



TikTok Australia
Level 10, 68 Pitt Street
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1 March 2023

Committee Secretary
Select Committee on Foreign Interference through Social Media
Department of the Senate
PO Box 6100
Canberra ACT 2600
Via email: foreigninterference47parl.sen@aph.gov.au

Dear Secretariat,

Further to our previous submission and evidence provided during the 46th Parliament, we welcome the opportunity to update the Committee on TikTok's continued efforts to keep our community and our platform safe.

The last two years have been an exciting period of change and growth for TikTok in Australia. We have welcomed new audiences, inspired new creators, celebrated Australian sporting and artistic talent and shone a spotlight on the thousands of unique Australian businesses, large and small, that call TikTok home. We have expanded our local presence – with a growing team in Sydney and new offices in Melbourne and across our region. And we have strengthened existing ties and forged new partnerships across government, the not-for-profit sector and civil society, to ensure that our platform remains a safe, authentic and inspiring place for the millions of Australians that use TikTok, as well as the broader Australian community.

The last two years have also underscored the need to drive further investments in the safety of our users and the integrity of our platform. Our continual efforts to tackle online misinformation and disinformation, which are set out in this submission, form an important part of this work. Since 2020, we have worked closely with independent experts to enhance our features, policies and processes to empower our users to make informed decisions about the content and information they consume on TikTok, and to help our audiences identify authentic sources of information in response to emerging threats and trends. We've also built new safety and privacy tools to help our users personalise their experience on our platform, and we continue to invest in and advance our global data security practices, with a growing team of experts supported by world-leading technology.

We know these investments are important – and we've seen the risks of inaction when it comes to data security through the recent high-profile data breaches that saw millions of Australians' sensitive information compromised across the insurance and telecommunications sectors. Australians rightly expect that the organisations they entrust with their data – whether it's a bank, telco or social media



platform – will handle their information diligently and transparently. For digital platforms such as ours, that often means balancing competing community expectations around privacy, data minimisation, accessibility, user experience and safety. As a growing platform, and the world's leading destination for short-form mobile video, we want to contribute constructively to these important and nuanced conversations.

We also recognise that with our platform's success comes added scrutiny. As we noted in evidence before this committee in 2020, the tech industry has been asked tough questions in recent years, as policymakers around the world continue to grapple with the challenge of ensuring regulation is fit-for-purpose in a global digital economy. We welcome the opportunity to build upon our record of close cooperation with successive Australian governments on key areas of shared interest, including online safety, privacy and election integrity.

As we embrace the opportunity to contribute to these discussions, we note as well that much has been made of our company's Chinese heritage. We are proud of our heritage, and it's important to note that we operate no differently to other global companies and claims to the contrary are unsubstantiated by evidence. As this submission details, and as even a cursory search of our platform for politically contentious subject matter will reveal, we do not moderate content on TikTok based on the political sensitivities of any government, including China's. For example, our users can readily find content on our app which contradicts the official Chinese Government position on contemporary events, including [the recent shooting down of a suspected Chinese surveillance balloon over the United States](#).

TikTok should not be made into a political football. The millions of Australians who enjoy TikTok every day, whose businesses have boomed, whose creativity and storytelling has exported them to the world, deserve better.

In Australia, we have and will continue to proactively engage with Government and the Parliament to address the scrutiny that comes with being a relatively new and successful entrant in a tightly contested market. Our ongoing conversations across Government have been open and constructive, and we welcome the recent comments of the Minister for Home Affairs and Minister for Cyber Security, namely that:

The Government is not currently considering a ban on TikTok. TikTok is one of the most widely used apps in Australia, much beloved by Australia's young people in particular. It's not currently on the table. (7.30, ABC TV, 21 February 2023)

Additionally, the United Kingdom's Secretary of State for Science, Innovation and Technology, the [Rt Hon Michelle Donelan MP](#), has recently made clear her position with respect to TikTok. She said:

We have no evidence to suggest that there is a necessity to ban people from using TikTok... That would be a very, very forthright move...that would require a significant evidence base to



be able to do that. We constantly review these things. National security always must come first, and if there was evidence presented to me that was contrary to that view, I would address it. But certainly there hasn't been.

It is also instructive that, when asked whether he believed TikTok was a security risk, and specifically [whether he would have concerns about his own child using TikTok](#), the Director of the UK Government's GCHQ, Sir Jeremy Fleming, replied:

No I wouldn't. But I would speak to my child about the way in which they think about their personal data on their device, because it's really important that from a very early age, we all understand that there is no free good here. When we are using these services we are exchanging our data for that, and if that's proportionate and we're happy with the way that data is safeguarded, then that's great. Make the most of it. Make those videos. Use TikTok – but just think before you do.

