

**SBS SUBMISSION TO SENATE SELECT COMMITTEE
ON FOREIGN INTERFERENCE ON SOCIAL MEDIA**

**INQUIRY INTO RISK POSED TO AUSTRALIA'S DEMOCRACY BY FOREIGN INTERFERENCE
THROUGH SOCIAL MEDIA**

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Key points

- SBS's provision of high-quality content on social media in English and more than 60 languages (with dedicated social media presence) is extremely important in countering misinformation and disinformation on social media—including that which arises from foreign interference. SBS is a key Australian publisher across multiple social media platforms with more than 120 active accounts providing balanced, accurate and highly trusted¹ content with strict quality control and safeguard measures (see **I.** below).
- SBS's operations and content on social media also help underpin the strength of Australia's democracy. SBS provides news and information that supports and helps enable democratic and civic participation by all Australians including those who speak languages other than English, and First Nations peoples. Key examples of this work by SBS include, among other things, its comprehensive content offerings during the most recent federal election in 2022:
 - live interpreting of Federal Election Leaders' Debates in four languages other than English;
 - comprehensive SBS News political coverage—including coverage aiming at dispelling misinformation;
 - National Indigenous Television's (**NITV**) unique platform for the exploration of political, social and cultural issues from Indigenous perspectives;
 - SBS Radio's provision of election information and explainers in 63 languages; and
 - SBS Settlement Guide—trusted information source for new arrivals—supporting civic as well as economic and cultural participation

(see **II.** below).

- Functionalities should be improved on social media platforms, as these could help mitigate inauthentic and harmful behaviours, including those intending to propagate misinformation and disinformation, for example, via enhanced moderation (see **III.** and **Appendix A** below).
- While preserving SBS's editorial independence, SBS would welcome further engagement with Government on initiatives or campaigns to help counter foreign interference including through social media. There is high awareness of SBS services among multilingual Australians, SBS also possesses in-depth insights into First Nations audiences; and there is significant incidental international consumption of SBS in-language content (See **IV.** below).

¹ ABC and SBS are the most trusted media brands when compared to commercial providers in the Australian market, according to SBS Brand Pulse survey in October 2022; *Q How do you trust the following media brands?* Base: All Australians; Total sample n=750.



Introduction

The Special Broadcasting Service Corporation (**SBS**) welcomes the opportunity to respond to the Senate Select Committee on Foreign Interference on Social Media's inquiry into risk posed to Australia's democracy by foreign interference through social media.

SBS's provision of high-quality content in more than 60 languages is extremely important in countering misinformation and disinformation on social media, including where that arises from foreign interference. SBS delivers content to audiences across a range of platforms, including on social media via platforms including Facebook (Meta), MeWe, Twitter, WeChat, TikTok and Instagram. SBS has more than 120 active social media accounts² as it is SBS's aim to be present where its Australian audiences are, across diverse demographics and age groups.

The awareness of SBS services among multilingual audiences is high—in some instances as high as 96 percent³ among community members who speak languages other than English surveyed (by SBS in collaboration with McNair audience research, since 2008).

SBS also has in-depth insights into First Nations audiences, including those gained through uniquely close relationships between SBS, NITV and NITV Radio services and First Nations communities; as well as SBS's ongoing, dedicated and in-depth research into First Nations peoples' media consumption preferences.

I. SBS's content, including content it makes available on social media, is highly trusted, thanks to its strict quality control and safeguard measures

SBS is Australia's is one of the most trusted⁴ media brands, providing high-quality, balanced, and accurate news and information via social media, SBS's suite of websites, SBS On Demand service, SBS apps, and broadcast television and radio.

Overarching everything SBS does is the comprehensive and robust SBS Code of Practice⁵ (the **SBS Code**) which is applicable to all SBS content that is provided on social media platforms (in addition to broadcast and online services). The SBS Code is made by the SBS Board under the *Special Broadcasting Service Act 1991*, and sets the parameters for delivering services to the community, in line with the SBS Charter.⁶

Strict editorial policies, practices and checks are also in place; such as the SBS Commercial Funding and External Relationships Guidelines⁷ which set out SBS's policies in relation to commercial and external financing activities, including advertising and sponsorship, and to its external relationships, including partnerships.

Further control and safeguard measures include SBS's Social Media Protocol⁸, Terms of Service⁹, and User-Generated Content Guidelines¹⁰—relating to the participation of end-users with SBS

² SBS's social media accounts are across multiple platforms including Facebook, Instagram, YouTube, Twitter, LinkedIn, TikTok, Vimeo, MeWe, Weibo, and WeChat.

