

Analysis of the election plans against international best practices

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1. Introduction and Background

The year 2024 has marked the largest election year in history, with more than 70 countries holding elections.¹ Large online platforms, such as Google, Meta, and TikTok, have seen a rise in the number of users, which has also led to an increase in digital disinformation and misinformation. Disinformation and Misinformation has the potential to undermine the fairness of the electoral process, thereby infringing upon South African citizens constitutionally protected right to vote.

Given the real possibility that disinformation and misinformation may infringe on this critical civil and political right, large platforms need to implement measures to mitigate such harms. Large platforms like Google, Meta, and TikTok have attempted to mitigate the harms by publishing their “election plans” on their websites. Therefore, the purpose of this research is to evaluate the election plans of Google, Meta, and TikTok against international best practices and assess their adequacy. These platforms were chosen because they published election plans and have a large user base in South Africa.

Each plan will be evaluated against two separate guidelines for mitigating systemic online risks during elections, the first being the European Commission’s regulations under the Digital Services Act, and second against the Voluntary Election Integrity Guidelines for Technology Companies, published by the International Foundation for Electoral Systems.

2. International Best Practices Guidelines

a. Digital Services Act (DSA)

¹ <https://www.newyorker.com/magazine/2024/01/15/the-biggest-election-year-in-history>

The European Commission's Digital Services Act (DSA) governs online intermediaries and platforms, including marketplaces, social media, content-sharing services, app stores, and online platforms for travel and accommodation. Its aim is to prevent illegal activities, harmful behaviours online, and the spread of disinformation. The DSA outlines specific rules for intermediary services, with responsibilities varying based on the role, size, and influence of each online entity within the digital ecosystem.²

Platforms with a large reach which has more than 45 million users per month in the EU are governed under the DSA more strictly than others. These are called **Very Large Online Platforms and Search Engines** (VLOPs and VLOSEs), which are categorised to pose potential risks in the dissemination of illegal content and societal harms. The online platforms discussed in this research viz Meta, TikTok and Google, fall under the title of VLOPs. Meaning that due to their large reach and number of users they should take steps to identify and assess the risk posed to users that are linked to their services and measures to mitigate those risks must be taken.³

Despite the DSA being applicable to countries in the European Commission, regulations and guidelines pertaining to safety and security on online platforms may be used to assess online platforms risk measures in South Africa.

Commission's guidelines under the DSA for the mitigation of systemic risks online for elections:

²

https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act_en

³ [DSA: Very large online platforms and search engines | Shaping Europe's digital future \(europa.eu\)](#)

"The guidelines represent best practices for mitigating risks related to electoral processes at this moment in time"⁴ These DSA guidelines were accessed on the European Commission's website and are directly quoted hereunder:⁵

1. **"Reinforce internal processes:** by setting up internal teams with adequate resources, using available analysis and information on local context-specific risks and on the use of their services by users to search and obtain information before, during and after elections, to improve their mitigation measures.
2. **Implement election-specific risk mitigation measures tailored to each individual electoral period and local context:** VLOPs should promote official information on electoral processes, implement media literacy initiatives, and adapt their recommender systems to empower users and reduce the monetisation and virality of content that threatens the integrity of electoral processes. Political advertising should be labelled as such, in anticipation of the new regulation on the transparency and targeting of political advertising.
3. **Adopt specific mitigation measures linked to generative AI:** VLOPs and search engines whose services could be used to create and/or disseminate generative AI content should assess and mitigate specific risks linked to AI, namely, labelling content that is AI generated (such as deepfakes), adapting their terms and conditions accordingly and enforcing them adequately
4. **Cooperate with EU level and national authorities, independent experts, and civil society organisations:** to foster an efficient exchange of information before, during and after the election and facilitate the use of adequate mitigation

⁴ https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1707

⁵ [Commission publishes guidelines under the DSA \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1707)

measures, including the areas of Foreign Information Manipulation and Interference (FIMI), disinformation and cyber security.

5. **Adopt specific measures, including an incident response mechanism, during an electoral period:** to reduce the impact of incidents that could have a significant effect on the election outcome or turnout.
6. **Assess the effectiveness of the measures:** through post-election reviews; VLOPs should publish a non-confidential version of such post-election review documents, providing opportunity for public feedback on the risk mitigation measures put in place.”

b. International Foundation for Electoral Systems (IFES)

The International Foundation for Electoral Systems is a global, non-profit organisation that collaborates with civil society, public institutions, and the private sector with the aim of promoting and protecting democracy through technical assistance and applied research.

Although the IFES is not currently engaged in any projects within South Africa, they are reported to have worked with over 145 countries to advance protection of democratic rights.

⁶ The IFES, in their Elections and Tech (electionsandtech.org) project developed the Voluntary Election Integrity Guidelines for Technology Companies, which has the potential of increasing the sphere of best practices for Big Tech companies during elections. The goal of these guidelines is to provide a set of shared expectations for companies and election authorities as they work to advance election integrity and provide high quality information to voters.

⁶ [South Africa | IFES - The International Foundation for Electoral Systems](#)

Potential guidelines that could be used as international best practices under IFES:⁷

Planning and Partnership

1. Determine how to prioritise resources across many global elections by taking account of a holistic set of considerations. Considerations include human rights, democratic principles, relevant use of the company's products and services, whilst considering the available resources.
2. *Consult with global civil society as necessary and appropriate.*
3. Establish and disseminate clear policies and processes regarding election-related content, activities, civil unrest, and violence.
4. Centralise information about the resources that are available and relevant to election authorities and other stakeholders.
5. Establish planning processes that consider election authorities' timelines and capacity.

Elections Operations

6. Enable access to authoritative election and voter information when appropriate. (Make best efforts to enable access to authoritative election and voter information, when appropriate).
7. Establish a strategy to act on misinformation and disinformation about electoral participation.
8. Establish and make available communication channels for election authorities: may be used to address critical incidents during the period immediately around elections.
9. Publicly provide information on paid political and/or paid election content.

Post-election Period:

⁷ <https://electionsandtech.org/election-integrity-guidelines-for-tech-companies/>

10. maintain appropriate coordination mechanisms and operations beyond the immediate election period.
11. Support post-election engagement with election stakeholders.

3. Big Tech Companies' Election Plans

The following are a reproduction of the Elections Plans published by Google, TikTok and Meta on their respective websites.

a. Google⁸

In line with Google's main goals of organising the world's information to ensure universal accessibility, Google's plans undertook several steps to help ensure election integrity in the South African elections. These steps included:

- Providing high quality information to the general public.
- Taking steps to safeguard their platforms from abuse; and
- Providing election campaigners with various security tools and training.⁹

i. Connecting people to reliable and trustworthy information

Acknowledging that searches for information related to elections increases during election periods, Google took several steps to help make it easier for voters to find information regarding elections.

