Taming the internet trolls with an internet ombudsman (draft)

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Abstract

Legislation and respect for human rights are still lagging far behind online social developments. To address this issue, a few European countries are currently discussing a new policy instrument - an internet ombudsman, which is a Content Qualification Assessment procedure implemented by neutral national institution consisting of a group of experts of ethics and legal issues related to content on the internet. This paper analyses the internet ombudsman by conceptually framing it into the evolution of the ombudsman institution, and by proposing future implementations including a traditional (mainly offline) model as well as a blockchain implementation. Findings show that whereas this policy instrument can have positive effects in eliminating the powerful gatekeeper role of internet platforms, the main risk is that the legal effect might be too weak to ensure satisfactory societal impact.

Introduction

With more than 3.5 billion users, the internet has the power to connect people from almost all over the world, and to disseminate news and content instantly over a vast geographical realm. For years, the internet has mainly been regarded as catalyst for economic growth and freedom of speech and in 2012 internet freedom was even declared as a human right by the UN Human Rights Council. However, the “dark sides” of the internet, such as fake news, cyber bullying and radicalization have progressively become more dominant showing how the internet can also be a weapon for oppressing regimes, and hence destruct human value in the society. It is against this background that the internet ombudsman has been put forward as a policy and tool designed to resolve these issues.

This paper analysis the idea of internet ombudsman and critically seeks to interpret and anticipate how internet ombudsman could be implemented as a policy instrument and an institution. It discusses its potential to resolve internet related issues related to human rights across borders. The paper is a conceptual paper. Firstly, and conceptually, we frame it into the historical context of the media ombudsman institution, which evolved during the 20th century. Then, we discuss future possible implementations and critically analyze the potential impact and drawbacks of these policy instrument implementations.

Ombudsman: Advantages, challenges, and difficulties

The position of the modern ombudsman originated in Sweden back in the 19th century (von Krogh & Nord, 2010), although some scholars argue that the origins of the idea can be traced all the way back to China during the Qin Dynasty (221 BC), and in Korea during the Joseon Dynasty (Park, 2008). The heart of the ombudsman's job is to investigate complaints by citizens of injustice at the hands of public officials (Danet, 1978), but this position is more than simply answering complaints. The ombudsman serves as an accountability mechanism of public, governmental and private organizations and institutions (Ginosar, 2005). As such, these are the goals of the role: to right individual wrongs; to make bureaucracy more humane; to lessen popular alienation from government; to prevent abuses by acting as a bureaucratic watchdog; to vindicate civil servants when they are unjustly accused; and to introduce administrative reform (Hill, 1976). Given the professional and ethical importance of the role, today different institutions (public as well as private) have incorporated the position of ombudsman in their activities (Buck, Kirkham & Thompson, 2010; Ranade, & Kumar, 2015; Trondal, Wille & Stie, 2017).

However, for the ombudsman to fulfill his/her work appropriately, several conditions need to be met. First the ombudsman must be sovereign and to have the ability to conduct his/her investigation independently, so that his/her conclusions will be impartial and objective. Second,

the office of the ombudsman needs to be accessible to the public and transparent in its work. Finally, his / her decisions must be effective and influence the organization in which s/he works (Gregory & Pearson, 1992; Giddings, 1998; Gregory & Giddings, 2000).

The position of media ombudsman has only been incorporated into media organizations in Europe and the US only during the 1960s and the 1970s. Within media organizations, the ombudsman oversees handling complaints from the public concerning misconduct of media organizations by conducting independent investigations. At the conclusion of the investigation, the ombudsman issues rulings which usually serve as ethical recommendations or reminders to media organizations to improve their conduct. In some organizations, the ombudsman also has the power to criticize the media organization in which s/he works independently and to publish such criticism (Ettema & Glasser, 1987; Starck & Eisele, 1999; Meyers, 2000). As Ginosar (2005) noted in his work, media ombudsman differs from any other organizational ombudsman due to the definition of the role: "a news ombudsman receives and investigates complaints from newspaper readers or listeners or viewers of radio and television stations about accuracy, fairness, balance and good taste in news coverage. He or she recommends appropriate remedies or responses to correct or clarify news reports" (ONO - Organizations of News Ombudsmen, 2018). As such, media ombudsmen do not deal only with organizational bureaucratic topics such as proper administration or amending wrongs. They also deal with complaints concerning issues such as fairness or good taste. Issues, which to begin with, are controversial and subjective (Daskal, 2015). This only adds to the abovementioned difficulties and challenges the ombudsman has to deal with in his/her work.