³ 96% awareness of SBS is among Italian language users in Australia, according to SBS's annual commissioning of McNair audience research.

⁴ (Same as 1) According to SBS Brand Pulse survey in October 2022; *Q How do you trust the following media brands?* Base: All Australians; Total sample n=750.

⁵ SBS Codes of Practice available at <https://www.sbs.com.au/aboutus/sbs-codes-of-practice>

⁶ SBS Charter available at <https://www.sbs.com.au/aboutus/sbs-charter>

⁷ SBS Commercial, Funding and External Relationships Guidelines <https://www.sbs.com.au/aboutus/sbs-commercial-funding-and-external-relationships-guidelines>

⁸ SBS Social Media Protocol available at https://www.sbs.com.au/aboutus/sites/sbs.com.au/aboutus/files/sbs_social_media_protocol_2011_-_external_version_230420.pdf

⁹ SBS Terms and Conditions available at <https://www.sbs.com.au/aboutus/terms-and-conditions>

¹⁰ SBS User-Generated Content Guidelines available at <https://www.sbs.com.au/aboutus/sbs-user-generated-content-guidelines>



material on social media services. The comprehensive SBS Privacy Policy¹¹ deals with SBS's obligations under *the Privacy Act 1988* (Cth), including the Australian Privacy Principles (**APPs**).

Additionally, all SBS's content which it makes available via social media is compliant with relevant laws including the *Online Safety Act 2021* (under the Act, SBS is regulated as a designated internet provider, whereas the Act also deals with the social media platforms through separate provisions); as well as the *Criminal Code Act 1995* and the *Criminal Code Amendment (Sharing of Abhorrent Violent Material) Act 2019* which regulate abhorrent violent material.

II. SBS operations also underpin the strength of Australia's democracy which may be subject to foreign interference

SBS provides news and information that supports and helps enable democratic and civic participation by all Australians including those who speak languages other than English. This important function of SBS helps counteract any efforts to undermine Australia's democracy and social cohesion, including those through foreign interference.

Recent and eminent examples of SBS's work underpinning Australia's democracy include content published during the 2022 federal election, when SBS provided comprehensive news and information including content it made available via social media, as extracted in subsections (**a.** to **e.**) below.

SBS's highly valued news, information and current affairs services are also consumed around the world. While SBS services are aimed at Australian audiences in line with our Charter, up to 30 percent¹² of all incoming social media traffic to SBS's websites is from overseas. For example, during the height of the COVID-19, many overseas audiences were accessing the SBS multilingual Coronavirus portal to access accurate and up to date information.

a. Live interpreting of Federal Election Leaders' Debates

Available on social media and SBS On Demand, as part of SBS's commitment to help ensure as many Australians as possible could access information in their preferred language to support informed civic participation, SBS launched live interpreting of three Leaders' Debates in up to four languages. In an Australian media first, live interpreting was provided in Arabic, Mandarin, Cantonese, and Vietnamese, in conjunction with media outlets Nine, Seven Network, and Sky News.

¹¹ SBS Privacy Policy available at <https://www.sbs.com.au/privacy>

¹² Source: Adobe Analytics : Unique Visitors : Referrer Type, Countries : 2022/08/01 - 2023/01/31 : Social Traffic - Aus v Non-Aus Dashboard



Figure 1 (above) SBS's provision of live interpreting of Leaders Debate on 8 May 2022 in Arabic language (Source: [SBS Arabic](#) Facebook page)

Arabic- and Mandarin-speaking audiences also heard the concession and victory speeches on election night (streamed live on the [SBS Arabic](#) and [SBS Chinese](#) Facebook pages). Live interpretation was also provided for key portfolio debates, such as the Treasury debate and the Defence debate.

b. Comprehensive SBS News political coverage—including coverage aiming at dispelling misinformation)

SBS News, including its active presence on [Facebook](#), [Instagram](#), [YouTube](#), [Twitter](#), among other platforms, provided comprehensive coverage across the campaign and on election night, addressing a range of issues and perspectives and interviewing both key leaders on the eve of the election.

Importantly, *SBS News* also focused on dispelling misinformation with explainers. This included a feature on social media platform WeChat and its role in the campaign, including in relation to misinformation targeting the Chinese-Australian community.¹³

There were also features focussing on first-time voters, explaining the electoral process, Section 44 of the Constitution (relating to restrictions on who can be a candidate for federal parliament), the minor parties, and outlining the various policies relating to childcare, housing affordability, remote housing, cost of living, English language funding, foreign aid and climate change.