Sir Jeremy's reflections reinforce the fact that despite some of the commentary singling out TikTok, all digital platforms and global businesses have a shared responsibility to keep our users and their data safe.

Just as we did in 2020, we invite members of the Committee to participate in a virtual or in-person tour of our Transparency and Accountability Centre, in order to assist committee members in their deliberations and provide a greater understanding of our platform, how it works, and the steps we take to protect our users' data and keep our platform safe.

We are proud to have built a global platform where Australians of every background and from every walk of life have found creativity and joy, and we welcome the opportunity to once again engage transparently with this inquiry process. We ask only that we are held to the same standards as any other digitally-enabled company with a global footprint, including our competitors; that we are judged by our policies and practices; and that the Committee considers the evidence before it with the objective and dispassionate judgement that these important matters demand.

Sincerely,

Ella Woods-Joyce
(a/g) Director of Public Policy
TikTok Australia and New Zealand



Our work to keep our community and our platform safe

Our misinformation policies

Misinformation is not a new challenge; however, the digital era provides new avenues to its propagation. At TikTok, we recognise the impact this can have upon the erosion of trust in public health, electoral processes, facts and science, and we are committed to being part of the solution.

We treat misinformation with the utmost seriousness and take a multi-pronged approach to stopping it from spreading, while elevating authoritative information and investing in digital literacy education to help get ahead of the problem at scale. We know there is no finish line when it comes to building a safe and secure platform for our users, which is why we continually work to improve our tools and settings with safety and user experience in mind. Set out below is a detailed summary of the policies, partnerships and other initiatives we have progressed since 2020 to counter misinformation and coordinated inauthentic behaviour on our platform. Over the past year, TikTok Australia has also been undertaking a high-profile, targeted safety campaign to help educate our users and the broader community about the range of tools and resources we have to support user safety and platform integrity.

The rules governing what our users can see, say and do on TikTok are set out in our [Community Guidelines](#). Within these Guidelines, our [integrity policies](#) prohibit content that could mislead our community about civic processes or matters such as public health and safety. For instance, we do not allow misinformation about voting, or content which undermines public trust in civic institutions and processes such as elections and scientific bodies. These policies can be applied to a wide range of content, and that's by design; this content is constantly changing, often based on what's happening in the world.

At TikTok, a combination of technology and more than 40,000 safety professionals based in Australia and across the world work together to enforce our integrity policies and our broader Community Guidelines. To do this effectively at scale, we continue to invest in technology-based flagging as well as human moderation. However, we also recognise that misinformation is different to many other content issues. Context and fact-checking are critical to consistently and accurately enforcing our misinformation policies. So while we use machine learning models to help detect potential misinformation, ultimately we rely upon our moderation teams to assess, confirm and remove misinformation violations.

We have specialised misinformation moderators who have enhanced training, expertise and tools to take action on misinformation. This includes direct access to our fact-checking partners who help assess the accuracy of content. Out of an abundance of caution, while content is being fact-checked or when content cannot be substantiated through fact-checking, it becomes [ineligible for](#)



[recommendation](#) into For You feeds. This effectively prevents such content from going viral on our platform.

We have more than a dozen fact-checking partners around the world that review content in over 30 languages. All of our fact-checking partners are accredited by the International Fact-Checking Network as verified signatories of the [International Fact-Checking Network's code of principles](#). In Australia, our fact checking partners are [Australian Associated Press](#) (AAP), Australia's only independent newswire service. The AAP has put the partnership in their own words in the lead-up to the most recent Australian federal election, by noting:

AAP has always been committed to factual, independent content and through AAP FactCheck, we are also actively working to minimise the spread of misinformation. Our partnership with TikTok is a significant expansion of that work and in the context of the forthcoming federal election, this will take on increased importance.

Lisa Davies, CEO, Australian Associated Press

In addition to removing inaccurate content that could harm our users or community, we also prohibit activities that seek to mislead people or use TikTok to deceptively sway public opinion. These activities range from inauthentic or fake account creation to more sophisticated efforts to undermine public trust. These actors never stop evolving their tactics, and we continually seek to strengthen our policies as new forms of deceptive content and behaviour emerge.

