

HOW SRI LANKA SHOULD RESPOND TO THE THREAT OF “FAKE NEWS”

Dinuka Cooray*

1.0 Introduction

From the inception of Declarations to Treaty based mechanisms to protect human rights, Freedom of Expression (FOE) was considered as an inevitable international customary law among states, which was subsequently adopted by many other United Nations treaties, Regional Conventions, and to national legislations by many states. In terms of Universal Declaration of Human Rights (UDHR 1948), Article 19, the “Right to Freedom of Expression was safe guarded as *“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers”*”.

This right is quite significant for proliferation of ideas and opinions for both individual and collective groups, and it is profoundly considered as a principal aspect of a democratic society. For the fulfilment of a state or even an individual being both positivity and negativity ought to be inculcated and balanced. As such, in order to reach a better destination variety of perspectives or in fact various expressions would be prudent to allow and utilize, even in a decision-making process.

Accordingly, every human being shall have his/her freedom to express his/her opinion. On the other hand, the Article 19 of UDHR includes right to seek, receive, and impart information. This portion of the Article elaborates that seek and receive information is a part of right to access information that are disseminated through different means.

Despite the fact that the UDHR has taken a holistic approach for this right the United Nations International Convention on Civil and Political Rights (ICCPR 1966) has imposed restrictions upon FOE under certain circumstances seeing the practical consequences of governing states. Accordingly, Article 19(3) mentioned that;

‘The exercise of the rights provided for in paragraph 2 of this article carries with its special duties and responsibilities. It may therefore be subject to certain restrictions, but these shall only be such as are provided by law and are necessary: (a) For respect of the rights or reputations of others, (b) For the protection of national security or of public order, or of public health or morals.

Therefore, it is legitimate to impose limitation to FOE under special instances.

* Attorney-At-Law,
LLB (Hons) KDU,
Diploma in Public Management (USJP),

Diploma in Diplomacy and World Affairs (BIDTI),
Diploma in International Relations (BCIS)

The breadth of this right demonstrates a system of disseminating and receiving information, which can be contributed and used by many parties and by numerous ways. Then, there arise a question with regarding its quality.

Notwithstanding the position where FOE could strengthen democratic values, any kind of misleading information can threaten democratic values. Thus, spread of false information on individuals or groups could be a threat and it could violate individual and collective rights, which emphasize the importance of having a regulation mechanism to oversee such dissemination of misinformation. For instance, suppose that a person publishes false facts on a public figure, an election candidate, a certain brand, and facts of a state etc. Objectively, that is a form of expression, which can be considered as an act of manipulation or abuse of FOE that shall be prevented, which will be discussed later in this article.

The purpose of this article is to examine the conflict between “FOE” and “Fake News”. While this attempt to understand the phenomenon of “Fake News” under variety of perspectives, as far as possible it also touches upon comparative jurisdictions in view of searching for a feasible solution for Sri Lanka to combat “Fake News”, while safeguarding “FOE”.

2.0 Understanding Fake News and the Importance of Regulation

With the development and usage of modern technology to distribute information to a wider audience, any information can be reached by millions, whereby the traditional channels of information have

dramatically focused on distributing information through Social Media Platforms (SMPs).

Broadcast media and printed media are the traditional ways of disseminating news and other information, which provided systems to correct any false information if broadcasted or published. On the other hand, prompt legal action can be taken against them due to easiness of tracing the source and ownership. Nevertheless, the proliferation of SMPs have made it complicated in taking prompt actions against misleading information and overseeing dissemination of “false information/fake news”.

Amidst the abovementioned context, there is no universally accepted definition given for the term “Fake News”, except certain definitions given by some countries like Russia and Malaysia in which Malaysia has defined fake news under Section 2 of its *Anti-fake news Actas*;

‘Any news, information, data and reports, which is or are wholly or partly false, whether in the form of features, visuals or audio recordings or as any other form capable of suggesting words or ideas’ (The Law Library of Congress 2018).

whereas, the *Russian Federal Law on Information, Information Technologies and the Protection of Information* (Information Law) defines fake news under Article 15(3) as;

‘socially-significant false information distributed under the guise of truthful messages if they create a threat of endangering

people's lives, health, or property; create possibilities for mass violations of public order or public security; or may hinder the work of transportation and social infrastructure, credit institutions, lines of communications, industry, and energy enterprises'.