In February 2022, *SBS News* also launched its own TV news bulletins in Arabic and Chinese. *SBS عربي News* and *SBS 中文 News* are bespoke *SBS* news bulletins for Australia's growing and diverse Arabic- and Mandarin-speaking communities, created by bilingual journalists dedicated to delivering a service designed for the communities they are a part of. The services air daily Monday to Friday on *SBS WorldWatch* Channel and are available on *SBS On Demand*, including with English subtitles.

¹³ <https://www.sbs.com.au/news/article/what-is-wechat-and-how-could-it-impact-the-australian-federal-election/qhey2ngj3>



c. NITV delivers a unique platform for the exploration of political, social and cultural issues from Indigenous perspectives

NITV is the only national media service by, for and about First Nations peoples, and in the context of Australian democracy, delivers a unique platform for the exploration of political, social and cultural issues from Indigenous perspectives. NITV has an active presence on [Facebook](#), [Instagram](#), [YouTube](#), and [Twitter](#), among other platforms,

NITV provides extensive political coverage with a First Nations lens across its daily news, in addition to current affairs programs *Living Black* (with a dedicated [Facebook page](#)) and *The Point* running special election programs involving First Nations parliamentarians and policy discussions focused on Indigenous community concerns.

d. SBS Radio provides election information and explainers in 63 languages—most with a dedicated social media presence

During the most recent federal election, SBS Radio provided a range of content on social media (with accounts dedicated to each language service available on social media platforms, and many language services having accounts across multiple platforms), online and on the SBS Radio app (in addition to terrestrial broadcast and distribution of audio on third party platforms such as Spotify). Coverage of the campaign focussed on increasing awareness and accessibility of candidates, policies, and the voting process amongst Australia's culturally and linguistically diverse communities.

A series of Election Exchange activations were also delivered in key seats, with SBS bilingual journalists on the ground speaking with and interviewing local candidates, community leaders and members of the public. These events took place in the Sydney suburbs of Bankstown and Eastwood and the NSW regional centre of Wagga Wagga; Dandenong, Broadmeadows and Ballarat in Victoria; and Hobart and Launceston in Tasmania. In total, the eight Election Exchange events delivered 400 interviews and more than 200 pieces of content in 20 languages across the SBS Radio network.

Content generated by the SBS Election Exchanges helped enable an independent and informed approach to policies and politicians at a local level. It encouraged culturally and linguistically diverse communities to be a part of the national conversation, and provided the opportunity to discuss the issues that matter to them.

SBS also created explainer videos in 40 languages, distributed via social media and available on the SBS Website¹⁴, in partnership with the Australian Electoral Commission, on topics like how to enrol, how to vote and how government works in Australia.

¹⁴ SBS Election Explainers videos available at <https://www.sbs.com.au/news/collection/election-explainers/33h6htqfa>



Figure 2 (above) SBS Election Explainers content in 2022, each item available in multiple languages (Source: [SBS News](#))

e. SBS Settlement Guide—trusted information source for new arrivals—supports civic as well as economic and cultural participation

The SBS Settlement Guide is a multi-platform service producing content in consultation with trusted experts, and practical information to help newly arrived migrants settle into life in Australia. Established in 2016, SBS journalists now produce the Settlement Guide weekly in up to 50 languages, available across SBS language services' social media accounts, websites, radio broadcast, and podcast.

The SBS Settlement Guide is designed to enable new and existing migrants, their families, and their communities to actively participate in civic, economic, and cultural life in Australia. Topics range from how politics in Australia works, how to get a job, understanding bushfire risks and safety, to how to join a sporting club.

For the 2022 election, 'how to vote' explainer videos were added to the Settlement Guide, maximising opportunities for newly arrived migrants to understand and participate in the election process.

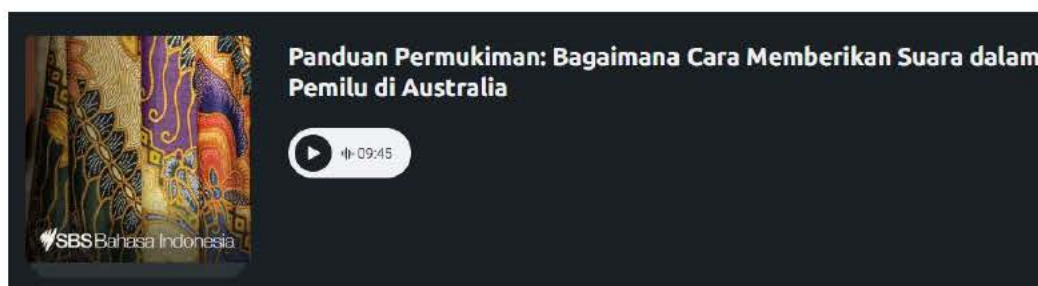


Figure 3 (above) a Settlement Guide feature, English translation: 'Settlement Guide: How to Vote in Australia' (Source: [SBS Bahasa Indonesia](#))