Studies analyzing the work of media ombudsmen revealed complicated and sometimes contradictory findings. Some researchers have shown how the use of ombudsman contributes to a better, more reliable and trustworthy conduct of media organizations (Weaver & Wilhoit, 1986; Starck & Eisele, 1999, Nemeth & Sanders, 2001). Others argue that it serves only as a

tool for public relations by maintaining the pretense of the ethical nature of media organizations (Ettema & Glasser, 1987; Pritchard, 1993; von Krogh & Nord, 2010). Nevertheless, the position of media ombudsman provides the only viable and free option for ordinary citizens to get involved with media organizations over issues such as professional norms and to contribute to the ethical conduct of media organizations. As such, it has the potential to contribute to the legitimacy, the trustworthiness and the professionalism of media organizations especially in the eyes of the public (Hartung, Jacoby & Dozier, 1988; Hermanson, 1993, Maciá-Barber, 2014). Thus, it is in the interest of any democratic society not only to preserve these systems but also to improve them and incorporate them in other systems as well.

The naissance of the idea of an internet ombudsman

The idea of an internet ombudsman has progressively gained interest given the increasing legal disputes on the internet. Whereas the internet in the early days was perceived as a forum where freedom of expression, cultural diversity and democracy were the leitmotifs, it has recently, and partly, evolved into a "dark" forum for online propaganda (Farag, 2017), fake news, cyber terrorism, cyber bullying (Kokkinos, 2016) and cybercrime (van der Hof & Koops, 2012). A sphere in which there is no respect for people's rights and liberties.

The lack of any entity in charge of regulating content online has created a situation in which the content of the internet is practically managed by three different entities: internet service providers (ISPs); internet search engines and social media companies. All of which operate in different settings and according to different political, financial and cultural interests and motivations. In recent years, most public and political attention was given in this context to the role of social media companies (e.g. Facebook, Twitter, YouTube). These companies, often referred to as Online Service Providers (OSPs) (Taddeo & Florid, 2015; Wentrup & Ström, 2017), have flourished in the last decade as social life has become increasingly concentrated to the online realm. These OSPs found themselves in powerful positions. They act as mediators

in the net between individuals, corporations, governments and the legislative domain. They have the role of stand between the protection of users' rights and government requests, as well as shareholders' expectations. Thus, they are highly engaged to participate in the public debate on the regulation of internet surveillance and the use of information and communication technologies (ICTs) within governmental national online security and policy strategies (Taddeo & Floridi 2016).

As the internet evolved, some legislative initiatives were formed in order to deal with the fragility of individuals' situation on the internet. One of the most advanced and developed initiative concerns the right to personal privacy and safety (Article 12 in the Universal Declaration of Human Rights). Already in the 1990s measures were taken in order to protect individual's personal information and visibility on the internet. Particularly, the idea of "right to be forgotten" which was captured by the European Commission already in 1995 in their legislative text on the "right to erasure" (1995 Data Protection Directive (95/46/EC). This was one of the most fundamental pieces of legislation on data protection. It was adopted for the purposes of protecting the 'data subject's right of access to data' and ensuring the free flow of personal information between European Member States. A second important milestone in this context was the case of Google Spain SL, Google Inc v Agencia Española de Protección de Datos, Mario Costeja González in 2014. Finally, in 2018, for the first time, the right to be forgotten was codified and is to be found in the General Data Protection Regulation (GDPR), in addition to the right to erasure. While these steps contributed significantly to the protection and the preservation of people's privacy online, there are still concerns surrounding the sharing of personal information, the ownership of personal data and the right to have information erased from the online world. This demonstrates why there is a need for another mechanism, the internet ombudsman.

Internet ombudsman: three issues for consideration

The idea of internet ombudsman that we suggest in this paper, is a rather new implementation of a policy instrument, which has got attention in as the United Kingdom and France (Bowcott, 2016). However, before outlining the structure and the implication of the internet ombudsman, we would like to relate to three main inherent challenges in applying such mechanism:

The geographical and temporary issues on how to contain and resolve legal and ethical disputes over the internet - The issue to containing disputes that arise on the internet within a bordered geographical space is due to internet's spatial and temporal properties. Geographers like Kellerman (2016) have suggested differentiated spatial models and alternative geographic metaphors for the internet, ranging from wide to narrow: virtual space, cyberspace, and internet screen-space. They build upon concepts defined by Batty (1997) of "virtual geography" and the projection a "cyberspace" on traditional space. Tranos and Nijkamp (2013) postulate that physical distance, but also different relational proximities, have a significant impact on the structure of the internet infrastructure, highlighting the spatiality of the internet.

