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UK COVID-19 INQUIRY

WITNESS STATEMENT OF SILKIE CARLO (M4/BBW/01)

I, Silkie Carlo, will say as follows: -

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Preface

0.1. This statement has been authored by Silkie Carlo. I am the Director of Big Brother Watch, an independent, non-partisan, non-profit, non-governmental organisation established in 2009 that campaigns to protect the right to privacy and civil liberties in the UK. I have been the Director of Big Brother Watch since January 2018. The organisation has 7 full-time members of staff and up to five volunteers at any one time.

0.2. Big Brother Watch seeks to protect rights, particularly in the context of new technology, by lobbying Parliament, conducting investigations, public campaigns, and strategic litigation. We work to inform and empower the public voice so we can collectively reclaim our privacy, defend our civil liberties and protect freedoms for the future.

0.3. During the pandemic, we produced fourteen comprehensive Emergency Powers and Civil Liberties reports and scores of policy briefings, circulated to every parliamentarian and where relevant those in devolved administrations. Our reports and briefings examined proposed and enacted emergency powers and focused on their impact on protected rights, civil liberties, democratic functioning and the rule of law. We gave written evidence to Parliament and Government consultations on related matters, and I was called to give oral evidence to the Public Administration and Constitutional Affairs Committee during the pandemic.

0.4. I make this statement pursuant to a Rule 9 request for evidence from the Inquiry dated 6th March 2024, which followed my written request to provide such evidence to the Inquiry dated 27th November 2023. The evidence requested by the Inquiry is specific to Module 4 (vaccines and therapeutics), particularly concerning the activities of the UK Government's Counter Disinformation Unit (CDU) during the pandemic period.

0.5. Any references I make in this evidence to statements made by ministers or parliamentarians in parliament are, respecting parliamentary privilege, not to be taken as evidence for or against disputed factual matters but rather as a matter of historical fact and to provide essential context and reflect the information given to the public about the activities of the Government's Counter Disinformation Unit (CDU) during the pandemic period.

Section 1: Big Brother Watch's investigation into government 'counter disinformation' activities

Background

1.0. Big Brother Watch undertook a long term investigation beginning in 2021 into the government's counter disinformation activity. As a result, we published our report *Ministry of Truth: the secretive government units spying on your speech*, [SC/1 – INQ000268260] in January 2023, which found that the CDU (and other similar units) routinely recorded the lawful, truthful speech of individuals who were not conceivably creating or spreading mis or disinformation - including elected politicians, world-leading academics, high-profile journalists and human rights campaigners - in so-called "counter disinformation" reports, as a result of those people criticising the government's pandemic policies. The topics monitored by the government, whether by tracking particular issues or more general "social listening" [SC/2 INQ000477571] around daily news reports, spanned criticisms of regional support, pandemic preparedness, vaccine supplies overseas, vaccine mandates, Covid status certificates, lockdown modelling and protest rights. Those affected include Leader of HM Opposition Sir Keir Starmer KC, Manchester Mayor Andy Burnham, Conservative MP and former minister David Davis, Green MP Caroline Lucas, columnist Peter Hitchens, Dr Alex de Figueiredo (Vaccine Confidence Project, London School of Hygiene and Tropical Medicine), Professor Carl Heneghan (Centre for Evidence-Based Medicine, Oxford University), and many others.

1.1. Our interest in government "counter disinformation" work began after a Government press release dated 30th March 2020 and titled "Government cracks down on spread of false coronavirus information online", revealed that a "Rapid Response Unit" (RRU) had been set up to operate from within the Cabinet Office and No.10 to tackle "harmful narratives online". [SC/11 INQ000361187] The press release explained that the unit was working with the "Counter Disinformation Cell" led by the Department for Digital, Media, Culture and Sport (DCMS). Little information was available about the make up or activities of these teams. The press release stated that "When false narratives are identified, the government's Rapid Response Unit coordinates with departments across Whitehall to deploy the appropriate response" which could include "working with platforms to remove harmful content."

1.2. We were concerned that lawful expression could be affected given that "harmful content" was not a concept defined in law, and we were unclear on the extent and legal basis for these activities. The relationship between Government and social media companies, particularly where the removal of lawful content is concerned, could have serious implications for human rights in the UK including the rights to privacy and freedom of expression protected under Article 8 and 10 of the European Convention on Human Rights respectively. Whilst it would be reasonable for governments to promote health information at such a critical time, and indeed, Article 15 of the International Covenant on Economic, Social and Cultural Rights acknowledges the right of everyone to "enjoy the benefits of scientific progress and its applications"[SC/12 INQ000480877] that would neither necessitate nor justify censorship of others. The right to freedom of expression protects our ability to freely share ideas, opinions and information without interference. This vital democratic right has never been restricted to the expression of views that are rational, desirable or proven to be true. We felt such issues necessitated further investigation.

