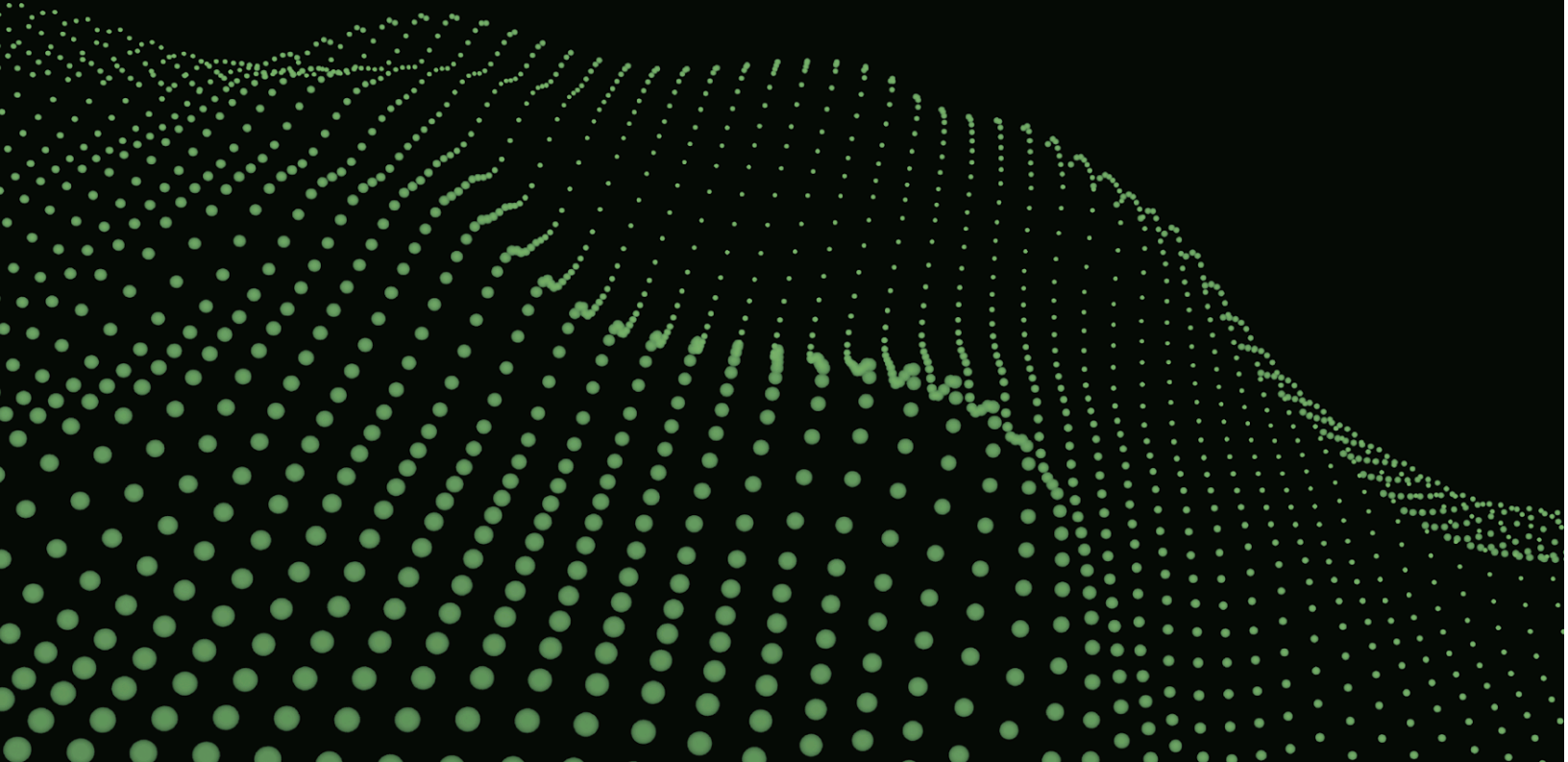




Australian Code of Practice on Disinformation and Misinformation | **Annual Report**

Published May 31, 2024



Background

DIGI is a non-profit industry association that advocates for the interests of the digital industry in Australia. DIGI's founding members are Apple, eBay, Google, Linktree, Meta, Microsoft, Spotify, Snap, TikTok, X (f.k.a. Twitter) Twitch and Yahoo. DIGI's vision is a thriving Australian digitally-enabled economy that fosters innovation, a growing selection of digital products and services, and where online safety and privacy are protected. DIGI is a key Government partner in efforts to address online harms, data and consumer protection online and to grow the digital economy, through code development, partnerships and advocacy for effective and implementable approaches to technology policy.

The Australian Code of Practice on Disinformation and Misinformation (ACPDM) was developed in response to Australian Government policy announced in December 2019 following the ACCC Digital Platforms Inquiry, where the digital industry was asked to develop a voluntary code of practice on disinformation.

DIGI developed the ACPDM with assistance from the University of Technology Sydney's Centre for Media Transition, and First Draft, a global organisation that specialises in helping societies overcome false and misleading information.

The ACPDM was launched in February 2021 and its signatories are Apple, Adobe, Google, Meta, Microsoft, Redbubble, TikTok and Twitter. The ACPDM was further strengthened in December 2022 in response to stakeholder feedback received through a planned review of the code that included a six week public consultation. These updates are the latest set in a series of improvements driven by DIGI and code signatories since the code was introduced in February 2021.

Mandatory code commitments include publishing & implementing policies on misinformation and disinformation, providing users with a way to report content against those policies and implementing a range of scalable measures that reduce its spread & visibility (Mandatory commitment #1). Every signatory has agreed to annual transparency reports about those efforts to improve understanding of both the management and scale of mis- and disinformation in Australia (Mandatory commitment #7).

Additionally, there are a series of opt-in commitments that platforms adopt if relevant to their business model: (Commitment #2) addressing disinformation in paid content; (#3) addressing fake bots and accounts; (#4) transparency about source of content in news and factual information (e.g. promotion of media literacy, partnerships with fact-checkers) and (#5) political advertising; and (#6) partnering with universities/researchers to improve understanding of mis and disinformation.

DIGI has produced this annual report as part of its governance of the ACPDM.

Australian Code of Practice on Disinformation and Misinformation | Annual Report

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Opening statement



By: Dr Jennifer Duxbury

Director, Policy, Regulatory Affairs and Research DIGI

Since the inception of the Australian Code of Practice on Misinformation and Disinformation (the ACPDM) innovation and agility have been hallmarks of signatories' efforts to combat the threat of online disinformation and misinformation. Since DIGI's last annual report, the signatories to the ACPDM have continued to adapt their approaches to changes in the digital information environment, including in response to developments in artificial intelligence, highlighted in the section of the report on signatories' 2024 transparency reports.

The ACPDM is open to a variety of digital services that can contribute to combatting disinformation and misinformation and strengthening the digital information environment. We are therefore delighted that in 2024 the ACPDM has continued to grow, gaining two new signatories: Twitch and Legitimate. Twitch, an interactive livestreaming service for content spanning gaming, entertainment, sports, music, joined as a signatory in February 2024 and has filed a baseline transparency report which provides an overview of their approach to mis and disinformation. Legitimate, joined in May 2024 and provides tools that enhance transparency in online journalism and help readers make more informed decisions on the articles with which they interact. The signatories of the ACPDM now include an even wider range of digital services – spanning providers of interactive livestreaming, news and information services, marketplaces, content authenticity technologies and tools to enhance the work of journalists – increasing the breadth of the code's impact in Australia.