As for the offline space, the online space can also be expressed in distance, (e.g., number clicks), boundaries (e.g., geo-blocking of specific domain names or firewalls), speed between places (e.g., broadband speed allowing a certain time between accessing two IP addresses), networking, and proximity (e.g., how online traffic will be structured based on social relations). Yet, there are important differences between the online and the offline space, particularly the lack of embodiment as well as the shorter time perspectives in the online space. Kellerman (2016, pp. 515) suggests that:

> First, cyberspace experiencing is normally much more extensive in its spatial extent as compared to that of real space. Second, cyberspace use may be temporally much more intensive given its continuous use. Third, cyberspace experiencing is shallower than that of real space in its perceptional imprint on

users, and fourth, cyberspace experiencing lacks almost any bodily involvement by its users.

Hence, not only is there a spatial aspect of the internet, but there is also a temporal property. For example, fake news can be accessible across, close to a limitless geographical space, and steered in their temporal accessibility. This creates a challenge in content regulation, especially in comparison to traditional media, which have a limited geographical reach, and are temporally constrained.

When it comes to controlling and regulating the internet, it is possible to discern two theoretical approaches – one stressing the *exceptionalism* of the internet, and one emphasizing a *bordered* and national internet (Wu, 2010). Compared to previous examples of technical networks, such as radio, telephone and TV, the internet may be seen as an exception, as it has developed into "the network of networks" capturing all other previous forms of media across national boundaries. This makes it more difficult to control, as communications take place in *many-to-many relationships* between sender and receiver, in both directions, with online platforms providing the supporting infrastructure. These spatial and temporal characteristics are important to take into consideration when it comes to designing the internet ombudsman institution. A body with mandate to only act within national borders is a step forwards, but in order for the institution to succeed, it must be configured and based on technology with that transcends national borders and works with within short time slots.

Striking the balance between rights and liberties – the internet is an international medium and as such, each culture, society state, has its own social and cultural norms. Similar to media / news ombudsman, the internet ombudsman will also have to deal with controversial and difficult issues such as slander, fake news, radicalization and discrimination, and at same time to ensure that the internet will continue to function as a free and creative sphere, open for dissidents, ideas and creativity all over the world. As such, the internet ombudsman will have

to deal with three main challenges that will force him/her to balance between different rights, liberties and freedoms:

1. Right to decent reputation - This right is the resulting dilemma between freedom of speech, expression and creation and between protecting personal privacy, reputation and safety. It will require the ombudsman to conduct an investigation concerning the possible damage certain information can possible inflict on the object of the publication.

2. Right to reliable information – This right again touches upon freedom of speech, expression and creation but this time in relation to the publication of fake information. This right will require the ombudsman to analyze the truthfulness and accuracy of published information.

3. Right to a clean and safe media environment - The right touches upon issues such as the meanings and boundaries of good taste, values that are perceived as immoral or behavior regarded as inappropriate. This right will require the ombudsman to consider issues such the well-being of children, the unique status weakened societal groups in society and even to some extent issues of morality.

Accepting the rules of the ombudsman system – similar to any other ombudsman system, this system will be a non-obligatory system. A such its effectiveness relies on its ability to achieve cooperation between the different stakeholders involved in managing the content online. Previous studies have shown how the lack of cooperation with the ombudsman institute has the potential of failing the institute. As we will elaborate, it will be up for the different internet companies to decide whether or not to implement the internet ombudsman's recommendations. Ignoring the ombudsman's recommendations all together, however, will eventually render the system as weak, ineffective and useless. Unfortunately, this might pave the way for other regulatory solutions, some of which might be too strict and even borderline censorship. Today we are already witnessing different attempts made by governments and other stakeholders, even in democracies, of censoring the internet. So, our proposed solution might serve as a preventive

measure against these attempts. Furthermore, in recent years, internet companies began to recognize their responsibility in managing the online content and are willing, more than even before, to cooperate with different regulation efforts. Thus, we argue that now is the time to implement our ideas and with that in mind we approach the actual internet ombudsman model.