- Accessing Information Using the "Google Search" Function:

⁸

<https://blog.google/intl/en-africa/company-news/how-google-is-supporting-election-integrity-in-south-africa/>

⁹ Abongile Mashele "How Google is Supporting Election Integrity in South Africa" *Google: Africa Blog* 18 April 2024 (available at:

<https://blog.google/intl/en-africa/company-news/how-google-is-supporting-election-integrity-in-south-africa/>).

Google focuses on ensuring that voters searching for topics relating to the elections were provided with important information, such as ID requirements and voting stations, from authoritative sources such as the IEC.¹⁰

- Accessing Information on YouTube:

Google ensured that its recommendation system would ensure that election content would be displayed in a user's search results, home page, and their "Watch Next" panel if that user had searched for election-related content.¹¹

Google also made use of both human reviewers and machine learning technology to review and remove any content that violated their policies.¹²

- Regulating Political Advertising:

Google required all advertisers wanting to run political ads to complete an identity verification process and ensured that all political ads contained an in-ad disclosure indicating who financed the ad.¹³ This information, as well as further information relating to the impressions all ads received, were published in Google's Political Ads Transparency Centre.¹⁴

Google also limited targeting of election ads, only allowing the use of categories based on age, gender and general location as determined using postal codes.¹⁵

ii. Equipping political candidates with security features and training

¹⁰ *Ibid.*

¹¹ *Ibid.*

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ The report can be accessed here:

<https://adstransparency.google.com/political?topic=political®ion=ZA>.

¹⁵ Mashele "Supporting Election Integrity" *Africa Blog*.

Recognising that campaign and election officials qualified as “high-risk users,” Google also sought to improve official’s security.

- Security Tools:

Google offered two free services to election and campaign officials, their Advanced Protection Program (“APP”) and Project Shield (“PS”), to assist in securing and safeguarding these users.¹⁶

The APP defends against targeted online attacks and secures users’ personal data by providing protection against phishing and harmful downloads.¹⁷

PS provides specific protection against “Distributed Denial of Service” attacks which can result in websites being taken offline to censure an internet user.¹⁸

- Training:

Google partnered with the IEC to provide political representatives with more information regarding Google’s “elections integrity work,” recommended security protocols, and how to report and remove harmful and illegal content.¹⁹

iii. **Protecting online information around elections and fighting misinformation**

Google also adopted several strategies to ensure that trustworthy information could be accessed on its platforms during the elections.

- Enforcing Policies:

Google sought to ensure that its usual policies regarding manipulated media and misinformation, online harassment and hate speech, and content inciting violence

¹⁶ *Ibid.*

¹⁷ More information on the APP can be found here: <https://landing.google.com/advancedprotection/>.

¹⁸ More information about PS can be found here: <https://projectshield.withgoogle.com/landing>.

¹⁹ Mashele” Supporting Election Integrity” *Africa Blog*.

were enforced during the elections.²⁰ Google's Trust & Safety teams who are responsible for implementing these policies and claims that they have suitable local knowledge and language expertise to implement these policies across all domestic contexts.²¹

- Coordinated Influence Operations:

Google also relied on its "Threat Analysis Group" ("TAG"), to assist in targeting threats towards its high-risk entities, such as political campaigners.²²

- Working with Other Relevant Stakeholders:

Google also worked directly with other relevant stakeholders, including the IEC, Media Monitoring Africa and TikTok, to fight against misinformation.²³ This included working within the coalition led by Africa Check that assisted South African media in fact checking political parties' various claims and to assist in equipping the public with basic fact-checking skills.²⁴

iv. Helping people navigate AI-generated content

Google's broader tools and policies aimed at ensuring the identification of AI-generated content were also to be applied during the election period.

²⁰ *Ibid.* Examples of these policies include its Community Guidelines on YouTube (more information on this policy can be found here:

<https://www.youtube.com/howyoutubeworks/policies/community-guidelines/#community-guidelines>)

and its Misrepresentations Policy (more information on this policy can be found here:

<https://support.google.com/adspolicy/answer/6020955?hl=en#zippy=%2Cclaims-related-to-politics-social-issues-or-matters-of-public-concern>).

²¹ Mashele "Supporting Election Integrity" *Africa Blog*. These teams are assisted by Google's "Large Language Models" which assist in ensuring a quick and adaptable response.

²² *Ibid.* All steps taken to combat such threats are reported in Google's TAG Bulletin which can be accessed here: <https://blog.google/threat-analysis-group/>.

²³ Mashele "Supporting Election Integrity" *Africa Blog*.

²⁴ *Ibid.*

- Advertisement Disclosures:

Google requires advertisers to indicate when their advertisements make use of imaging that inauthentically depicts real or realistic-looking people or events. This includes content made using AI. Google also prohibits the use of such content to mislead viewers, such as the use of deep fake content.²⁵

- Content Labels on YouTube:

Google's policies around disclosure and artificially created content also apply on YouTube. Where a content-creator discloses that their videos contain altered content, a label to that effect is included in their video.²⁶

- Limiting Generative AI Products:

During the election period, Google also restricted what type of election-related queries their AI products, Gemini, and Search Generative Experience, would return responses for.²⁷

- Watermarking:

To assist in identifying AI-generated content, any AI-generated content would receive a digital watermark embedded into it using SynthID, a tool from Google DeepMind.²⁸

While Google did adopt some election-specific plans, it mostly relied on the ongoing implementation of many of its existing policies to safeguard the integrity of the elections. Very few election-specific plans were put in place by Google.

²⁵ *Ibid.*

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ *Ibid.*

b. TikTok: ²⁹

i. Election Centre in-app

TikTok released a statement³⁰ in which they ensured that they would protect South Africans during the national elections by launching an Election Centre in-app, available in various local languages, which would enable people to easily separate fact from fiction. The platform further stated that they will work in collaboration with the Electoral Commission and civil society organisations to ensure that South Africans can rely on the Election Centre in-app to find trusted and authoritative information. This initiative is just one element of a wider strategy to ensure that TikTok remains a creative, safe, and civil place for South Africans during the election period. Other initiatives that the platform promised to enforce will be discussed below:

ii. Enforcing policy:

TikTok stated that they would have a dedicated team that would work with technology to ensure that rules are being enforced and misinformation removed, Covert influence operations,³¹ and other content and behaviour that can increase during an election period³²

²⁹ <https://elections.sanef.org.za/2024/04/23/tiktok-launches-sa-election-centre/>

³⁰ <https://elections.sanef.org.za/wp-content/uploads/2024/04/TikTok-response-to-SANEF.pdf>

³¹ which are defined by TikTok as coordinated, inauthentic behaviour where networks of accounts strategically work together to mislead people or our systems and influence public discussions, which can include attempting to undermine the results of an election, influencing parts of an armed conflict, or shaping public discussion of social issues.