Moreover, according to Cambridge dictionary “fake news” is defined as “*false stories that appear to be news, spread on the internet or using other media, usually created to influence political views or as a joke*”. The aforementioned definitions cover all types of media, where the Cambridge definition specially focuses on politics as the objective of making fake news, and further adds joke in to it, where it gives arise to a question whether sarcastic posts in social media will be removed. It is pertinent to note that the above definitions were demonstrated simply to give an idea on what “fake news” look alike, and how states have instilled their “objectives of making these laws” into their definitions, which will be looked into later.

Apart from the definitions given to fake news, Wardle (2017) has taken a widespread view of the problem. He says that to tackle the problem the entire information system should be looked into, and term “fake news” will not suffice when countering misleading information due to the complexity of types of information. He points out three elements of an information ecosystem as follows: (1) The different types of content that are being created and shared, (2) The motivations of those who create this content, and (3) The ways this content is being disseminated. Subsequently he introduces two other terms as “*misinformation*” and “*disinformation*”,

where misinformation is described as the unintentional sharing of false information, while disinformation is described as the Intentional creation and sharing of information known to be false.

Thereafter, he has introduced seven types of problematic information/content as follows; (1) No intention to cause harm but has potential to fool (*Satire and Parody*), (2) Misleading use of information to frame an issue or individual (*Misleading content*), (3) When genuine sources are impersonated (*Imposter content*), (4) News content is 100% false, designed to deceive and do harm (*Fabricated content*), (5) When headlines, visuals or captions don't support the content (*False connection*), (6) When genuine content is shared with false contextual information (*False content*), (7) When genuine information or imagery is manipulated to deceive (*Manipulated content*).

Therefore, tackling misleading information should be implemented under a wider perspective because of the variations of contents. Moreover, the above variations and terms indicate that there is a possibility of unintentional sharing of information, whether it be true or false, especially in SMPs. In such event penalizing someone under a single definition will cause complications, and it further indicates the level of gravity attach to each type of information. Thus, addressing these issues in counter attacking fake news will be essential (emphasis added).

From the “Facebook role in Myanmar crisis” (Human Rights Council 2018), to “Pizza gate Shooting incident” (The New York Times 2017), “Aftermath of April 2019 Bombings in Sri Lanka” (BBC 2019),

“Fake News dissemination websites of Hungary and India” (The Economic Times 2020), and “spread of false information in Sri Lanka during Covid-19 pandemic” (Ada Derana 2020) fake news have caused social, economic, political consequences, which is a clear threat to FOE.

The aforementioned incidents are few among hundreds of other similar stories indicate how information are misused by people. This also exemplifies different kinds of motivations, parties that are targeted, and also social behavioural patterns among the society. While SMPs worsen the situation it also demonstrates the level of responsibility of users and how much importance they have given to information in SMPs, which should be looked into because it is necessary to examine whether there is sufficient reliable information provided to the audience and in fact people may struggle to identify the credibility of information.

Additionally, the activity of “bots” in SMPs must be scrutinized as they are simple algorithms instructed to do specific tasks within SMPs, and it is kind of artificial intelligence (AI) that studies, interacts, and misleads users, where it can be a source to propagate fake news online (Centre for Information Technology & Society 2018). The issue of bots was widely discussed with related to twitter, where certain “bots” acted as influential users, and the emotional human beings, most of the times get trapped to interact and share information, which the bots are programmed to spread. While, this technical issue must be also addressed in regulating fake news, it is also relevant to emphasize the necessity of regulating

human behavioural patterns in social media.

Basically, the spread of misleading information is considered to be against world peace and order, and the few examples aforementioned demonstrate how bad it can affect to the society. Some were politically motivated towards adversaries, while some were directed towards communities to cause panic. The summarized story indicates about the manipulation of the online community that need to be examined for different reasons. Because misleading may be done by the governments as well as by other collective bodies who propagate their own ideologies. Accordingly, it is abundantly clear that FOE has been allowed to flourish through the internet in both ways. What alarms is the way people utilize it, which have attracted law enforcement agencies to take their chances against who violate the given freedom.

