing public sentiment by foreign entities, and especially if it is by using fabricated information. To borrow a phrase, it is important that the cure is not worse than the disease.

35. Of course, if the material is not only from a foreign-source but also inflammatory and prejudicial to public order and social harmony, it is likely that existing agencies and all the other laws of the land will have been activated to staunch the impact of the material, regardless of whether it has been generated by foreign entities.

Details of the Working Processes of the Commission – Investigate, Warn, Penalise for Further Circulation

36. The recommended process of the system can be described in the following manner:

36.1. The Commission is constituted and ready to do its work anytime an election or a national referendum is called.

36.2. Political parties declare in an election the sort of media they will use and also whether they will be using any foreign vendors to generate their material. There is a list of declared foreign media vendors that will be used that is shared with the Commission.

36.3. When an election or referendum is called, as soon as the circulation level of any material related to the election or referendum breaches a threshold, it enters the monitoring dashboard of the Commission. It is up to the Commission to decide if the material is indeed election-related and should fall under its scrutiny. Members of the public can also send in reports of what they think are materials that should come under the Commission's scrutiny by the same criteria or their estimate that these meet the criteria. This is especially targeted at material sent through private messaging systems. If the Commission judges that the material is election-related and meets the circulation thresholds, it authorises the centralised task force, to investigate its provenance. It is likely that there will be lists of materials submitted each day in the run-up to the election or referendum. The task force reports its findings to the Commission on that list of materials under scrutiny.

36.4 The Commission issues an alert to the public of the list of election-related materials found to be "likely to be from foreign source" (generated overseas or in Singapore but by foreign entities), or "confirmed to be from foreign source" and indicate which of these coincide with the list of declared foreign sources set out by contesting political parties and which do not. The Commission then places this advisory on its definitive official media platform and also inserts the advisory on the platform(s) on which the material is found. Further circulation of the material, if the source is not on the list of vendors of political parties, after a notification period of say, three hours, will be subject to prosecution and penalties.

36.5. If the material comes from a foreign source, the Commission gives further authority to appropriate agencies to investigate whether it contains fabrications if the material contains more than just opinion, and if the Commission judges that they are consequential to the election, the referendum and ultimately, to the national interest. The task force reports to the Commission, regardless of when that investigation is complete. The Commission reports publicly on the outcome on its official media platform and places the same advisory on the platform(s) where the material is found. When material is identified on the Commission's judgment is that it is election-related, foreign-generated and contains falsehoods, the highest level of regulation is placed – it asks that the material is removed by its creators if possible, circulation is banned and warns that the most severe penalties will be levelled, after a minimum notification period from the Commission.

36.6. From the start, if the Commission judges that the material is elected-related and is prejudicial to good order and social harmony, it can make a formal report to the appropriate authorities for their follow-up action at any time, if it has not already been picked up by the authorities using all the other laws of the land. It issues the advisory on its official media platform and if technologically, possible, on the platform(s) hosting the material that it contains material that is controversial. The material is still scrutinised by the Commission for whether it is foreign-sourced and contains falsehoods in processes that have been described above.

36.7. The Commission continues its monitoring and advisory activities right through Cooling-Off Day and Polling Day. Investigations and attending operational processes carry on beyond these till the files are closed.

Illustrating how the Commission Will Work – Three Scenarios

37. There are two most critical aspects of the proposed system which help to make it legitimate and effective.

38. First, that the independent Commission has the discretion and takes the responsibility for the following decisions:

- If the material is election-related;
- If the provenance of the material based on investigations is likely or confirmed to be from foreign sources;
- If the foreign-generated material contains falsehoods (not opinion), based on investigations, should be of concern to voters; and
- If the election-related material is prejudicial to good order and social harmony especially given the speed and spread at which it is being circulated.

39. Second, the work of the independent Commission has to be supported by a centralised task force to do the following

- Investigate the provenance of material online or on offline media;
- Investigate the veracity of assertions made if they are presented as facts, data that the state should be in possession of, or incidents that the police might have record of; and

- The authority to draw on these investigative resources, the connections to foreign parties to investigate and the authority to release the relevant information and reports of investigations to the Commission.

40. To illustrate how this Commission might work, here are three scenarios which are fictional although some aspects may draw on actual incidents. There is also a flow-chart found in the Annex that summarises the key processes envisaged.

Example 1: The Writ of Election has been issued. One day before Nomination Day, a key opposition politician alleges that the Election Department has lost his application for a minority certificate. He tweets: “ELD lost my minority certificate - dirty tricks of govt election office”. While the Election Department states publicly that it will investigate this allegation, the tweet is in a trending frenzy.