³² Accessed from [TikTok Reinforces Commitment to Platform Integrity with Key Initiatives Ahead of South Africa Elections | TikTok Newsroom](#) on 19 September 2024.

was reported by TikTok as being monitored³³ where TikTok asserts that their Policy regarding Covert influence operations look for evidence of:

- Accounts that coordinate with each other – this could be operated by the same entity, using same devices and share other technical similarities whilst spreading the same narrative.
- They mislead systems or users. This is reported as trying to conceal their locations or using face personas to pose as others.
- They are attempting to manipulate or corrupt public debate in order to impact the decision making , beliefs and opinions of a community. ³⁴

iii. **Countering misinformation:**

Tik Tok stated that they have specialised misinformation moderators who are given enhanced tools and training to detect and remove violative content, as well as teams on the ground who partner with experts to ensure local context and nuance is reflected in our approach.³⁵

- Fact-checking:

³³ [Countering influence operations \(tiktok.com\)](#) date accessed 11 October 2024

³⁴ [Covert Influence Operations \(tiktok.com\)](#)

³⁵ Accessed from [TikTok Reinforces Commitment to Platform Integrity with Key Initiatives Ahead of South Africa Elections | TikTok Newsroom](#) on 19 September 2024.

In South Africa, TikTok works with Code for Africa, their fact-checking partner, who supports them to assess the accuracy of content in multiple official languages, and they label any claims that cannot be verified.³⁶

- Investing in media literacy:

In preparation for the South Africa elections, TikTok worked with Africa Check to create media literacy campaigns to counter misinformation. Tik Tok claims to have produced videos in English, Afrikaans, isiZulu, isiXhosa, sign language and all videos come with English subtitles.³⁷

- Deterring covert influence operations:

TikTok dedicated experts working to detect, disrupt, and stay ahead of deceptive behaviours. TikTok reports the removals of covert influence networks in their quarterly [Community Guidelines Enforcement Reports](#).³⁸

- Tackling misleading AI-generated content (AIGC):

TikTok stated that they do not allow manipulated content that could be misleading, including AIGC of public figures if it depicts them endorsing a political view. They also require creators to label any realistic AIGC and recently launched a first-of-its-kind tool to help people do this. Additionally, alongside 20 other leading tech companies, TikTok recently pledged to help

³⁶ Accessed from [TikTok Reinforces Commitment to Platform Integrity with Key Initiatives Ahead of South Africa Elections | TikTok Newsroom](#) on 19 September 2024.

³⁷ Accessed from [TikTok Reinforces Commitment to Platform Integrity with Key Initiatives Ahead of South Africa Elections | TikTok Newsroom](#) on 19 September 2024.

³⁸ Accessed from [TikTok Reinforces Commitment to Platform Integrity with Key Initiatives Ahead of South Africa Elections | TikTok Newsroom](#) on 19 September 2024.



prevent deceptive AI content from interfering with this year's elections through proactive collaboration.³⁹

- Tailoring their approach to accounts belonging to politicians, political parties, and news outlets:

TikTok enforced a policy that bars politicians and political parties from advertising or making money on TikTok. If the accounts of politicians or political parties spread misinformation or incite violence, the platform ensured that their platform would be suspended.⁴⁰

³⁹ Accessed from [TikTok Reinforces Commitment to Platform Integrity with Key Initiatives Ahead of South Africa Elections | TikTok Newsroom](#) on 19 September 2024.

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c. Meta⁴¹

According to Meta, it invests more resources to protect elections online than any other tech company. Meta noted having the largest third party fact checking network of any social media platform, which includes South African fact-checking partners in various South African languages.⁴² Ahead of the 2024 national election, Meta aimed to establish an “Election Operations Center” tailored to South Africa, that would find and mitigate potential threats on its platforms (including Facebook, Instagram, WhatsApp and Threads) in real time.⁴³ They also noted having a direct working relationship with the IEC in preparation for the elections.⁴⁴

Meta planned to focus its teams, technologies, and investments on the following key areas in the lead up to the elections:

i. Taking action against harmful content

- Meta reports having 40 000 people working on safety and security, having invested over 20 billion dollars in teams and technology in this area since 2016.⁴⁵ This investment has allowed for 15 000 content reviewers across Facebook and Instagram in over 70 languages.⁴⁶
- Community Standards are intended to inform the public about the type of content that is permitted on Facebook and Instagram, including what is allowed in the context of elections. Meta reports “taking action” against attacks on people based on

⁴¹ Balkissa Idé Siddo, “How Meta Is Preparing for the 2024 South African Elections,” (12 April 2024). Available at: <https://about.fb.com/news/2024/04/how-meta-is-preparing-for-the-2024-south-african-elections/>.

⁴² Ibid.

⁴³ Ibid.

⁴⁴ Ibid.

⁴⁵ Ibid.

⁴⁶ Ibid.

characteristics such as religion or ethnicity, in contravention of Community Standards policies on harassment or hate speech.⁴⁷

- Ahead of the election, Meta sought to establish a South Africa-specific Elections Operations Centre focused to identify potential threats across its apps and technologies in real time.⁴⁸

ii. Combating misinformation

- Meta describes removing the “most serious” misinformation from its platforms, which it lists as content that may result in imminent violence or physical harm, or content that is intended to suppress voting.⁴⁹
- Meta works with independent fact-checking organisations who review and rate content when it does not violate these policies, even if edited or created with AI or other digital tools. Should fact-checkers debunk content, a warning label is attached to the content and its distribution (in Feed) is reduced so people see less of it. Fact checking partners in South Africa include Africa Check and AFP, who can fact check in English, and other languages like Afrikaans, isiZulu, Sesotho, and Setswana.⁵⁰
- Recognising the importance of speed ahead of the election period which would have many breaking news events, Meta planned to make fact checking easier for its partners by allowing keyword detection to group related content and make it easy to find. Meta also onboarded fact checking partners to its new research tool, the Meta Content Library, that would apparently support their work with its powerful search capability.⁵¹

⁴⁷ Ibid.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Ibid.