3.0 Sri Lankan Context, Legal Framework, and “Fake News”

The aftermath of April bombings in 2019 was the most critical point, where the government felt necessary to regulate and prevent “hate speech” and “fake news”. Consequently, they determined to bring laws, so that they consulted many parties, yet the work has not seen an outcome. Nevertheless, responses can be observed when fake news and hate speech are discovered in SMPs. The legal framework at the contemporary can be summarized as follows;

Constitution of the Democratic Socialist Republic of Sri Lanka (1978), Article 15(2) restricts “Right to Freedom of speech and

expression including publication guaranteed through Article 14(1)(a)” as follows;

“The exercise and operation of the fundamental right declared and recognized by Article 14(1)(a) shall be subject to such restrictions as may be prescribed by law in the interests of racial and religious harmony or in relation to parliamentary privilege, contempt of court, defamation or incitement to an offence”

International Covenant on Civil and Political Rights Act No. 56 of 2007 provides the foundation to counter hate speech as follows;

Section 3:

- (1) No person shall propagate war or advocate national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence.*
- (2) Every person who - (a) attempts to commit, (b) aids or abets in the commission of or (c) threatens to commit, an offence referred to in subsection (1), shall be guilty of an offence under this Act.*
- (3) A person found guilty of committing an offence under subsection (1) or subsection (2) of this section shall on conviction*

by the High Court, be punished with rigorous imprisonment for a term not exceeding ten years.

The *Penal Code* does not accommodate any provision for fake news and is not defined, however, it speaks of preventing unwanted excitement among the public in terms of *Section 120*, which states as follows;

‘Whoever by words, either spoken or intended to be read, or by signs, or by visible representations, or otherwise, excites or attempts to excite feelings of disaffection to the State, or excites or attempts to excite hatred to or contempt of the administration of justice, or excites or attempts to excite the People of Sri Lanka to procure, otherwise than by lawful means, the alteration of any matter by law established, or attempts to raise discontent or disaffection amongst the People of Sri Lanka, or to promote feelings of ill-will and hostility between different classes of such People, shall be punished with simple imprisonment for a term which may extend to two years.’

In 2007, *Computer Crimes Act No. 24 of 2007* came into being along with the aforementioned statutes penalized illegal computer activities that could have an impact on public order. *Section 6* provides;

(1) Any person who intentionally causes a computer to perform any function, knowing or having reason to believe that such function will result in danger or

imminent danger to - (a) national security, (b) the national economy, or (c) public order, shall be guilty of an offence and shall on conviction be punishable with imprisonment of either description for a term not exceeding five years.

Additionally, beside the aforementioned, *Section 69 of the Sri Lanka Telecommunications Act, No. 25 of 1991, amended by Act No. 27 of 1996* (Which established the Telecommunication Regulatory Commission of Sri Lanka [TRCSL]), empowers the Government to prohibit or restrict the use of telecommunication during emergency situations. Moreover, *Information and Communication Technology Act, No. 27 of 2003* that created Information Communication Technology Agency (ICTA) obliges to enforce national policy on ICT through Computer Emergency Readiness Team (CERT) that focus on related issues.

As could be noted, there is no precise legislative provisions that could penalize fake news. Be that as it may, law enforcement agencies in terms of the above provisions attempts to counter fake news up to a certain extent.

The ICCPR Act particularly focuses on “hate speech” restricting FOE for the purpose of maintaining national security, while penal code focuses on hatred as well as unwanted excitement among the communities. Contrast to the aforementioned, Computer Crimes Act speaks of illegal computer activity, which is indeed an activity via internet. The usage of

“bots” and other “minor AI” in propagating types of news, through human instructions can be related to provisions of this Act, even though it may not have widely identified in Sri Lanka. Eventually, it shows an empty space in the legal framework with no interpretations, or any specific offence to take measures against misleading information.

However, it is pertinent to note that Criminal Investigation Department (CID) continues to arrest offenders for creating and spreading fake news, which pose a question on how they will be penalized. The section 6 of Computer Crimes Act advocates the use of computer to function a certain programme feeding disinformation, contrast to publishing a misleading content. The activity of “bots” or particular algorithmic code complies with expressions of section 6 that explicate the context as “*intentionally causes a computer to perform any function*”. Bot activity usually “cause” a computer to perform any function spontaneously compared to a human that spread messages, photos, videos, or word documents in SMPs by manual usage. Therefore, human contribution towards propagation is not enclosed by Computer Crimes Act, and most apparent provision that could curb disinformation would be Section 120 of the penal code that penalize unwanted excitement of public. Thus, it is abundantly clear that there exists a necessity towards addressing these glitches either through legislations or policy regulations, because the present counter measures by police is perceived to be modest performances of prevention rather than proceeding to penalize offenders.