DIGI and the code's signatories are committed to engage in activities that help obtain their insights from external stakeholders about how we can work together to strengthen measures to fight mis- and

disinformation threats. Our annual event provides a forum for expert discussion and stakeholder engagement regarding responses to misinformation and disinformation in Australia. In July 2023 we partnered with the Centre for Media Transition of the University of Technology Sydney to bring together a range of experts and stakeholders for some lively discussions on topical issues. The event opened with a briefing from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts on the consultation process for the Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023, followed by two panel discussions. The first, moderated by Professor Derek Wilding, Co-Director of the Centre for Media Transition, raised important issues related to the consultation on the Bill. The second, examined how holistic interventions work together to combat misinformation and create healthy information systems.

A key element of the governance of the ACPDM is the work of the members of the independent complaints sub-committee, and administration sub-committee which is outlined in this report, who have worked hard to address complaints under the code. Another key element is the independent oversight of the annual transparency reports by Hal Crawford, who analyses signatories' draft reports and requests improvements and provides an attestation of the claims made in the final products before publication. We want to thank all of our independent experts for their expertise which inform DIGI and signatories' efforts toward continual improvement under the code.

In 2024, DIGI and the ACPDM signatories look forward to continuing to contribute to the development of effective responses in this challenging policy space, building on the body of experience and learnings from the code to date.

Dr Jennifer Duxbury
Director, Policy, Regulatory Affairs and Research, DIGI.

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Part 1 | The 2024 Transparency reports

Insights from 2024 Reports published on DIGI website

The purpose of ACPDM requirements for signatories to submit annual transparency reports is to give the Australian public, the ACMA, and the Australian Government the tools to assess how the signatories are adhering to their commitments under the ACPDM¹. The goal of the reports is to also help improve understanding of online misinformation and disinformation in Australia over time. *The Transparency Reporting Guidelines Version 2.1 for The Australian Code on Disinformation and Misinformation*, prepared by our independent expert, Hal Crawford, set out best practice reporting for the Code's signatories, enabling them to clearly articulate how they meet their commitments under the Code to combat mis- and disinformation. Our transparency reporting process is backed up by an independent review and assessment process also undertaken by Hal Crawford, in which he analyses signatories' draft reports and requests improvements and provides an attestation of the claims made in the final products before publication.

This year's transparency reports that have been published on the DIGI website cover the reporting period January 1, 2023 to December 31, 2023 (including the period of the 2023 campaign for the Australian Indigenous Voice referendum). This independent process has seen this year's transparency reports contain qualitative and quantitative insights about how signatories approaches to mis and disinformation are evolving.

The importance of innovation and agility in fighting mis and disinformation

A key theme that emerges from this year's transparency reports is that combatting mis- and disinformation requires innovation and agility. Since our last annual report, the focus on artificial intelligence (AI) and interest in understanding how AI could affect the spread of disinformation has continued to grow. To be clear, challenges include the use of AI technologies to create and amplify malicious content. This has led to changes in the policies of signatories concerning user-generated content. In early 2023, **TikTok** introduced a policy that requires users to label AI-generated content that contains realistic images, audio or video, in order to help viewers contextualise the video and prevent the spread of potentially false, misleading, or deceptive content. TikTok also introduced new labels for users to disclose AI-generated content to make clear to viewers when content is significantly altered or modified by AI technology. The labels have been designed to make it easier for users to comply with their community ' synthetic media policy. **Meta** also re-evaluated its policies, consulting with a range of stakeholders globally to identify if there was a need to update and amend these to keep pace with the rapid generative AI advances. These consultations, as well as new recommendations by Meta's Oversight Board, led to a range of new changes specifically relating to how Meta handles manipulated media.

New features and tools have also been introduced by signatories to respond to developments in generative AI. In October 2023, **Google** rolled out the 'About this image' feature to English language users globally which provides users of Google Search and Chrome with an easy way to check the credibility and context of images they see online, including an image's history, how other sites use and describe it, and an image's metadata. Users can use this feature to identify if an image may have been generated with

¹ The first set of reports were filed by eight signatories on May 22, 2021. The second round of annual reports were published on May 30, 2022 and cover signatories activities under the code for the reporting period January 2021 to December 2022. The third round of reports was published on 29 May 2023 for the reporting period January 2022 to December 2022. These reports are available on DIGI's website.

Google's AI tools when they come across it in Search or Chrome. As leaders in AI development **Google** and **Microsoft** have also provided supplementary information in their reports about their approach to deploying AI safely and responsibly in tools and features to their services.

To help mitigate the negative impact of misinformation and disinformation, **Adobe** is focused on providing tools to digital platforms that can help their users determine the sources and authenticity of online content. In March 2023, Adobe's new generative AI model, Firefly, was announced, and along with its commitment to leveraging the Content Provenance Initiative's (CAI) Content Credentials to bring transparency to generative AI outputs. It is also worth noting the progress of the CAI led by Adobe. The CAI was launched in late 2019 and works to increase trust online through provenance, which are the facts about the origins of a piece of digital content. The CAI supports the development and provision of tools to help consumers make better informed decisions about the content they are consuming online. In 2023, the initiative reached over 2,000 members including – CEPIC, Dentsu, Omnicom Group, National Geographic Society, National Public Radio (NPR), Photoshelter, and Publicis Groupe. The CAI currently has 78 members in Australia, including Woolworths and the Australian Associated Press.

While AI poses challenges to the integrity of the digital information ecosystem, the reports also demonstrate the opportunities for AI to assist and streamline signatories' efforts in detecting and disrupting disinformation operations. For example, Microsoft's report provided information about how it is integrating GPT4 enabled content moderation solutions for Microsoft Start service to proactively block violative content.

The impact of shifts in the geopolitical landscape on dis and misinformation narratives

Shifts in the geopolitical landscape continue to shape the issues that are the subject of dis and misinformation narratives including the Russian-Ukraine and Israel-Hamas conflicts. Data provided by signatories highlights the scale of signatories efforts to combat mis and disinformation threats centred on unfolding world events. For example:

- Following the attack by Hamas in Israel and the escalated conflict in Israel and Gaza, **YouTube** removed over 95,000 videos, terminated over 4,500 channels and removed over 70 million comments².
- In the six months since October 7, 2023, **TikTok** removed more than 3.1 million videos and suspended more than 140,000 livestreams in Israel and Palestine for violating its Community Guidelines, including content promoting hate speech, violent extremism and misinformation. Since the onset of the war TikTok has also observed spikes in deceptive account behaviours, necessitating the removal of 35 million fake accounts in the month after the start of the war – a 67% increase in the previous month. From October 7 through to the end of 2023, TikTok removed more than 169 million fake accounts globally, as well as removing approximately 1.2 million bot comments on content tagged with hashtags related to the war.

The proactive investigative work of Google shows how coordinated campaigns can involve multiple state based actors. Throughout 2023, **Google's** Threat Analysis Group (TAG) identified several campaigns as part of their investigation into coordinated influence operations linked to Russia. In August 2023, TAG identified a campaign linked to the Internet Research Agency (IRA) that was sharing content in Russian that was supportive of Russia and critical of Ukraine, NATO and the United States. The TAG continues to closely monitor activity in Israel and Gaza with regards to the ongoing conflict, focusing on the safety and security of users and the platforms and help them access and share important information.