III. Functionalities should be improved on social media platforms

SBS previously provided submissions to other policy processes¹⁵ and ¹⁶ suggesting improved functionalities on Facebook, a social media platform which is used by many multilingual Australians at a higher rate than the general population. Such improved functionalities would not only help enhance SBS's role as publisher of content supporting civic participation and open democracy; but could further mitigate inauthentic and harmful behaviours, including those intending to propagate misinformation and disinformation, through enhanced moderation. However, these enhancements have not been implemented by Facebook to date. An updated list of SBS's suggestions relevant to Facebook functionalities can be seen at **Appendix A**.

On YouTube, screening and approval of users' comments are currently done through a manual, and therefore resource-intensive, process; an option of word filtering functionality should be made available.

On Twitter, there should be an avenue for unauthorised (or no-longer authorised) and excessively dormant accounts (posing access risks to such accounts), to be unilaterally and swiftly closed without the current need for an intensive process.

On TikTok, while pre-moderation of comments is useful, keyword filtering should be improved with additional words added to the relevant database—including more words that have nuanced meanings (which are similar to words with explicit meanings); and keywords around key events (such as January 26).

IV. SBS would welcome further engagement with Government on initiatives or campaigns to help counter foreign interference including on social media

SBS is Australia's only media provider offering comprehensive multiplatform services in more than 60 languages to a national Australian audience—these include, among other things, advertising, translation, and full media production services.

More information is provided in subsections (**f.** and **g.**) below.

f. SBS Media offers a comprehensive suite of services

SBS Media can help entities or government agencies reach further into multilingual communities with their messages or campaigns, including through multi-platform SBS advertising packages. SBS can also assist with messages or campaigns for First Nations communities, where there is significant mobile device usage¹⁷, and for which SBS Media has mobile-led advertising strategies that can be further adapted. For more information, please visit sbsmedia.com.au and SBS Media's *Beyond 3%* initiative (in relation to First Nations advertising audiences).

SBS In Language services help governments and organisations reach communities in their preferred languages. As a federal government approved service provider, SBS In Language provides high quality NAATI-certified translation services for online, print, radio and video—with in-house capabilities for typesetting, subtitling, voice overs, re-narration, and full-scale audio-visual production that can meet short notices and tight timelines, such as those during crisis events. SBS

¹⁵ SBS's September 2022 submission in response to the ACCC's *Digital Platform Services Inquiry March 2023 Report on social media services Issues Paper*, available here: <https://www.sbs.com.au/aboutus/accs-digital-platform-services-inquiry-march-2023-report-on-social-media-services>

¹⁶ SBS's January 2022 submission to the *Inquiry into Social Media and Online Safety* by the House of Representatives Select Committee on Social Media and Online Safety, available here: <https://www.sbs.com.au/aboutus/inquiry-into-social-media-and-online-safety-2>

¹⁷ Townsend P., Halsey J. R., & Guenther J. (2016). *Mobile Learning Congruencies with Aboriginal and Torres Strait Islander Cultural Philosophies*. *Publishing Higher Degree Research*, p. 25—which stated that '70% of Aboriginal and Torres Strait Islander people own a smartphone, and in remote communities 43% of Aboriginal and Torres Strait Islander people own a smartphone'.



Cultural Connect service can also provide advice and expertise in crafting culturally appropriate content, including content tone, as part of SBS's comprehensive service offerings.

For more information, please visit sbs.com.au/inlanguage and sbsmedia.com.au/cultural-connect.

g. SBS Inclusion training program can further assist entities or government agencies working on foreign interference, in their understanding and interaction with Australia's diverse communities

SBS Inclusion program helps organisations and their staff to enhance cultural awareness, and other aspects of inclusion and diversity. Modules build competence with respect to Aboriginal and Torres Strait Islander peoples, LGBTIQ+ people, and issues of gender, disability, and age discrimination.

Also, in 2016, SBS [Cultural Atlas](#) was created as a supporting resource to the program. It has grown to provide a wealth of information for users to gain a broad understanding of the norms and behaviour of people in Australia from diverse cultures.

For further information, please visit inclusion-program.com.au and culturalatlas.sbs.com.au.