Along with our policies prohibiting harmful misinformation, we also remove content and accounts that involve spam, fake engagement, impersonation and coordinated inauthentic behaviour, such as the use of multiple accounts to exert influence and sway public opinion while misleading individuals, our community or our systems about the account's identity, location, relationships, popularity or purpose.

To continually improve detecting and removing misinformation and coordinated inauthentic behaviour, we made key investments in 2022, including:

- continued investment in machine learning models and increased capacity to iterate on these models rapidly, given the fast-changing nature of misinformation.
- improved detection of known misleading audio and imagery to reduce manipulated content.
- a proactive detection program with our fact-checkers who flag new and evolving claims observed across the internet. This allows us to look for these claims on our platform and remove violations. Since starting this program last quarter, we have identified over 200 distinct trends, representing more than 158,000 videos on-platform.

Election integrity and political accounts

TikTok is first and foremost an entertainment platform, and we're proud to be a place that brings people together over creative and entertaining content, where people come to share their stories and understand other people's experiences. Those stories can touch on all aspects of our users' lives,



including current events like elections. TikTok has long prohibited [political advertising](#), including both paid ads on the platform and creators being paid directly to make branded content. In 2023, [we are extending these restrictions](#) to solicitations for campaign fundraising, including content from politicians asking for donations and content from political parties directing people to a donation page on their website. We apply these restrictions at both an ad policy and an account level. This means accounts belonging to politicians and political parties will have their access to advertising features turned off, which helps us to more consistently enforce our strict policies.

These restrictions are complemented by our policies regarding state-affiliated media, which we apply where there is evidence of clear editorial control and decision-making by members of the state. We use the policy to [label accounts](#) run by entities whose editorial output or decision-making process is subject to control or influence by a government, providing context and transparency around information sources to TikTok users.

However, we also recognise that there will be occasions where governments may need access to our ad services, such as to support public health campaigns and to provide timely access to information. We will continue to allow government organisations to advertise in those and similar circumstances, working alongside a TikTok representative to ensure compliance with our strict platform integrity policies. However, we remain committed to our policy prohibiting political ads, and note that another popular platform recently announced its decision to reverse its political advertising prohibition and now allows such ads.

To ensure potential misinformation can be addressed in a timely way during periods of heightened political activity in Australia, TikTok has established dedicated escalation channels with the Australian Electoral Commission (AEC) and State and Territory electoral commissions. During the 2022 Federal Election, TikTok worked with the AEC to deliver [our in-app election guide](#). The guide promoted the importance of enrolling to vote, and provided detailed, authoritative information on the election process, including information on where and how to vote and preferential voting explainers developed by the Commission. We are proud of this joint undertaking, and note the [AEC's comments at the time of launch](#):

We're liaising closely with TikTok and greatly appreciate their collaboration in driving participation in the election process, and on measures designed to preserve election integrity. We're excited by TikTok's Election Guide and its potential to be an important resource for the platform's community. The hub will help Australian voters on TikTok access credible, reliable information to enrol and vote.

Australian Electoral Commission

Along with Microsoft, TikTok is a [founding signatory](#) to the Electoral Council of Australia and New Zealand (ECANZ)'s Statement of Intent concerning election management arrangements with social media and other digital services companies (online platforms). The Statement is designed to support Australian electoral management bodies and online platforms to address breaches of Commonwealth,



State and Territory electoral-related laws and breaches of online platforms' terms of service related to electoral integrity.

Privacy, security and access to Australian user data

TikTok strives to be open and transparent about how we collect and process our users' information. We collect this information in order to provide a useful and relevant experience for our community, and we encourage our users to read our [Privacy Policy](#) to learn about our practices and the kinds of user data we collect. TikTok user data, including that of our Australian users, is stored in protected data centres in the United States and Singapore. No differently to other social media platforms, this data includes:

- Phone numbers or emails so we can register an account.
- Birthdays so we can confirm a person's age and provide an age-appropriate user experience.
- Likes, shares and search history on our app so we can recommend more relevant content.
- Device ID characteristics which help us perform a number of security functions, like mitigating spam and protecting TikTok accounts against malicious activity. We also use this information to help advertisers optimise and measure the effectiveness of their ad campaigns.
- Approximate location inferred from IP addresses to show relevant content and ads based on the region a person is in.

Contrary to what is often claimed by our critics, the TikTok app is not unique in the amount or sensitivity of information it collects; in fact, our platform collects less data than many popular mobile apps. For example, we do not collect information about our users' current or former workplace, their family connections, their relationship status, hometown, education history or health data. Unlike other apps, we also do not collect precise GPS data in Australia.

