

**From:** [Kristina Temel](#)  
**To:** [REDACTED]  
**Subject:** General Election 2023: Twitter and the Electoral Commission  
**Date:** Friday, 21 April 2023 12:09:00 pm  
**Attachments:** [image001.jpg](#)

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Kia ora [REDACTED],

I thought it would be a good time to introduce myself and start touching base with you on the election integrity measures Twitter will have in place for the New Zealand general election.

In 2020 our dedicated point for escalations was [REDACTED], but we understand that [REDACTED] is no longer in that role.

[REDACTED] encouraged us to always notify [REDACTED] as well as using our escalation via the Twitter's "Government Partner Support Portal" - an escalated path to file a report content. Tickets filed through enrolled accounts via the Support Portal automatically got expedited into the ticketing system. The Portal also had several reporting options that were not available on the public support pages including election interference, request of inactive usernames, and unusual spike in followers, etc. A user name and dedicated e-mail (the legal and policy team email) was set up so that we could access the reporting pathway. We could escalate using the Commission's Twitter account - [REDACTED] - and our Legal & Policy email - [REDACTED] to report content that violated local law or that breached Twitter's election policy. We could also use the portal to request preservation of any content that we may need for an investigation to prevent it being deleted and no longer accessible after 30 days.

We understand that at the time of the last election, there was a ban on political advertising on Twitter. Twitter rules also prohibited the use of the platform for the purposes of manipulating or interfering in elections, including posting or sharing content that may suppress participation or mislead people about when, where or how to participate. There were also rules preventing impersonation and the use of synthetic or manipulated media ('deep fakes'), that deliberately try to make people think they are seeing reality and that causes serious harm. [REDACTED] shared policy updates on the labelling or removal of false or misleading information about how to participate, suppression or intimidation, misleading information about outcomes or false or misleading affiliation. Twitter had information on Twitter's [cause-based advertising policies](#), [the ban on political content](#), and Political Content [FAQs](#). However, these links are now out of date and we would welcome an update on how election advertising is treated. If it is allowed, an outline of what processes advertisers have to go through if any would be helpful.

In 2020, we did use the escalation channel to escalate a concern about a person claiming to have dual voted. We are keen to reconfirm the escalation process we should use for 2023 and to understand whether there have been any changes to the measures that Twitter had in place in 2020.

There have been no law changes regarding the new Zealand election advertising rules for the 2023 general election. The only difference is that there are no referendums this time. The Commission is responsible for responding to complaints about an election advertisement that is in breach of the promoter statement or authorisation requirements or the election day rules. If we get a complaint, we will attempt to liaise with the promoter in the first instance. If we cannot contact them, the person does not respond or does not take remedial action and we are satisfied that there is a breach of the Electoral Act, we will escalate via the escalation process. We would also like to again be able to escalate concerns about any false information being provided about the conduct of the election, (for example voter interference and fraud, offers to buy and sell votes with cash or gifts, statements that advocate or provide instructions or show explicit intent to illegally participate in a voting process, misrepresentation of dates, locations, times, and methods of voting, misrepresentation of who can vote, qualifications for voting, whether a vote will be counted, and what information or materials must be provided in order to vote). As before, we will not otherwise escalate matters related to complaints about false or misleading content online as we do not have the mandate to do so except in the very narrow range of circumstances in section 199A of the Electoral Act. We will also make complainants aware of their ability to complain to the platform themselves if they wish to and we will also provide info on the roles of the other agencies including the Advertising Standards Authority, Broadcasting Standards Authority and Media Council.

Happy to schedule a meeting to discuss if that is useful, otherwise any information you can provide would be appreciated.

Ngā mihi

Kristina

**Kristina Temel** | Manager, Legal and Policy | **Electoral Commission** | Te Kaitiaki Take Kōwhiri

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Phone +64 4 806 3506 | [vote.nz](http://vote.nz) | [elections.nz](http://elections.nz)

[https://echo.election.net.nz/sites/default/files/ele0156\\_728x90\\_eng\\_2.jpg](https://echo.election.net.nz/sites/default/files/ele0156_728x90_eng_2.jpg)



**From:** [REDACTED]  
**To:** [Kristina Temel](#)  
**Cc:** [REDACTED]  
**Subject:** Election material and reporting  
**Date:** Monday, 31 July 2023 5:02:20 pm

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**Electoral Commission Cyber Security Warning:** This email originated from outside of the Commission. Please take extra care when clicking links or opening attachments. When in doubt, contact the IT Service Desk.