⁵¹ Ibid.

iii. **Working with local organisations to prepare for elections**

- Meta signed the “Voluntary Framework of Cooperation to Address Disinformation in the 2024 National and Provincial Elections in South Africa”, which is an agreement for collaboration with the IEC and other industry partners, to mitigate election-related risks where possible.⁵²
- Meta and Africa Check sought to train IEC staff to improve their ability to detect misinformation. In partnership with the IEC and Media Monitoring Africa (MMA), Meta trained over 160 government communicators on its approach to combating misinformation, and the safety and security features available on its platforms.⁵³
- Meta, alongside other platforms, appeared before the Parliamentary Portfolio Committee on Communications (PPCC) to engage policymakers on its state of readiness for the elections, resulting in a series of PPCC sessions throughout the year to help them understand how public officials and public organisations can ensure online safety and security.⁵⁴
- In partnership with the South African Human Rights Commission and The Other Foundation, Meta planned to run trainings with civil society organisations to increase online safety for marginalised communities, by raising awareness of its safety tools and the best use of its platforms.
- An election resource centre was created on its website, specifically for the South African elections. It offers government, political, and non-profit partners information on how to secure their accounts and engage voters with authoritative information.⁵⁵

⁵² Ibid.

⁵³ Ibid.

⁵⁴ Ibid.

⁵⁵ Ibid.

iv. **Empowering voters**

- Meta emphasised its commitment to supporting an informed and engaged community on its platforms prior to elections, recognising the importance of access to reliable information and the responsible use of online platforms during an election.⁵⁶
- In partnership with Digify Africa, Meta developed digital literacy tools such as Lesedi WhatsApp chat services and Kitso, making education more accessible by teaching digital literacy skills and online safety in a data-light way.⁵⁷
- Meta ran anti-hate speech and misinformation campaigns on its platforms and on local radio, to educate people about identifying and reporting online hate speech and misinformation and directing them to Meta's Hate Speech Transparency Centre page and the Kitso WhatsApp chat service for more information.⁵⁸
- Meta planned to launch its Voter Information Unit and Election Day Reminder on Facebook and Instagram before election day, to give users neutral reminders, redirecting them to the IEC website to find authoritative information.⁵⁹

4. Implementation Check Table

a. **DSA Guidelines**

International best practice (DSA)	Implemented?		
	TikTok	Google	Meta

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ Ibid.

⁵⁹ Ibid.

Reinforcing internal processes (teams/adequate resources/context-specific risks)	<ul style="list-style-type: none"> - Released statement to protect South Africans by launching an Election Centre in-app available in local languages to separate fact from fiction (collaboration with Electoral Commission and civil society organisations) - Specialised misinformation moderators who are given advanced tools and training to detect and remove violative content, and 	<ul style="list-style-type: none"> - Google relies on its Trust and Safety teams to enforce its policies. It claims that these teams are equipped with local knowledge and language expertise which would allow them to operate effectively in the South African context. However, little information can be found online regarding who constitutes these teams, and how it can be deduced that they are adequately equipped with 	<ul style="list-style-type: none"> - Over 40k people working on safety and security, \$20 billion invested in teams and technology in this area. - 15k content reviewers across Facebook and Instagram in over 70 languages - Activate South Africa specific 'Elections Operations Center' focused on identifying potential threats across apps and tech in real time.
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	teams on the ground who partner with experts to ensure local context and nuance is reflected	respect to the South African context. In fact, at the start of 2024, the year in which the greatest number of elections are taking place globally in recent history, Google was reportedly reducing its team of approximately 250 Trust and Safety employees by approximately 10 employees during company-wide lay-offs. ⁶⁰	- Created an election resource centre specifically for South African elections, providing government, political and non-profit partners with information such as how to secure their accounts and engage voters with authoritative information.
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⁶⁰ Davey Alba, Shirin Ghaffary,ffary "Google Trims Jobs in Trust and Safety while Others Work Around the Clock" *Bloomberg News* 4 March 2024 (available at: <https://www.bloomberg.com/news/articles/2024-03-01/google-trims-jobs-in-trust-and-safety-while-others-work-around-the-clock?embedded-checkout=true>).

		<ul style="list-style-type: none"> - Google's partnerships with the IEC, MMA and Africa Check assisted in capacitating the organisation in the South African context. However, these partnerships focused on Google providing its partners with access to its services as opposed to relying on the organisations for context-specific expertise. 	
Specific risk mitigation measures tailored to	<ul style="list-style-type: none"> - Dedicated experts working to detect, disrupt and stay ahead 	<ul style="list-style-type: none"> - Training was offered to political campaigners as "high-risk users" 	<ul style="list-style-type: none"> - Combatting misinformation through removal from platforms if

<p>each individual electoral period and local context.</p>	<p>of deceptive behaviours.</p> <ul style="list-style-type: none"> - Reports removals of covert influence networks in quarterly Community Guidelines Enforcement Reports - Collaborations with Africa Check to create media literacy campaigns to counter misinformation; videos produced in English, Afrikaans, isiZulu, isiXhosa, sign language. - Collaboration with Code for 	<p>in terms of Google's partnership with the IEC. Training on Google policies, recommended security protocols, and reporting and removal processes may have assisted political campaigners in using Google services safely and responsibly, potentially mitigating against harms that may have otherwise been incurred if they used Google's</p>	<p>it can contribute to imminent violence or physical harm or suppresses voting.</p> <ul style="list-style-type: none"> - If it does not violate those policies, collaboration with independent fact-checking organisations to review and rate the content
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	<p>Africa to assess accuracy of content in multiple official languages, and labels claims that cannot be verified.</p> <ul style="list-style-type: none"> - Policy that bars politicians and political parties from advertising or making money on TikTok and suspend accounts if they suspect this 	<p>platforms without adequate training.</p> <ul style="list-style-type: none"> - Google limited the targeting of political campaigns on its platforms. <p>However, it still allowed the targeting of advertisements to certain groups and individuals based on age, gender, and general location which limited the impact of this risk mitigation.</p> <ul style="list-style-type: none"> - Some of the security features offered to political campaigners such as PS, APP 	
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		<p>and TAG may have assisted in mitigating the risk of cyberattacks against these users. However, these are general services offered, which were not tailored to the South African context.</p> <ul style="list-style-type: none"> - The use of Google's Large Language Model assists in ensuring the translation of content on Google's platforms which Google relied on to promise a swift response to violations of their 	
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		<p>policies.</p> <p>However, this remains an applied tool and previous work done by the LRC in collaboration with Global Witness has highlighted Google's inefficiency in removing content in languages other than English that violate its policies.⁶¹</p>	
Adopt specific mitigation	- Require creators to label any realistic AIGC	- Google's general policies regarding generative AI	- Meta works with independent fact-checking

⁶¹ In an investigation done by the LRC and Global Witness, YouTube approved 40 advertisements submitted by the LRC which contained hate speech in violation of YouTube's Community Guidelines. These advertisements were published in English, Afrikaans, isiXhosa, and isiZulu. See further: <https://lrc.org.za/facebook-x-twitter-youtube-and-tiktok-approve-violent-misogynistic-hate-speech-adverts-for-publication-in-south-africa/>.