Democratic elections rely on trust in electoral institutions and informed participation by citizens. To respond to the threat of influence operations governments need access to new and adaptive methodologies to track threats to the integrity of electoral processes. **Microsoft's** Democracy Forward

²As of 8 January 2024

Initiative is an innovative effort to protect democratic institutions and processes from hacking, to explore technological solutions to protect electoral processes, and to defend against disinformation. For example, Microsoft is helping governments track influence operations during elections, launching its Elections Communications Hub for elections officials across the globe to share security concerns on Microsoft's platforms, including potential incidents of disinformation.

The 2023 Australian, Aboriginal and Torres Strait Islander Voice to Parliament Referendum campaign

During the Australian, Aboriginal and Torres Strait Islander Voice to Parliament Referendum campaign, Signatories that provide social media services worked closely with the Australian Electoral Commission to manage content referrals. They also took proactive steps to support Australians stay informed, and to protect the integrity of the referendum processes including by connecting citizens to helpful and authoritative information. For example:

- **TikTok** created a Referendum Hub in collaboration with SBS's National Indigenous Television channel (NITV) and implemented front-end product features that enabled users who were seeking or viewing content associated with the referendum to access authoritative and factual sources of information from TikTok's community partners and the Australian Electoral Commission³.
- **Meta** developed referendum day reminders on Facebook and Instagram to encourage people to vote. Additionally, Meta launched a new media literacy campaign with Australian Associated Press, building on its "Check The Facts" campaign which ran ahead of the 2022 Federal Election.

Apple's report also highlighted the value of their professionally curated online news service in promoting reliable information to counter referendum misinformation. For example **Apple News** informed and educated readers by, featuring and promoting 15 free Spotlight collections on the Voice, with over 200 individual pieces of content which addressed key moments and milestones during the debate, with the specific intent of mitigating misinformation in the community. These collections received over 3 million views from readers. Fact-checking played an important role in mitigating the spread of misinformation on social media services provided by Signatories throughout the referendum campaign. In preparation for the 2023 Aboriginal and Torres Strait Islander Voice Referendum, **Meta** provided a one-off funding boost to AAP and AFP, so that they could increase their capacity in the lead up to it.

Support for impactful research

Research is needed to better understand the drivers and social impacts of mis- and disinformation and evaluate the effectiveness of interventions that can help mitigate the risk of serious harm to the community. Some of the ways in which the ACPDM signatories are supporting research include:

- **Microsoft** has a partnership with Partnership on AI which works to better understand and address the emerging threat posed by the use of AI tools to develop malicious synthetic media (i.e., deep fakes).
- **Google's** YouTube Researcher Program provides scaled, expanded access to global video metadata across the entire public YouTube corpus via a Data API for eligible academic researchers from around the world, who are affiliated with an accredited, higher-learning institution. The program allows researchers to independently analyse the data they collect, including generating new/derived metrics for their research.
- In 2023, **Adobe** published research on EKILA, a new decentralised system designed to help artists and creators get proper recognition and payment for their work in generative AI. EKILA uses a sophisticated method to trace and credit the original sources of AI-generated images, aligning with the latest standards for tracking content origins (C2PA).
- In March 2023 **Meta** sponsored and hosted the Australian Media Literacy Alliance's Australian Media Literacy Summit, which brought together a range of journalists, academics, educators,

³ According to the TikTok 2024 Transparency Report, this hub was viewed approximately 76,000 times.

librarians and other experts to discuss and learn about diverse ways to strengthen media literacy education in Australia.

Developing useful metrics to assess signatories' year on year performance against the ACPDM commitments remains challenging, particularly without knowing the outcome of proposed mis and disinformation legislation. We acknowledge there remains a need for signatories to provide more quantitative comparative data as Hal Crawford has set out in his analysis of the reports. We look forward to progressing work in 2024 on the development of suitable metrics to assess signatories' performance against the Code outcomes, in collaboration with the ACMA.

Independent assessment of the 2024 ACPDM transparency reports

By: Hal Crawford, Crawford Media Consulting

Seven full reports and one preliminary report were submitted. During the course of the year, Twitter left the Code and Twitch joined. The preliminary report was submitted by Twitch, preparatory to its first full report in 2025.

Reports submitted adhered to the compulsory formal requirements outlined in the Transparency Reporting Guidelines.

This is the fourth reporting round under the ACPDM, including the 2021 reports which had not yet been shaped by the reporting guidelines. In each successive year, the reports have incrementally improved, providing more context to the often complicated and extensive efforts of the Signatories to reduce mis/disinformation on their platforms. Unfortunately this year that progress has for the most part stalled.

There is a great deal of variation in how the Signatories approach their annual reports, which is a natural reflection of big differences in business models and operational complexity. In addition to this natural variation, Signatories have responded differently to requests for trended data and associated commentary. It is of considerable concern when a major Signatory continues to supply only isolated annual data points. The reasoning for not providing multi-year data – that it would require contextual commentary – contradicts the core purpose of the reporting regime.

This reluctance to provide accessible data, which in any case is publicly available in the previous reports, also contradicts the recommendations of the Australian Communications and Media Authority (ACMA) in its second report to government (July 2023).

On a related but different matter, It has been a recurring recommendation, both of ACMA and this auditor, that Signatories formally commit to internally consistent Key Performance Indicators (KPIs). The fact this has not happened is an indicator that, as stated, improvement of the reporting regime has stalled.

Despite these two problems, there is a great deal of useful and interesting information in this year's reports and Signatories have been mostly responsive to requests for change and elaboration. There are indications that the storm of mis/disinformation that surrounded the COVID pandemic has abated, and some signatories have reported significantly reduced inauthentic behaviour (for example, fake account creation). There are also new areas for concern, including a surge in Chinese propaganda activities on Facebook and Instagram. There are many similarly interesting case studies spread through the reports.

Some Signatories have supplied information on artificial intelligence (AI) and how it has been used to both facilitate and combat mis/disinformation, and I look forward to hearing more in future reports.

I urge the Signatories to continue improving their reports and commit to consistent internal KPIs as a minimum reporting requirement. A self-regulatory regime is preferable to government intervention in the sensitive and difficult area of mis/disinformation, and an ongoing commitment to improvement is vital in maintaining the credibility of the Code.

Part 2 | Code Administration

This section contains an overview of the key activities of DIGI in its role as administrator of the ACPDM.

Updates to the transparency reporting process

In this section of the report, we discuss the updated Best Practice Reporting Guidelines 2.1 that are included in full in this report in Appendix A. Objective 7 of the ACPDM states: 'Signatories publicise the measures they take to combat Disinformation and Misinformation' and the corresponding outcome states: 'The public can access information about the measures Signatories have taken to combat Disinformation and Misinformation'.

The Guidelines were developed by Hal Crawford, an independent expert in digital news media, appointed under the ACPDM governance arrangement. While they are recommendations and the signatories are not bound to adhere to these recommendations when drafting their reports, they aim to support the outcomes based approach of the ACPDM. In March 2022, DIGI strengthened the approach to transparency reporting with the introduction of Best Practice Transparency Reporting Guidelines. In March 2024, DIGI asked Hal Crawford to further update the Guidelines to:

- Include specific requests for clear explanations of major changes in policy information
- Include specific information about efforts to combat AI-generated dis/misinformation
- Update the table of Code signatories to reflect withdrawals and additions
- Highlight areas for continual improvement based on analysis of past reports including KPI's.