4.0 Analysing with Comparative Jurisdictions to curtail “Fake News”

It is pertinent that the counter measures and the approach of legislators in crafting those laws differs according to countries and the capricious nature of these legislations is what most human rights activists criticize. After perusal of legislations this article intends to emphasize some salient features that other countries have executed.

Most states do not provide legislations, however, according to Poynter (2020) countries, for instance; *Belarus, Cambodia, China, France, Germany, Kenya, Malaysia, Myanmar, Russia, Singapore, Vietnam* etc. Contain legislations to counter fake news and misinformation, while other countries utilize *reporting mechanisms, arrests, stirring media literacy, and also internet shutdowns* to curtail the negative effects of fake news. What is more vital is the objective and the method of answering the threat in a manner that sustain “FOE” in a respectable form.

The facts unfolded in the previous sections revealed that, that there is no proper definition given to “Fake News”. Then, at the same time, it is pertinent to emphasize the variation of information that exist in traditional and electronic media. None of those variations are addressed by the states that have enacted laws, rather, they have given priority for the context in which they intent to prevent fake news, similar to France that give priority to curb fake news during elections (The Law Library of Congress 2019).

Then, the German legislators focus on Social media networks that consists two

million or more registered users (*Article 1, section 1 of the Network Enforcement Act*). This piece of legislation, which is the most recent one of all, requires social media networks to remove illegal content upon any complaints, where it could fine large amounts of fines against companies that intentionally disobey. Moreover, they have introduced a complain mechanism in which the SMPs are obliged to provide their users to lodge complaints, and specifically the companies will have to publish biannual reports under a prescribed manner, if they receive more than hundred complaints about unlawful content (*Article 1, section 2*), which is a reliable method of making the companies accountable for their services. Even though, this is identified as a feasible method for Sri Lanka, it is pertinent to highlight the fact that the veracity of the complaints should be also examined before making the companies liable.

Furthermore, *Protection from Online Falsehoods and Manipulation Act* (POFMA) recently (i.e. 2019) came into being in Singapore and encompassed most platforms that could be a source for proliferation of false statements under its Section 3. While it prioritize the grounds in which false statements are prohibited under Section 7, POFMA has explained “*statements of fact*”, defined as “*statements which a reasonable person seeing, hearing or otherwise perceiving them would consider as representations of fact*”, while “*false statement of fact*” is defined as a “*false or misleading statement which a reasonable person would consider to be a representation of fact*”, so they have not defined “fake news”, rather has taken a broader view on the matter. The amount of fine would differ at large for individuals and non-individuals, and specifically this

Act has acknowledged the usage of “bots” and fake accounts within Singaporean counter measures. Besides, the legislation grants power for the relevant Minister to issue ministerial orders and directions against violators, while it has also designed a complete mechanism including court proceedings, which means that, the Act has introduced an appealing system; first to the Minister against orders or directions issued by POFMA, and then to the High Court if not satisfied with the decision of the Minister. This remedy is more alike writ jurisdiction in Sri Lankan context, which could be a method that Sri Lanka should take cognizance in combating fake news. Although, this seems to create more burden under prevailing court system this method can be a sensible answer for criticisms of human right activist who oppose these sorts of legislations. Additionally, this Act has incorporated and addressed relevant agencies (i.e. In Singapore, Info-Communications Media Development Authority) to cater their services under orders that emanate under this Act, which indicates that the whole process is reinforced through relevant agencies (Singapore Statutes Online 2019).