<p>measures linked to generative AI (labelling AI content/adapting T&C)</p>	<p>and recently launched a first-of-its-kind tool to help.</p> <ul style="list-style-type: none"> - Pledged to help prevent deceptive AI content from interfering with this year's elections through proactive collaboration 	<p>applied during the elections. This required advertisers to disclose if their advertisements contained any generative content. Similarly, YouTube videos containing generative content needed to be labelled accordingly.</p> <ul style="list-style-type: none"> - All AI-generated content was watermarked using a digital watermark, SynthID. - During the election period, Google limited the types of 	<p>organisations who review and rate content, including if it was created or edited by digital tools such as AI; if content is debunked, they attach warning labels to the content and reduce its distribution in feed, so people are less likely to see it</p>
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		election queries that its generative AI products would provide a response to.	
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<p>Cooperate with EU level (African regional level) and national authorities, independent experts, and civil society organisations</p>	<ul style="list-style-type: none"> - Collaborations mentioned in other sections: <ul style="list-style-type: none"> o Africa Check - Collaborations with Electoral Commission and civil society organisations to ensure South Africans can rely on the Election Centre in-app to find trusted and authoritative information 	<ul style="list-style-type: none"> - Signed a Framework of Cooperation with the IEC, Media Monitoring Africa, and other social media platforms to ensure co-operation in curbing election-related misinformation.⁶² - The framework supports the creation of a working group between signatories to assist one another in combatting misinformation. 	<ul style="list-style-type: none"> - Collaboration with IEC to mitigate risks associated with elections through voluntary framework to address disinformation. - Collaborate with Africa Check to train IEC and MMA staff. - Work with Africa Check and AFP within South Africa - Use keyword detection to group related content in one
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⁶² IEC "Electoral Commission Partners with Social Media Giants to Combat Disinformation in 2024 National and Provincial Elections" *Electoral Commission of South Africa* (available at: <https://www.elections.org.za/content/About-Us/News/Electoral-Commission-partners-with-social-media-giants-to-combat-disinformation-in-2024-National-and-Provincial-Elections/>).

			<p>place, making it easy for fact-checkers to find. Their fact checking partners are also being onboarded to their new research tool, Meta Content Library, that has a powerful search capability to support them in their work.</p> <ul style="list-style-type: none"> - Continuing long term partnership with Digify Africa to develop several digital literacy tools such as Lesedi
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			WhatsApp chat services, making education more accessible
Adopt specific measures, including an incident response mechanism, during an electoral period	Dedicated team that works with technology to ensure rules are being enforced and misinformation removed, covert influence operations , or content that meets the TikTok Policies definition of covert operations are reported to have been monitored closely during election periods	- Under the Framework of Cooperation, Google agreed to co-operate with the IEC and MMA in the use of the Real411 platform to allow for real-time review of reports of disinformation on its platforms by an external panel of experts and the IEC. In terms of the framework, Google is expected to respond to	The most serious kind of misinformation is removed from platforms, such as content that could contribute to imminent violence or physical harm, or that is intended to suppress voting

		<p>notifications by the IEC regarding reported misinformation on its platforms. However, an overview of the reports received on Real411 from April to June reveal that very few complaints from Google platforms were recorded on the site.⁶³</p> <p>- Under the Framework of Cooperation, Google also agreed to cooperate with the IEC and MMA on the</p>	
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⁶³ See <https://www.real411.org/trends>.

		<p>Padre.org.za platform to ensure transparency regarding political advertising. However, when looking at the site, no information is recorded regarding advertisements aired on any Google platforms.⁶⁴</p> <p>- During the elections, Google also applied its ordinary policies regarding misinformation, hate speech, harassment, and</p>	
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⁶⁴ See <https://www.padre.org.za/library?page=1>.

		<p>the incitement of violence.</p> <ul style="list-style-type: none"> - Google's partnership with Africa Check during the election period assisted in ensuring that claims made by political parties were fact checked.⁶⁵ - Google's Political Advertising Report provided good insight into the reach and funding of political advertisements. 	
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⁶⁵ See

<https://africacheck.org/fact-checks/blog/press-release-africa-check-south-african-media-google-create-coalition-fact>.

Assess effectiveness of the measures	X	While Google did adopt several mechanisms focused on combatting misinformation and harmful content during the South African election period, many of these mechanisms remained broad and amounted to little more than the implementation of Google's existing policies. Google adopted few targeted or contextual mechanisms or policies. Its co-operation with local organisations and the IEC in particular appears successful and ensured that the IEC and other political campaigners benefited from training provided by Google. However, positive these	While Meta's collaborations with South African stakeholders did provide local organisations like the IEC with an increased understanding of the tools offered by Meta — these tools were no different from what they have been implementing on their platforms. Content that infringed the existing policies or that was debunked by fact checkers would be dealt with accordingly, which did not differ in the election process. Furthermore, aside from directing users to the IEC website for authoritative
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		partnerships appear, a report on the effectiveness of the partnerships is needed to measure the impact that these partnerships had in removing content that was harmful disinformation and misinformation	information, given the lack of an assessment in the months following the elections, it is difficult to measure the effectiveness that this partnership had in stopping/removing election disinformation and misinformation.
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b. IFES guidelines

International best practice (IFES)	Implemented?		
	TikTok	Google	Meta
<i>Determine how to prioritise resources across many global elections by taking account a holistic set of considerations (human rights, democratic principles etc)</i>	TikTok partnered with other Tech Platforms as well as the non-profit organisation, Media Monitoring Africa, and the Independent Electoral Commission (IEC) to	Google's partnership with local organisations in countries during elections, like the IEC, assists in resource distribution.	Meta partnered with the IEC and other industry partners to mitigate potential election-related risks where possible. In partnership with the SAHRC and The Other Foundation,

