Justice & International Mission
Uniting Church in Australia
SYNOD OF VICTORIA AND TASMANIA

Centre for Theology and Ministry
29 College Crescent
Parkville Victoria 3052
Telephone: +61-3-9340 8807
jim@victas.uca.org.au

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600
E-mail: ec.sen@aph.gov.au

Submission by the Synod of Victoria and Tasmania, Uniting Church in Australia to the inquiry on the *Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2024*

30 September 2024

The Synod of Victoria and Tasmania, Uniting Church in Australia, welcomes the opportunity to make a submission to the inquiry on the *Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023*.

From its foundation, the Uniting Church in Australia upheld the need for truth in public life. In its Statement to the Nation at its inaugural National Assembly of representatives of the Uniting Church across Australia in 1977, it stated:

> *We affirm our eagerness to uphold basic Christian values and principles, such as the importance of every human being, the need for integrity in public life, the proclamation of truth and justice, the rights for each citizen to participate in decision-making in the community, religious liberty and personal dignity, and a concern for the welfare of the whole human race.*

The OECD has emphasised that government responses to misinformation and disinformation should focus on measures that prevent its spread.[1]

We continue to be of the view that material that it would be unacceptable to circulate through other forms of media, such as print, radio and television, should also apply to the online world.

There has been a growing body of behavioural science research showing that our interaction with technology changes our behaviour as people. This branch of psychology has been labelled cyber-psychology.[2] Clinical psychologist Michael Seto has stated concerning our engagement with the online world as a result of the technology companies rolling out products that have not been tested for their behavioural impact. He stated "We are living through the largest unregulated social experiment of all time…."[3]

Some aspects of internet psychology have been studied since the 1990s and are well known and documented. The effect of anonymity online – or perceived anonymity – is one example.

[1] OECD, "Draft Principles of Good Practice for Public Communication Responses to Mis- and Disinformation", 2022, 7.
[2] Mary Aiken, 'The Cyber Effect', John Murray Publishers, London, 2017, 4.
[3] Ibid., 16-17.

It is the modern-day equivalent of that superhero power of invisibility. It has been found to fuel online disinhibition, that is doing whatever you feel like as you are not worried about the disapproval of others. Disinhibition is fed by the perceived lack of authority online, the sense of anonymity as well as the sense of distance or physical removal from others.[4] Due to the 'online disinhibition effect', as it is known, individuals can be bolder, less inhibited, and judgement impaired. Almost as if they were intoxicated.[5] Disinhibition is likely to fuel the willingness of people to spread misinformation and disinformation in a way that many would not do in face-to-face conversations with others.

Psychologist Jamil Zaki points out that anonymity tempts people to "try on cruelty like a mask, knowing it won't cost them. It does, of course, cost their targets."[6]

Not all the impacts of the online world on human behaviour are negative. Altruism, for example, is amplified online, with people often being more generous and giving in cyberspace than they are face-to-face. This has been seen in the enormous growth in online crowdfunding.[7]

The online world has been shown to reduce people's empathy for others. Countries with higher Internet usage also have lower average levels of empathy. People who spend more time on the Internet, social media or gaming platforms report more significant trouble understanding others.[8] A lack of empathy again helps with the spread of harmful disinformation and misinformation.

The online world has made it much easier for like-minded people to find each other than relying on running into such people in the real world. This is positive when it means people share hobbies or support each other, such as 'stay-at-home-mums'. Millions of people with rare diseases have been able to go online and join Facebook groups and message boards such as RareConnect.org. Sufferers from such illnesses can share tips on managing symptoms, dealing with insurers, and exploring new therapies. Online illness communities are wells of mutual empathy and understanding. Rare illness sufferers who feel isolated, judged, or just "different" find solace in people they will never meet in person.[9] However, it has also made it easier for people with disturbing or harmful interests to find each other. They are free from any social disapproval that may have previously inhibited their behaviour.

We all are subject to socialisation. Socialisation is the process where we acquire our attitudes, values, beliefs and behavioural patterns in conformity with the demands of the society or group to which we belong to.[10] Successful socialisation of a person is marked by acceptance of the society or group the person is part of. Anyone who has joined a hobby or interest group or a church congregation knows that each such group has its own culture, its own accepted norms in the group. You will often modify your behaviour to fit in. This has a downside, as behaviours that were initially troubling to you, or made you feel uncomfortable, may start to feel normal over time.[11]

[4] Ibid., 21.
[5] Ibid., 5.
[6] Jamil Zaki, 'The War for Kindness. Building Empathy in a Fractured World', Robinson, 2019, 148-149.
[7] Mary Aiken, 'The Cyber Effect', John Murray Publishers, London, 2017, 5.
[8] Jamil Zaki, 'The War for Kindness. Building Empathy in a Fractured World', Robinson, 2019, 147.
[9] Ibid., 164.
[10] Mary Aiken, 'The Cyber Effect', John Murray Publishers, London, 2017, 37.
[11] Ibid., 38.

