### **Full Fact evidence**: Consultation on Digital Services Act

### Who we are

* 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.
* Bad information can damage public debate, pose risks to public health and erode public trust. We tackle it in four ways. We check claims made by UK 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.
* 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 or its users which we can fact check and attach ratings to. Our transparency report on the partnership is on our website[[1]](#footnote-1). Full Fact’s fact checks have been integrated into Google search since 2017.
* Full Fact is a registered charity in the UK. 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[[2]](#footnote-2).

### Bad information online

1. Full Fact is no stranger to misinformation. We have been checking claims made in the UK public debate for over a decade. Our team monitors social media, including Facebook and Instagram - through our partnership as part of their Third Party Fact Checking programme[[3]](#footnote-3) - Twitter, and what the public shares with us from WhatsApp and YouTube. We look for claims in UK english language 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 UK parliamentarians. This coverage, as well as our varied fact checking experience, has given Full Fact a unique viewpoint from which to understand the misinformation landscape, particularly online.
2. As fact checkers, we want to reduce the spread of information that can disrupt democracy or put people’s lives at risk. Misinformation, both offline and online, does pose genuine harms that need to be addressed, including by lawmakers, social media companies or the public.
3. But at the same time there remains legitimate concerns about the harms that a disproportionate response to misinformation could have on 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, and we advocate for a measured response and an understanding that everyone makes mistakes.
4. While there is a great deal of anecdotal evidence, there is less high-quality research, especially in the EU, 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.

### Covid-19 infodemic

1. The scale, global reach and unrelenting pace of bad information related to the Covid-19 outbreak has presented a fresh challenge. That does not mean that all the misinformation we are seeing is new or surprising. Vaccine misinformation, 5G conspiracies and bad information about treatments 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 outbreak has presented a fresh challenge for fact checkers, internet companies and governments alike.
2. There are multiple examples of content that has gone viral quickly, often in multiple countries. In April 2020 Full Fact along with Agence France-Presse in France, Correctiv in Germany, Pagella Politica/Facta in Italy and Maldita.es in Spain, published Infodemic: Covid-19 in Europe[[4]](#footnote-4). This collaborative report, supported by the Google News Initiative, reported the common themes seen in the articles published by each independent organisation in March and April 2020. In total 645 articles relating to Covid-19 (and the social and political issues around the outbreak) were published by the five organisations. The most common themes included:

* Cures and remedies
* 5G misinformation
* That the virus was man made
* Vaccine misinformation
* Comparisons between coronavirus and the flu

1. As the five different countries experienced their outbreaks at roughly the same time, information in one country would often track what was happening in another. Particularly notable was that during the month of March, as Italy experienced the peak of its outbreak ahead of the other countries, false and unverified information about what was happening in Italy was common across Germany, the UK, Spain and France.
2. Recent Full Fact research, in collaboration with AfricaCheck in Africa and Chequado in Argentina[[5]](#footnote-5), highlighted that the best way to fight health misinformation is to focus on prevention. Accurate information can stop harmful narratives from gaining exposure. Collaboration between governments and organisations to share information on the misinformation they are identifying would be beneficial in preventing the spread to other areas or languages.

### Online platforms responsibilities

1. 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. The internet companies should recognise their role in serving information to users, and the need to do so responsibly. We believe there are three areas that the internet companies should focus on:
   1. Supplying good information;
   2. Improving transparency;
   3. Working with experts.

Supplying good information

1. It is critical that users have access to high quality information, particularly when searching for further detail on Covid-19. The internet companies have a responsibility to ensure that good information is served first. We have been encouraged to see all the companies take steps to implement this, such as providing easily accessible links to official national sources prominently on their platforms. This should continue beyond the coronavirus crisis, and we are encouraged by the increased information being provided ahead of the US election.
2. It will also be critical to look ahead for the moments of vulnerability that are likely to occur in the future. We saw that the policy changes made by various internet companies to remove content related to 5G being a cause of Covid-19 only happened after attempted arson in the UK. Anti-vaccination claims are a trend that we remain concerned about. It is likely that if a successful vaccine is developed that false claims and conspiracy theories will be shared. The Commission should facilitate collaboration to ensure that the most accurate information is available if and when such a vaccine is developed. By identifying areas where harm could be caused, such as on vaccines, we can all take action to minimise the risk.

Improving transparency

1. It is also critical that users have confidence that guidelines or terms and conditions set by the internet companies will be enforced. This can only be achieved through transparency on the processes and how these are scaled up when needed. The internet companies 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.
2. None of the internet companies are sufficiently transparent on the action they have taken to prevent Covid-19 misinformation. Facebook, Instagram, Twitter and YouTube have all published information on how their guidelines are enforced, including detail on their moderating system (e.g. mix of AI and human moderators) but have provided little to no detail on the extent to which these have been applied. To date, Twitter is the only company which has provided metrics on the number of accounts challenged and removed. Even that has limited use as it is only at a global level with no breakdown on the numbers of accounts challenged per country, or detail on how or why accounts were flagged. We also need more information on how the AI systems which are being relied upon to flag content are being trained, and what the consequences are when it thinks it has found something - particularly when it is making judgements on what is true or false.
3. While the Disinformation Action Plan and Code of Practice was an important step in encouraging the internet companies to provide greater information transparently, with no consistent format the companies “did not provide the level of detail necessary to allow for independent and accurate assessments”[[6]](#footnote-6). This will be important in understanding the scale of the problem, the impact of measures taken by the companies and being able to compare between companies.

Working with experts

1. Finally, the internet companies should 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. None of the other internet companies have to date set up similar partnerships with fact checkers in the EU. 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. Sharing this with fact checkers would enable us to make decisions on the most impactful claims to check.
2. Any regulation that is taken forward to address these issues should be proportional. It should focus on transparency, collaboration and provide greater support for those working to ensure accurate information is available. This must be done through an open, democratic process to inspire confidence in the measures taken.

1. <https://fullfact.org/media/uploads/tpfc-q1q2-2019.pdf> [↑](#footnote-ref-1)
2. <https://fullfact.org/about/funding/> [↑](#footnote-ref-2)
3. <https://fullfact.org/blog/2019/jan/full-fact-start-checking-facebook-content-third-party-factchecking-initiative-reaches-uk/> [↑](#footnote-ref-3)
4. <https://covidinfodemiceurope.com/?mc_cid=53a5b68bb7&mc_eid=5ef2c3a7c6> [↑](#footnote-ref-4)
5. <https://fullfact.org/blog/2020/may/health-misinformation/> [↑](#footnote-ref-5)
6. <https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_19_2570> [↑](#footnote-ref-6)