In case of *People’s Republic of China*, Chinese legislators through *Article 291a (2)* by 9th amendment to the *Criminal Law* recognized penal provisions against spreading fake news, however, a slight shortcoming would be, that they have limited only to dangerous situation, epidemic situation, disaster situation or alert situation, which is not catering the purpose of this article. Notwithstanding the above, China has made service providers on information publishing and messaging accountable at large, by different means. For instance, *Article 24 of the Cyber*

Security Law states that “when providing services of information publication or instant messaging, service providers must ask users to register their real names. The service providers must not provide relevant services to any users who do not perform the identity authentication steps”, and violations would be penalized. Additionally, provisions on the *Administration of Internet News and Information services*, under *Article 5* has categorized news providers containing social media, websites, mobile apps, major blogs, and those who disseminate official news, and has required them to obtain license. And according to *Article 6* these licenses will be issued to Chinese citizens (The Law Library of Congress 2019). It is quite debatable on how these features can be instilled on Sri Lanka due to numerous platforms of information. Apart from government and private media institutions, there are individuals and organizations that maintain websites, applications to disseminate news including personal views. These private platforms gather considerable number of followers and subscribers, which indicates the level of surveillance that the Sri Lankan government should consider.

Excluding laws, certain countries focus on *media literacy*, where countries such as Australia, Canada, Denmark, Netherland, Sweden, Singapore and United States of America have aimed at campaigns against fake news and promoting media literacy, which is also one of the best practices in combating fake news.

5.0 Conclusion

The above discussion substantiates the necessity of some form of regulation over acts that abuse “Right to Freedom of

Expression”. The examination of laws in other countries was adopted to select suitable features for Sri Lankan context.

Considering in creating a piece of legislation, identifying the whole purpose of the law is mandatory, and the fascinating terms; “Fake News”, “Misinformation”, “Disinformation” shall be well interpreted along with the purpose. This article would define “Fake News” as follows;

‘Any socially-significant news, information, data and reports, which is or are wholly or partly false, distributed under the guise of truthful messages via telecommunication system, information network or any other media, whether in the form of features, visuals or audio recordings or as any other form capable of suggesting words or ideas that create threat of people’s lives, property, and possibilities for mass violations of public order or security at any time’.

This will subsequently make it easy to create the offence of spreading fake news. However, intentional and unintentional acts shall be distinguished. Then, the cognizance shall be made on methods of disseminating information covering printing media, electronic media, SMPs, and messaging platforms (i.e. WhatsApp, Viber, Imo etc.), which will encompass the applicable sphere including stakeholders that can be made accountable.

The present mechanism to counter fake news is implemented through the collaboration of CID, TRCSL, CERT, and relevant Internet Service Providers (ISP). The Singaporean *POFMA* have taken

relevant agencies under the purview of a single Act. Therefore, it is recommended to enact a single legislation interconnecting relevant agencies.

Moreover, an accurate user-friendly complaint mechanism is essential under a specific agency that is named as the “supervisory body”, and it is prominent to adhere to the step taken by the German legislators as per *Article 1, section 1 of the Network Enforcement Act* to recommend the SMPs to provide complain system for its users. Nonetheless, it is doubtful whether huge companies like Facebook would attend to claims made by Sri Lanka. It is recommended to use diplomatic means to negotiate matters. The rationale of imposing such condition is to make the SMPs accountable in a situation, where there is already complains to the supervisory body. This would act as a double verification process.

Then, *Article 24 of Chinese Cyber Security Law* emphasizes the importance of registering real names of users when providing services of information publication or instant messaging. Specially, since the issue deals with information, it is quite an essential requirement in the present environment, and further, if it is possible to initiate requiring verification method of the user even in SMPs creation of fake accounts can be prevented, so that the illegal human activity can be controlled, while permitting time to combat the issue with both activities in internet (Which social networks presently do).

Considering the counter measures, it can be categorized as *immediate* and *long term*. Immediate remedy would be to stop spread of fake news, and the most appropriate

authority to order would be the Magistrate Court according to Sri Lanka. The collaboration of law and technology is clear at this juncture, and persons who intentionally manufactured, published fake news shall be distinguished from those who unintentionally shared. Therefore, if the authorities can prevent any likely danger to the society that would be a satisfying situation, and there will be a question as to the justifiability of penalizing such offenders. At that point it is wise worthy to inquire for any human rights-based approach to counter fake news.

