**Full Fact response to *Our Digital Future*: Labour Party Consultation**

**Summary**

* As fact checkers, Full Fact wants to reduce the harm done by online content that can disrupt democracy or put people’s lives at risk.

*Online harms*

* Measures are needed to tackle the harms caused by bad information, but these measures must be both proportionate and protect freedom of speech.
* The government’s plans for regulating the internet companies need much more detail on the functions of Ofcom as the regulator, the powers available and the requirements on the companies to fully make a judgement on how effective they might be. The government should publish the full response to the Online Harms consultation as soon as possible and introduce legislation in this parliamentary session.
* While the companies should be applauded for taking action against health misinformation this year, we have yet to see sufficient transparency from them. They need to do more to share information on the problems on their platforms, and work collaboratively with others tackling misinformation. This should be a key principle of the Online Harms legislative framework.

*Building a foundation for the future*

* The Covid-19 pandemic has seen new impetus to create better information sharing which could be a foundation for maintaining the supply of reliable information in crises. Now is the opportunity to take a carefully considered and cohesive approach to how we want to tackle these problems in the future. To achieve this, Full Fact is over the next few months convening experts to create [a new model for approaching information crises](https://fullfact.org/blog/2020/sep/building-model-collaborating-combat-misinformation-crises/).

*Digital innovation*

* Civil society must be involved in the UK’s efforts to be at the forefront of digital innovation. Full Fact is at the leading edge of using AI in the fight against bad information, through our work developing automated technology to support fact checkers. We know that digital innovation can support bringing good information and accountability to citizens and communities. Charities have an important role to play in the development of new technologies and should be included as the conversation develops.

*Personal data*

* The need for robust and timely data has been made clear by the coronavirus pandemic, which has exposed the problems caused when there are fragmented or partial data sources. For this reason, the UK must invest in data infrastructure, skills and horizon scanning.
* There is also a need for a renewed focus on data governance, transparency and accountability - without which it will be impossible to earn the public’s trust. Done well, the collection of good data can improve policy responses, public services, provide cost savings and benefits, and help build and maintain public trust.

*Technology and our public services*

* Transformation of public services must come with a focus on ethical frameworks on governance, transparency and accountability. This can only be effectively achieved through direct consultation with the public. New systems should be built with data that is fit for purpose, allowing the right information to be gathered from the outset.

*Digital inclusion*

* A greater focus is needed on ensuring that no-one is excluded from the digital revolution, but this must go beyond access. Those who are newly online must be able to find good, accessible information to fully participate in the social and economic life of the country. Full Fact, along with many other organisations, has invested in creating resources that seek to improve audiences’ ability to think more critically about the information they come across. The UK government’s forthcoming media literacy strategy should encourage coordination and evaluation across organisations, as well as provide sufficient investment in education across all ages.

**About Full Fact**

1. Full Fact fights bad information. We’re a team of independent fact checkers, technologists, researchers, and policy specialists who find, expose and counter the harm it does.
2. Bad information damages public debate, risks public health, and erodes public trust. So we tackle it in four ways. We check claims made by politicians, public institutions, in the media and online and ask people to correct the record where possible to reduce the spread of specific claims. We campaign for systems changes to help make bad information rarer and less harmful, and we advocate for higher standards.
3. Full Fact is a UK partner in Facebook’s Third-Party Fact-Checking programme. The programme gives us access to a queue of posts being shared in the UK which have been flagged as potentially false by Facebook and Instagram or its users which we can fact check and attach ratings to. Our latest transparency report on the partnership can be found on our website[[1]](#footnote-1). On 29 September 2020 Full Fact launched a new three month pilot partnership with WhatsApp that allows the public to send in claims they have seen being shared. Full Fact’s fact checks have also been integrated into Google search since 2017, and will be a source for the new fact-check boxes on YouTube[[2]](#footnote-2).
4. Full Fact is a registered charity. We're funded by individual donations, charitable trusts, and by other funders. We receive funding from both Facebook and Google. Details of our funding can be found on our website[[3]](#footnote-3).

