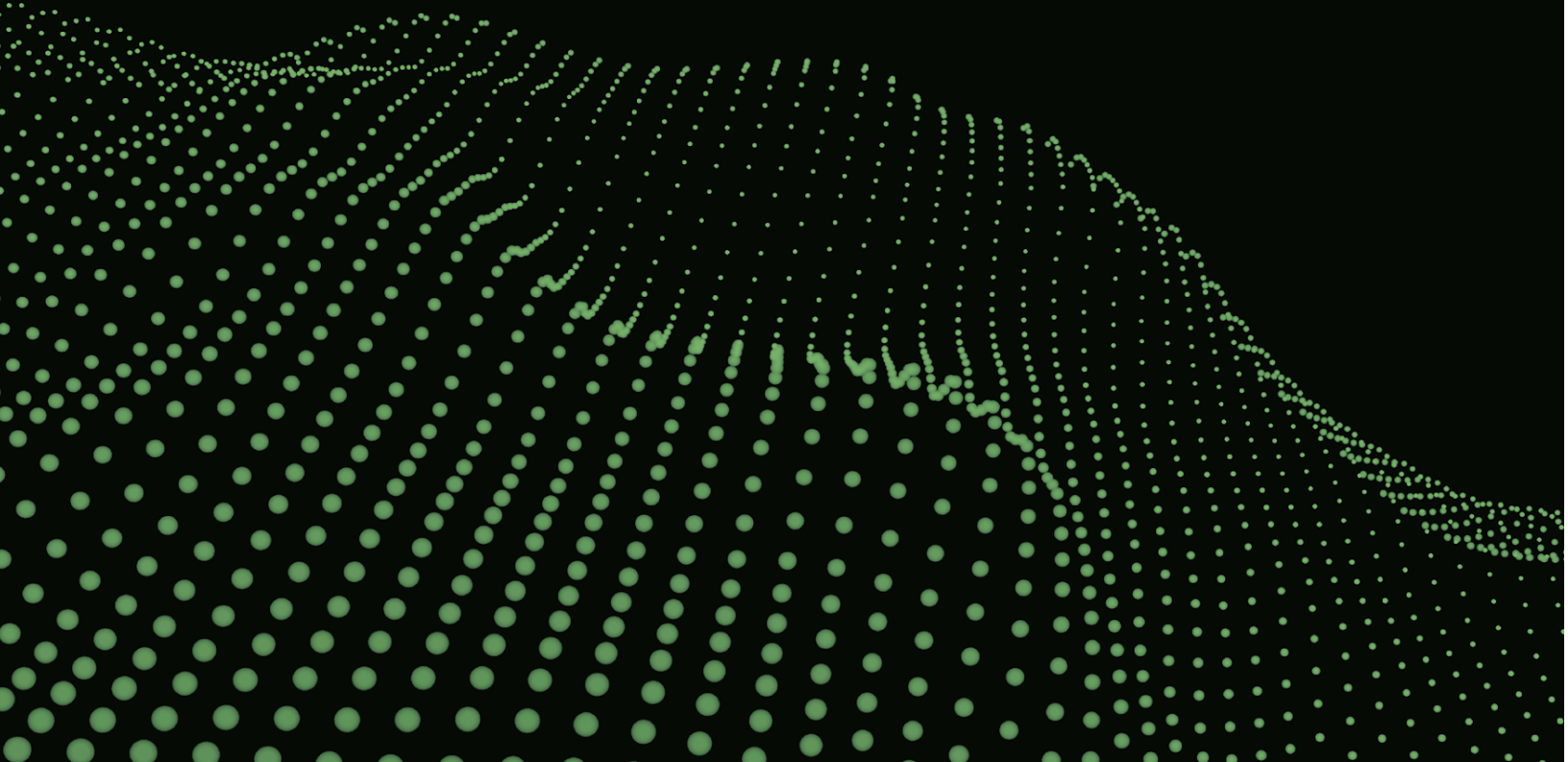




Australian Code of Practice on Disinformation and Misinformation | **Annual Report**

Published June 5, 2025



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, Discord, eBay, HelloFresh, Google, Meta, Microsoft Snap, Spotify, 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 project that aimed to help societies overcome false and misleading information.

The ACPDM was launched in February 2021 and its current signatories are Apple, Adobe, Google, Meta, Microsoft, Redbubble, TikTok, and Twitch.

The Code includes mandatory code commitments by all signatories to publish & implement policies on misinformation and disinformation, provide users with a way to report content against those policies and to implement a range of scalable measures that reduce its spread & visibility (Mandatory commitment #1). Every signatory must provide 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, the Code includes 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 produces this annual report as part of its governance of the ACPDM.

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Opening statement



By: Dr Jennifer Duxbury

Director, Policy, Regulatory Affairs and Research DIGI

This 2025 annual report by DIGI provides insight into signatories' efforts under the ACPDM and their collective progress in addressing disinformation and misinformation in Australia over the 2024 calendar year. Signatories remain deeply invested in tackling harmful mis- and disinformation, and in fostering a safe and reliable online environment for everyone in Australia.

Over the past year, major signatory platforms continued to take proactive action to find and remove disinformation threats, and publish important information and analysis about the tactics and origin of the perpetrators and other threat indicators. To date, Australia has not been the subject of a large-scale foreign disinformation campaign. However, the Government remains concerned that Australia needs to be alert to that risk including the potential for malign actors to use AI spread damaging anti-Western narratives¹. The information relevant signatories publish about Coordinated Inauthentic Behaviour (CIB) operations globally and best practice in identifying and countering emerging campaigns facilitates ongoing awareness amongst the defender community of the need to closely monitor the local environment for disinformation threats.