The updates document responds to the expansion of the Code in December 2022, observations made by the ACMA in Digital platforms' efforts under the Australian Code of Practice on Disinformation and Misinformation Second report to government⁴ and to developments in the dis/misinformation environment concerning the rise of Artificial Intelligence (AI).

Complaints

The Code complaints facility is an important pillar of the Code's governance process which is aimed at ensuring Signatories are accountable for the commitments under the Code including the accuracy of the information in their transparency reports. Eligible complaints can be made by the public, via the complaints portal that DIGI administers on its website, and are escalated to an independent Complaints Sub-committee.

⁴ Published at <https://www.acma.gov.au/July 2023>.

In October 2023, the independent Complaints sub-committee heard a complaint made against X (f.k.a. Twitter) by Reset Australia alleging a breach of X's commitment under the Code to provide a tool for reporting breaches of its civic integrity policy. DIGI assessed the complaint as an 'eligible complaint' – under the ACPDM's Terms of reference for Complaints Facility and referred it to the Complaints Sub-committee. Following its evaluation of the Complaint, on 27 November 2023 the Complaints Sub-Committee decided to withdraw X's signatory status under the Code. This was the first complaint DIGI has received that was eligible to be determined by the Complaints Committee.

More recently, Reset Australia brought a complaint against Meta, alleging that its 2023 Transparency report contained false statements about its fact checking and labelling processes. The independent Complaints Sub-Committee completed its inquiries into the complaint against Meta in April 2024 after considering the information provided by the parties and consulting the independent reviewer of the Meta transparency report. The Committee dismissed the complaint on the grounds that Reset Australia produced no convincing evidence that Meta's transparency report contained false statements. Details of the committee's decisions on complaints are published on the DIGI website⁵.

To date, DIGI has received 65 complaints through the complaints portal since it launched in October 2021, of which 32 have been received since the last reporting period commencing January 2023. Of these 16 were received during the reporting period January 1 to December 31 2023. Based on the information provided by complainants to date, all but 2 complaints have generally been incomplete and/or related to individual items of content on signatories' products or services.

Annual Event 2023

The ACPDM includes a commitment in section 5.29 by signatories to convene an annual event to foster conversations about mis- and disinformation.

In 2023, DIGI partnered with the [University of Technology Sydney \(UTS\), Centre for Media Transition](#) to host a lineup of expert speakers for a discussion on content moderation and policy approaches in the realm of misinformation and disinformation. The audience was composed of relevant Government stakeholders, industry, and academics.

The event opened with a briefing from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts on the [exposure draft of the Communications Legislation Amendment \(Combating Misinformation and Disinformation\) Bill 2023](#) and the consultation process that was open at the time.

It then proceeded into a discussion of the draft Bill moderated by Professor Derek Wilding, Co-Director of the Centre for Media Transition with DIGI and Andrea Carson, Professor of Political Communication in the Department of Politics, Media and Philosophy at La Trobe University. The second panel discussion of the event was moderated by DIGI's Dr. Jenny Duxbury and examined how holistic interventions work together to combat misinformation and create healthy information systems with representative experts. The event intended to illuminate what a multi-stakeholder approach looks like in practice. A list of panel speakers and their biographies can be found below.

Dr. Jenny Duxbury,
Director Policy, Regulatory Affairs, and Research, Digital Industry Group Inc (DIGI)

⁵<https://digi.org.au/complaint-by-reset-australia-against-x-f-k-a-twitter-upheld-by-australian-code-of-practice-on-disinformation-and-misinformation-independent-complaints-sub-committee/> and <https://digi.org.au/reset-australias-complaint-against-meta-under-the-australian-code-of-practice-on-disinformation-and-misinformation-is-dismissed-findings-of-the-independent-complaints-sub-committee-15-april-2024/>

Dr Duxbury is a senior legal professional and policy advisor with over 20 years of international experience spanning private and public sector legal practice, corporate governance, public policy, and academia. Dr Duxbury has held General Counsel roles at Reuters Limited, Airservices Australia, Lonely Planet and ninemsn. She leads DIGI's work on mis and disinformation including the development and administration of the Australian Code of Practice for Disinformation and Misinformation.

**Professor Derek Wilding,
Co- Director University of Technology Sydney, Centre for Media Transition (Moderator)**

Derek joined UTS as a Visiting Fellow in August 2014 and is now Co-Director of the Centre for Media Transition. CMT is an interdisciplinary initiative of the Faculty of Law and the Faculty of Arts and Social Sciences, launched in July 2017. Derek came to UTS from an industry-based position as Executive Director of the Australian Press Council. As Executive Director, he led the Council's complaints-handling functions and worked with the Chair and members on a review of the Council's standards of practice. Before this, he worked for the Australian Communications and Media Authority.

**Professor Andrea Carson,
La Trobe University**

Andrea Carson is a Professor of Political Communication in the Department of Politics, Media and Philosophy at La Trobe University. She is a political scientist and a trained journalist. Professor Carson examines the media's role in democracies, journalism and political communication. Her studies focus on information quality (both high and low) with special interests in investigative journalism (high quality) and mis- and disinformation (low quality information and fake news). She studies mitigation measures to combat mis- and disinformation, including fact -checking and government regulatory environments.

**Saffron Howden,
Journalist, author and media literacy leader**

Saffron Howden has worked for 20 years in the news media at The Sydney Morning Herald, Daily Telegraph, AAP and Australian Community Media (ACM). Saffron co-authored [Kid Reporter: The Secret to Breaking News](#) and co-founded Australia's national newspaper for children, Crinkling News. She has worked at the forefront of media literacy advocacy in Australia and is now a PhD candidate at the University of Canberra looking at the impact of media literacy education on the spread of misinformation. Saffron was the first Google News Initiative Teaching Fellow for Australia and New Zealand and currently works as national editorial training manager at ACM.

**Venessa Paech,
Co-Founder and Director of Australian Community Managers (ACM)**

Venessa Paech is Australia's leading expert in online communities and community management. She has over 25 years' experience building, managing and leading online communities, at companies including Lonely Planet, REA Group, Envato and Australia Post. Her consultancy clients include: ABC, Teach for Australia, Reach Out, SANE and Woolworths. ACM is a national centre of excellence for online community management training and resources. Venessa teaches online community management for post-graduates, and Community as a leadership model for Executives at the University of Sydney. Venessa is a published academic, and a PhD Candidate researching AI and online communities.

**Holly Nott,
AAP Director of Editorial Partnerships**

Holly Nott brings more than 20 years of journalistic experience to her role as AAP's Director of Editorial Partnerships. She works closely with social media platforms and other non-traditional clients of the newswire, and has overall responsibility for the direction and operations of AAP FactCheck, which she established in early 2019. Since AAP became an NFP almost three years ago, Holly has also driven AAP's work in the media literacy space, developing campaigns and training units with social media partners.