Harmful online content

**Our experience during the pandemic**

1. Full Fact has been checking claims made in public debate for over a decade. However, like everyone else, we have been in somewhat uncharted territory this year. That does not mean that all the misinformation we are seeing is new or surprising. Vaccine misinformation, 5G conspiracies and bad information about treatments or cures for illnesses have been an enduring part of public debate for a long time. But the scale, global reach and unrelenting pace of bad information related to the coronavirus pandemic has presented a fresh challenge for fact checkers, internet companies and governments alike.
2. Since the outbreak of Covid-19, Full Fact has published hundreds of fact checks and articles providing the context and evidence behind claims about the virus, the lockdown, and the government’s response to the crisis. Full Fact monitors social media, including Facebook and Instagram (through our partnership as part of their Third-Party Fact-Checking programme[[4]](#footnote-4)), Twitter, and what the public shares with us from WhatsApp and YouTube. We look for claims in print and online newspapers, and in broadcast media including news programmes on TV and radio. We also check high profile statements from public figures, including parliamentarians.
3. We have seen a huge amount of interest and concern from the public about information and data about the pandemic. We launched an online form[[5]](#footnote-5) on 16 March 2020 for people to submit queries on what they had seen in the public domain that they were unsure about or did not seem quite right to them. In response we received thousands of questions, claims or concerns about misinformation, and we continue to receive a large number to this day. These have included questions about social distancing and lockdown rules, the risk of medical conditions and treatments, and how the virus spreads[[6]](#footnote-6). We also get sent many posts and claims via email and on social media that we are asked to check.
4. This coverage, as well as our varied fact checking experience, has given Full Fact a unique viewpoint from which to understand the misinformation landscape during the pandemic.

**Tackling misinformation**

1. We want to reduce the harm done by information that can disrupt democracy or put people’s lives at risk. Misinformation, both offline and online, poses genuine harms that need to be addressed, including by lawmakers, internet companies and the public.
2. But at the same time there remains legitimate concerns about the harms that a disproportionate response to misinformation could have on our society. It is crucial to remember that freedom of expression isn’t limited to accurate statements. We must not conflate misinformation with ordinary people getting things wrong on the internet. The latter is not a harm in and of itself, and certainly not one that merits a policy response. Interactions on internet platforms are already mired with difficulties. We advocate for a measured, proportionate response based on clearly defined harms and an understanding that everyone makes mistakes.
3. The internet companies have taken significant additional steps to provide accurate information to their users since the outbreak of coronavirus. This should be applauded. But there is also much more that could be done to provide the best information to users and it is our view that regulation is necessary to ensure this. It should not be left to private companies to take decisions that impact people’s human rights and our democracy.
4. Full Fact has called for the policy response to misinformation and disinformation to be carried out through open transparent democratic processes. It is our view that the time has come for legislative measures to be brought before Parliament.
5. However, with the publication of the full response to the Online Harms consultation now a year late, and therefore with insufficient information on the detail of how the proposed powers of the regulator will function, it is difficult to make an assessment as to whether the Online Harms proposals would actually have had any material impact on tackling Covid-19 related misinformation. There has been a disappointing lack of detail from the government specifically on action to tackle harmful false information. Full Fact therefore recommends that the government sets out its thinking and plans on disinformation and misinformation in greater detail, perhaps in a disinformation strategy. We believe this would help the government, other actors in this field, parliament, and the public have a clearer understanding of the problem and proposals to address it without unduly impacting freedom of speech.
6. It is also our view that the role of the proposed regulator is too broad. The White Paper sets out excessively strong and unrealistic expectations of what role the regulator can play. The risks associated with broad powers to interfere in free speech have yet to be adequately addressed. The government must be pressed to give further detail and sufficient opportunity for parliamentary scrutiny.
7. In the interim response to the Online Harms consultation published in February 2020, the government set out its proposal for a duty of care. We believe that if internet companies are left to determine what content and behaviour is acceptable on their platforms then it is unlikely that the duty of care will cause meaningful change in tackling the harms caused by misinformation. The rules around what is acceptable behaviour and content should be set through open democratic transparent processes in the UK, not through the commercial decisions of US and other internet companies. The government should also provide further detail on which internet companies it expects will fall within scope.