Signatories continued to utilise advancements in Artificial Intelligence (AI) to implement improved solutions for automatically detecting and removing content that violate their policies, such as MSN's GPT4 enabled content moderation solutions. A key theme emerging from this year's reports is the

¹ See *Online misinformation and disinformation reform Impact Analysis*, Department of Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, September 2024.

growing emphasis on the authenticity and provenance of online content – alongside efforts to detect, remove and reduce the spread of harmful material and elevate authoritative and high quality material. ACPDM signatory platforms are actively deploying innovative tools, such as Google's SynthID and AI labeling initiatives by Meta and TikTok, to help identify and differentiate between original content and heavily edited or AI-generated content.

Furthermore, many ACPDM signatories have significantly expanded their participation in a range of industry partnerships, and have supported valuable academic research and media literacy initiatives. These sorts of collaborative efforts are increasingly being recognised at the inter-governmental level as essential in fostering better understanding of dis and misinformation threats, informing effective solutions and building a resilient information ecosystem².

Over the past year, Australians have experienced a vigorous political debate surrounding the Federal Government's proposed *Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2024* which if passed would have given the ACMA formal powers to oversee the regulation of mis and disinformation online. This debate highlighted the complex issues surrounding the regulation of mis- and disinformation, and the delicate balance between protecting democratic processes and the need for open public discourse on important political issues. Following the Bill's withdrawal, DIGI and ACPDM signatories will progress a planned review of the Code in the second half of 2025, with a focus on the code's governance and transparency arrangements.

DIGI and ACPDM signatories want to take this opportunity to affirm commitments to the ACPDM and are looking forward to continuing our work with all stakeholders to further enhance the effectiveness of the Code in 2025 and beyond.

² See OECD, *Recommendation of the Council on Information Integrity, Adopted on: 17/12/2024* e.g. Recommendation 3, Strengthen societal resilience.

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Part 1 | The 2025 Transparency reports

Insights from 2025 Reports published on DIGI website

The core objective of the annual transparency reporting process of the ACPDM is to provide the Australian public, the ACMA, and the Australian Government with the means to evaluate signatories' adherence to their commitments under the ACPDM. The signatories' commitments to transparency under the Code are supplemented by Best Practice Reporting Guidelines that help signatories to more effectively articulate how they fulfill their obligations to combat mis- and disinformation³. Additionally, the transparency reporting process includes an independent review and assessment by Shaun Davies, who analyses signatories' draft reports, suggests improvements, and provides an attestation of the final published claims.

This year's transparency reports, available on the DIGI website, cover the period from January 1, 2024, to December 31, 2024. A summary of each report's insights can be found in Appendix A. Further contextual analysis of the signatories' actions to fulfill commitments under Outcomes 1 and 6 of the Code is provided below.

Reducing the risk of Harms that may arise from the propagation of Disinformation and Misinformation on digital platforms (Outcome 1)

Artificial Intelligence: Rapid technological advancements, particularly in generative artificial intelligence, have continued to dramatically transform the information landscape, presenting both opportunities and challenges for combatting mis- and disinformation. In 2024, signatories have continued their efforts to harness AI to enable the detection of false information on digital services and identify disinformation tactics like bots and deepfakes. All major platforms have significantly expanded their use of AI for detecting and mitigating mis- and disinformation risks and labeling AI generated content. Collaborative multi-stakeholder initiatives like the Content Provenance Initiative, co-founded by Adobe, are playing a crucial role in establishing technical standards that trace the journey of media content, vital in our shared fight against misinformation. Major platform signatories such as Tik Tok and LinkedIn are utilising the Coalition for Content Provenance and Authenticity Specification (C2PA) to facilitate AI labeling on their services.

Elections: Democratic elections around the world remain a target for cyber attacks and mis- and disinformation. In 2024, advances in information technology enable propaganda and disinformation. For example, the Commonwealth's Independent Intelligence Review has shown that China spends billions of dollars annually on foreign information manipulation efforts.⁴ The Russian campaign known as 'Doppelganger' remains a continuing threat, regularly using fake clones of legitimate websites (both from media organisations such as Le Monde, The Guardian, Ansa, Der Spiegel, and Fox News and public institutions) to propagate false narratives and sow divisions within countries supporting Ukraine⁵. The Chinese operation known as 'Spamoflage' (or Dragonbridge) was active across more than 40 online platforms in 2023 where it employed inauthentic accounts to seed and amplify videos and cartoons that

³ These were developed by Hal Crawford, the ACPDM independent expert from 2021- 2023 and are set out in Appendix B of this report. These reporting guidelines will be included in the review of the ACPDM in 2025.

⁴ *Independent Intelligence Review*, 2024 (Commonwealth, 2024) p25-26.

⁵ See *EU Disinformation Lab, What is the Doppelganger Operation? List of Resources*
<https://www.disinfo.eu/doppelganger-operation/>

promote pro-China and anti-Western narratives⁶. In 2024, the Microsoft Threat Analysis Center reported on sustained attempts by Chinese influence operations to influence the 2024 US election⁷.

While the challenges to democratic systems are not new, those who seek to undermine them continually adapt their tactics and methods. Election integrity therefore continues to be a major focus for signatories. TikTok, Meta, and Google implemented election-specific misinformation policies and provided electoral information guides during the 2024 elections. Along with other leading tech companies, Adobe, Google, LinkedIn, Meta, TikTok and Microsoft pledged via the Tech Accord to Combat Deceptive Use of AI in 2024 Elections⁸, to help prevent deceptive AI-generated content from interfering with democratic elections globally. The Accord outlines commitments to combat harmful, deceptive AI-generated content targeting voters. Members of the Accord agree to collaborate on developing tools to detect and address online distribution of misleading electoral content, and on increasing public awareness about the problem. Additionally, Microsoft continued its work via its Democracy Forward initiative to protect democratic institutions and processes from hacking, to explore technological solutions to protect electoral processes, and to defend against disinformation. We look forward to hearing in next year's reports about how this work has informed signatories' approaches to protecting the integrity of the 2025 federal election in Australia.