1.3. Freedom of expression is even more, not less, relevant in a pandemic. It is a protected right that supports democracy, enables the discovery of truths and builds public trust in information – these are all important factors that benefit public health. Scientific discovery was rapidly developing and research – for example, on the impact of face coverings, the development of immunity, the validity of tests, or the impact of the virus on the menstrual cycle – was in very early and inconclusive stages at the time that the government's "counter disinformation" activity began. It is through a free forum of ideas that the public can understand, contextualise and trust information, whereas perceived controls on information sharing are associated with public suspicion and distrust of authorities.[SC/13 INQ000480878] [SC/14 - INQ000480879]

1.4. At the time of the government's press release, social media companies had already made controversial decisions with regards to information controls on their platforms. For example, on 25th March 2020 Facebook announced that since January 2020 it had removed "posts that make false claims about cures, treatments, the availability of essential services or the location and severity of the outbreak" as well as "claims that physical distancing doesn't help prevent the spread of the coronavirus" and the platform

"banned ads and commerce listings that imply a product guarantees a cure or prevents people from contracting COVID-19."[SC/15 INQ000477450] Whilst there was little transparency about precisely how Facebook judged content falling into those categories, the company publicised the fact that under the policy, adverts for face masks were banned.[to "protect against scams" and "misleading medical information".[SC/16 - INQ000480881 [SC/17 - INQ000480882] This decision contradicted later public health research: by June 2020, the government viewed mask-wearing as so important, it had legislated to mandate wearing face coverings on public transport.[SC/18 INQ000237460]

1.5. Information about the RRU and CDU, beyond the aforementioned press release, was minimal and very hard to find. We did not know what practices or policies they followed or even how many staff they had. Individuals whose online posts had been recorded or flagged by a government disinformation unit were not informed and did not know how their data had been processed, and nor were overall figures published on such activities. We submitted an initial request under the Freedom of Information Act (FOI Act) to DCMS in February 2021 asking for how many pieces of social media content the CDU had flagged/recommended for removal, which was refused under section 36(2)(c) of the FOI Act including on appeal; and similarly, we submitted a FOI request to the Cabinet Office asking how many pieces of social media content the RRU had flagged/recommended for removal in 2020, and if the RRU had shared any such content with law enforcement, but this request was refused under section 12 (1). Following this, our Head of Research and Investigations Jake Hurfurt launched a deeper investigation, supported by the Big Brother Watch team.

1.6. Our investigation was conducted using open source research, FOI requests, speculative Subject Access Requests (SARs) by potentially-affected individuals, and by interviewing a UK military whistleblower who had worked in the "77th Brigade" on counter-disinformation during the pandemic. We published the results of our investigation in our *Ministry of Truth* report on 29 January 2023. [SC/1 INQ000268260]

1.7. Secrecy has been a constant obstacle to scrutinising the Government's counter-disinformation work. Big Brother Watch submitted at least 20 FOI requests to DCMS and DSIT about the CDU, 19 of which were rejected in full and one received a response containing heavily redacted minutes. [SC/19 INQ000480884] Our questions have ranged

from the simple (staffing and budget levels) to requests for reports commissioned by the CDU and emails it has exchanged with social media companies. At least 14 of these transparency requests have been refused with explicit sign off from ministers, with the department claiming that information as basic as the public money spent on the unit would undermine its capabilities. Details on staffing and budget was obtained following intervention from the Information Commissioner, who found that transparency on those matters was in the public interest. [SC/20 - INQ000480886]

1.8. MPs also repeatedly asked ministers to reveal the resources available to the CDU (12 times), and the amount of content it has flagged for review (19 times). [SC/19 - INQ000480884] Ministers refused to answer these reasonable questions by MPs on every occasion, putting up an even greater shield of secrecy than that of the intelligence agencies, whose statistics are published in annual reports by the Investigatory Powers Commissioner.