The practical implementations of the internet ombudsman institution: Two suggestions

The idea of the internet ombudsman is that it should work as neutral institution that may quickly examine and make recommendations to internet service providers, internet search engines companies and social media companies whether or not posts or websites should be removed. The ombudsman institution will be appointed in each country by the judiciary or the local Data Protection Agency and we suggest here two ways for implementing the institution:

A traditional implementation - The internet ombudsman may become an institution consisting of a team of legal and ethical experts who handle incoming cases from internet platforms and the public within a predetermined time interval (e.g. 48 hours). For example, one can imagine a button in the *Facebook* platform where a user can report an entry to the internet ombudsman directly. *Facebook* should in turn also be able to report for guidance in publishing decisions. Thereafter, the internet ombudsman makes a recommendation for both the notified person and the internet platform in question. If the internet platform complies with this recommendation, the latter may not be convicted of having been deleted or leaving the post as it acted in good faith. The overall work aims at combating socially destructive phenomena such as fake news, radicalization and discrimination, but to promote the internet as the forums of the different thinkers, ideas and creativity. The internet ombudsman can thus be replicated on a global scale and become a decentralized international network for the maintenance of human rights.

Third-party liability (i.e. ISP’s or OSP’s liability) is justified when a party may relatively effortlessly redress or prevent harm without exposing itself to disproportionate consequences.

It appears legitimate to prescribe certain legal duties on OSPs in an effort to reinforce the effectiveness of for example counter radicalization policies, protection of human integrity, democracy and society caused by hurtful content. Any imposition of content regulation duties must however meet the standards set by International Human Rights Law and notably with regard to duties that include active obligations given the corollary of OSP accountability.

Clearly, it is not ideal to expose the private sector to the consequences of government delegation without relief. If the international community wishes to engage the active assistance of the private sector in protecting its citizens, the very least it can do is to offer efficient remedies against not only legal liability but also commercial and "political" exposure which show no signs of abating. OSP duties must be predicated upon an operable definition (or at least workable guidance) of the illicit content in question.

In view of the difficulty in some cases of qualifying specific content as illicit and in order to protect freedom of speech to the fullest extent realistically possible a fast track procedure or Content Qualification Assessment could therefore be created [1].

Such a procedure will allow the OSPs to obtain an authoritative qualification assessment. The Content Qualification Assessment procedure will provide specific remedy and be available to OSPs who by virtue of their accountability and in the interest of free speech should be allowed to obtain immunity pursuant to such a content qualification Assessment. The authority to deliver a content qualification Assessment could vest in an internet ombudsman institution

[1] The "Content Qualification Assessment" was first proposed in a report to UNESCO on radicalization: Policy Recommendation (Shefet 2016). The ambit of this CQA was understandably focused on terrorist and radicalizing content and came about as a result of specific experience of how difficult it may be to qualify content as "illicit" with regard to apology for terrorism, incitement to terrorism, instruction (based on the Warsaw Convention of 2005) and in particular interviews with the French judge (Cour de cassation) who is performing the functions of "la personnalité habilité" under the emergency decree laws that were in effect in France from November 16th 2015 to November 1st 2017 (and have now to a very large extent been replaced by regular legislation).

appointed in each country by the judiciary or the national data protection agency. A Content Qualification Assessment would not be treated as a judgement or as an arbitration award. The assessments would not be legally binding but provide authoritative guidance on interpretation/qualification. The OSP would be free to choose to follow or not to follow the assessment. Acting in accordance with a Content Qualification Assessment would however relieve the OSP from any future penal or civil sanctions including claims made by authors, editors, publishers, government or any third party relative to the specific content covered by the assessment. Later litigation will not suspend the Assessment (i.e. the OSP may continue to rely on the Assessment throughout the litigation process). Specialized tribunals allowing fast track procedures and the authority to enjoin take down or blocking orders, daily penalties in the case of non-compliance and any other interlocutory measures should also be created. Injunctions should provide unequivocal instructions to the OSPs and the other parties involved as to the precise steps and scope of the action required (territorial scope as well as DNS, URL or IP blocking identification and inclusion as the case may be of reintroduced content).

Detailed procedural rules covering costs, appointment of members of the internet ombudsman institutions and the steps involved in obtaining a content qualification Assessment must be drafted (see the Proposition de loi (French Senate, 2016) on the creation of an internet ombudsman, as drafted by Shefet)[2]. The internet ombudsman institution could also be combined with an advisory board encouraging users to actively participate in a self-regulatory effort.