**Dr. Amelia Johns,
University of Technology Sydney**

Amelia Johns is a Senior Lecturer in Digital and Social Media. Her work spans the fields of digital media and citizenship studies, with a focus on young people's negotiation of racism, political engagement and activism, digital literacy and safety across networked and closed digital platforms and publics. She is the recipient of an ARC Discovery project: 'Fostering Global Digital Citizenship: Diasporic Youth in a Connected World'. She was awarded a Facebook Content Policy Award in 2019 for the project 'Mapping and Countering the Diffusion of Hate Speech Across Social Media'. She is currently working on a UNESCO funded project: 'Mapping and Review of Online Resources for, and perceived needs among vulnerable and marginalised young people in the Asia Pacific Region on digital literacy, safety and participation'.

Promotion of Code

Since the launch of the ACPDM, there has been domestic and international interest in the code as a principles based regulatory model. DIGI has continued to engage with interested Australian stakeholders including consumer groups, academic and online community moderators and has provided information to the Department to support the development of the government's policy approach, including a detailed submission on the exposure draft of the Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023.⁶

DIGI ran social media advertising to grow greater awareness of the ACPDM among Australians. This included a generalised, broad audience, awareness building campaign on LinkedIn and a targeted awareness campaign in the week leading up to the 2023 Australian Indigenous Voice referendum. DIGI also continues to promote key milestones in its governance of the code through media releases and other communications materials. These included media release and engagement to support public transparency of the Independent Complaints Sub-Committee's decision regarding X (f.k.a Twitter).

Governance Committees

The governance arrangements for the ACPDM are set out in Appendix B of this report. In accordance with these arrangements, the Administrative Committee (including the independent committee members met twice and the Steering Group met on 3 occasions during the period between 22 May 2023 and May 29 2023. The main focus of the committees was to consider the ACMA's second report on digital platforms' efforts under the Australian Code of Practice on Disinformation and Misinformation Second report to government⁷ in the light of the Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023. As a result the process of the Administrative Sub-Committee has been updated so that Signatories will provide the Committee with updates on developments concerning:

- progress on general KPI development;
- Emerging issues and signatories responses (e.g notable events such as referendum/Israel and Hamas conflict);
- Notable new initiatives e.g around addressing AI, research;
- relevant developments arising from material changes in the functionality of their services or in the content disseminated by users of the service that the committee (as per above);
- relevant policy and service updates/changes by signatories.

Signatories have also decided that given the uncertain status of the Bill, a further review of the Code will not take place in 2024 until there is greater regulatory certainty in relation to the regulation of mis- and disinformation in Australia.

⁶ DIGI's submission on the exposure draft of the Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023.

⁷ Published at <https://www.acma.gov.au/July 2023>.

Appendix A | Updated Transparency Reporting Guidelines for The Australian Code on Disinformation and Misinformation



By: Hal Crawford
Crawford Media Consulting
Version 2.1 of these guidelines were finalised in April 2024



Executive summary

This document provides guidelines for Signatories preparing the transparency reports required by the Australian Code of Practice on Disinformation and Misinformation ("the Code"). The reports themselves fulfil two functions: to inform the public and to provide a framework for the review of activities under the Code.

Three years of reports have already been filed, with each year providing an incremental improvement in terms of utility and consistency.

These guidelines request Signatories provide:

- Trended data relevant to the Australian market over extended periods
- Clear explanations of major changes in policy

- Consistency in reported metrics year-on-year
- Audience-friendly documents with a minimum of promotional language
- Specific information about efforts to combat AI-generated dis/misinformation

As in past years, we provide an overview of reporting requirements and a template for the completed reports. The template follows the same form as the 2022 and 2023 reports, with some additions to reflect the increased scope of the Code from December 2022 and changes to incorporate feedback from the Australian Communications and Media Authority.

Introduction

The purpose of this document is to set out guidelines for the annual reporting required of Signatories under the Australian Code of Practice on Disinformation and Misinformation (“the Code”). The annual reports are required under Objective 7 of the Code: “Signatories publicise the measures they take to combat Disinformation and Misinformation.”^[1]

Signatories filed initial annual transparency reports in May 2021, followed in successive years by reports which have incrementally improved in terms of specificity and consistency.

The general purpose of the reports can be inferred from Objective 7 and the Code’s administrative requirements, and is twofold:

- To communicate to the general public measures taken by Signatories against dis/misinformation
- To provide a framework for the independent reviewer, DIGI and other stakeholders to audit compliance with the Code

Although these aims are related, they could result in significantly different outputs if one function dominated. A key reminder for Signatories is that the documents must be accessible and comprehensible to the general public. The dual purpose of the reports will influence the reporting template recommended in this document.

This is the third iteration of these Guidelines following the introduction of Code. This document responds to the expansion of the Code in December 2022, and to developments in the dis/misinformation environment.

Feedback and changes from past reports

Global regulation of dis/misinformation has developed significantly since work on the Australian Code began, and there have been regulatory developments within Australia that may also affect the operation of the Code in future. We focus here on specific requests made to Signatories to improve the utility of their annual transparency reports.

All Signatories fulfilled the formal requirements of the transparency reporting regime through 2021-23.

Since the third round of reports were filed in 2023, the membership of the Code has changed: Twitter (X) was asked to leave following a serious breach of the Code, and gaming streaming platform Twitch joined.

The table below indicates the word count and commitments to outcomes made by each Signatory under the Code, as indicated in transparency reports filed in May 2023 and Twitch's opt-in form.

	Word count	1	1A	1B	1C	1D	2	3	4	5	6	7
Adobe	3500	✓						✓	✓		✓	✓
Apple	2100	✓	✓		✓		✓		✓		✓	✓
Google	8800	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Meta	9900	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Microsoft	10,500	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Redbubble	2,200	✓	✓	✓	✓		✓	✓			✓	✓
TikTok	6500	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Twitch	na	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓

Signatories for the most part made improvements in these areas, and we direct them to continue their efforts. In particular, the reports filed in 2022-23 fulfilled the request to reduce emphasis on process, to be explicit about committed outcomes, to reduce promotional language and to strive for overall clarity. In the 2023 reports two significant additions to the reporting requirements arose from additions to the Outcomes: the introduction of a requirement to provide information about recommender systems (Outcome 1e) and an addition to Outcome 2, strengthening the reduction of monetisation incentives for dis/misinformation (5:15).

Outcome 1e gave rise to a reporting obligation to show how signatories have “made information available to the end-user” regarding the operation of recommender engines (5.14.A). Signatories who have committed to this outcome must also include evidence they have made recommender options available to users (5.14.B).

In terms of Outcome 2, signatories should speak to their efforts to deter advertisers “from repeatedly placing digital advertisements that propagate Disinformation or Misinformation”.

Areas for continued improvement are:

- In the consistent provision of trended data so that comparisons can be made year-on-year
- In the provision of data related to the Australian market; and
- In clear explanations of relevant internal policy changes.

In addition, we would like to see discussion and explanation of any measures explicitly undertaken to combat AI-generated dis/misinformation.

Key guidelines

Calendar year reporting

Reports should refer to data from the previous calendar year. The reports filed in May 2023, for example, should relate to the 12 months from 1 January to 31 December 2022. Given that months will have elapsed from the end of that period to the time of compiling the report, it may be acceptable to refer to developments in dis/misinformation in the first half of the current calendar year in passing commentary.

The use of a common reporting period is essential in terms of making comparisons year-on-year and platform-to-platform, and increases the utility of the reports.