By contrast, consider the wide range of data that passes through other apps on our smartphones every time we pay a bill, book a ride, search for directions or track our fitness – or the sensitive financial and health information we regularly disclose to an even broader range of online platforms, including search engines, e-commerce websites, cloud storage platforms, insurance providers and customer loyalty schemes. Australians who access these ubiquitous online platforms all accede, tacitly or otherwise, to the collection of potentially sensitive information in exchange for the convenience of accessing digitally-enabled services. The volume and sensitivity of the data handled by these platforms far exceeds that which we collect in order to offer our users a useful and relevant experience on TikTok.

Like many global technology companies, TikTok has product development and engineering teams all over the world – including in the United States, China, the United Kingdom, Singapore and Ireland – collaborating to deliver the best product experience for our community of users. In light of the alarmist tone some of the commentary on this matter has attracted, it should again be emphasised that there is nothing remarkable about a global technology company employing a global workforce – including



employees based in China – nor are overseas data flows synonymous with malign foreign influence. As the Attorney-General's Department has noted in its recent [Privacy Act Review Report](#):

The free flow of information across borders is an increasingly important component of international trade and digital service models. It is estimated that international data flows will add \$11 trillion to the global economy by 2050. McKinsey Global Institute estimates the value of data flows has overtaken the value of global trade in physical goods.

In light of the above, it is difficult to see how our practices differ in any meaningful way to those of our peers, or indeed to the practices of many large Australian businesses that operate digital platforms to facilitate the provision of goods and services. There is nothing especially unusual or untoward about global companies sharing Australian user data with overseas-based teams, including teams based in China. This statement holds true as much for these businesses as it does for TikTok, and we would respectfully suggest that far from being evidence of malign foreign influence, overseas data transfers of this kind simply reflect the realities of operating a technology-enabled business in an interconnected global economy.

Of greater significance, as recent high-profile data breaches involving Australian user information show, are the steps these organisations take to protect this information. At TikTok, our global privacy and security teams work diligently to protect our users' information and stay ahead of constantly evolving security threats. We use cutting-edge technology and multi-layered defences to make it harder for malicious actors to get into our systems, and regularly engage with outside experts to test our infrastructure and processes. We've also partnered with [HackerOne](#) to operate a global bug bounty and vulnerability disclosure program.

To mitigate the risks of unauthorised data access, use and disclosure, we have also implemented comprehensive policies and procedures that log and limit internal access to user data by our employees, wherever they're based, based on demonstrated business need. This means that if an overseas-based team, including China-based employees, were required to access user data to perform a function specifically tied to their role (such as debugging, troubleshooting or performance monitoring to optimise user experience), this access would be subject to a series of controls and safeguards and adherence to authorisation approval protocols overseen by our Global Security Organisation led out of the United States.

Transparency and misinformation reporting

TikTok Australia is a founding signatory to the *Australian Code of Practice on Disinformation and Misinformation*. Over the life of the Code, we have been active participants in the associated reporting processes, including through engagement with ACMA. Our two transparency reports under the existing code are [available online](#), and provide considerable additional information about our approach to mis- and disinformation on our platform. In light of the reporting periods covered, these two reports necessarily focussed heavily on our management of COVID-19-related content and vaccine



misinformation, given its significance in Australia during the pandemic. The data disclosed through this reporting process shows our identification and removal of COVID-related misinformation appeared to track proportionally alongside lockdowns in Victoria and New South Wales, as well as the nationwide vaccination roll out. We look forward to providing our next transparency report in coming months, which will detail our efforts to identify and remove misinformation over the period covering the 2022 federal election.

In addition to our reporting under the *Australian Code of Practice on Disinformation and Misinformation*, we also publish quarterly Community Guidelines Enforcement reports to provide regular updates and insights into the volume and nature of content and accounts removed from our platform. Our most recent [Community Guidelines Enforcement Report](#) for July-September 2022 provides a detailed summary of a range of issues related to authenticity and platform integrity, including detected spam account activity, fake engagement and covert influence operations. With regard to the latter, as our Community Guidelines Enforcement Report details, we identified and removed five on-platform operations between July and September 2022. These comprised:

- One network operated from Georgia targeting Russian-speaking audiences, primarily based in Kazakhstan, Belarus and Ukraine. The individuals behind these accounts shared content in Russian using inauthentic accounts posing as news outlets amplifying a pro-Russia viewpoint targeting discourse about the war in Ukraine;
- One network operated from Taiwan and targeted primarily Taiwanese audiences. The individuals behind these accounts used inauthentic accounts to create a high number of derogatory comments in addition to sharing content in Traditional Chinese targeting civic discourse in Taiwan;
- One network operated from Russia targeting European countries, primarily Germany, Italy and the United Kingdom. The individuals behind these accounts created localised inauthentic accounts and shared content in German, Italian and English using speech synthesis in these languages amplifying a pro-Russia viewpoint targeting discourse about the war in Ukraine;
- One network operated from Kenya targeting Kenyan audiences. The individuals behind these accounts shared content in English using inauthentic accounts and used deceptive behaviours to build an audience, such as the use of manipulated media targeting discourse on elections in Kenya; and
- One network operated primarily from Spain targeting audiences in the United States. The individuals behind these accounts created and amplified partisan US civic content in English and Spanish using accounts posing as political parties, redirecting users to off-platform fundraising links, merchandise links and closed information channels in an attempt to likely benefit financially through targeting civic discourse in the United States.

Over the same reporting period, we blocked 41,459,159 spam accounts, removed 94,733,447 videos posted by spam accounts and removed 759,044,040 fake followers.

To give outside experts and policymakers an insight into how our safety teams go about the day-to-day work of moderating content on our platform, we provide virtual and in-person tours of our



[Transparency and Accountability Centre](#) (TAC). These tours provide an opportunity for participants to see up close how we moderate and recommend content, TikTok's user privacy and platform security measures, as well as our source code and how our algorithm operates. We have one such centre currently operating in the United States, with another centre in Singapore under construction. We would welcome the opportunity to provide members of the Committee with the opportunity to tour the centre, as has already been done by a range of Australian Government officials and parliamentarians.

We are continually working to build on our transparency efforts, and to improve ease of access to public and anonymized data about content and activity on our platform and our moderation system. In 2022, we announced a [range of updates and initiatives](#) to support this goal. [This includes providing API access to research the TikTok platform, and providing API access to research our moderation system.](#) We've also continued to build on our efforts to provide our community with additional transparency around our recommendation system, including through the introduction of a '[why this video](#)' tool, building on a range of existing features that enable our users to understand and make adjustments to their experience on TikTok.

Stronger partnerships

To engage our audiences about the risks of mis- and disinformation, and to stay ahead of emerging trends and challenges, we regularly engage with researchers, civil society organizations and media literacy experts, both in Australia and globally. Not only does this collaboration help strengthen our policies and overall domain expertise, it also enables us to elevate authoritative voices in our app.

For example, while piloting our state-affiliated media policy in 2022, we developed an independently validated methodology to guide our content labelling decisions in consultation with more than 60 media experts, political scientists, academics and representatives from international organizations and civil society across North and South America, Africa, Europe, the Middle East, Asia and Australia. We have also established the Asia Pacific Safety Advisory Council (SAC), bringing together a group of independent online safety experts to advise our decision-makers on issues related to trust and safety at TikTok. The SAC holds extensive knowledge across shared topics of interest including cyber-wellness, mental wellbeing, minor protection and countering misinformation.

In Australia, we have engaged the AAP to create and deliver targeted digital media literacy training to popular TikTok creators. In collaboration with the AAP, our creators produced content to instruct their followers how to confidently source reliable and factual information, how to interrogate that information effectively, and how to use those skills to create factual, reliable and educative content. TikTok Australia has also established a dedicated escalation and reporting channel with the Department of Home Affairs in order to quickly assess and, where appropriate, remove content that violates our integrity policies.



During the COVID-19 pandemic we launched a range of specific, in-app resources to support public health efforts. We programmed and promoted a livestream with [Dr Kerry Chant](#) and supported the NSW Government to livestream its daily [COVID-19 press conferences on TikTok](#). We similarly supported a livestream discussion between 'Dr Karl' Kruszelnicki and the Director of the Doherty Institute, Professor Sharon Lewin, around the science of vaccines as the COVID-19 vaccine rollout was underway. We also partnered with [UNICEF Australia](#) to launch a dedicated in-app COVID-19 vaccine content hub specifically for Australians. This local resource, in addition to our global COVID-19 hub, aimed to help fight vaccine hesitancy, surface accurate information on COVID-19 vaccinations and galvanise support for this critical public health program within the Australian community.