According to Wingfield (2019), “*for policymakers considering developing a policy or law, one of the first steps should be making sure that their approach is in line with international human rights law and standards*”. It is significant to realize that “manufacturing, publishing, spreading fake news” are originated because of a “thought in mind”, and other financial reasons and authorities drive against a “thought” that was publicized to create panic. Thoughts cannot be stopped; however, it can only be prevented when thoughts are being publicized. Here, it is important to consider about the *long-term* counter measures, whereby it is vital to question ourselves whether a fine or an imprisonment would stop thoughts that are generated in our mind, although it prevents spreading. This is where *media literacy programmes, ethics, correct social media practices, technical monitoring systems* are significant. Most probably a “*rehabilitation and investigation process*” would be suitable to find root causes for the offence while understanding psychological basis, rather than penalization, which will satisfy the claims made by human rights activists. The more pressure authorities impose on

prevention of “Expressions”, the more it will find ways to disseminate, which shows the importance of considering *long term* counter measures along with *immediate steps*. Moreover, similar to Singaporean model, there shall be an appealing system as well.

As the foregoing discussion in this article has revealed, it is abundantly clear that there is a necessity to regulate “Fake News” as it would harm the “Right to FOE” and other Fundamental Rights enshrined in the Constitution. While doing so, upholding Human Rights are essential, and whatever the law shall cater to their satisfaction as emphasized in this article.

Reference List

Centre for Information Technology & Society 2018, *How is Fake News Spread? Bots, People like You, Trolls, and Micro targeting*, CITS, viewed 23 April 2020, <<https://www.cits.ucsb.edu/fake-news/spread>>

Computer Crimes Act No. 24 of 2007 (Sri Lanka)

Constitution of the Democratic Socialist Republic of Sri Lanka (1978)

Cyber Security Law 2017 (People’s Republic of China)

Derana 2020, *Seven arrested for spreading false information on COVID-19*, Ada Derana, viewed 15 April 2020, <<http://www.adaderana.lk/news.php?nid=62567>>

Funke, D & Flamini, D 2019, *A guide to anti-misinformation actions around the world*, Poynter, viewed 22 April 2020,

<<https://www.poynter.org/ifcn/anti-misinformation-actions/>>

Haag, M & Salam, M 2017, Gunman in 'Pizza gate' Shooting Is Sentenced to 4 Years in Prison, *The New York Times*, 22 June, viewed 15 April 2020, <<https://www.nytimes.com/2017/06/22/us/pizzagate-attack-sentence.html>>

Information and Communication Technology Act, No. 27 of 2003 (Sri Lanka)

International Covenant on Civil and Political Rights Act No. 56 of 2007 (Sri Lanka)

Network Enforcement Act (Gesetz zur Verbesserung der Rechtsdurchsetzung in sozialen Netzwerken) 2017 (Germany), <<https://germanlawarchive.iuscomp.org/?p=1245>>

Penal Code of the Democratic Socialist Republic of Sri Lanka (1885)

Protection from Online Falsehoods and Manipulation Act 2019 (Singapore) <<https://sso.agc.gov.sg/Acts-Supp/18-2019/Published/20190625?DocDate=20190625>>

Report of the independent international fact-finding mission on Myanmar 2018, United Nations Human Rights Council, viewed 22 April 2020, <https://www.ohchr.org/Documents/HRBodies/HRCouncil/FFM-Myanmar/A_HRC_39_64.pdf>

Sri Lanka Telecommunications (Amendment) Act, No. 27 of 1996 (Sri Lanka)

Sri Lanka Telecommunications Act No. 25 of 1991 (Sri Lanka)

The Economic Times 2020, *Coronavirus 'fake news' network busted in Hungary*, The Economic Times, viewed 15 April 2020, <<https://economictimes.indiatimes.com/news/international/world-news/coronavirus-fake-news-network-busted-in-hungary/articleshow/74039716.cms>>

The Law Library of Congress 2018, *Malaysia: Anti-Fake News Act Comes into Force*, The Law Library of Congress, <<http://www.loc.gov/law/foreign-news/article/malaysia-anti-fake-news-act-comes-into-force/>>

United Nations 1948, *Universal Declaration of Human Rights* (UDHR), United Nations, viewed 20 April 2020, <<https://www.un.org/en/universal-declaration-human-rights/>>

United Nations 1966, *International Covenant on Civil and Political Rights*, United Nations Human Rights Office of the High Commissioner, viewed 20 April 2020, <<https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>>

Wakefield, J 2019, *Sri Lanka attacks: The ban on social media*, BBC, viewed 20 April 2020, <<https://www.bbc.com/news/technology-48022530>>

Wardle C. 2017, *Fake news. It's complicated*, First Draft, viewed 19 April 2020, <<https://medium.com/1st-draft/fake-news-its-complicated-d0f773766c79>>

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