Statement of commitments and relevant services/products/platforms

Signatories must state near the beginning of their reports which Code Objectives/Outcomes they have committed to, and which services and products the commitment applies to. This is particularly important for Signatories with big and differentiated portfolios. The omission of a relevant service/product should be noted.

Changes in policy

Signatories should provide details on any significant policy changes related to dis/misinformation and their activities to combat it. This information can be included in the Summary, and in the relevant Outcome sections of the reports. Signatories should clearly explain the change from the old policy to the new, and what prompted the change.

The impact of generative AI

The ACMA has requested Signatories provide information in their transparency reports on specific measures taken to combat dis/misinformation generated by artificial intelligence (AI). This requirement does not require a structural change to the report template – because the existing Outcomes are engineered to capture activity against this kind of dis/misinformation – but Signatories are directed to

consider AI explicitly and provide relevant information where available. This also applies to any policy changes that many have been instigated by the rise of generative AI.

Trended data

In general, there is a need for more trended numerical data in the transparency reports. A minimum of three years of reporting should be supplied with any data, in order to give context. This is a key requirement for understanding.

It may not always be possible to supply three years of data for a given metric. In that case, contextualisation through trended monthly numbers may be appropriate.

Accompanying commentary is vital to explain changes. For example, the incidence of detected dis/misinformation may have increased in a given year because the quantum of dis/misinformation increased, or because a Signatory improved detection. Regardless of the potential misinterpretation of trended data, a transparency reporting regime demands it, and furthermore demands that the same data be reported in subsequent years. Any addition or omission of data should also be the subject of an explanatory note.

The expectation of the report review process is that data used as internal Key Performance Indicators in the area of dis/misinformation be included in the report unless there is a clear commercial imperative to omit (see more on KPIs below).

Australian data

Reporting under the Code should provide data for the Australian market. Global metrics may also be relevant, but given the Code's national nature the primary concern should be Australian numbers, examples, and context. It is recognised that Australian data may not always be available: if this is the case, the Signatory should explicitly note that this is the case.

Public accessibility

There are other aspects of the initial reports that can be built on to improve communication with a general audience:

- The emphasis on brevity in the first version of these guidelines was perhaps too severe given the big scope of some Signatories' operations. Limiting to 10,000 words should be possible, however.
- The use of graphical elements such as bar and line charts helps in communicating numerical information
- Breakout (separated from main text body) case studies are recommended to illustrate key points and developments.

Promotional language

One noticeable aspect of some of the first reports was a “promotional” tone. It is natural that Signatories seek to portray their efforts and accomplishments in the best possible light. Unfortunately, promotional language undermines the informational content of the reporting, and encourages cynicism towards what are in fact major and important efforts to curb mis/disinformation. We encourage Signatories to avoid promotional writing and to maintain a neutral stance, highlighting problems and successes with equanimity, and thereby increasing the credibility of the reporting.

We appreciate this can be difficult with a public document: a good rule of thumb is to avoid statements and words that would not be found in internal company reporting.

Generic information

Generic information relating to dis/misinformation process and policy that is unchanged from past reports should be condensed or moved to appendices where appropriate. This is to place greater emphasis on novel aspects of the fight against mis/disinformation, and to avoid losing the novel information among material that is the same year-to-year.

The previous iteration of these guidelines found that on average, 84% of the content in the initial 2021 reports was generic information relating to dis/misinformation process and policy.

Bearing in mind the dual purpose of the reports – to communicate to the public and demonstrate compliance with the Code – it is necessary to include some of this information repeatedly. For example, it is a mandatory requirement of reporting that Signatories provide links to reporting mechanisms for dis/misinformation (see below for mandatory links). Signatories may also want to include important information about their approach to tackling dis/misinformation in every report, and there should be an opportunity to do this.

Mandatory links reporting

Signatories’ commitments under the Code include simple links to information in order that the independent reviewer may assess compliance. To be explicit regarding these mandatory requirements, they are:

- 1b: Links to user guidelines, policies and procedures relating to mis/disinformation
- 1c: Links to publicly available tools for reporting mis/disinformation
- 5: Links to/evidence of published information that allows users to better distinguish factual information from mis/disinformation

The link requirements are provided as a checklist to ensure simple elements are not omitted. As indicated in the rest of these guidelines, Signatories are expected to elaborate significantly through the identification and provision of relevant data and commentary. Signatories who have not committed to an Outcome/Objective are exempted from the relevant mandatory elements. Note that in addition to providing these links to assist the independent reviewer, it may be helpful for the reviewer to directly query the Signatory on elements of a submitted report.

The issue of KPIs

In the European Union's 2022 Strengthened Code of Practice on Disinformation, great emphasis is put on quantifying the effectiveness of dis/misinformation countermeasures through Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs) associated with commitments.² The idea is that these data may provide a measure of cross-platform comparison. The EU requires that Signatories provide data for the 6-month reporting period on a country-by-country basis.

In practice, the reports filed under the EU Code demonstrate the difficulty in attempting to mandate meaningful shared metrics between platforms that have very different business models, audiences, interfaces and functions. In the three waves of reports filed to March 2024, the big platforms have created half-yearly reports over 200 pages long with many incomplete tables, often featuring imprecise or missing data. While it appears that great efforts have been made to satisfy requirements, the documents are of questionable use to the public. They do not include trended data – which will accumulate over time as the corpus grows – and need further aggregation and interpretation before they become useful to anyone.

An earlier version of these guidelines predicted that the EU model would prove useful for comparisons over time within the same organisation, rather than pan-industry. This is indeed the case with the reports so far published.

We urge the Australian Code's Signatories to identify and commit to appropriate internal KPIs that are consistently reported on from one year to the next.

Challenges in reporting

The Signatories are diverse businesses and there are big variations in the application of the Objectives/Outcomes. It is not possible to be prescriptive in dictating the data supplied in the transparency reports, although it is expected that Signatories themselves identify relevant data and supply it in line with the suggestions of this document (i.e., within the Australian market, for the reporting period, and for a minimum of two years prior to that). A particular challenge may arise for the Signatories whose dis/misinformation operations are extensive. We encourage them to focus on changes within the reporting period and their interpretations, responses and initiatives. There are also some Signatories whose activities relevant to the Code cannot be quantified. In this case, Signatories are encouraged to report case studies and such qualitative information as will increase the general understanding of their efforts.

Note on formatting

We recommend Signatories use their own formatting conventions in terms of font, layout and colour in the final PDF document. This will not hinder independent review and may enhance messaging to the general public. As implied in the template below, the reports should follow a common structure, with considerable leeway for different elements like graphs, tables and breakout case studies. This will ensure a degree of uniformity across Signatories and better enable comparison between reporting periods. Where numerical data can be supplied, the preference is to present this at the beginning of sections and to contextualise with commentary. It is important to clearly explain metrics and the rationale behind them.

Report structure

We recommended following the framework below in preparing reports. Content suggestions and constraints are given in brackets. Note the positions of graphs and breakout case studies are given as examples only.

Australian Code of Practice on Disinformation and Misinformation

[Name of Signatory]

Annual Transparency Report

[Reporting period] No

Summary

- [Discuss in brief the overall features of the reporting period]
- [Include analysis of the general environment relevant to dis/misinformation]
- [Reiterate the primary elements of your work against dis/misinformation]
- [Include information here about significant policy changes related to dis/misinformation]

Commitments under the Code

[Use a table to summarise commitments and the platforms they apply to, as below]

1a [paraphrase Outcome 1a]	[platform] [service] [product]
1b [paraphrase Outcome 1b]	[platform] [service] [product]
1c [paraphrase Objective 2]	[platform] [service] [product]
Etc. ...	Etc. ...