Transparency and Reporting: Major platform signatories reported improvements to their transparency and reporting processes. For example, in May 2024, LinkedIn announced the implementation of the Coalition for Content Provenance and Authenticity's (C2PA) 'Content Credentials' technology, which labels AI-generated media and allows users to trace its origin. TikTok added data to its Transparency Centre, including monthly insights and data on detecting and disputing Covert Influence Operations. TikTok also introduced a Global Elections Hub, a centralised resource for users that provides authoritative election information, safety tips, and resources to engage in civic processes.

Support for the efforts of independent researchers to improve public understanding of Disinformation and Misinformation. (Outcome 6).

While improving technological solutions will continue to play a key role in enabling platforms to detect and respond to mis- and disinformation threats, there is equally an ongoing need for multi-stakeholder partnerships and support for academic research. Media literacy is also critical in informing the broad range of stakeholders that need to collaborate in building societal resilience to mitigate the potential harmful impacts from mis- and disinformation online. The OECD notes that:

As society becomes increasingly exposed to multiple sources of information, from traditional media to social media platforms, individuals need to be equipped with the tools and skills to navigate this complex environment. There is no silver bullet to combat mis- and disinformation but a long-term and systemic effort to build societal resilience through media, digital, and civic literacy should seek to empower individuals to cultivate critical thinking skills and to identify and counter the spread of false and misleading information.⁹

⁶ Olivier Guillard, *China-linked 'Spamouflage' network and the US November election*, Institut d'études de géopolitique appliquée, Paris, September 18, 2024. See 2023 ACPDM Transparency reports for details of actions taken by Tik Tok, Youtube and Facebook to disrupt these activities in 2023.

⁷ As the U.S. election nears, Russia, Iran and China step up influence efforts, Microsoft Oct 23, 2024 at <https://blogs.microsoft.com/on-the-issues/2024/10/23/as-the-u-s-election-nears-russia-iran-and-china-step-up-influence-efforts/>

⁸ Available at <https://securityconference.org/en/aielectionsaccord/accord/>.

⁹ <https://www.oecd.org/en/topics/sub-issues/disinformation-and-misinformation.html>.

The 2024 reports demonstrate how signatories are taking a multifaceted approach to supporting research and strategic partnerships in the misinformation space, ranging from data access and funding to media literacy partnerships and advisory councils:

Microsoft provided access to several data resources for researchers, including the Bing Search ORCAS dataset, MS MARCO datasets, and public access to Bing APIs. As noted above, its Democracy Forward Initiative focused on providing technological solutions against disinformation. Microsoft also supported the Partnership on AI, a non-profit partnership of academic, civil society, industry, and media organisations that is focused on using research and education to ensure that AI advances positive outcomes for people and society.

TikTok continued to collaborate with Australian Associated Press Fact Check to train TikTok creators to identify and avoid misinformation, and to produce reliable and informative content. This initiative aims to empower creators to spread positive media literacy messages to their audiences. Tik Tok's Safety Advisory Council, comprising Australian and New Zealand experts, assists the platform to identify existing and emerging issues in APAC, which affect TikTok's platforms and users, and develop strategies to tackle these challenges.

Meta sponsored a range of academic research projects, such as:

- 'Influencers and Messages: Analysing the 2023 Voice to Parliament Referendum Campaign' led by La Trobe University's Professor Andrea Carson. This report analysed factors contributing to the outcome of the 2023 Australian Voice Referendum.
- 'Adult Media Literacy in 2024: Australian Attitudes, Experiences and Needs' survey report conducted by Western Sydney University, Queensland University of Technology, and the University of Canberra. This survey examined adult media literacy abilities, needs, and experiences in Australia.
- New analysis led by Dr. Anne Kruger from the University of Queensland that reviews the Australian Code of Practice on Disinformation and Misinformation, maps regulatory options, draws learnings from recent stress tests, and makes recommendations for addressing mis- and disinformation. The final report is due to be published later in 2025.

Additionally, Meta supported continued dialogue on mis and disinformation by convening a roundtable event called 'Diss or Miss? Recent information integrity insights and learnings for future events in Australia; in August 2024, attended by government, policymaker, academic, and industry representatives.

Meta also partnered with AAP FactCheck on media literacy campaigns. In October 2024, Meta partnered with AAP to run a new education campaign aimed at building awareness of the increasing sophistication of generative AI technology and emphasising the need for people to think critically about the content they engage with and share. Meta also provides API access to researchers.

Google supported Squiz Kids' 'Newshounds' media literacy program delivered in Australian classrooms to provide primary school children with media literacy skills that help them better navigate online content. Over 2,000 Australian classrooms are using the program, which has had early success: 86% of pilot students said Newshounds has changed the way they consume media and every teacher said they can see improvements in students' abilities to critically consume media. Google also provided the YouTube

Researcher Program that offers support for early-career professors in relevant fields. In 2024 Google also expanded its partnership with AAP, and joined the C2PA coalition.

Twitch offered open API access for researchers with approval and has partnered with MediaWise to produce educational materials, which remain available on the Twitch Safety Center.

Apple supported the News Literacy Project which aims to empower young people with critical thinking skills to navigate the digital age and seek out accurate information.

Adobe, the co-founder of the Content Authenticity Initiative (CAI) and the Coalition for Content Provenance and Authenticity (C2PA), reports that CAI now has over 4,500 members globally. In 2024, Adobe collaborated with the US Department of Defense on implementing Content Credentials.

In summary, this year's transparency reports from signatories to the Australian Code of Practice on Disinformation and Misinformation for 2024 contain many qualitative and quantitative insights on the evolution of signatories actions to address mis- and disinformation in the evolving technology landscape. A continued challenge for the reporting process is obtaining trended quantitative Australian data, given the diversity of signatories business models and the need for signatories to update their policies year on year in ways that can undercut the utility of the trended data for comparative purposes. DIGI and signatories are committed to improving the quality of transparency reporting, ensuring the reports effectively inform the public on signatories actions under the ACPDM and provides a useful framework for the ongoing review and enhancement of their activities.