Hi Kristina,

We were introduced by [REDACTED] previously and our teams have cooperated with the Electoral Commission in the past.

I'm writing to check regarding any additional materials or updates the company should be aware of ahead of the upcoming General Election.

I'm also writing to make sure the reporting lines for the upcoming election are known and set given NZEC's role. If there is a refresh for how to report or use our forms, and update that would be helpful, especially given the time and changes in the interim across the entities and teams, we can provide that too. If there is a time over the next couple of weeks that would be helpful please let us know.

Thank you.

With best regards,

[REDACTED]

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[REDACTED]

**From:** [Kristina Temel](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED] [Jarrod Baker](#)  
**Subject:** RE: Election material and reporting  
**Date:** Monday, 31 July 2023 7:50:00 pm  
**Attachments:** [image001.png](#)

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Hi [REDACTED],

Thanks for getting in touch.

There have been no law changes regarding the New Zealand election advertising rules for the 2023 general election. The only difference is that there are no referendums this time. The Commission is responsible for responding to complaints about an election advertisement that is in breach of the promoter statement or authorisation requirements or the election day rules. If we get a complaint, we will attempt to liaise with the promoter in the first instance. If we cannot contact them, the person does not respond or does not take remedial action and we are satisfied that there is a breach of the Electoral Act, we will escalate via the escalation process. We would also like to again be able to escalate concerns about any false information being provided about the conduct of the election, (for example voter interference and fraud, offers to buy and sell votes with cash or gifts, statements that advocate or provide instructions or show explicit intent to illegally participate in a voting process, misrepresentation of dates, locations, times, and methods of voting, misrepresentation of who can vote, qualifications for voting, whether a vote will be counted, and what information or materials must be provided in order to vote). As before, we will not otherwise escalate matters related to complaints about false or misleading content online as we do not have the mandate to do so except in the very narrow range of circumstances in section 199A of the Electoral Act. We will also make complainants aware of their ability to complain to the platform themselves if they wish to and we will also provide info on the roles of the other agencies including the Advertising Standards Authority, Broadcasting Standards Authority and Media Council.

In 2020 our dedicated point for escalations was [REDACTED], but we understand that [REDACTED] is no longer in that role.

It would be good to confirm that you are our contact for any escalations. [REDACTED] encouraged us to always notify [REDACTED] as well as using our escalation via the Twitter's "Government Partner Support Portal" - an escalated path to file a report content. Tickets filed through enrolled accounts via the Support Portal automatically got expedited into the ticketing system. The Portal also had several reporting options that were not available on the public support pages including election interference, request of inactive usernames, and unusual spike in followers, etc. A user name and dedicated e-mail (the legal and policy team email) was set up so that we could access the reporting pathway. We could escalate using the Commission's Twitter account - [REDACTED] - and our Legal & Policy email - [REDACTED] to report content that violated local law or that breached Twitter's election policy. We could also use the portal to request preservation of any content that we may need for an investigation to prevent it being deleted and no longer accessible after 30 days. It would be great if you can confirm the details of the Government Partner Support Portal that we can use for 2023.

We understand that at the time of the last election, there was a ban on political advertising on Twitter. Twitter rules also prohibited the use of the platform for the purposes of manipulating or interfering in elections, including posting or sharing content that may suppress participation or mislead people about when, where or how to participate. There were also rules preventing impersonation and the use of synthetic or manipulated media ('deep fakes'), that deliberately try to make people think they are seeing reality and that causes serious harm. [REDACTED] shared policy updates on the labelling or removal of false or misleading information about how to participate, suppression or intimidation, misleading information about outcomes or false or misleading affiliation. Twitter had information on Twitter's [cause-based advertising policies](#), [the ban on political content](#), and Political Content [FAQs](#). However, these links are now out of date and we would welcome an update on how election advertising is treated. If it is allowed, an outline of what processes advertisers have to go through if any would be helpful.

In 2020, we did use the escalation channel to escalate one concern about a person claiming to have dual voted. We are keen to reconfirm the escalation process we should use for 2023 and to understand whether there have been any changes to the measures that Twitter has in place.

Happy to schedule a meeting to discuss if that is useful, otherwise any information you can provide would be appreciated.

Kind regards

Kristina Temel

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