[Include short commentary on omitted objectives/outcomes/platforms/services/products]

Reporting against commitments

Outcome 1a: Reducing harm by adopting scalable measures

[Metrics reported and for what reason]

[Comments on trends observed]

[Any changes in type of content/behaviour targeted]

[Changes to acceptable use policy etc.]

[What measures were successful and how is that reflected in the data?]

[Tables and graphics as appropriate]

[Case studies as appropriate]

CASE STUDY 1

[Illustrates a particular aspect of data trend or impact of changes made]

[Note this is an example location for a case study. If appropriate and available, Signatories should provide several case studies. Such qualitative content is valuable in bringing policy to life.]

Outcome 1b: Inform users about what content is targeted

[What new initiatives in communicating to users what constitutes mis/disinformation?]

[Evidence of user engagement with this content]

[Links to user guidelines, policies and procedures relating to mis/disinformation]

[Note to include information about work against AI generated mis/disinformation]

[Include any policy changes from the last reporting period]

Outcome 1c: Users can easily report offending content

[Any changes in the way users report content for the reporting period]

[Links to publicly available tools for reporting mis/disinformation]

Outcome 1d: Information about reported content available

[What data have you published to users about the amount and quality of dis/misinformation reporting under 1c?]

[Include such data if available]

[Also give links to where the data has been published]

Outcome 1e: Information about recommender engines

[What information have you provided to users about how recommender engines work on your platforms?]

[What options do users have around recommender engines, and how has that been communicated to them?]

[Provide links where possible, or example screenshots if not]

Objective 2: Disrupt advertising and monetisation incentives for disinformation.

[Explain KPIs as above]

[Quantify progress made against the monetisation of disinformation, graphically if possible]

[Per 5:15, what measures have been taken against advertisers who repeatedly provide ads containing dis/misinformation?]

[Changes to policies and processes implemented to reduce monetisation for targeted content and behaviour]

[Any relevant changes in market conditions]

Objective 3: Work to ensure the integrity and security of services and products delivered by digital platforms.

[Detail of work in the period against inauthentic behaviours that impact product security]

[Note to include information about work against AI generated mis/disinformation]

[As above, detail trends and initiatives, and plans in this area]

[This section may contain reference to 1a, given potential overlap in these Objectives – it is acceptable to simply refer to that section if all actions against inauthentic user behaviour are covered there]

[Include any policy changes from the last reporting period]

Objective 4: Empower consumers to make better informed choices of digital content.

[Detail the ways in which you have helped users distinguish dis/misinformation from quality information]

[What is the uptake or awareness of such “empowerment tools”?]

[In what content categories are they active?]

Objective 5: Improve public awareness of the source of political advertising carried on digital platforms.

[Detail the ways in which you have flagged political advertising and improved the awareness of political sources of advertising]

[Any challenges on the horizon, e.g. Upcoming elections]

CASE STUDY 2

[Illustrates a particular aspect of data trend or impact of changes made]

Objective 6: Strengthen public understanding of Disinformation and Misinformation through support of strategic research.

[Suggest the use of the table here]

[Name of university/institute/company]	[Overview of research]
...	...
...	...

[Notable success/challenges/changes in the above work]

[Include links]

Objective 7: Signatories will publicise the measures they take to combat Disinformation.

[Aside from this report, what other information about your work against dis/misinformation has been communicated to the public?]

[Quantify engagement with this information if possible]

[Overlaps to some extent with 1d, and if there is complete overlap simply refer to that section]

Concluding remarks

[Unanswered questions and challenges]

[Summary of any new initiatives not already mentioned]

[Evolution of your business's understanding of the problem and how to tackle it]

[Observations on the Code and the process of reporting]

[May include developments between the end of the reporting period and now]

Appendix

Business and Content Context

Approach to Disinformation and Misinformation

1 "... each Signatory will provide an annual report to DIGI setting out its progress towards achieving the outcomes contained in the Code which will be published on the DIGI website." 7.3, page 17.

2 Commitment 40, *The Strengthened Code of Practice on Disinformation 2022*

Appendix B | Governance arrangements for The Australian Code on Disinformation and Misinformation

In October 2021, DIGI announced the governance arrangements for the ACPDM in order to strengthen the code and its effectiveness. These are summarised here. The code is a novel self regulatory mechanism that aims to drive improvements through increased transparency about how platforms tackle mis and disinformation; DIGI's governance arrangements have been tailored with that aim in mind.

Complaints committee

The Complaints Committee is independent and resolves complaints about possible breaches by signatories of their commitments under the code. DIGI acts as secretary on this committee, but has no vote on decisions in order to avoid conflicts of interest. The committee meets to hear complaints of material code breaches that cannot be resolved by signatories and complainants. The Terms of Reference for the Complaints Sub-committee can be found on the DIGI website⁸, and the three independent members of the Complaints Sub-committee are detailed below.

Administration committee

The Administration Sub-Committee brings together the three independent representatives from the Complaints Sub-Committee with signatories of the code. This committee monitors the various actions taken by signatories to meet their obligations under the Code, such as the operation of the complaints facility.

Signatory steering group

As any digital company can adopt the code, not just DIGI's members, this group enables companies that are not members of DIGI to have an equal say in decisions that are made about the code, if they choose. This group serves to separate DIGI's advocacy work on behalf of its members from the code governance functions.

Independent review of transparency reports

An independent expert fact checks all signatories' transparency reports and provides an attestation of them, in order to incentivise best practice and compliance. The reviewer provides advice to the Administration Sub-committee if it cannot provide an attestation of claims in a transparency report. The attestation process does not involve an evaluation of the quality of the reports or the compliance with the Code, but provides independent confirmation that certain publicly verifiable information is provided in accordance with agreed reporting guidelines. Signatories may also provide an internal contact with whom the reviewer can confidentially verify any internal policies and processes that are not publicly verifiable. The reviewer's role entails:

1. Verifying if each signatory has published and implemented policies and processes that comply with their obligations in sections 5. 8, 5.10, 5.11 and 5.13 that pertain to Objective 1 (Safeguards

⁸ DIGI, *Terms of reference for Complaints Facility and Complaints Sub-committee* | *The Australian Code of Practice on Disinformation and Misinformation*, <https://digi.org.au/wp-content/uploads/2021/10/DIGI-TOR-for-Complaints-Facility-and-Complaints-Sub-committee--ACPDM--FINAL-NE-1.pdf>

against Disinformation and Misinformation) and Outcomes 1a, b, c and d of the Code. These sections contain the baseline requirements to implement measures that contribute to reducing the risk of users exposure to Disinformation and Misinformation, explain prohibited behaviors, provide mechanisms to report Disinformation and Misinformation, and provide general information on actions taken in response to reports.

