

Christina Rees MP and Sir Roger Gale MP  
House of Commons  
London  
SW1A 0AA

Wednesday 7 June 2022

Dear Christina Rees MP and Sir Roger Gale MP,

We have seen the open letter sent to your Committee by Big Brother Watch, ARTICLE 19 Open Rights Group, Index on Censorship and Global Partners Digital.

As you know the bulk of my oral evidence on behalf of Full Fact was about freedom of expression. We respect these organisations and we hope the Committee will engage with their concerns. However, with respect, we believe their letter underplays the risk to freedom of expression from the status quo.

They say: "The legislation enlists social media companies to act as private online police who will have to adjudicate on the legality of online content and restrict what they deem illegal." These sorts of decisions are already happening.

They also say: "The Bill also creates a new category of speech where the Government deems such expression to be "harmful". Under the threat of penalties, the legislation will cause online intermediaries to censor swathes of legal online discussion including in matters of general discourse and public policy." Platforms already censor swathes of legal online discussion.

As I said in evidence to the Committee, "we have normalised a level of censorship that was unimaginable in previous generations." It is up to the Committee to use the Bill to challenge and change this.

We called on the Committee to amend the Bill to tackle three main threats to freedom of expression:

1. From internet companies, by legislating to require free speech based approaches to content moderation to be preferred to the current large scale content restrictions

2. From algorithms overreaching, by recognizing that content moderation is safety critical and legislating for independent public third party testing just as we have for other safety critical industries to from car manufacturing to water supply
3. From our own government, by legislating to stop them pressuring internet companies to restrict certain kinds of content online as they do now

These threats exist with or without the Bill as it stands. Withdrawing the Bill will do nothing to defend freedom of expression. The Committee has the power to amend it to protect freedom of expression.

We are here to work with you to do that, and our report *Tackling Online Misinformation in an Open Society*<sup>1</sup> sets out more.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Will Moy", with a long horizontal line extending to the right.

Will Moy  
Chief Executive, Full Fact

Cc

Mark Johnson - Big Brother Watch  
Barbora Bukovská - ARTICLE 19  
Jim Killock - Open Rights Group  
Ruth Smeeth - Index on Censorship  
Richard Wingfield - Global Partners Digital

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<sup>1</sup> <https://fullfact.org/about/policy/reports/full-fact-report-2022/>