

The Rt Hon Nadine Dorries MP

Secretary of State for Digital, Culture, Media and Sport

Department for Digital Culture Media and Sport

July 2022

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.



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- **Ensure any user verification duty is effective, privacy-respecting and accessible.** While anonymous abuse is a legitimate concern online, it is essential that measures to address this concern adhere to strong minimum standards, including for privacy, and that the ability for people to be anonymous online is protected.
- **Strengthen child safety provisions.** The Bill must be amended to ensure that all platforms likely to be accessed by children are both in scope and are required to meet Codes of Practice on Child Safety with binding minimum standards. This will mean children are adequately protected and that their rights to participate freely online are upheld.

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.



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- **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.



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With best wishes,

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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*

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Delphine Halgand-Mishra, *Executive Director, The Signals Network*

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Jamie Wareham, *Director, QueerAF*

Ellen Judson, *Head of CASM*