2. Verifying if each signatory has published and implemented policies and processes that comply with their obligations in relation to any optional commitments they have made under the Code.
3. Verifying if the policies and processes mentioned in the transparency report are accessible to Australian users.
4. Verification of 1, 2 and 3 involves checking information provided in the transparency report against public sources.
5. Verifying if each signatory is meeting the ACPDM's commitments regarding the form of the reports including the Best Practice Guidelines.
6. Verification will not involve review of sensitive or proprietary information such as the deployment of technological solutions to detect and remove accounts propagating disinformation.
7. Advising each signatory on a confidential basis if they can attest that the report meets these review requirements, or if there are any gaps.
8. Providing advice to the Administration Sub-committee if they cannot provide an attestation in relation to a signatory's reports, in which case the signatory/ies must either amend and resubmit the reports to the reviewer for further assessment or provide written reasons as to why they dispute the reviewer's assessment.
9. Providing a generalised assessment of the reports, which has been included below in this annual report.

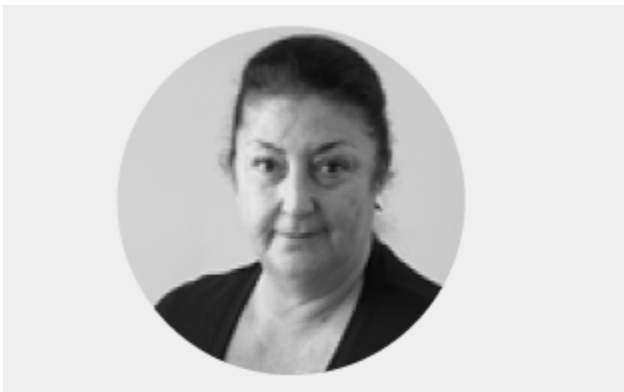
Independent Members of Administration Committee and Complaints Committee



Dr. Anne Kruger

Dr Anne Kruger sits on the Complaints Sub-Committee and the Administration Sub-committee.

Anne leads academic and industry collaborative projects aimed at strengthening information integrity. Anne spent nearly four years with global online verification experts First Draft News.



Victoria Rubensohn AM

Victoria Rubensohn AM sits on the Complaints Sub-Committee and the Administration Sub-committee.

Victoria has extensive experience in media and communications regulation in Australia and overseas, and with codes of practice in broadcasting, telecommunications, content

Anne was co-chief investigator and Interim Director at the University of Technology Sydney's Centre for Media Transition which worked with DIGI on the development of Australia's first disinformation and misinformation regulatory code of practice.

A recipient of the UNESCO International Programme for the Development of Communication (IPDC) grant, in 2022 she co-authored a verification and responsible reporting guidebook for practitioners in Southeast Asia.

Anne was an anchor at CNN Hong Kong during SARS, and later a finance reporter at Bloomberg TV. She established an OSINT verification lab at the University of Hong Kong collaborating with technologists Meedan, taught news literacy at HKU and led media literacy projects with UNESCO throughout APAC. She previously held senior editorial, presenter and online positions with ABC Australia and began her career in regional news with Channel Nine's WIN TV. Anne has a PhD in social media verification education.

classification and advertising. Victoria is currently Consumer Director of Communications Compliance Ltd and Principal of Omni Media. From 2011 to late 2020, Victoria was an Independent Reviewer for Ad Standards Australia; From 2015 to 2019, she was a Consumer Member of the Code Authority of ADMA; and from 2009 to 2015, she was Convenor of the Classification Review Board. Victoria has chaired federal government policy review committees on copyright convergence and digital radio. From 1994 to 2009, Victoria chaired the Telephone Information Services Standards Council regulating value-added telecommunications services. Victoria is a Director of the Australian Communications Consumer Action Network (ACCAN), the Centre for Inclusive Design, chair of the Communications Law Centre Ltd and is an Advisory Board Member of the Centre For Media Transition at UTS. She also serves on the advisory committee of the International Institute of Communications Australian Chapter, and was formerly President of the Communications and Media Law Association and Chair of the National Film and Sound Archive.



Christopher Zinn

Christopher Zinn sits on the Complaints Sub-Committee and the Administration Sub-committee.

Christopher has led various successful and disruptive campaigns to help consumers make better decisions in complex markets such as energy, private health insurance and financial services. Christopher heads the www.determinedconsumer.com initiative, is the



Hal Crawford

Hal Crawford is the independent reviewer of the 2021 transparency reports, and author of the Best Practice Guidelines.

Hal is a news executive and consultant with 25 years' experience in digital and broadcast media, and currently runs Crawford Media Consulting. He was recently the News Director at one of New Zealand's biggest newsrooms, Newshub, managing news and current affairs on TV, online

CEO of the Private Health Insurance Intermediaries Association, sits on the statutory authority reforming the funeral industry, and is on a self-regulatory code committee for the charitable sector. He was also director of communications and campaigns for consumer group CHOICE and has been a reporter and producer for TV, radio and newspapers both in Australia and overseas including the ABC, the Daily Telegraph, Channel Nine, and the UK Guardian.

and radio platforms. Hal was previously Editor-in-chief at ninemsn, and a non-executive director of youth content publisher Pedestrian. Hal is currently chair of the Advisory Board for the Centre for Media Transition at UTS, and has made other contributions to industry and regulatory frameworks for broadcast and digital media. Hal was the co-founder of a social media news sharing project, Sharewars, which gathered and analysed content data from the world's biggest news publishers. He co-authored the book *All Your Friends Like This*, published by HarperCollins in 2015, about social media and news.

Complaints portal

A key component of the governance arrangements is the public complaints portal, that is available on DIGI's website⁹. The operation of the portal is detailed publicly in the complaints facility terms of reference¹⁰, which explains the processes for how complaints are resolved. The resolution measures have been designed to provide incentives for signatories to address breaches of the code, which is considered a better outcome than more punitive resolution measures.

When a complaint is made through the portal, DIGI assesses its eligibility and escalates the complaint according to a standardised internal process that is overseen and approved by the complaints sub-committee. The complaints form enables members of the public to make complaints where they believe a signatory has breached a code commitment. This approach is consistent with the recommendations of the final report from the ACCC Digital Platforms Inquiry, which recommended an approach to complaints that centres on code breaches through a focus on 'assessing the response of the digital platforms to complaints against the terms of the code'¹¹.

Signatories to the ACPDM also commit to providing an avenue for the public to make complaints about instances of mis- and disinformation on their platforms. DIGI does not accept complaints about individual items of content on signatories' products or services, and encourages members of the Australian public to report misinformation or materials that violate specific platform policies directly to the code signatories via their reporting mechanisms.

✓ Example of **eligible** complaint

A failure to implement and publish policies and/or reporting that will enable users to report the types of behaviours and content that violates their policies under section 5.10 of the Code.

✗ Example of **ineligible** complaint

A determination by a signatory that specific items of content or categories of content is or is not disinformation or misinformation, or a decision to remove an individual's account. Those

⁹ DIGI, *Complaints*, <https://digi.org.au/disinformation-code/complaints/>

¹⁰ DIGI, *Terms of reference for Complaints Facility and Complaints Sub-committee | The Australian Code of Practice on Disinformation and Misinformation*, <https://digi.org.au/wp-content/uploads/2021/10/DIGI-TOR-for-Complaints-Facility-and-Complaints-Sub-committee--ACPDM--FINAL-NE-1.pdf>

¹¹ ACCC (2019), *Digital Platforms Inquiry Final Report*, <https://www.accc.gov.au/system/files/Digital%20platforms%20inquiry%20-%20final%20report.pdf>, p. 371

complaints will be handled by the signatories under the policies and procedures for reporting issues they are committed to implement under section 5.11 of the code.