

# Submission to the Australian Code of Practice on Disinformation and Misinformation 2025 Review

17 October 2025

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# DIGI Voluntary Industry Code on Mis- and Disinformation 2025 Review

We welcome the opportunity to make a submission to respond to the DIGI Voluntary Industry Code on Mis- and Disinformation 2025 Review.

We are the Chief Investigators of the Australian Research Council-funded Linkage Project, [Addressing Misinformation with Media Literacy through Cultural Institutions](#):

- Professor Tanya Notley, **Western Sydney University**
- Professor Michael Dezuanni, **Queensland University of Technology**
- Professor Sora Park, **University of Canberra**
- Dr T.J. Thomson, **RMIT University**

We use “misinformation” as an umbrella term to refer to all kinds of false and misleading information and content. We use the single umbrella term since it is often unclear what the intent is when false and misleading content is created or shared. It is also usually unclear whether false and misleading content is part of a coordinated or strategic action. When people encounter mis- or disinformation, they do not make a distinction between the two.

Our project highlights a lack of knowledge about the everyday experiences of Australians when it comes to online misinformation. In addition, our project has worked closely with four national public cultural institutions to explore how media literacy can be used to help people identify and avoid misinformation online.

We believe our project research findings—in addition to our extensive knowledge of other research on this topic—are strongly aligned with some of the questions raised in the Review paper, especially: “D. Should scope of Code be reduced to focus on disinformation only and exclude misinformation?” and “E2. What role (if any) can the Code play in facilitating an ecosystem approach to combatting misinformation and disinformation?”

We provide detail on each of these discussion areas below.

## ***D. Should scope of Code be reduced to focus on disinformation only and exclude misinformation?***

We strongly disagree with this proposal and do not believe the Code should be reduced to only include the more limited category of disinformation.

The first reason is because it is extremely challenging, if not impossible, to assess whether a piece of information is dis- or misinformation, especially once it is shared by general users and appears on multiple platforms.

The second reason is because general users are affected by both forms of false and misleading information, regardless of the intent, and both can have detrimental impact on individuals and society.

A functioning and fair society needs well-informed citizens who are capable of identifying and creating credible and trustworthy information and who can avoid and identify low-quality, false and misleading information.

Australians use social media more frequently than any other type of media with 94% using them at least once a week. In 2024, Australians used an average of five different social media platforms every week. This reflects a significant increase compared to 2021 when people used 3-4 platforms in a week. This growing and significant use means that social media companies have a responsibility when it comes to the delivery of content.<sup>1</sup>

However, our nationally representative survey finds that nearly half (45%) of adult Australians regularly encounter misinformation online. Only 20% reported they did not see any misinformation online in the week before the survey, while 21% were unsure about whether they had.<sup>2</sup>

The use of social media is strongly associated with people's encounters with misinformation. The more social media platforms people use, the more likely they are to report encountering misinformation regularly. For instance, more than two-thirds (70%) of those who regularly use six or more social media platforms had reported encountering online misinformation in the past week, whereas only 25% of those who use only one social media platform report this.<sup>3</sup>

Of concern though, just 39% of adult Australians are confident they can check if information found online is true.<sup>1</sup> Worryingly, many people who express confidence are in fact over-confident in their ability. When we tested the ability of more than 2,000 Australian adults to verify information, only 3% of them passed this test. Some 40% who had said they were confident they could verify information scored zero on our test.<sup>4</sup>

Our research also shows that most adult Australians are concerned about misinformation and they want more – not less – action taken to address it. The vast majority (80%) of Australians

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<sup>1</sup> Notley, T., Chambers, S., Park, S. & Dezuanni, M. (2024). Adult Media Literacy in Australia 2024: Australian Attitudes, Experiences and Needs. Western Sydney University, Queensland University of Technology and University of Canberra. <https://apo.org.au/node/327239>

<sup>2</sup> *ibid.*

<sup>3</sup> *ibid.*

<sup>4</sup> Park, S., Notley, T., Thomson, T.J., Hourigan, A., and Dezuanni, M. (2024). Online Misinformation in Australia: Adults' experiences, abilities, and responses. University of Canberra and Western Sydney University. <https://apo.org.au/sites/default/files/resource-files/2024-12/apo-nid328959.pdf>

say the spread of misinformation on social media needs to be addressed in Australia, while 12% are unsure and only 8% disagree.<sup>5</sup>

We asked adults who think the issue of misinformation on social media is something that needs to be addressed which measures they think are needed. Almost all adults (94%) agreed that people need to be taught how to identify misinformation. The vast majority (91%) also think that social media platforms should monitor, label and remove misinformation. There is also a strong consensus (87%) that governments should introduce laws to make social media platforms remove misinformation that could be harmful.<sup>6</sup>

These nationally representative findings from our research demonstrate that Australians want social media companies to take action to remove and/or label false and misleading information from their social media feeds. Our complementary qualitative research with a subset of the same participants further shows people are angry and frustrated that platforms put untrustworthy content in front of them that they did not ask for and that is unrelated to the people and groups they have chosen to follow. This research shows that Australians want to be given back more control over their feeds and see it as the fault of platforms for putting irresponsible content in front of them for financial gain.<sup>7</sup>

We believe—and our research supports—that it is the responsibility of platforms to act in the interest of Australian citizens when it comes to the delivery of news and information. For these reasons, we strongly oppose any reduction in scope of the existing Code. Instead, we would support the code to be expanded to give people back more control over what they encounter in their feeds—and to ensure there is more transparency about what they are seeing and why.