*Improve transparency*

1. It is our view that increased transparency is the first crucial step in ensuring that measures taken against misinformation are proportionate and do not impact freedom of speech. This principle should apply to all organisations who seek to identify and tackle misinformation.
2. The internet companies clearly have a role to play in reducing the spread of bad information. They are acutely aware of their responsibility to protect freedom of speech, and are often wisely cautious of using the enforcement powers that they have. But that means it is even more important for experts outside of the companies to be able to make independent assessments of when these powers are used.
3. None of the internet companies are sufficiently transparent on the action they have taken to prevent Covid-19 misinformation. We have yet to see satisfactory information on the amount of content that has harmful consequences and breaks the terms and conditions set by the companies, the amount of such content that has had action taken against it, or what the impact of these measures has been. When information is provided, this is often at a global level and with little detail or examples. This is clearly insufficient.
4. We are encouraged to see the government plans to introduce mandatory transparency reports as part of the Online Harms legislative agenda. However the current plans to only publish transparency reports annually will prevent regulation from being effective. In the fast-moving online world, the regulator will have limited impact if dealing with data from months ago, or only data that internet companies choose to provide. This has been particularly evident during Covid-19, where misinformation has spread at pace.
5. We note that transparency should also be a principle that the government champions. DCMS have stated that they are working closely with the internet companies[[7]](#footnote-7), including sharing information on content that breaches the terms and conditions set by the companies. We are disappointed that DCMS have not provided more information about what content has been identified, how this has been identified and what subsequent action has been taken by the companies.

*Encourage cross sector collaboration*

1. It is also critical that efforts to tackle bad information are collaborative. There are a number of different groups including within the government, the internet companies, academia, fact checkers and other civil society organisations who are seeking to minimise the harm caused by bad information. These organisations should not be operating in silos.
2. The internet companies should also have a specific responsibility to ensure that those who are investigating misinformation have the best information available. Facebook remains the only company that has a paying relationship with fact checkers through the Third Party Fact Checking programme, of which Full Fact is one of two fact checkers in the UK. Where companies do not want to partner with fact checkers, there would still be benefit in sharing regular insights on claims that are being widely shared. While some information can be gleaned from Google Trends or Twitter highlights, the companies themselves have the best insights into content going viral.

*Invest in research*

1. The decision to introduce regulation should be evidence based. While there is a great deal of anecdotal evidence, there is less high-quality research that can give us the information needed to truly understand the harms caused by bad information. Greater investment in long term research is necessary to ensure that responses to misinformation are proportionate and effective.

**Building a foundation for good, reliable information**

1. The response by organisations to the slew of bad information during the coronavirus pandemic was developed under intense time pressure and in an atmosphere of anxiety and confusion, rapidly changing information, and the practical challenges brought about by the pandemic. But these changes are forming what could be a foundation for maintaining the supply of reliable information around future elections and unexpected events like terror attacks and natural disasters – events triggering information crises that require a greater or different response than during ‘business as usual’ times.
2. There is now an opportunity to greater consider and plan for more cohesive and collaborative responses, so that we are all on the front foot when the next incident affecting our information environment hits. That is why on 22 September 2020 Full Fact announced that, together with experts from different misinformation-related backgrounds, we will be creating a new model for approaching information crises[[8]](#footnote-8). We will set globally-relevant principles for preventing and mitigating the harm caused by bad information. This will give clear direction when the next crisis occurs. With the support of Facebook, Full Fact will release a first version of the agreed approach with contributions from a range of experts at the end of 2020.
3. More information about the project to build a model for collaborating to combat misinformation crises can be found on our website at: <https://fullfact.org/blog/2020/sep/building-model-collaborating-combat-misinformation-crises/>.

Digital innovation

1. If the UK is to be at the forefront of digital innovation and to co-lead the Fourth Industrial Revolution, it must prioritise the involvement of civil society in these efforts at UK, regional and nations levels as well as in its international leadership.

1. Digital innovation is not the exclusive domain of tech firms, business and social enterprise. Many UK charities are advancing technology for social outcomes. For example, Full Fact is at the leading edge of using AI in the fight against bad information online. We are developing automated technology to help increase the speed, scale and impact of fact checking. We also provide expertise to global fora on or related to the Fourth Industrial Revolution. For example, through the World Economic Forum (WEF) ‘Partnering with Civil Society in the Fourth Industrial Revolution (4IR) initiative, a multi-stakeholder platform for driving stakeholder responsibility for social justice in the 4IR through collective action and systems change interventions with civil society on the design, deployment, use and governance of technology.
2. Charities have an important role to play in the social and commercial development of technology, and an ecosystem of support must include non-profit and for-profit entities with government playing a role in providing an enabling environment that this be so.
3. Full Fact is one of 20 global winners out of over 2000 entrants to the Global AI for Social Good Impact Challenge, and one of very few non-profits to have gone through Google's own accelerator programme for its investees. We play on a level with serious private AI companies, but for the public benefit. Even at this level, as a charity doing AI our work is made more challenging due to the nature of the present investment market and the limited ways capital can be accessed.
4. The dominant model of tech innovation is presently US VC funding which has consequences that range from a brain drain of people and firms to the US (with loss of tax receipt in the UK) to the narrow range of interests of VCs - there is more of a market for making calendars easier, than for trying to do what is socially useful, profitable, but less high-growth/big-market – for example, making disabled people's lives easier.
5. What public benefit innovation we do see is often a side effect of a commercial tech – for example, AI-based speech to text benefits people with hearing loss – but more specialised technology that would bring significant social benefit is not investable in a VC model, so is not realised. Sustained investment matters to meet social needs and supporting alternative types of financing for cutting edge technology development in both the private sector, academia, and the charity sector could bring the best economic and social benefits.
6. In addition to financing, the government is best placed to provide another much-needed resource: data. This would unlock digital innovation for a wider range of players simply by levelling the playing field in terms of access to data, and particularly large corpuses of data.