	<p>ensure that disinformation is restricted. TikTok further implemented a dedicated election centre for the elections in South Africa, which was available in the languages that are spoken locally in South Africa. This function also features election information that is authoritative concerning the South African election and is linked to the IEC website. These languages include isiXhosa, isiZulu, and Afrikaans.</p>	<p>However, Google does not provide information regarding how its internal resources are distributed. There is a lack of transparency by Google regarding its own internal resource distribution.</p>	<p>Meta provided training to civil society organisations. It also set up an election resource centre on its website, tailored to the South African elections. Meta also ran anti-hate speech and misinformation campaigns on its platforms and local radio for six weeks ahead of the elections, directing people to its transparency page. However, the transparency page does not specifically mention the election, neither does it engage with South African democratic principles in this</p>
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			context. It would have been effective to allocate more resources for the creation of election-specific policies, or to direct users to authoritative sources on democratic principles at this stage.
<i>Consult with global civil society as necessary and appropriate.</i>	TikTok has partnered with several organisations in South Africa as well as in the African region. The partnership between TikTok and the IEC, has resulted in the creation of the in-app election centre and this is a good step when it	Google partners with many organisations across various domestic and regional contexts. Its partnerships with the IEC, MMA and Africa Check are some examples in the South African context. Google appears to have predominantly focused on	Meta's collaborations with organisations such as the IEC, Africa Check, AFP, MMA, the PPCC, SAHRC, and The Other Foundation were used to provide fact checking in local languages, to offer digital skills training to various individuals, to develop an ongoing relationship with

	comes to the preservation of the integrity of the election process. ⁶⁶ TikTok collaborated with the fact-checking organisation, Africa Check, to educate users about important aspects of election information. In simpler terms, this collaboration ensures that there is accurate fact-checking and election literacy. ⁶⁷	partnerships with international fact-checking organisations, funding and partnering with the International Fact Checking Network to support approximately 135 networks of fact checkers. ⁶⁹ However, at least when it comes to generative AI, Google's international partnerships are Western-focused. ⁷⁰	policymakers in preparation for the elections, and to ensure that its understanding of the electoral process was authoritative.
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⁶⁶ Accessed at [TikTok SA adds in-app election centre | ITWeb](#) on 25 September 2024.

⁶⁷ Accessed at [TikTok SA adds in-app election centre | ITWeb](#) on 25 September 2024.

⁶⁹ See: <https://safety.google/content-safety/>

⁷⁰ Google reports that it has partnered with the White House, G7, US AI Security Institute Consortium, UK AI Safety Institute and National AI Research Resource. See Laurie Richardson "How we're partnering with the industry, governments and civil society to advance AI" *The Keyword* 14 February 2024 (available at: <https://blog.google/technology/ai/google-ai-partnerships-government-industry-civil-society/>).

	<p>Another important collaboration fostered by TikTok was the collaboration with CODE for Africa. This collaboration ensures that claims can be verified as true, false, or unsubstantiated and dealt with, in terms of the guidelines set by TikTok. This would also allow moderators to play a role in terms of taking the right actions when there is a breach of the guidelines in terms of TikTok's policy guidelines.⁶⁸</p>		
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⁶⁸ Accessed at [TikTok SA adds in-app election centre | ITWeb](#) on 25 September 2024.

<p>Establish and disseminate clear. policies and processes regarding election-related content, activities, civil unrest, and violence</p>	<p>Election Integrity:</p> <p>TikTok has implemented policies to address misinformation related to elections. They have established rules to prevent the spread of false information about voting processes, election results, and political campaigns. This includes partnerships with fact-checking organisations and efforts to promote authoritative sources of information.</p> <p>TikTok has guidelines designed to address content</p>	<p>Election Integrity:</p> <p>Google relies on its general policies regarding misinformation in the election context. It does, however, appear to implement stronger fact-checking policies for political advertising and requires further funding transparency for such content.</p> <p>To this end, Google also partners with local organisations, like the IEC in the South African context, to provide election officials and</p>	<p>Election Integrity:</p> <p>Meta has developed and enforced policies to combat misinformation and manipulation around elections. This includes labelling or removing false information about voting, election results, and election-related procedures. They have also introduced fact-checking programs and transparency tools for political ads.</p> <p>Content Moderation:</p> <p>Meta's platforms, including Facebook and Instagram, have guidelines to address</p>
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	<p>that promotes or glorifies violence and civil unrest. The platform works to remove or limit the visibility of content that could incite violence or contribute to unrest.</p>	<p>political campaigners with training regarding its internal policies and procedures.</p> <p>Content Moderation: On YouTube, Google has policies to address harmful content related to violence, hate speech, and misinformation. These policies aim to limit the spread of content that incites violence or promotes harmful conspiracy theories. These are, however, general policies and not specific to elections.</p>	<p>harmful content such as hate speech, incitement to violence, and misinformation. They employ a combination of automated systems and human moderators to enforce these rules.</p> <p>Civil Unrest and Violence: Meta has policies aimed at curbing content that promotes or incites violence, especially in the context of civil unrest. They have taken steps to limit the spread of such content and have occasionally removed or flagged posts that</p>
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		<p>Civil Unrest and Violence: Google has guidelines to address and mitigate content that promotes or glorifies violence, particularly in the context of civil unrest. They work to remove or limit the visibility of such content to prevent the escalation of violence. However, again, these are its general policies, and not specific to the election context.</p>	<p>violate their standards.</p>
<p>Centralise information about the resources that are available and relevant to election authorities and other stakeholders.</p>	<p>Launched an Election Centre in-app, available in various local languages, which would enable people to easily separate</p>	<p>Election Centre: Google has created an "Election Centre" to provide resources and information specifically for election officials.</p>	<p>Election Integrity Hub: Meta has established an Election Integrity Hub to provide resources and tools for election officials and</p>

	fact from fiction. The platform further stated that they will work in collaboration with the Electoral Commission and civil society organisations to ensure that the South Africans can rely on the Election Centre in-app to find trusted and authoritative information. This initiative is just one element of a wider strategy to ensure that TikTok remains a creative, safe, and civil place for South Africans during the election period.	This centre offers tools, best practices, and guidelines to help with election administration, including security and integrity measures.	stakeholders. This hub offers guidance on best practices for managing election-related information and combating misinformation.
<i>Establish planning processes that</i>	Partnerships:	Partnerships:	Meta's partnership with the IEC

<i>consider election authorities' timelines and capacity.</i>	TikTok and the IEC entered into a partnership to ensure that the integrity of the electoral processes is protected. This was done through signing the Framework of Cooperation between TikTok and the IEC, to ensure that digital harms are mitigated. The partnership ensures that the laws that are already in existence are respected, and that users' data is not shared. This framework also ensures that the South African	Google's partnership with the IEC appears focused on improving the IEC's capacity and assisting the organisation in the buildup to the election. However, how this partnership may or may not have affected Google's own internal planning is not disclosed by the company.	capacitated them by providing misinformation training to staff and enabled them to train government communicators on Meta's security features and approach to misinformation. It is not clear what Meta's practice for overall engagement during the electoral process with the IEC was.
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	<p>Constitution, the Electoral Act, and the Electoral Code of Conduct are upheld.⁷¹</p> <p>This Framework also ensures that the Working Group between collaborators i.e. TikTok, Google, Meta and the IEC is protected. This collaboration ensures the promotion of accurate information, that there is greater awareness on election campaigns and that training is</p>		
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⁷¹ Accessed at [Electoral Commission partners with social media giants to combat disinformation in 2024 National and Provincial Elections - Electoral Commission of South Africa](#) on 26 September 2024.