Independent Assessment of the 2024 ACPDM Transparency Reports

By: Shaun Davies, Independent Reviewer

As the newly appointed independent reviewer, I assessed eight full reports submitted this year, including Twitch's first full report. I can see that significant dedication has been invested in preparing these complex documents, and I thank all participants for their efforts. Each report provides valuable insights into the evolving landscape of online mis- and disinformation.

Striking a balance between maintaining a healthy online environment and maximising free speech is a difficult job. I was struck in this year's reports by examples of how generative AI is being leveraged for both the creation and detection of mis- and disinformation, and at efforts to make the provenance of AI-generated content visible to users. These are important initiatives, responding to evolving challenges in the digital media.

The reports continue to show some improvements, notably around consistent reporting of metrics and the provision of trended data specific to Australia, which was explicitly called out by the independent reviewer in last year's report. Some signatories also provided new and insightful data points outlining the impact of their operations in Australia. Reports also gave valuable insights into emerging generative AI technologies and the evolving nature of deliberately orchestrated disinformation campaigns.

But there remain areas for improvement. While most signatories provided trended data for 2024, several did not. Providing trended data in the reports is not a requirement of the Code, but it is strongly encouraged in the Transparency Reporting Guidelines.

The reasoning given to me is that moderation systems are complex, and numbers may go up and down dramatically due to changes in functionality, product focus or policy. These changes can be difficult to explain as both external and internal factors may be at play. I know from experience that this can be true, but I think it is not unreasonable to ask that signatories attempt a clear and understandable explanation.

Considering this, I will recommend some updates to the Transparency Reporting Guidelines. One proposed amendment is to create a more explicit and structured explanation of the KPIs that signatories consistently report on. Content moderation metrics can be arcane to non-specialist readers, and thus without explanation may not promote transparency. One approach to improve this would involve an appendix that lists and explains all a signatory's chosen KPIs in a manner that is clear and comprehensible to lay readers.

A related recommendation is that any metric that varies by a large percentage year-on-year should be accompanied by explanatory commentary. The specific threshold would be determined through consultation with signatories. Commentary need not be overly detailed but should give at least a plausible theory about what drove any substantive change.

I also want to see more emphasis on the novel aspects of each year's report. Some repeated information is unavoidable and even useful, but signatories should prioritise data and commentary specific to the reporting year, rather than simply updating figures within previously used narratives. I would especially like to see more case studies, which bring to life the complexity of content moderation and are particularly helpful to lay readers without expertise.

During my tenure as reviewer, I will be encouraging greater transparency around the inevitable challenges of balancing enforcement with the fundamental right to freedom of speech. Most metrics presented in these reports focus on the suppression of mis- and disinformation, which is a critical and commendable effort. However, the first guiding principle of the Code explicitly emphasises respecting free speech.

Public discussion of moderation generally, and mis- and disinformation specifically, in my view often carries the implicit assumption that a successful system should achieve perfect enforcement, where moderation

finds everything 'bad' and never takes down anything 'good'. This creates an unproductive starting point for constructive dialogue, as it is unrealistic. So, I would like to see some honest discussion of the trade-offs, challenges and even mistakes that are inevitable in moderation systems.

I'm honoured to take on the role of independent reviewer for the Code. Promoting a healthy information ecosystem with a foundation of trustworthy and truthful information is a passion of mine, and I hope that together with all stakeholders, we can do some good for Australia.

Part 2 | Code Administration

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

Appointment of new independent reviewer

DIGI has appointed a new independent reviewer of the Code, Shaun Davies, to provide additional oversight and support best-practice implementation. DIGI thanks outgoing independent reviewer, Hal Crawford, for his significant contributions to improving the quality of transparency reporting under the ACPDM over the past four years. We wish Hal all the best in his new role as Editorial Director of Mumbrella.

Mr Davies is a respected digital leader with two decades of experience in AI policy, content moderation and media strategy. His work at Microsoft and ongoing academic research at UTS gives him a strong and unique insight into the challenges of digital content governance.

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.

During the calendar year 2024, 31 complaints were received through DIGI's complaints portal. Based on the information provided by complainants to date, all but one complaint during this period has been ineligible, generally because they related to individual items of content on signatories' products or services and many did not relate to mis or disinformation. The Complaints Committee met on three occasions in 2024 to consider the second eligible complaint made by Reset Australia against Meta on 4 November 2023. The independent Complaints Sub-Committee completed its inquiries into the complaint 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. The full decision of the Complaints Committee is available on the DIGI website¹⁰.

¹⁰<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/>

Annual Event 2024



Creating a healthy, diverse information environment and protecting the public from serious harm in relation to medical misinformation is a priority for industry, government, and civil society. How to establish a threshold of 'verifiable truth' in medicine, a field where contestability and open dialogue are core tenets of scientific progress presents unique challenges.

For the 2024 annual event, DIGI moderated a briefing and panel discussion with experts and advocates shedding light on the key issues related to misinformation, disinformation, and the evolving world of medical knowledge. The event audience consisted of industry, government and civil society organisations.

Event speakers

Professor Anne Twomey AO

Anne Twomey is a Professor Emerita at the University of Sydney, where she taught Constitutional Law and Public Law. She has previously worked for the High Court of Australia, the Commonwealth Parliamentary Research Service, the Senate Legal and Constitutional Committee and The Cabinet Office of NSW. She is currently a part-time consultant to Gilbert + Tobin Lawyers, and spends much of her time on public education, including her 'Constitutional Clarion' YouTube channel. She recently gave evidence to a Senate Committee on the misinformation bill.

Professor Peter Shergold AC

Professor Peter Shergold AC is a distinguished Australian academic and public servant, renowned for his

leadership in public administration and higher education. He served as Secretary of the Department of the Prime Minister and Cabinet, advising the Australian government on a wide range of policy matters.