As the legislation allows for the Election Media Monitoring Commission to investigate when tweets are shared x number of times or has x number of followers, its members are asked to decide if it is election-related, who respond in the affirmative. The Commission then refers the material to the centralised task force to check if the material has been generated and circulated by foreign entities and also whether an algorithm or automated bots as well.

The investigation shows that there is no foreign influence at play. The file is closed and no further action is taken by the Commission.

Even if the material is found to be locally-sourced, and yet contains falsehoods, other political processes and state laws can apply, but no further action should be taken by the Commission which is designed to target foreign interference.

The Election Department responds to the allegations as it should. It issues its statement that the opposition politician put his application form in his bag after he received it and filled it in three days before Nomination Day, and therefore never submitted it, based on camera footage. The Election Department places in its statement that the politician has propagated a falsehood and states these facts.

Example 2: The Writ of Election has been issued. It is three days before Nomination Day. There is a story that is trending on Twitter and is being shared widely on Facebook. It is alleged that a Filipino man reported to the police that Thaipusam worshippers in his neighbourhood were playing the drums and making a lot of noise.

As the legislation allows for the Election Media Monitoring Commission to investigate when tweets and Facebook posts are shared x number of times or has x number of followers, its members are asked to decide if it is election-related, which they respond in the affirmative. The Commission then refers the material to the centralised task force to check if the material has been generated and circulated by foreign entities and also whether an algorithm or automated bots as well.

More critically, as it has already caused a great deal of anti-immigrant, anti-foreigner sentiment, it flags the material as being prejudicial to good order and social harmony on its website and also inserts a message on the two platforms hosting the story about

this. The Commission understands that the police already have their own investigations in motion.

The task force reports that this story originated on a site that is not based in Singapore and that there is also evidence that some of the circulation has been the effect of the use of automated bots.

The Commission states that the material has foreign-origins and possibly is circulated by bots on its website and inserts the advisory on the two platforms hosting the material. It warns readers that further dissemination of the material is disallowed and can make one liable for prosecution of circulating foreign-generated election material after the notification period of three hours from the time that this advisory is published.

The Commission asks the task force to investigate the veracity of the material, which responds two days before Polling Day to say that it is not true -- the police received no such report and there was no such incident and that no Thaipusam worshippers played on drums or music outside of the designated spots where those are permissible.

The Commission updates its advisory on its website that the material was generated by foreign sources, spread using technology and contains deliberate falsehoods. It does the same on the platforms that the original material was hosted. It reminds readers not to circulate the material any further and that doing so can make one liable for prosecution and more severe penalties for circulating what is now confirmed to be foreign-generated online falsehoods. The Commission makes a formal report to the police and other authorities about the material, sharing its evidence with them.

A month after the election, it is found that two foreign editors of a foreign-based website were responsible for fabricating the material. They profited handsomely by it. And, since they continued to be in Singapore as they were during the election, they are arrested and charged with creating and spreading deliberate online falsehoods. One individual who circulated the material four hours after the Commission's advisory that it was foreign-generated was charged with circulating the prohibited material.

Example 3: The Writ of Election has been issued. It is twelve hours to Cooling-Off Day. A Singaporean has crafted a succinct and elegant 25 line allegory, shared on Facebook, about a leader in Singapore whom he opines has mis-handled Singapore's relations with country ABC and caused Singaporean businesses to lose opportunities to participate in a large regional infrastructural project funded by ABC. It goes on in its final line to suggest that only those with deep cultural understanding of ABC should lead the country. The circulation of the material and also commentaries on it both breach the threshold of circulation which raises the material to the monitoring dashboard of the Commission.

As the legislation allows for the Election Media Monitoring Commission to investigate when material is shared x number of times, its members are asked to decide if it is election-related, which they respond in the affirmative. It then refers the material to the centralised task force to check if the material has been generated and circulated by foreign entities and also whether an algorithm or automated bots were involved.

The task force identifies the originator of the material as the immigrant to Singapore from ABC, who keeps close ties with business and government leaders in the country of his origin by travelling there when its ruling party's national congress meets in the recent two years, according to Singapore's intelligence and immigration agencies. Many of the commentators to his material are also immigrants from ABC.