[2] In continuation to the French law proposition, Shefet also drafted a Motion for Recommendation for the Parliamentary Assembly of the Council of Europe (Council of Europe, 2017) which led to the Council (having accepted the Motion in January of last year) to appoint a rapporteur and an "expert" to produce a report in the topic for the Council of Europe.

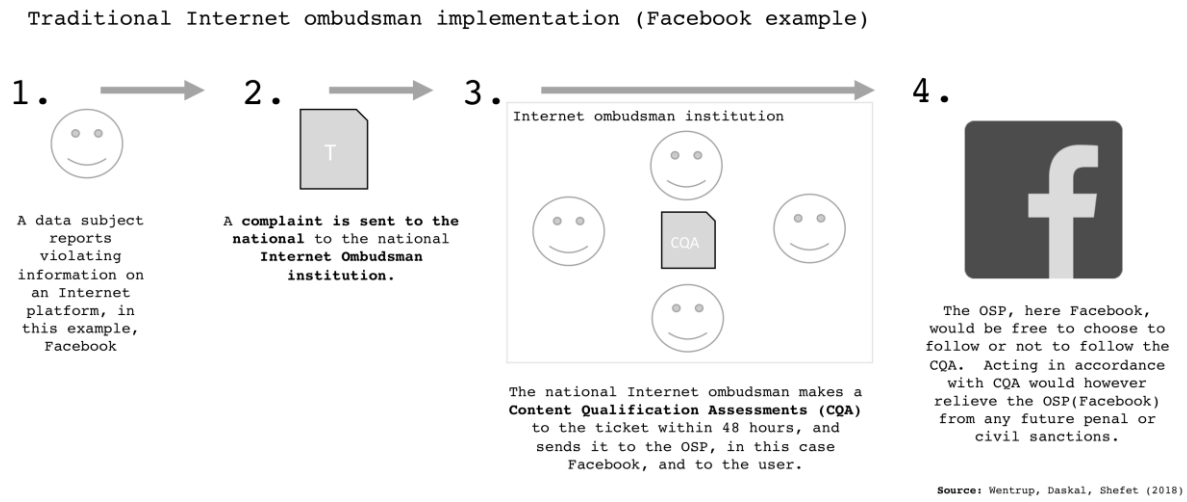

Figure 1. A traditional implementation of internet ombudsman (Source: Authors' own model)

A blockchain implementation - One could imagine a blockchain-based internet ombudsman institution, which would work similarly as *bitcoin* (Nakamoto, 2008; Swartz, 2018), or any other blockchain-based technology. Yet, instead of mining bitcoins, hence using computing power to resolve mathematical algorithms, it would use data and documented expertise to resolve ethical and legal disputes on the internet. The advantage of blockchains is that they are distributed, in that they use a combination of encryption and peer-to-peer technology to update a common and immutable record to show when a transaction has occurred. All nodes within the system will synchronize to display the outcome. For an internet ombudsman blockchain, as opposed to relying and being controlled by a national central body, it could rely on a consensus-based system where nodes, i.e. pre-qualified legal ethical experts, being geographically distributed, could resolve, or present Content Qualification Assessments on specific ethical issues arisen on OSP-platforms. Slightly different to bitcoin though, the identities on the internet ombudsman blockchain would not be protected. Instead the names of the experts, the data subjects and the OSP would be transparent in order to ensure accountability. As a reward

for the work of the experts, and similar as to the bitcoin mining work, they would receive a financial reward for their job.

After the experts proposes their Content Qualification Assessments to specific online disputes, which would be published on the blockchain as “tickets”, there would be a voting process. Thus, the proposed Content Qualification Assessments would receive votes from the blockchain, i.e. a critical mass of legal and ethical experts. The process would function similar as an academic peer-review process with two important differences; 1) a critical mass of experts, i.e. with a minimum number of experts involved, distributed over an international network and voting; and 2) the time factor, which should not exceed 48 hours per ticket.

The Content Qualification Assessments triggering most votes would be published on the internet ombudsman blockchain, which would be available for anyone to download and would be unbreakable or impossible to modify. Most characteristics for the internet ombudsman would be similar to that of bitcoin – transparency, a decentralized network (without a central powerful body), and a reward system for the qualified work of the legal and ethical experts. But the large difference would be the transparence and accountability, hence the names of the involved parties could not be disclosed.