	<p>provided to political parties and other key stakeholders, which has the effect of ensuring that disinformation is reduced.⁷²</p> <p>This Framework further makes provision for online platforms to implement policies such as the removal of harmful content, advisory warnings and other processes that play a role in disinformation.⁷³</p>		
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⁷² Accessed at [Electoral Commission partners with social media giants to combat disinformation in 2024 National and Provincial Elections - Electoral Commission of South Africa](#) on 25 September 2024.

⁷³ Accessed at [Electoral Commission partners with social media giants to combat disinformation in 2024 National and Provincial Elections - Electoral Commission of South Africa](#) on 25 September 2024.

	<p>From the information provided, these planning processes align with the internal processes at TikTok. TikTok claims that it is serious about the protection of election integrity and furthers the work of removing posts that are harmful to policy guidelines at TikTok. So, this collaboration was no deviation from the already existing processes to combat harmful information, especially where it pertains to the safeguarding of electoral processes.</p>		
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<i>Enable access to authoritative election and voter information when appropriate.</i>	<p>TikTok announced the implementation of the in-app Election centre, which has no paid political ads, and has invested in media literacy regarding elections. The broader strategy of this in-app Election Centre is also to ensure the maintenance of a creative, respectful, and secure environment during elections.⁷⁴</p> <p>To ensure the visibility and accessibility of the in-app Election</p>	<p>Authoritative Sources: Google has taken certain steps to ensure users access to authoritative sources regarding election content. Google Search prioritises linking users to authoritative sources when users search for information regarding elections. Google has also limited its generative AI products ability to respond to election-related queries, only allowing responses to certain queries. What these queries</p>	<p>The features launched by Meta ahead of the election such as the Voter Information Unit and Election Day Reminder, not only reminded users to vote, but redirected them to authoritative sources on how to vote on the IEC website. Meta also attaches warning labels to content that has been debunked by fact checkers, and makes sure fewer people see it.</p>
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⁷⁴ Accessed at [TikTok announces partnership with IEC to combat misinformation ahead of May elections \(polity.org.za\)](https://www.polity.org.za) on 25 September 2024.

	<p>Centre, labels were implemented on content that is associated with the 2024 general elections.⁷⁵ The labels also serve as links that lead to the election centre.</p> <p>TikTok further labels AI election content, unverified election claims, as well as State-affiliated media accounts. Creators are further required to label realistic AI generated content.</p> <p>Along with Africa Check, TikTok also</p>	<p>are, however, has not been explained by Google.</p>	
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⁷⁵ Accessed at [TikTok announces partnership with IEC to combat misinformation ahead of May elections \(polity.org.za\)](https://www.polity.org.za/article/tiktok-announces-partnership-with-iec-to-combat-misinformation-ahead-of-may-elections-2024-25-september-2024) on 25 September 2024.

	<p>assists users in discerning AI-generated content. Through endorsing the IEC's Frame of Cooperation, TikTok also made the commitment to protect against deceptive AI.</p> <p>TikTok further collaborated with the South African Human Rights Commission (SAHRC) to protect against hate speech and to shield users from other forms of violence.⁷⁶</p>		
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⁷⁶ Accessed at [TikTok-Elections-One-pager.pdf \(citizen.co.za\)](#) on 24 September 2024.

<p>Establish a strategy to act on misinformation and disinformation about electoral participation.</p>	<p>Dedicated team that would work with technology to ensure that rules are being enforced and misinformation that can increase during the election period is monitored by the Global Fact Checking Programme, and by partnering with experts to provide local context. If the content is found to be misinformation it is removed.⁷⁷</p> <p>Specialised misinformation moderators are given enhanced tools and training to</p>	<p>Fact-Checking and Labelling: Google has implemented systems to label, and fact-check information related to elections. This helps users identify authoritative sources and avoid misleading content. For example, they use fact-checking programs and provide labels on search results and YouTube videos to indicate whether content has been verified.</p> <p>Google's partnership with Africa Check also assists with</p>	<p>Content Moderation and Policies: Meta has developed and enforced policies to combat misinformation about electoral participation. This includes removing or labelling content that spreads false information about voting procedures, registration, and election results.</p> <p>Fact-Checking and Labelling: Meta partners with independent fact-checking organisations to review and label false or misleading</p>
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⁷⁷ [Combating harmful misinformation \(tiktok.com\)](#) last accessed on 11 October 2024

	<p>detect and remove violative content.</p> <p>Policy that if politicians or political parties spread misinformation on the platform, their account will be suspended.</p>	<p>ensuring that content on its platforms is fact-checked.</p>	<p>information about elections. This labelling appears on posts and news stories to provide users with context and direct them to accurate information.</p>
<p>Establish and make available communication channels for election authorities: may be used to address critical incidents during the period immediately around elections</p>	<p>Dedicated Election Integrity Team:</p> <p>TikTok has set up a specialized team focused on election integrity and misinformation. This team works directly with election authorities, fact-checkers, and other stakeholders to address issues</p>	<p>Dedicated Election Support Teams:</p> <p>While Google assisted in training the IEC and political officials in using its platforms effectively, Google does not appear to have specific communication channels for authorities.</p>	<p>Election Operations Centre: Meta has an Election Operations Centre that provides support to election authorities. This centre is involved in monitoring and responding to election-related issues and misinformation, ensuring that authorities have a</p>

	<p>related to electoral content.</p> <p>Emergency Response</p> <p>Protocols: TikTok has protocols in place to handle critical incidents related to elections. This includes providing election authorities with a way to quickly report and address any problematic content or emerging threats during the election period.</p>		<p>direct line of communication during critical periods.</p>
<p>Publicly provide information on paid political and/or paid election content</p>	<p>Election Integrity</p> <p>Policies: TikTok has established policies to govern political and election-related content, including</p>	<p>Political Ad Transparency</p> <p>Reports: Google publishes transparency reports that include details</p>	<p>Political Ad Transparency</p> <p>Reports: Meta publishes transparency reports that offer insights into</p>