Personal data and our online lives

1. Good information allows us to answer the most pressing of society’s questions; by quantifying a problem, the government is in a better position to tackle it. The public, in turn, will benefit not just from improved public services that they can place more confidence in (see following section), but also from having access to accurate information when making decisions in their own lives.
2. The coronavirus pandemic has shown that robust and timely data is crucial to support decision making, and it has helped to coordinate support for the people that needed it.[[9]](#footnote-9) But the pandemic has also exposed fragmented or partial data sources - for instance in the social care system[[10]](#footnote-10) - and problems with data sharing within and between branches of government. Relying on poorer quality information, or simply not having it, risks costly delays in action.
3. The UK must invest in data infrastructure, skills and horizon-scanning, so that government can not just be better able to anticipate, react and recover from crisis events, but be better able to understand its own operations, the effectiveness of its policies, the quality of public services and key facts about the country’s population and the economy. This knowledge can be used to inform spending decisions, ensuring this and future governments achieve the best value for money from investment across all areas of expenditure, while also improving social and economic outcomes.
4. In addition to increasing spending commitments in infrastructure, skills and tools, it is essential that there is a renewed focus on data governance, transparency and accountability. Without this it will be impossible to earn the public’s trust, which is essential for a properly functioning democracy.
5. Surveys have found that people are more willing to accept the use of their data if they believe it is for the public good[[11]](#footnote-11), and are more willing to trust organisations when they are transparent on how they use data.[[12]](#footnote-12) Public awareness will be crucial in gaining the public’s trust, and there must be a focus on preventing the introduction of any perverse incentives that might encourage less transparency.[[13]](#footnote-13) As Full Fact and others said in an open letter last year:

*“Debate and discussion about the appropriate extent of using citizens' data within government needs to be had in public, with the public. Great public benefit can come from more joined-up use of data in government and between government and other sectors. But this will only be possible, sustainable, secure and ethical with appropriate safeguards, transparency, mitigation of risks and public support.”[[14]](#footnote-14)*

1. Done well, there is an opportunity to collect the right data that feeds into a richer set of evidence to inform and evaluate policy decisions over both the short and long-term. This should improve policy responses over time, improve public services, provide cost savings and benefits, and help build and maintain public trust.

Technology and our public services

1. Digital technology can make public services better and more available to everyone. In the last few months alone there has been significant innovation in using technology to deliver public services, from trials being held via video link, to the new NHS app that allows users to book a test online. There are many advantages to this innovation. Yet, if citizens are to have more of a say in decision-making, this is not only a matter of technology, it is also a question of the quality of information available, whether on a local and/or national dimension.
2. Better data and information for the public good, both at a local and a national level, means using technology to help people across the country hold national, regional and local government to account, give them confidence that they are using trustworthy services (and can help shape them) and allow citizens to make decisions that can improve their lives.
3. In the months to come it will be important to reflect on the impact of increased technology use to deliver public services. Again, transformation should include a focus on ethical frameworks of governance, transparency and accountability, and this must happen in direct consultation with the public.
4. It is also essential that any new technologies or systems are built to last, especially noting the likelihood that we will see more created to deal with Brexit and the pandemic. For too long, governments have neglected investment in the foundations required to take best advantage of technology and data.
5. This should include ensuring that new systems are built with data that is fit for purpose, recorded in standardised formats on modern, future-proof systems and held in a condition that means it is findable, accessible, interoperable and reusable. Together, this will allow the right data, statistics and information to be gathered from the outset, which will provide the evidence needed to better understand our society, evaluate interventions and inform policymaking.

