SENSE about SCIENCE
Because evidence matters

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Dear ✂,

Online safety regulation call for evidence

This submission is in addition to roundtable contributions on 1 March 2023.

In seeking to protect children we urge Ofcom to acknowledge that harmful content can appear anywhere: for example, the most damaging assault on a vaccination programme in the UK resulted from claims published in a reputable journal and promoted by a sympathetic mainstream media[1]. Regulation should also consider the available evidence base on if and how misinformation generates unhealthy beliefs, or reenforces them, and if and when such beliefs result in negative behaviours[2].

The solution to misinformation should never be to restrict access to information, or put limits on opportunities for good questioning. Moderation of content on user-to-user platforms is important, but must not be reduced to crude censorship by opaque algorithms. We have already seen the harmful removal or demotion of good quality information and important discussions of difficult issues or conflicting evidence as a result of this: for example, Facebook tagging a credible BMJ article as 'partly false' because 'the authors did not express unreserved support for vaccination", or Instagram 'shadow banning' a (Harding Prize for Good Science Communication winning) Cochrane review for 'false content', which was also tagged by Twitter as 'misleading'[3].

We believe that the best way to counter misinformation is to provide good access to useful information. We therefore urge Ofcom to also address the issue of what content is not surfaced as much as what is. It is possible for users of user-ot-user platforms to consistently receive weak or biased health information, where each item individually may not meet a given threshold of harm, but which invite people to seek out misleading content. Restricting access to good information should therefore be recognised as equally harmful as promoting misinformation, with an obligation on providers to ensure diverse credible sources are not supressed: we cannot prevent 'false narratives' without providing full account of 'true narratives'

As is clear from the above, the lack of transparency in AI systems used in user-to-user systems presents a significant risk. To ensure people have access to good health information and be able to have honest discussions about issues where uncertainty and a lack of evidence exist requires the processes by which information is shared/promoted or suppressed/censored, to be open to public scrutiny. Only when we can see the data used to inform algorithms, and the assumptions being

made in constructing them, can we judge whether the outputs are able to bear the weight put upon them[4]. Policymakers, regulators and citizens need to be able to ask penetrating questions about AI systems to judge if they are fit for purpose, given the significant impact they now have on society's access to information.

Please let me know if you require additional information our resources on any of the above; we look forward to contributing further to the development of regulations.

Yours faithfully,

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Deputy Director, Sense about Science

[1] Nature Immunology editorial (2008) A case of junk science, conflict and hype. *Nat Immunol* 9, 1317. https://doi.org/10.1038/ni1208-1317

[2] Adams, Z., Osman, M., Bechlivanidis, C., & Meder, B. (2023). (Why) Is Misinformation a Problem? *Perspectives on Psychological Science* https://doi.org/10.1177/17456916221141344

[3] Coombes, R & Davies, M (2023) Facebook versus the BMJ: when fact checking goes wrong. *BMJ* 2022;376:o95 (https://doi.org/10.1136/bmj.o95)

[4] Sense about Science (2023) Data Science: a guide for Society https://senseaboutscience.org/data-science-a-guide-for-society/ (Also available as a pdf download)