In the online world, people with very disturbing or harmful behaviours are often able to forms groups that amplify the problematic behaviour. They are free from being challenged by the wider society. In the real world, fear of social isolation moderates what many people may say if they know it will meet with the disapproval of others.[12] That effect is dampened in the online world.

Given the psychological effects of the online world on human behaviour, the spread of seriously harmful misinformation and disinformation seems more likely than in the real world. Thus, greater regulation of misinformation and disinformation in the online world is justified.

Therefore, the Synod supports the *Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2023* as a small step forward in addressing misinformation and disinformation in the online world. However, much more will be needed if the flood of misinformation and disinformation in the online world is to be seriously curbed. A critical step forward would be empowering the ACMA or the eSafety Commissioner to require standards of the algorithms of the social media and search engine corporations that make recommendations of content to prevent the spread of cases of clear misinformation and disinformation. The algorithms should also be designed to detect and prevent the spread of misinformation and disinformation by bots and artificial intelligence services. Such a measure would not stop individuals from manually spreading misinformation and disinformation by posting it publicly or sending it to others, but the algorithms would not amplify their efforts.

We agree with the definitions of "misinformation", "disinformation", “inauthentic behaviour” and "serious harm" in the Bill.

The Synod supports that the ACMA will have the power to register codes and make standards to compel digital service platform service providers to act against misinformation and disinformation on their services.

The Synod supports the range of enforcement actions that will be available to the ACMA for non-compliance by digital platforms or individuals to the measures contained within the Bill.

The Synod strongly supports the addition to the *Broadcasting Services Act* to include a new object to encourage digital platform providers to protect the community against harm caused, or contributed to, by misinformation and disinformation on digital platform services.

The Synod believes that digital corporations cannot be trusted to adequately deal with disinformation and misinformation on their platforms voluntarily. The Synod is concerned that most digital platforms seek to minimise their costs in dealing with harmful content of all types on their services. Chris Gray outlines how such an approach harms both the content moderators and users of the services in his direct experience as a content moderator.[13] Further, the lag in content moderation often means much of the harm misinformation and disinformation will cause will have happened before the content is removed.

In 2023, the Synod commissioned an investigation into content moderation Business Processing Operation (BPO) corporations in the Philippines. The investigators reported that,

[12] Jörg Matthes and Andrew F. Hayes, ‘Methodological Conundrums in Spiral of Silence Research’, in eds. Wolfgang Donsbach, Charles T. Salmon and Yariv Tsfati, ‘The Spiral of Silence. New Perspectives on Communication and Public Opinion’ (New York: Routledge, 2014), 55 – 56.
[13] Chris Gray, *The Moderator* (Gill Books, 2022).

in general, subcontracted content moderators suffer from dire working conditions, being overworked and underpaid. They continue to have inadequate support to address potential psychological issues from overexposure to harmful and distressing content. BPO content moderators are prevented from organising, which blocks them from launching a concerted effort to have their rights as employees respected. Those who try to organise content moderators are often terminated from their employment. Union organisers have also been murdered. It is common practice for BPOs to compel employees to sign ironclad Non-Disclosure Agreements to prevent outsiders from understanding the lack of training that content moderators receive. Many of the content moderation operations in the Philippines are under the oversight of the Philippine Economic Zone Authority, making it harder for content moderators to have their work entitlements respected.

Further, Ong and Tapsell concluded after considering disinformation around Southeast Asia elections that:[14]

> *It is also abundantly clear that big tech platforms have uneven protocols and guidelines in their social media content moderation practices around elections. Facebook enjoys positive publicity from their takedowns, but without a transparency and accountability framework that invites deliberation around these decisions, they can stand accused of partisanship.*

The point of raising these concerns is that the Commonwealth Government should be more prepared to set and enforce regulations over digital platform providers to ensure that the corporations meet expectations of dealing appropriately with harmful misinformation and disinformation on their services. Digital platform providers should not be trusted to meet such standards on their own.

The Australian Government needs to continue to develop further responses to the problem of harmful disinformation and misinformation. The OECD and the Canadian Privy Council Office's Impact and Innovation Unit have argued that there is no one-size-fits-all solution for addressing misinformation and disinformation.[15] They have argued that partnerships between government, experts, academics and other non-government actors are necessary for a coordinated response.

Dr Mark Zirnsak
Senior Social Justice Advocate
Justice and International Mission Cluster
Uniting Church in Australia
Synod of Victoria and Tasmania

[14] Jonathan Corpus Ong and Ross Tapsell, "Mitigating Disinformation in Southeast Asian Elections: Lessons from Indonesia, Philippines and Thailand", (NATO StratCom Centre of Excellence, 2020), 25.
[15] Chiara Varazzani, Michaela Sullivan-Paul, Lauryn Conway, Andrea Colasanti and Nicholas Diamond, "Misinformation and Disinformation. An international effort using behavioural science to tackle the spread of misinformation", (OECD and Canadian Privy Council Office's Impact and Innovation Unit), 27.