	<p>rules around advertising. These policies are aimed at ensuring that ads related to elections are transparent and comply with relevant regulations.</p>	<p>about political and election-related advertising. These reports provide information on the volume of ads, the types of ads, and the sources of funding.</p> <p>The reports have been updated to reflect advertising information during the information cycle.</p>	<p>the political ads run on its platforms. These reports include information on the volume of ads, spending, and trends in political advertising.</p> <p>Disclosure Requirements: Meta requires political advertisers to disclose information about their ads. This includes details about the sponsor, the targeting of the ads, and how much was spent. Advertisers must also go through a verification process to ensure compliance with their policies.</p>
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Maintain appropriate coordination mechanisms and operations beyond the immediate election period.	The processes and policies that were expanded on during the elections were already in existence prior to the election period. The policies that are in place to combat hate speech, incitement and disinformation were only upgraded during the election period, but were already functional as TikTok aims to further the interests of existing laws and the Constitution. Therefore, there is room to believe that the coordination mechanisms that are in place will	As most of the policies Google implemented during elections relating to misinformation, hate speech and incitement of violence were its general policies, they remained in effect after the election period.	Election-specific policies were not implemented ahead of the elections, so the existing Community Standards policies which provided guidance on issues that could be relevant in this context (such as hate speech, harassment, and incitement of violence) continue to be enforced post-election.
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	continue even after the elections.		
Support post-election Engagement with election stakeholders.	It is not yet clear whether the agreement between TikTok and the IEC will extend beyond the year of the general elections (2024). Furthermore, there is no evidence to suggest that any engagement with the relevant stakeholders is still taking place post-election.	It remains unclear regarding the longevity of Google's partnership with the IEC.	Meta's appearance before the PPCC in 2023, set in motion a series of further sessions for 2024 to build an understanding of online safety amongst public officials and organisations. The election resource centre is still available on its website, and now provides information for incoming or outgoing government entities on how to manage their digital presence.

5. Areas in which the Big Tech companies can improve on (DSA guidelines):

a. Google

- o Google does not, in their election plans, address assessing the effectiveness of the measures through actions such as publishing post-election reviews, allowing for public feedback on the risk mitigation measures put in place.
- o Google's election plans also lack specificity in significant areas, such as resource allocation and distribution, clear communication channels for the relevant election officials, and transparent planning processes.
- o While Google increases its fact-checking around elections, it would also benefit from tailoring its policies to the election context, instead of relying so heavily on its general policies.
- o Google also needs to improve what inputs it receives from its election partnerships. Its partnerships with organisations such as the IEC and MMA appear focused on providing these organisations with access to Google's infrastructure and services. Google lacks specific domesticated tools for implementing its policies across diverse domestic contexts and more could be gained through these partnerships to address those shortcomings.

b. Meta

- o Meta does not, in their election plans, address assessing the effectiveness of the measures through processes such as publishing post-election reviews, allowing for public feedback on the risk mitigation measures put in place.
- o Although Meta discusses combatting disinformation and has tools to check whether content is "created or edited by digital tools such as AI," there are limited references directly to Artificial Intelligence in the election plans; it should be made clearer even though it could be inferred.

c. TikTok

- o TikTok does not, in their election plans, address assessing the effectiveness of the measures through actions such as publishing post-election reviews, allowing for public feedback on the risk mitigation measures put in place.

6. Research Analysis (Key Points) and recommendations.

- **Disinformation in campaigns:**

- o the Broadband Commission for Sustainable Development (September 2020) study finds that there are cases in which one type of response can work against another, for example where there is an over-emphasis on responses through top-down regulation without any investment in bottom-up empowerment. There are further examples of cases of internet communications companies (such as Facebook, X etc.) not removing disinformation-laden attacks on journalists on the grounds of 'free speech.' where companies use free speech as an attempt to justify them avoiding taking swift action against impugned content, they undermine journalists safety and also allow misinformation or disinformation to reach more people.⁷⁸
- o Internet communications companies could: expand financial support for, and heighten the visibility of, intergovernmental anti-disinformation campaigns beyond crises like the COVID-19 pandemic.⁷⁹

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https://www.broadbandcommission.org/wp-content/uploads/dlm_uploads/2023/01/WGFoEDisinfo_Report2020-compress.pdf p11

⁷⁹ ibid p122

- o Electoral commissions and government committees can also provide reliable information on candidates and parties, as well as work with the internet communications companies towards the promotion of such information.⁸⁰
- **Recommendations for internet communications companies during elections:**⁸¹
 - o Recognise the significant damage potentially caused by political disinformation, specifically in the run-up to elections (including disinformation in online advertising) and engage in a multi-stakeholder dialogue on the policies and methods they adopt specifically during election periods. These could include temporary restrictions on pre-election political advertising; additional transparency information for political adverts placed during election periods; election-specific policies for promoting reliable information sources; and deployment of additional content moderation and fact-checking resources.
 - o To deal with cross-platform electoral disinformation, collaborate on the setting of broad industry-wide norms for dealing with electoral disinformation that support democracy and aid self-regulation.
 - o Collaborate on improving their ability to detect and curtail election disinformation, as cross-platform methods of manipulation are often practiced during elections.
 - o Apply the lessons learned from responding with urgency to the COVID-19 'disinfodemic' and apply those lessons to the management of political and electoral disinformation.

⁸⁰ ibid p.135

⁸¹ ibid p.138

- o Contribute significantly towards funds for fully independent research into manifestations and impact of election disinformation, as well as independent evaluation of the effectiveness of the companies' own disinformation responses, with such initiatives to be managed by arms-length independent funding boards.
- o Work together, and under the guidance of the UN Special Rapporteur for the Right to Opinion and Freedom of Expression, along with other independent international experts, to develop a consistent policy approach for dealing with disinformation agents who hold powerful political office while using their sites.
- o If **political campaigning** is to take place by political parties, candidates and other individuals, online intermediaries have a responsibility to develop codes of conduct that make explicit their respect for such fundamental rights and put in place strategies for their effective enforcement in line with the respective national rules on political campaigning.⁸²
- **More recommendations for social media and online platforms:**⁸³
 - o Give meaningful access to data to election observers and researchers in line with personal data protection rules to enhance effective electoral campaign oversight and better detection and analysis of disinformation campaigns.
 - o To provide sound research and oversight of electoral/political campaigns, social media and online platforms should provide better, more precise, and more coherent data to accredited election observers and researchers.

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<https://edoc.coe.int/en/internet/7614-internet-and-electoral-campaigns-study-on-the-use-of-internet-in-electoral-campaigns.html> p.23

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<https://www.wahlbeobachtung.org/wp-content/uploads/2020/02/smm-austria-wahlbeobachtung.org-final-report-030220.pdf> p.33

- o As currently many responsibilities lie with the social media and online platforms, watchdog organisations should have full and guaranteed access to data relating to content that is misinformation, disinformation, especially to algorithms regulating political advertisements.

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