Conclusion

SBS's provision of high-quality content on social media in English and more than 60 other languages is extremely important in countering misinformation and disinformation for all Australians—including that which arises from foreign interference efforts.

As a result, functionalities should be improved on social media platforms as these are relevant to SBS's operations on social media.

Should funding permit, SBS would welcome further engagement with Government on initiatives or campaigns to help counter foreign interference including through social media.

Appendix A – Examples of Facebook functionalities that should be improved

Preferred functionality	Progress to date	Recommended tool enhancements
Swift identification and removal of inauthentic or malicious accounts	Not provided by Facebook. Current workarounds are not ideal—by using the Facebook Word Filter tool, accounts can be blocked. However, new inauthentic or malicious accounts (such as fake, spam, or bot accounts), emerge very quickly	A tool that can swiftly, or automatically, identify and remove inauthentic or malicious accounts
Prompt support of technical issues faced by a publisher (preferably in the same time zone or in-country)	Not provided by Facebook. Current practice is that technical issues faced by SBS social media team are to be reported to the centralised Meta News Support portal. This takes an extended timeframe to address each issue	A local, or same time zone, technical support pathway that can swiftly address technical issues faced by a publisher such as SBS
Bespoke moderation support tools around anticipated key events	Not provided by Facebook	Bespoke moderation support tools should be provided to help a publisher such as SBS moderate comments, during and around anticipated key events, for example those in relation to January 26, during and around which the moderation workload significantly increases
Rectification of Business Manager bug	Not addressed by Facebook	There appears to be a bug that causes page administrators to be unlisted from Business Manager, resulting in SBS having to constantly re-add them
Pre-moderation Ability to switch to pre-moderation, so page owners can go through a queue of unpublished comments and approve what goes live	Not provided by Facebook. Current workarounds are not ideal: <ul style="list-style-type: none"> • Some comment-filtering tools using automatic keyword-matching are available (for example, the Facebook Word Filter tool). This tool is not always reliable and is also resource intensive to use, as it requires manual preparation and execution on each social media page • This creates a resourcing issue as SBS has presence on multiple social media pages • The 'view all hidden comments' function on Facebook can only be applied to individual 	A centralised tool to view and pre-moderate a queue of unpublished comments across Facebook profiles managed by an organisation should be provided. Pre-moderation is already a standard feature of other platforms including YouTube and TikTok

	<p>posts, and not applied at an aggregate level for all posts</p> <ul style="list-style-type: none"> • It only applies after a post has been published and hidden, not before it is published 	
<p>Pre-set closing of user comments Ability to set a specified timeframe after publication, before the comments section of a post automatically closes/does not accept further comments</p>	<p>Not provided by Facebook. Current workarounds are suboptimal:</p> <ul style="list-style-type: none"> • Page moderators can manually stop comments a certain time after a post • However, this process is resource intensive as it requires manual execution for each individual post (there is no centralised functionality to manage a group of posts) • This functionality is not extended to posts that are 'boosted', or advertised ('sponsored posts') • This functionality is not available for geographically controlled posts • Moderators need to consider whether these workarounds will reduce the reach of a post by causing it to be downranked 	<ul style="list-style-type: none"> • A centralised tool should be provided to set a specified timeframe after publication for users' comments and should apply to all posts, including boosted and advertised posts, and geographically controlled posts • Moderation should not impact the prominence of a post
<p>Ability to moderate fragments of comments</p>	<p>Relevant functionality does not work consistently:</p> <ul style="list-style-type: none"> • The Word Filter tool provides some 'smart filtering' (which detects variations of a given word that is to be hidden) • However, the filter does not work consistently and 'smart filtering' does not appear to always be effective for words in languages other than English • The filter can only be managed at the page level and cannot be managed centrally 	<ul style="list-style-type: none"> • The Word Filter product should be further refined and improved, including in relation to words in languages other than English. • Centralised moderation functionality should be made available across Facebook pages managed by an organisation
<p>Ability to pause live video comments</p>	<p>Moderation tools currently available for livestreamed videos are yet to be rolled out across all users; they appear to contain errors ('bugs'); and, do not include effective 'stop comments' functionality:</p>	<ul style="list-style-type: none"> • The ability to pause or stop live video comments should be provided • Live Producer moderation tools should be consistently provided to all users

- While the Live Producer tool provides a new set of moderation features, these cannot be accessed for any other type of post, and unlike on other types of posts comments cannot be switched off on Facebook Live videos
- The Live Producer interface is not yet rolled out to all users
- In the past year, live video features (such as staggering posts from one user, limiting the length of a comment and limiting posts to followers of a page) have been inconsistently available