Professor Shergold was also the Chancellor of Western Sydney University and is known for his work in advancing social impact research as the founding Chief Executive of the Centre for Social Impact at the University of New South Wales. With a background in law and economics, he has made significant contributions to governance, public policy, and social equity. In recognition of his service, he was appointed a Companion of the Order of Australia (AC) in 2017.

Today, Professor Shergold continues to be a respected figure in both the public and academic spheres, advocating for evidence-based policymaking, social justice, and effective governance. His passion for improving the lives of Australians and his commitment to excellence continue to inspire those who strive to make a positive impact in the world.

**Dr. Anne Kruger,
PhD in social media verification education, University of Queensland**

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

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.

**Adam Dunn,
Professor of Biomedical Informatics, Head of Biomedical Informatics & Digital Health at the University of Sydney**

Adam Dunn established the Discipline of Biomedical Informatics and Digital Health in the School of Medical Sciences at the University of Sydney in 2020. He has nearly two decades of academic experience in medical informatics and digital health, with a unique skill set across computer science, data science, clinical epidemiology, public health, and computational social science.

His main research interest is in applications of artificial intelligence (AI) in health. This includes clinical applications of AI using data from text and other data in medical records, public health applications of AI using data from the community and the online information they engage with, and clinical research applications of AI using data from and about clinical trials.

He has led or co-led research projects funded by the NHMRC, AHRQ, NLM/NIH, and WHO. He holds or has held senior editorial roles with a range of research methods and medical informatics journals and applied computer science conferences.

Promotion of the ACPDM

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, academics and online community moderators and provides information to interested parties on a reactive basis, as well as undertaking speaking engagements with core audiences to promote public understanding on the code. For example, in 2024, DIGI spoke with journalists, other media professionals and civil society at the Alliance for Journalists' Freedom annual forum; with scientists, science communicators, technology and media representatives at a roundtable convened by the Australian Science Media Centre; and with media and law professionals at a Communications and Media Law Association forum. These focused engagements are outside the discussion of the ACPDM during the course of regular industry and government activities.

DIGI also continues to promote key milestones in its governance of the code through media releases and other communications materials. In 2024, DIGI issued four proactive media releases regarding the code, including to support public transparency of the transparency reporting round and Independent Complaints Sub-Committee's activities. The ACPDM was featured in 8 media stories. DIGI also regularly engages with inbound media requests related to the code to support public transparency and promote deeper understanding of the code's principles, goals, and activities.

Governance committees

The governance arrangements for the ACPDM are set out in Appendix B of this report. The specific functions of the Administration Sub-Committee include:

- Monitoring actions taken by Signatories to meet their obligations under the Code, including material changes since their most recent transparency reports.
- Reviewing the operation and effectiveness of the Code Complaints Facility, including the number of ineligible and eligible complaints.
- Reviewing and reporting on Signatories' responses to systemic issues brought to its attention by the Complaints Sub-committee.
- Reviewing and reporting on the effectiveness of the independent review of transparency reports.
- Reporting on progress of relevant research initiatives on misinformation and disinformation.
- Reviewing the annual report produced by DIGI on Code administration.
- Making recommendations to DIGI and Signatories related to issues raised and discussed at meetings.

The primary role of the Signatory Steering Group is to steer the implementation of the Governance arrangements under the ACPDM. Its role includes tasks such as finalising governance arrangements, agreeing on appointments of independent members, determining arrangements for the annual event required under the Code, agreeing on Best Practice Reporting Guidelines, considering changes in government policy, evaluating the need for amendments to the Code, approving DIGI's Annual Report on Code Administration, and agreeing on the scope of annual reviews of the Code.

The Steering Committee held meetings in April and November 2024 focused on considering the implications for the ACPDM of shifts in government policy concerning the regulation of mis- and disinformation. In April, recognising the potential impact of the *Communications Legislation Amendment (Combating Misinformation and Disinformation) Bill 2024*, the Committee decided to temporarily defer the annual review pending further clarity on the Bill's status. In November, the Steering Committee met again, to consider the ACMA's *Third Report to Government on digital platforms efforts under voluntary arrangements* released in September 2024. In December 2024, following withdrawal of the Bill, the

Administrative Committee convened to receive updates on signatory actions under the Code and to further consider the recommendations from the ACMA's *Third Report to Government*.

During 2024, Administrative Committee members contributed to the 2024 annual report's development and were invited to participate in the Annual Event. Additionally, Administrative Committee members were briefed by DIGI on our proactive engagement with the government concerning the Bill.

Code Review

Signatories have decided to conduct a review of the ACPDM in the second half of 2025, including ways in which the governance arrangements can be improved. The Code review will also be an opportunity for signatories to consider ACMA's recommendations in its *Third Report to Government on digital platforms efforts under voluntary arrangements* which include:

- **Improved Transparency Reporting:** including more trended data, contextual analysis to explain data changes, and a more standardised approach to reporting across platforms including KPI's.
- **Code Review and Governance:** review of the code's reporting and governance frameworks.
- **Increased Participation:** Encouraging more platforms, especially those with large Australian user bases, to sign up to the code.
- **A Strengthened Complaints Facility:** including improving referral pathways and increasing transparency on signatory commitments.

Appendix A | Insights from 2025 Transparency Reports on The Australian Code on Disinformation and Misinformation.

1. Introduction

This report summarises key information from the 2025 transparency reports of the signatories to the Australian Code of Practice on Disinformation and Misinformation:

- Platform Specific Actions and Data Insights (Outcome 1)
- Signatories Commitments and 2024 Policy Updates.

This report was compiled with the assistance of an AI Tool.