1.9. Since the rebranding of the CDU as the "National Security Online Information Team" ("NSOIT"), both Big Brother Watch and parliamentarians have submitted new FOIs and questions to DSIT about its activities and have experienced continued secrecy. [SC/21 - INQ000480887]

Section 2: Findings

The Counter Disinformation Unit

2.1. The Counter Disinformation Cell, as it was then called, was stood up in March 2020 to "crack down" on "false coronavirus information online" [SC/11 - INQ000361187]; later during the pandemic response in 2020, it evolved into a "permanent" team situated within the Department for Science, Innovation and Technology (DSIT) and was called the Counter Disinformation Unit (CDU). This is detailed in paragraphs 1.11 to 1.12 of Susannah Storey's witness statement to the Inquiry. [INQ000183331]

2.2. In November 2023, in the wake of our investigation into its controversial activities, the CDU was retitled the "National Security Online Information Team" ("NSOIT"), although its remit is not limited to national security. [SC/22 - INQ000480888] It is unclear how

NSOIT differs to the CDU other than in name: NSOIT claims to “focus” on national security and public safety, and the CDU similarly stated that its focus was national security, public safety and public health. [SC/23 - INQ000420988]

2.3. Our investigation found that the CDU's monitoring was widespread, frequently engaged accurate and lawful speech of democratic importance, and was in no way restricted to 'disinformation' as suggested by the Unit's title.

2.4. A SAR by Conservative MP Sir David Davis revealed that his questioning of lockdown modelling during the pandemic was recorded by the CDU. A May 2020 entry in a CDU report noted that:

“A series of posts by influential and verified Twitter users such as David Davis MP and [REDACTED] were highly critical of the government”. [SC/1 - INQ000268260] (p12)

2.5. The entry does not cite specific statements or Tweets from Sir David but in the weeks preceding the date on the entry, he co-authored a Daily Telegraph article with science writer Lord Ridley questioning the mathematical reasoning underpinning the Imperial College lockdown model that significantly influenced the government's early Covid decision-making and posted several times Twitter about the same. [SC/24 - INQ000480890] [SC/25 INQ000480891] Sir David did not spread any misinformation; he questioned the modelling and called for greater transparency about how it was performed. In scrutinising the model - which indicated the possible loss of lives and livelihoods the country would face, and provided the basis for the most significant curtailment of civil liberties in British peacetime history - he was performing his democratic duty as a parliamentarian. No doubt, the Covid-19 Inquiry will seek to perform the same scrutiny role. Such scrutiny must not be maligned as mis/disinformation – to do so would be an abuse of power, a threat to free expression, and an unjustifiable misuse of resources (particularly during a pandemic).

2.6. The Government spent approximately £1.5m on contracts for AI company Logically to support the work of the CDU between 2020 and 2023. These are outlined in paragraph 3.3 of Susannah Storey's witness statement [INQ000183331]. The contract

DCMS awarded to Logically was for "analytical support relating to potentially harmful disinformation online".[SC/26 INQ000480892] Further, in addition to the contracts Ms Storey outlined, DCMS paid £1.3 million to controversial technology company Faculty Science for a year-long contract offering "technical support on understanding the threat and mitigation of disinformation" from April 2022.[SC/27 INQ000480893]

2.7. Our research, and the documents we obtained via FOI, indicated that the CDU's main functions were generalised monitoring of social media posts; the production and circulation across government of "mis/disinformation" reports; and flagging posts to social media companies for enforcement.

2.8. Our research found that CDU reports contained monitoring and recording of general attitudes towards the UK government's pandemic policies rather than strictly mis/disinformation. One such report was titled "CDU Vaccine Mis/Disinformation: Narratives and Engagement 6 – 23 August 2021", which featured an analysis of engagement with news articles about vaccines. This included a Mail on Sunday story dated 15th August 2021 covering the introduction of compulsory Covid booster vaccinations for care home staff and overseas travel.[SC/28 INQ000480894] As part of the report, the CDU outlined which individuals had been sharing the article, commenting on their perceived attitudes towards vaccines.[SC/1 INQ000268260] (p19) This, evidently, is not work countering mis/disinformation. The reports we obtained raised questions about the CDU's remit, legitimacy and efficacy. The routine monitoring of mainstream media outlets' coverage and individuals' opinions on the government's pandemic response is a wholly distinct project from battling disinformation from hostile entities.