Digital inclusion

1. Ensuring that no-one is excluded from the digital revolution goes beyond enabling access in many ways. As Sir Tim Berners-Lee stated at the 2020 United Nations General Assembly:

*“The web is often not safe or empowering. So as we widen access we must also deliver a better web. All of us here are digital citizens and all have a duty to create the web we want. That means behaving well and building strong online communities — but it also means fighting against online abuse, pushing back on misinformation and disinformation, and campaigning for the rights of everyone to use the web.”*

1. The ability of those that do not yet have internet access to participate fully in the social and economic life of the country when they are finally helped online is also impeded by the quality and usefulness of the information they are able to find upon doing so. Access to the internet must also provide citizens with what they need to make decisions about their own lives and their contribution to society as active citizens. Tackling misinformation is part of achieving meaningful digital inclusion, towards a ‘better web’ as Berners-Lee describes it. This requires government and other actors to provide good information in accessible ways as well as supporting efforts to minimise bad information.
2. All individuals have a responsibility to take their own steps to prevent bad information being shared. Fact checking is just one method Full Fact uses to address the problems caused by bad information; our work is also aimed at educating the public so everyone is able to spot, and challenge, potentially misleading claims. For example, we have published a toolkit[[15]](#footnote-15) aimed at improving online literacy, including tips on how to fact check claims about Covid-19[[16]](#footnote-16).
3. Full Fact is not alone in these efforts: there are various media and information literacy programmes that seek to improve audiences’ ability to think more critically about the information they come across. There is no one-size-fits-all approach that we can say works universally around the world, but media literacy appears to be the preferred approach internationally. A meta analysis of 51 interventions has found that these initiatives do increase knowledge, criticism and awareness of the influence of the media.[[17]](#footnote-17)
4. The UK government is currently developing a media literacy strategy that aims to ensure a coordinated approach for children, young people and adults that supports them in thinking critically about what they see online and how they can report harmful content. We support efforts to coordinate this approach, given that there are a wide variety of programmes in existence already, and to invest in rigorous independent evaluation of media literacy programmes. There must be ongoing and sufficient investment in education across all ages that enables individuals to understand that responsibility and take action for themselves and others.
1. https://fullfact.org/ [↑](#footnote-ref-1)
2. <https://www.bbc.co.uk/newsround/54269085> [↑](#footnote-ref-2)
3. <https://fullfact.org/about/funding/> [↑](#footnote-ref-3)
4. <https://fullfact.org/blog/2019/jan/full-fact-start-checking-facebook-content-third-party-factchecking-initiative-reaches-uk/> [↑](#footnote-ref-4)
5. <https://fullfact.org/health/ask-newcoronavirus/> [↑](#footnote-ref-5)
6. <https://fullfact.org/blog/2020/apr/public-concerns-coronavirus/> [↑](#footnote-ref-6)
7. https://questions-statements.parliament.uk/written-questions/detail/2020-03-25/hl2919 [↑](#footnote-ref-7)
8. <https://fullfact.org/blog/2020/sep/building-model-collaborating-combat-misinformation-crises/> [↑](#footnote-ref-8)
9. <https://committees.parliament.uk/publications/2024/documents/19531/default/> [↑](#footnote-ref-9)
10. <https://www.bmj.com/content/369/bmj.m2463> [↑](#footnote-ref-10)
11. For example, on patient data: [https://understandingpatientdata.org.uk/sites/default/files/2018-08/Public%20attitudes%20key%20themes\_0.pdf#page=10](https://understandingpatientdata.org.uk/sites/default/files/2018-08/Public%2520attitudes%2520key%2520themes_0.pdf%23page%3D10) [↑](#footnote-ref-11)
12. <https://theodi.org/article/nearly-9-in-10-people-think-its-important-that-organisations-use-personal-data-ethically/> [↑](#footnote-ref-12)
13. [https://www.gov.uk/government/publications/cdei-publishes-its-first-report-on-public-sector-data-sharing/addressing-trust-in-public-sector-data-use#tenuous-trust--data-sharing](https://www.gov.uk/government/publications/cdei-publishes-its-first-report-on-public-sector-data-sharing/addressing-trust-in-public-sector-data-use%23tenuous-trust--data-sharing) [↑](#footnote-ref-13)
14. <https://fullfact.org/media/uploads/national_data_strategy_-_joint_open_letter_to_sos.pdf> [↑](#footnote-ref-14)
15. <https://fullfact.org/toolkit/> [↑](#footnote-ref-15)
16. https://fullfact.org/health/how-to-fact-check-coronavirus/ [↑](#footnote-ref-16)
17. <https://fullfact.org/media/uploads/media-information-literacy-lessons.pdf> [↑](#footnote-ref-17)