2. Platform Specific Actions and Data Insights (Outcome 1)

Google

Category	Action/Data Insights
Content Removals (Au)	<div>-123,128 YouTube videos that violated Community Guidelines and were uploaded from IP addresses in Australia were removed.</div> <div>- 5,169 YouTube videos uploaded from Australian IP addresses removed for violating Misinformation, Spam, or Scams policies.</div> <div>- Over 74% of guideline-violating videos uploaded from Australian IP addresses removed with 10 or fewer views.</div> <div>NB: Google uses a violative review rate as an indication of how well their systems are protecting the community using a transparent methodology.</div>
CIB operations	<div>-Published detailed analysis on response to CIB threats globally in 2024 in Google’s Threat Analysis Group Bulletin available on the Google website. See details for each month at https://blog.google/threat-analysis-group/tag-bulletin-q4-2024</div>

	<p>-Throughout 2024, TAG identified several campaigns as part of their investigation into coordinated influence operations linked to Russia. For example in January 2024, TAG identified a campaign linked to Russian threat group COLDRIVER that was expanding its use of malware in targeting Western officials.</p>
AI-related Interventions	<p>- Joined C2PA coalition and collaborated on the newest version (2.1) of the technical standard, Content Credentials standard for transparency in AI-generated content.</p>
	<p>- Implemented SynthID (beta), which embeds digital watermarks into AI-generated content (images, audio, text).</p>
	<p>In July 2024, Google announced availability of 'About This Image' on Circle to Search and Google Lens, giving users more ways to quickly get context on images that they see wherever they come across them. In addition, Search expanded the feature to 40 additional languages around the world, including French, German, Hindi, Italian, Japanese, Korean, Portuguese, Spanish and Vietnamese.</p>
	<p>YouTube controls to influence recommendations:</p> <ul style="list-style-type: none"> • Users can view, delete, or turn on or off their YouTube watch and search history. • If users do not want to see recommendations at all on the homepage or on the Shorts tab, they can turn off and clear their YouTube watch history. • Users can also tell YouTube when it is recommending something a user is not interested in. YouTube will use this data that when generating recommendations for that viewer in the future.
Ad Takedowns (Au)	<p>- 5,283,584 advertising creatives actioned for violating Misrepresentation Policies where advertiser billing country is Australia.</p>
Ad Appeals (Au)	<p>- Google Ads received 180,815 ad appeals in Australia for various policies. Following these</p>

	appeals, 1,243 removed videos were reinstated.
Human Search Rating Efforts/evaluations of recommended systems	Used human raters and evaluators to assess quality of search results and recommendations across other services.

Meta

Category	Action/Data Insights
Content Removals	- Took action on over 350 pieces of content across Facebook and Instagram in Australia for violating Misinformation policies.
Content Warnings	- Displayed warnings on over 6.4 million distinct pieces of content on Facebook and over 509,000 on Instagram in Australia, based on fact-checking.
Ad removals	- Removed over 95,000 ads in Australia for not complying with Social Issues, Elections and Politics (SIEP) ads policy.
Fake accounts removed	From January to December 2024, detected and removed 4.3 billion fake accounts on Facebook, on average proactively detected and removed over 99% of these accounts before they were reported to Meta.
AI-related Interventions	- Expanded Gen AI transparency and information on platforms so that users know when they are seeing posts made with AI.
	- Added both a visible 'Imagined with AI' label and invisible watermarking to photorealistic images created using Meta AI Imagine feature.
User controls and transparency	- Introduced new tools to provide users with more transparency around content ranking algorithms and recommendation systems, including updates to Reels and Feed ranking technologies,
	Users have various options to personalise their Feed experience. <ul style="list-style-type: none"> - They can hide a post to prevent it from reappearing and minimise similar content,

	<p>reconnect with previously unfollowed individuals or groups,</p> <ul style="list-style-type: none"> - temporarily snooze posts from specific sources. - report content that violates Meta's Community Standards or appears spammy. - The "Show more" and "Show less" feature allows for temporary ranking adjustments, while unfollowing or managing favorites enables users to prioritise or deprioritise certain content.
CIB operations	<p>Meta removed over 20 new covert influence operations globally in 2024.</p> <p>In Q1 removed six separate covert influence operations for violating policy against CIB. They originated in:</p> <ul style="list-style-type: none"> o Bangladesh, o China, o Croatia, o Iran, and o Israel <p>In Q2 removed six separate covert influence operations that violated policy against CIB. They originated in:</p> <ul style="list-style-type: none"> o Russia, o Vietnam, and o The United States <p>In Q3 removed five separate covert influence operations that violated policy against CIB. They originated in:</p> <ul style="list-style-type: none"> o India, o Iran, o Lebanon, and o Moldova <p>In Q4 removed three separate covert influence operations that violated policy against CIB. They originated in:</p> <ul style="list-style-type: none"> o Benin, o Ghana, and o China

Ad Takedowns	- Removed over 14,000 ads for violating Misinformation policy from January to December 2024 in Australia.
Fact-checking Efforts (Au)	- Partnered with three third-party fact-checkers in relation to Australia content: Australian Associated Press (AAP), Agence France Presse (AFP), and RMIT FactLab in 2024. Noted that its third-party fact-checking program in the US will change, with fact-checking replaced by Community Notes from 2025. The AU is not impacted by this change to-date.

Microsoft

Category	Action/Data Insights
Content Removals	<ul style="list-style-type: none"> - Removed 92,733 pieces of misinformation globally - Removed 1,259 pieces of misinformation reported, posted, or shared by Australian members.
Fake accounts blocked (Au)	- In Australia, LinkedIn blocked more than 1 million fake accounts and
Defensive search interventions for Bing (Au).	See Table page 10 of ACPDM Transparency report
AI-related Interventions	- Microsoft together with Open AI launched the Societal Resilience Grants to support various global initiatives promoting AI literacy, ethical AI use and societal resilience against AI-related challenges.
	- Partnered closely with Microsoft's Responsible AI team to proactively address AI-related risks in Bing generative AI experiences.
Ad Takedowns	<ul style="list-style-type: none"> - Took down more than ~8 billion ads and product offers for various policy violations. - Suspended nearly 442,593 customers and blocked 162,000 ads with websites that either

	contain content not allowed in policy or spread disinformation;
Ad appeals and rejections (Au)	See Table at p.17 of ACPDM Transparency Report
Fact-checking Efforts	- Bing Search ingests tags for fact-check articles using the ClaimReview open schema to help users find fact-checking information.
	- Strengthened partnerships with third-party organisations, including the News Literacy Project and The Trust Project, to fund media literacy campaigns.