In the future algorithms could be written to use the data and intelligence recorded in the blockchain in order to resolve disputes that have already occurred. In such a way, the experts would mainly work on new, previously undocumented online disputes. Such a blockchain system could be financed by a global OSP tax. For example, an OSP, which uses data subject content as fuel for its business model and has a turnover and profit over an arbitrary level would be obliged to pay such an OSP tax.

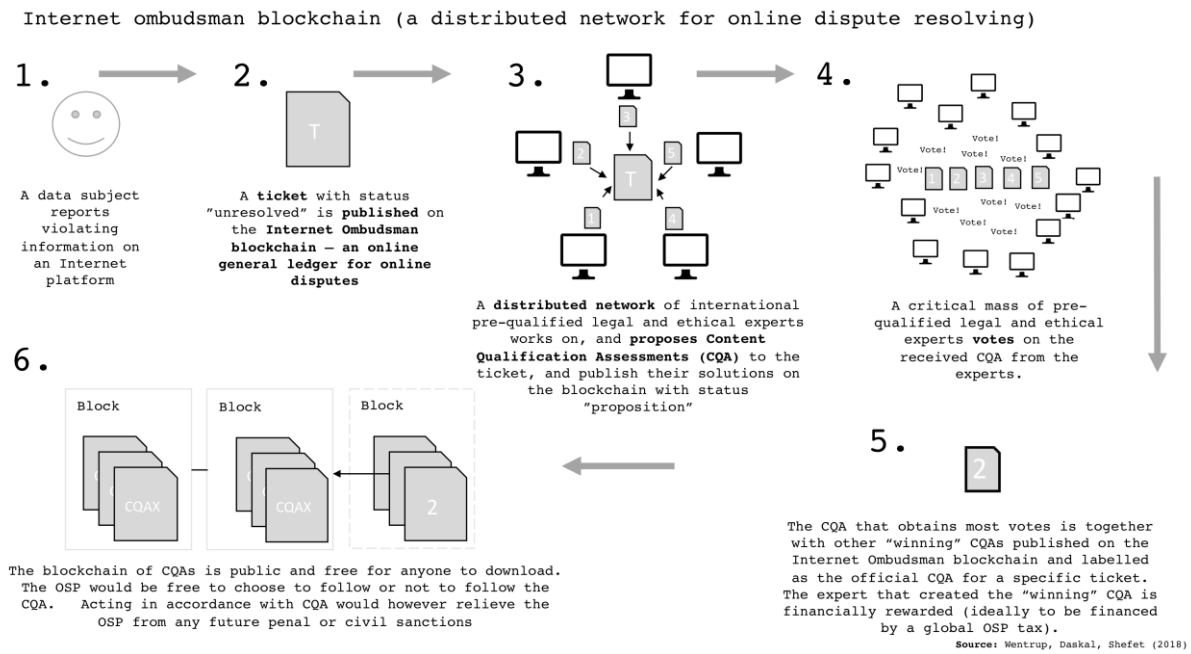

Figure 2. A blockchain implementation of internet ombudsman (Source: Authors' own model)

Concluding remarks

Regardless of choice of implementation, the system of an internet ombudsman institution is a complex and rather expensive system, which requires substantial human, financial and technological resources. But its advantages are clear. First and foremost, it aims to create a coherent working framework that deals with the issue of problematic content online, from slander to fake news. As a non-judicial and therefore non-obligatory system is has the potential to create a dialogue between all stakeholders involved in managing and distributing content online (e.g. social media companies, search engines companies, internet service providers) concerning the professional norms that shape and construct the internet. The "legal" effect of the recommendation (because the Ombudsman's decision would not be of a binding nature) would be to relieve different internet actors of any potential later penal or civil liabilities, so they will be free from their role as gatekeepers in relation to content posted by individuals on their platforms (Zittrain, 2006; Stevenson, 2014; Laidlew, 2015). Furthermore, they will receive "absolute immunity" in Europe, which the current e-commerce directive does not provide.

Eradicating inappropriate content online will not result in actors and people becoming more ethical, but it may mitigate a great deal of damage and limit the possibilities for those wanting to disseminate messages violating human rights, thus eventually improving the online public sphere. Finally, the work of the internet ombudsman aims to balance between the rights of the victims (individuals and society / the internet actors) when the judgment call might create a risk of collateral blocking, thus the Internet Ombudsman function is therefore ultimately to serve the interest of free speech on the internet.

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