The Commission issues the advisory on its website and the platforms on which the material and commentaries are hosted and shares that it is likely that this is foreign-generated – although it was created by someone located in Singapore, he is of foreign origins and has on-going ties with foreign entities. Further circulation of any of the material related to the original communication and the follow-up is disallowed after the three hour notification period, and can be subject to prosecution and penalties. As the Commission judges that this is an opinion piece, no further action is taken to investigate if falsehoods are involved. The original advisory on circulation is in place. In the event, the originator of the material decides of his own accord to remove his post.

Conclusion – Final Notes

41. To recap, the system that is proposed in this submission targets legislative means of curbing communication that is related to elections or referendum generated by foreign entities and also if they contain falsehoods and/or sow discord within Singapore, and alerts voters to these. The alert provides warning that further circulation is not allowed.

42. Further time will be needed to investigate on the veracity of the information that the material may contain. If it bears falsehoods, a further alert is issued to the public that circulation is not allowed and that higher penalties may be imposed.

43. This submission does not propose pressuring or imposing fines on companies that host such material because Singapore does not have that sort of leverage on them, and also, it presumes that there are entities who can be sued for hosting the material in the first place.

44. It also does not ride solely on a public reporting mechanism as there has to be some objective measure by which it is decided that material has or might hold sway over the voting public. It also helps to ensure that the system by which material is surfaced to the Commission for consideration is non-partisan. There is a channel available for the public to report material which they think or suspect meets the Commission's circulation threshold. Their identities will be kept anonymous when they do so. This is designed especially because materials can be spread through private chat groups if those with intent to harm from circulation know that the system exists with this loophole. By these means, hopefully, that loophole is addressed although not in a foolproof fashion.

45. The system depends on the establishment of a central verification service that the state will have to plan, design, legislate for and subject to testing before actual roll-out. It will be afforded a great deal of power but it cannot itself release information of its investigations and compromise privacy. It operates in a way that protects the innocent,

especially as it works through the intermediating body which is the Commission. The system must be just and fair.

46. The Commission on the other hand, operates in a way that aims to not subvert the democratic process – its starting point is that it can only act if there is foreign interference at play, especially during an election or referendum. This is aligned to a long-standing governance principle in Singapore. It does not prosecute foreign entities for political influence, for deliberate falsehoods, nor for material that sows discord. It raises the flag when there is material that is disallowed and gives notice that further circulation is subject to penalties that other arms of the state should prosecute. As the state has already prosecuted individuals and entities that have spread online falsehoods, as well as material that has threatened to or has actually caused social disruption in the past, there is no need to do more after setting up this Commission, than to ensure that the basis of evidence, the processes that cover the instances of deliberate falsehoods that subvert Singapore's democratic processes and sovereignty are in place, along with a definition of the penalties for further circulation are in place also.

47. This submission also assumes that there will be many other recommendations made by other Singaporeans to the Select Committee to boost the level of media literacy, access to quality information on governance and public education, efforts to provide skills to professional and citizen journalists, and even netizens to create high quality output and that will not be construed as “fake news” so that all help is given to stay within the bounds of high-quality output. These are just as important in complementing the work of the formal state institutions which is the level at which this submission is targeted.

48. As the question of deliberate online falsehoods and how they can affect democracy and sovereignty is an area that many countries are seeking to bolster too, it is clear that the technology on which these work, is evolving. Whatever this Parliamentary Select Committee should recommend and the government take up, the provisions and protections should be reviewed after a reasonable time to ensure they keep up with the new modalities of communication. By then, there will have been a record not only of how Singapore's system is working but a record of how alternative systems work. Further iterations of our system can be made so that it continues to be effective while not doing too much harm to our freedom of expression, to media and democratic choice.

49. A final note – it is always important to be as judicious as possible in the design of regulatory bodies as the political system must never be so asymmetrically-tilted as to privilege the incumbent in power too much. Citizens and voters must feel that the system and its attending institutions are fair and operate fairly; that they allow for the prospect of rational, rule-based transfers of power should political sentiment shift – from one party to another, and then maybe to a third party or back again to the first one, for instance. It is when citizens and voters have faith in the system that democratic choices are about the merits of public policy than a desperate fight about the rules of the game.

50. The author submits this in her own name. Even if she is recognised as staff at the Institute of Policy Studies, the Institute does not have an institutional point of view on

this matter and therefore she should not be deemed as a representative of the Institute or any other organisation for that matter. She is willing to appear before the Committee if it feel that may be of benefit to its important work.

Dr Gillian Koh
Senior Research Fellow

Investigation Process of the Election
Media Monitoring Commission