Redbubble

Category	Action/Data Insights
Impressions and clicks on misinformation by Au users	In 2024, there were 49,496 impressions and 361 clicks by Australian users for listings that were subsequently removed for violating mis-/disinformation policy.
Removal fake/inauthentic accounts	In 2024, over 300,000 accounts were disabled for violating policies.
User Reports	- Nearly 3,000 reports were submitted by users using the reporting functionality.
User reports/moderation of designs	- In 2024, Users submitted nearly 100 reports using the reporting functionality which includes but is not limited to reports of misinformation or disinformation. 25 uploaded designs containing harmful misinformation were detected and removed from the platform. Lower reporting numbers as compared to previous years may be due to a decrease in uploads of violating content and effective proactive measures taken to eliminate and deter such content onsite.

Violative account removals /interventions	- 300,000 violative accounts (including accounts that use bots) were blocked or removed.
AI-related Interventions	-Fake/inauthentic accounts were blocked or removed using third-party account abuse detection software.
	- Information about recommendations in feeds provided to users in the Redbubble help centre
Trends	- During 2024 there was a substantial rise in the moderation of election misinformation, particularly after Q1, likely driven by the increase in uploads of election-related content coinciding with elections in the US and Australia. - Uploads of medical-related dis-/misinformation remained at consistent levels throughout the year.

Twitch

Category	Action/Data Insights
Account Removals	Suspended 3 accounts globally for violating Harmful Misinformation Actor Policy. None of these were based in Au.
Enforcements	H2 2024, issued 34.1M account enforcements for spam, scams, and fraud globally; 66,414 of these were for accounts based in Australia.
AI-related Intervention	Provides Content Classification Labels (CCLs) so viewers can assess if a stream they're about to watch contains discussions or debates about politics or sensitive social issues such as elections, civic integrity, military conflict, and civil rights.

	<p>Users can customise their recommendations on Twitch by letting Twitch know if they are “not interested” in a streamer or content category that is recommended to them.</p> <p>Users can navigate to their settings page and review what they have marked as “not interested” and then edit those selections.</p> <p>Launched Content Display Preferences in May 2024, allowing users to filter out streams labeled with tags such as Politics and Sensitive Social Issues. These preferences shape both recommendations and search results—streams tagged with filtered labels will not appear in users’ recommendations, category browsing, or search results.</p>
Other transparency initiatives	<p>Twitch provides open access to its API, which may be used to retrieve most publicly available channel information, such as content classification labels, stream tags, and moderation settings.</p>

TikTok

Category	Action/Data Insights
Content Removals	Proactive removal rates for harmful misinformation in Australia consistently above 95% throughout 2024.
Fake accounts removals and interventions	<p>July to December 2024</p> <ul style="list-style-type: none"> • Fake likes removed: 19,744,339 • Fake likes prevented: 224,991,803 • Fake followers removed: 13,999,073 • Fake followers requests prevented: 26,265,320 • Fake accounts prevented: 6,965,826

	<ul style="list-style-type: none"> Videos removed from Fake accounts: 2,260,249
Covert influence operations	In 2024, disrupted a total of 59 networks globally. Publishes the details of all of the CIO network identified and removed. See the transparency report on its website for details. See data in ACPDM report on how Tik Tok identifies CIB threats.
AI-related Interventions	<p>Developed additional tools to help users control the content recommended to them. These include:</p> <ul style="list-style-type: none"> - Not interested: Users can long-press on the video in your For You feed and select 'Not interested' from the pop-up menu. This will let us know they are not interested in this type of content and will limit how much of that content we recommend. - Video keyword filters: Users can add keywords – both words and/or hashtags that they would like to filter from their For You feed. - For You feed refresh: To help discover new content, users can refresh their For You feed, which provides new recommendations.
	In March 2024 co-published a case study ¹¹ on how TikTok applied the Framework for Responsible Practices for Synthetic Media to its AI policies.
	- Became the first video-sharing platform to implement C2PA's Content Credentials technology.
User Reporting Tools	- Enabled users to report misinformation across various features including comments, direct messages, accounts, sounds, hashtags, and auto-suggestions.
Fact-Checking	-In 2024, TikTok collaborated and maintained fact-checking partnerships with the Australian Associated Press (AAP) to prevent the spread of

¹¹ <https://partnershiponai.org/wp-content/uploads/2024/03/pai-synthetic-media-case-study-tiktok.pdf>

	<p>misinformation.</p> <p>-TikTok also maintains a database of fact-checked claims to enable human moderators to accurately identify misinformation content.</p>
State elections (Au)	Implemented Search Guides for the four AU state elections in 2024 to direct users to authoritative sources of information for each respective election.

Adobe

Category	Action/Data Insights
Content Provenance	- Launched the Firefly Video Model, expanding Adobe's generative AI tools to include video creation.
	- Ensured the model is IP-friendly and commercially safe, using licensed materials such as Adobe Stock and public domain content.
	- Integrated Content Credentials into the Firefly Video Model, providing verifiable metadata about the creation and modification of digital content.
Trends	- The Content Authenticity Initiative (CAI) now includes over 4,500 members globally.

