Dear Secretary of State,

We write to you as a coalition of 16 organisations regarding the Online Safety Bill. For years in the making, the government has stated its aim is to make the UK the safest place in the world to go online. As presented to MPs in its current form, the Bill is on the verge of being unworkable. It focuses too heavily on trying to regulate what individual people can say online, rather than getting to the heart of the problem and addressing tech companies’ systems and algorithms that promote and amplify harmful content. As a result, it risks being the worst of both worlds: failing to keep us safe, while also threatening free speech.

There are straightforward ways in which the Bill can be strengthened. We are calling for the government to amend the Bill when it goes to the House of Lords, making changes in the following areas to tackle disinformation and abuse, end dangerous loopholes, boost transparency and ensure effective regulation.

**Tackle disinformation and abuse online**

- **Strengthen freedom of expression and rights protections.** The Bill must be amended to include reference to rights as defined in the ECHR, include rights protections in its online safety objectives, and require more extensive rights impact assessments by platforms and the regulator.

- **Protect against harmful misinformation and disinformation.** The Bill must be amended to strengthen the mitigation measure requirements for false or misleading content that poses risk of serious harm at scale or the public will be left vulnerable to its harms.

- **Protect people from marginalised backgrounds.** While the Bill has a stated aim of protecting such groups, it falls seriously short. It must be amended to account for the intersectional nature of much abuse, to adopt the violence against women and girls, hate crime and children's codes of practice and to add the Equality Act on the face of the Bill.
End dangerous loopholes

- **Close serious online harm loopholes.** Extensive research from around the world shows that harmful forms of media content, political speech and ads cause the greatest harm online. These exemptions and exceptions should be scrapped and paid ads should be brought into scope.

Boost transparency and ensure regulation is future-proof

- **Expand transparency requirements.** The Bill must be amended to include greater transparency requirements and guarantee access to data for verified independent researchers and academics.

- **Clarify the way platforms are defined.** At present, the Bill categorises companies based on their size and functionality. This must be amended to categorise companies based on the risk they pose to online safety, otherwise small platforms that host hate, suicide and self-harm material, and disinformation will slip through the cracks.
The Rt Hon Nadine Dorries MP  
Secretary of State for Digital, Culture, Media and Sport
Department for Digital Culture Media and Sport

- **Standardise duties and risk assessments.** It is right that tech companies complete risk assessments and comply with specific duties, but that only works if they are given mandatory and binding minimum standards to meet and then act on. The Bill must be amended to ensure this is the case.

- **Preserve regulatory independence.** For the public to have faith in the regime, the regulator must be truly independent of government or industry. The Bill must be amended to rein in the Secretary of State’s powers and limit these to providing strategic direction only. This will enable the regulator to work without fear of partisan influence, in line with other regulatory regimes.

Taken together, these would make the Bill simpler, more effective and easier to enforce. They would also put the onus on tech giants to stop harmful content going viral or being promoted to vulnerable children, rather than policing what we say. As the Bill makes its way through parliament, this is the last chance to bake in protections that work.

We are ready and willing to work with the government, MPs, Peers and other interested parties on amendments that would strengthen the Bill and allow us to support the legislation as it makes its way through Parliament. Please do not hesitate to contact us.
The Rt Hon Nadine Dorries MP
Secretary of State for Digital, Culture, Media and Sport
Department for Digital Culture Media and Sport

July 2022

With best wishes,

Kyle Taylor, Director, Fair Vote UK
Tom Brake, Director, Unlock Democracy
Sasha Havlicek, CEO, Institute for Strategic Dialogue (ISD)
Nathan Sparkes, CEO, Hacked Off
Nick Lowles, CEO, HOPE not hate
Mark Kieran, CEO, Open Britain
Mat Ilic, Chief Development Officer, Catch22
Nick Martlew, Executive Director, 5Rights Foundation
Eva Pascoe, Chairman, Cybersalon.org
Hera Hussain, CEO, Chayn
Helen Pankhurst, Convenor, Centenary Action Group
Eva Okunbor, acting CEO, Glitch
Poppy Wood, Policy Lead, Reset
Delphine Halgand-Mishra, Executive Director, The Signals Network
Lydia Prieg, Head of Economics, New Economics Foundation
Jamie Wareham, Director, QueerAF
Ellen Judson, Head of CASM