กลไกเชิงสถาบันในการรับมือกับข่าวลวงทางการเมืองในระบอบประชาธิปไตยที่ตั้งมั่น: กรณีศึกษา เอสโตเนีย ฝรั่งเศส เยอรมนี สวีเดน และสหราชอาณาจักร*

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Institutional Mechanisms for Countering Political Disinformation in Consolidated Democracies: Case Studies of Estonia, France, Germany, Sweden, and the United Kingdom

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บทคัดย่อ

ประเทศที่ประชาธิปไตยลงหลักตั้งมั่นในโลกตะวันตกเผชิญกับปัญหาข่าวลวงทางการเมืองอย่างต่อเนื่อง ทำให้รัฐบาลของประเทศเหล่านี้ได้มีการสร้างกลไกเชิงสถาบันในการรับมือ ข้อถกเถียงทางวิชาการที่ผ่านมามักจะให้น้ำหนักกับประสิทธิภาพของกลไกดังกล่าว อย่างไรก็ตามการวิจัยในครั้งนี้มุ่งสร้างข้อถกเถียงในเรื่องการทำงานของปัจจัยเชิงคุณค่าและปทัสถานที่ส่งผลต่อการออกแบบกลไกเชิงสถาบันในการรับมือกับข่าวลวงทางการเมือง ซึ่งเป็นมุมมองที่มักจะถูกละเลย การศึกษาครั้งนี้ใช้การเปรียบเทียบกรณีศึกษาจำนวน 5 กรณี ได้แก่ ประเทศเอสโตเนีย ฝรั่งเศส เยอรมนี สวีเดน และสหราชอาณาจักร ข้อค้นพบที่สำคัญคือแม้ว่ากฎหมายที่เกี่ยวข้องกับการกำกับดูแลสื่อและเนื้อหาทางการเมืองใน 5 ประเทศที่เลือกศึกษาถูกบัญญัติขึ้นภายใต้กรอบใหญ่ของการคุ้มครองเสรีภาพในการพูดและการสื่อสารโดยรัฐธรรมนูญ แต่ความแตกต่างในรายละเอียดของการออกแบบกลไกเชิงสถาบันเป็นผลมาจากฐานรากเชิงปทัสถานว่าด้วยเสรีภาพในการพูด ('Free speech' normative underpinnings) และกรอบการรู้คิด (Cognitive framework) ในเรื่องข่าวลวงทางการเมืองที่ต่างกัน ซึ่งทั้งสองสิ่งนี้คลี่คลายปรากฏออกมาผ่านตรรกะของการกระทำที่เหมาะสม ทั้งนี้เงื่อนไขโครงสร้างระบบการเมืองที่เฉพาะเจาะจงในแต่ละประเทศก็ส่งผลต่อการกำหนดเขตแดน (Parameter) ของความเหมาะสมที่ส่งผลต่อการออกแบบกลไกเชิงสถาบันในการรับมือกับข่าวลวงทางการเมือง

คำสำคัญ: การออกแบบกลไกเชิงสถาบัน, ตรรกะของการกระทำที่เหมาะสม, ข่าวลวงทางการเมือง, เสรีภาพในการพูดและแสดงออก

Abstract

Consolidated democracies in the Western hemisphere are persistently confronted with the challenge of political disinformation. This has compelled their respective governments to formulate and implement institutional mechanisms as a countermeasure. Prevalent academic literature has predominantly centered on the efficacy of these mechanisms. This research, however, endeavours to contribute to the scholarly debate by foregrounding the influence of normative and value-based factors on the design of these institutional arrangements - a perspective that has hitherto been largely overlooked. Employing a comparative case study methodology, this analysis investigates five nations: Estonia, France, Germany, Sweden, and the United Kingdom. A salient finding of this study is that while the legal frameworks governing media and political content in all five countries are situated within the broader constitutional mandate of protecting freedom of speech and communication, the granular variations in their institutional designs are attributable to divergent normative underpinnings of free speech and distinct cognitive frameworks concerning political disinformation. These elements manifest through a logic of appropriateness, which is itself conditioned by the specific parameters of each country's political structure. Consequently, these structural conditions delineate the boundaries of what is considered an appropriate institutional design for combating political disinformation.

Keywords: Institutional Mechanism Design, Logic of Appropriateness, Political Disinformation, Freedom of Speech and Expression

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