Apple

Category	Action/Data Insights
Curation and credibility signals	Apple supports human curation by trained journalists. An editorial team at Apple News vets publishers before they are onboarded to the platform. Outlets are evaluated to ensure they are credible, standards-based, professional organisations. Details on the guidelines are

	<p>accessible at https://support.apple.com/guide/news-publisher/publishing-on-apple-news-apde42330c66/icloud.</p> <p>-Apple News works with NewsGuard, an organisation that provides tools for readers to understand misinformation that may be spreading online. NewsGuard credibility ratings are based on journalistic criteria and cover over 35,000 online sources.</p>
Reports of content concerns	<p>- In 2024, Apple News readers worldwide reported approximately 495,000 concerns on articles, covering both technical and content-related concerns. Approximately 492,300 reports – were not substantiated. Approximately 2,700 concerns on 1,300 individual articles worldwide were deemed valid and warranted action from the moderation team.</p> <p>These concerns cover a range of issues and were not limited to misinformation/disinformation. Across all concern categories, less than half of one percent of concerns originating in Australia were deemed valid and resulted in some action.</p>
AI-related interventions	<p>- Apple makes information about recommendations in News available to users, together with options and tools associated with those recommendations.</p>

3. Signatories Code Commitments and Policy Updates

Company	Services with Code Commitments	Code Commitments	Policy Updates (2024)

Google	Google Search, Google News, Google Advertising (Ads & AdSense), YouTube	All 7 Objectives and Outcomes	<p>Google Advertising: Updated Misrepresentation Policy (AI-generated public figure scams) & Expanded Political Content Policies (disclosure of synthetic content).</p> <p>YouTube: Introduced Creator Studio tool (disclosure of altered/synthetic media) & Expanded Privacy Request process (removal of AI-generated/synthetic content).</p>
Meta	Facebook, Instagram including advertising.		<p>Facebook/Instagram</p> <p>Reports changes to third-party fact-checking program in the US (not implemented in Australia and announced in 2025)</p> <p>Updated its penalty protocols (public figures during civil unrest).</p> <p>Launched political content controls to adjust whether Facebook recommends or does not recommend political content in a users' Feed.</p> <p>Implemented new transparency tools (content ranking algorithms & recommendation</p>

			<p>systems,</p> <p>Advertising</p> <p>Required advertiser disclosure (generative AI or digital techniques in political/social issue ads).</p>
Microsoft	Microsoft Advertising, Bing Search, MSN (Microsoft Start), LinkedIn	All Objectives and Outcomes	<p>Bing: Generative AI evolved; Copilot launched; Copilot in Bing phased out. Bing continues generative AI experiences.</p> <p>Microsoft Advertising: Revised network-wide policies (harmful disinformation)</p> <p>LinkedIn: Content Credentials (C2PA) labeled automatically. Tech Accord to Combat Deceptive Use of AI in 2024 Elections.</p> <p>MSN: Integrated GPT4-enabled content moderation.</p>
Twitch	Live streaming service "Twitch"	All Objectives and Outcomes except for 5 (political advertising which Twitch does not carry).	Launched Content Display Preferences (filter streams by Politics, Sensitive Social Issues).

TikTok	Social media platform (video creation/sharing) "Tik Tok"	All Objectives and Outcomes	In 2024, introduced a Harmful Misinformation Guide, via Tik Tok online Safety Centre. Updated global policies on election misinformation (prohibiting content promoting illegal participation/electoral interference).
Adobe	Content Authenticity Initiative (CAI), Coalition for Content Provenance and Authenticity (C2PA), Adobe Firefly	1a, 3, 4, 6 and 7	Evolving implementation of AI ethics principles and responsible technology use.
Redbubble	Redbubble Platform	All Objectives and Outcomes except for 5 (Redbubble does not allow political advertising)	Temporary pause in proactive screening for harmful misinformation (Q2) due to policy updates.

Apple	Apple News	Outcomes 1(Objectives 1a, 1c, 1e), 2, 4, 6 and 7.(Apple does not allow political advertising)	Updated its news publisher user guide on AI-generated content (must be labeled, misleading use not allowed; potential suspension) ¹² .
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¹² <https://support.apple.com/en-gb/guide/news-publisher/apd8da39c6f2/icloud>

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 website¹³, 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.

¹³ 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>

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 against Disinformation and Misinformation) and Outcomes 1a, b, c and d of the Code. These sections contain the baselines 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.

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



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 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

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.

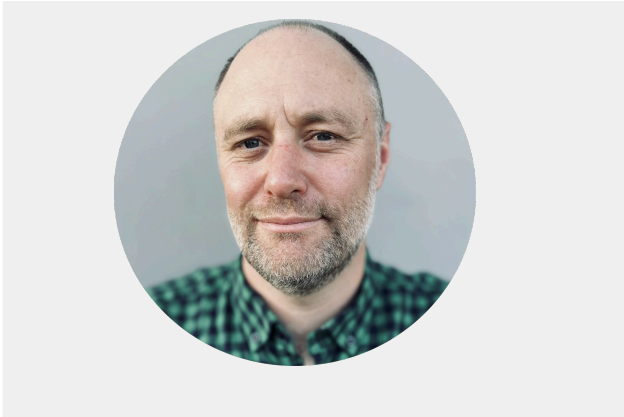
Film and Sound Archive.



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 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.



Shaun Davies

Shaun Davies is the independent reviewer of the 2024 transparency reports.

Shaun Davies is an accomplished digital leader with 20 years of experience spanning content moderation, artificial intelligence, policy, communications, and newsroom leadership. His expertise includes managing global quality and safety for Microsoft Start's content feed, where he set policy and directed cross-functional teams to implement AI systems for moderation. Shaun is also concluding a Master of Research at the University of Technology Sydney, focusing on the role of journalists in at-scale content moderation for mis- and disinformation. His career reflects a unique combination of practical experience and academic insight into the challenges of the digital age.

Complaints portal

A key component of the governance arrangements is the public complaints portal, that is available on DIGI's website¹⁴. The operation of the portal is detailed publicly in the complaints facility terms of reference¹⁵, 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'¹⁶.

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 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.

¹⁴ DIGI, *Complaints*, <https://digi.org.au/disinformation-code/complaints/>

¹⁵ 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>

¹⁶ ACCC (2019), *Digital Platforms Inquiry Final Report*, <https://www.accc.gov.au/system/files/Digital%20platforms%20inquiry%20-%20final%20report.pdf>, p. 371