### ***E. Additional Issues***

#### ***2) What role (if any) can the Code play in facilitating an eco-system approach to combatting misinformation and disinformation?***

A whole-of-society approach is needed to address the individual and collective harms caused by false and misleading information. A multi-pronged approach is widely accepted by diverse stakeholders who mostly agree this include appropriate regulation, pro-active action and transparency from technology platforms and companies, research, media literacy education, and support for public interest journalism<sup>8</sup>.

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<sup>5</sup> Notley, T., Chambers, S., Park, S. & Dezuanni, M. (2024). Adult Media Literacy in Australia 2024: Australian Attitudes, Experiences and Needs. Western Sydney University, Queensland University of Technology and University of Canberra. <https://apo.org.au/node/327239>

<sup>6</sup> *ibid*

<sup>7</sup> We have two journal articles in submission that examine this specific issue.

<sup>8</sup> Carson & Fallon (2021), *Fighting fake news: A study of online misinformation regulation in the Asia Pacific*, La Trobe University; European Commission 2018, *Action plan against disinformation*, European Commission.

Reset Tech Australia’s experimental research concludes that there are severe shortcomings of the current Code<sup>9</sup>. They argue we need more research on the effectiveness of labelling, prebunking and debunking as well as empirical evidence grounded in independent research to inform better regulation and policies.

While we agree that DIGI members and other players in Australia’s digital media ecosystem should support broader issues of information integrity, the Code’s targeted focus on misinformation and disinformation is critically important and should not be diluted.

Our research shows that Australians have a low media literacy ability relative to other countries and this hampers their ability to create trustworthy content and to avoid the harmful effects of false and misleading content. We are therefore in strong support of DIGI providing financial and in-kind support to increase media literacy.

Those who have received media literacy education are much more likely to come across misinformation in the first place – possibly because they have the ability to discern facts from fiction – and when they do, they are much more likely to check other media to see if the information they found is true.<sup>10</sup> To create a safe online environment, digital platforms need to work with users and other industry stakeholders.

To support media literacy in platforms, DIGI members should:

1. Ensure people have access to information about the business models that underpin their digital app, service or platform - that is, how people make money from content, including disinformation content;
2. Provide users with access to information about how and why they are being served particular kinds of content on the platform;
3. Offer users the ability to easily change and control their privacy settings, including the capability to remove access to their information and data by third parties; and
4. Give users greater control over what they encounter.

We also emphasise the need for media literacy initiatives to be designed by trusted organisations who are able to support critical thinking around media use. To achieve this, DIGI members can fund evidence-based media literacy initiatives designed by independent media literacy experts while supporting the visibility of media literacy initiatives on their platforms. To be credible and trusted, these initiatives should not be used for commercial gain or influence.

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<sup>9</sup> Reset Tech Australia (2024). Misinformation and Disinformation Will Not Be Combated With Industry Codes. <https://au.reset.tech/uploads/Combating-Misinformation-and-Disinformation-Needs-More-Than-Industry-Drafted-Codes.pdf>

<sup>10</sup> McGuinness, K., Park, S., Lee, J. Y., Lukamto, W., Fisher, C., Fulton, J., Haw, A. & Holland, K. (2025). Unpacking election misinformation: Australians’ experiences of news and information about the 2025 federal election. News & Media Research Centre, University of Canberra.10.60836/hc77-gn54

## Submission Authors

**Dr Tanya Notley** is Professor in the School of Humanities and Communication Arts and a member of the Institute for Culture and Society at Western Sydney University. Tanya is internationally recognised for her work in areas of digital inclusion and media literacy. She has led 10 large-scale media literacy research projects since 2017 with more than 20 industry partners. She leads two longitudinal national media literacy surveys. Tanya is a founding member and served as the Co-Chair of the Australian Media Literacy Alliance from 2020-23. Prior to joining Western Sydney University, Tanya worked in youth media, community media and human rights media for more than a decade.

**Dr Michael Dezuanni** is Professor in the Digital Media Research Centre at Queensland University of Technology and Chair of the Australian Media Literacy Alliance. Michael is internationally recognised for his expertise in media literacy pedagogy, having undertaken research in the areas of digital media, literacies, and learning in home, school, and community contexts since 2009. Michael is currently the Program Leader for Creating Better Digital Futures at QUT's Digital Media Research Centre, which produces world-leading research for a creative, inclusive, and fair digital media environment. He is also a chief investigator in the ARC Centre of Excellence for the Digital Child. Michael brings extensive experience working with industry partners, including public cultural institutions, to this project.

**Dr Sora Park** is Professor of Communication and Director of the News & Media Research Centre, Faculty of Arts & Design, University of Canberra. She is internationally recognised as an expert in digital media users and media policy, with a special focus on news consumers and digital inclusion. Sora has extensive experience with large-scale surveys, having led the *Digital News Report: Australia* each year, which is part of the global 48 annual study hosted by Reuters Institute for the Study of Journalism at the University of Oxford.

**Dr T.J. Thomson** is an Australian Research Council DECRA Fellow and a senior lecturer at RMIT University, where he co-leads the News, Technology, and Society Network and is an affiliate of the Australian Research Council Centre of Excellence for Automated Decision-Making and Society. As a former visual journalist and editor, T.J. brings a depth of media industry experience and expertise from an international scholarship on visual media. T.J. has co-authored more than 53 journal articles and book chapters and is the author or co-editor of three books. He was the associate editor of *Visual Communication Quarterly* from 2017-2025 and is currently an international engagement editor for *Digital Journalism*, the world's top-ranked journalism journal.