2.9. The CDU's contractors also cast a wide monitoring net over domestic speech, seeming to focus on speech that criticised government policies rather than mis/disinformation. In performing its contract with DCMS, Logically produced a "Covid Mis/Disinformation Report" on a weekly or biweekly basis, a "Covid Mis/Disinformation Platform Terms of Service Report", a flash report analysing the response to the approval of Covid vaccinations for teenagers and general Covid weekly reports. Responding to our FOI request, DCMS refused to disclose copies of any of the reports Logically gave it, claiming: "malign actors could exploit the information contained within the report - such

as by reusing and tailoring content so that it is likely to receive high levels of engagement - to continue spreading harmful mis/disinformation." [SC/3 INQ000477573]

2.10. Therefore, the only insight we could obtain into the content of such reports was via subject access requests ("SARs") made by individuals to obtain copies of their personal data, should it be held, in the content of these reports.

2.11. SARs by Big Brother Watch staff showed that Logically was monitoring the posts of our staff members and recording them in disinformation reports. As employees of a human rights NGO, we play a recognised role in the democratic functioning of our society by scrutinising policies and using advocacy, campaigns and litigation to protect the rights of the British public. Whilst it is possible for NGOs and indeed anyone to publish incorrect information – or "misinformation" – such damaging and stigmatising terms should only be used by the government and its contractors where there is strong and unequivocal evidence to support such claims. This is even more important when such a label may be the precursor to government attempts at secret, extrajudicial censorship via private social media companies. Our staff members' SARs provided evidence that Logically monitored and recorded our criticism of the mandatory domestic Covid status certification policy in multiple reports.

2.12. Firstly, a talkRADIO Tweet containing a clip of an interview I did with them, an OFCOM-regulated broadcaster, about the Covid pass policy possibilities/consultation in April 2021 was included in a "Covid Mis/Disinformation Platform Terms of Service Report", which appeared to function to "indicate [to the government] that content might potentially breach Twitter's terms of service" [SC/1 INQ000268260] (p16) [SC/4 – INQ000477574]. The Tweet/interview clip was recorded specifically in "Annex 2" of that report on "general statistics on platform actions", which raised my concern that Logically/DCMS may have attempted to get the platform to take action against the content – although I have no way of knowing for sure whether they did. The interview was about the launch of Big Brother Watch's cross-party coalition of 90+ parliamentarians opposing Covid passes on human rights and equality groups, the simultaneous publication of Big Brother Watch's report *Access Denied: the case against a two-tier Britain under Covid certification*, and our response to the government's consultation. [SC/29 INQ000480895] It focused on the civil liberties and equality issues that

vaccine passports could have. It is not feasible that the Tweet/interview could have breached Twitter's terms of service and it did not contain false information. As it would happen, the parliamentary rebellion against mandatory Covid passes in the subsequent December 2021 House of Commons vote was the biggest rebellion since the vote on the Iraq War.

2.13. Secondly, Logically recorded another Tweet of mine in a "Covid Mis/Disinformation Platform Terms of Service" report, in which I compared the enforcement and impact of vaccine passports with mandatory vaccine policies. [SC/1 - INQ000268260](p18). Analysis of such policies and their impact on rights and exclusion are entirely valid, and such work is the duty of human rights organisations particularly when public health authorities were considering both policy options at the time. Although I also sent SARs to DCMS, and this report was produced for and sent to DCMS in accordance with their contract, the Department did not disclose this to me - only Logically did in response to my SAR to the company. It is regretful that DCMS did not send me this data, given that its since-published retention policy would require the Department to still hold the report. [SC/30 - INQ000480897] Logically further disclosed that the company had marked my Tweet as a potential breach of Twitter's terms of service and had claimed that it supported a "narrative" that "vaccine passports are a form of mandatory vaccination" and that my analysis "speculates" and "distorts facts", in notes sent to DCMS with the Tweet. My description of how both policies are generally enforced, and of how government officials were considering designing the policies, was honest and truthful. In any event, Twitter's medical misinformation policy from early March 2021 made no mention of vaccine passports and defended the right of people to express strong opinions or commentary. [SC/31 - INQ000422808] Logically's monitoring and misrepresentation of my policy analysis, and inclusion of it in a "disinformation" report indicates that protected speech was monitored and flagged for potential censorship in such a way that mirrored the government's political interests rather than the definition of mis/disinformation.

2.14. Thirdly, a Tweet by our Advocacy Manager Mark Johnson, in which he shared a link to a petition on the official parliamentary website (where all petitions are vetted and fact-checked before they are published) urging the government not to roll out Covid-19 vaccine passports [SC/32 - INQ000480899] was recorded in a Covid Mis/Disinformation Report [SC/1 - INQ000268260](p17). At the time of the Tweet and the report, the

government was conducting a consultation on Covid passes and it was not a settled policy to implement them. [SC/33 - INQ000480900] The petition had over 275,000 signatures on the day the Logically report was dated; [SC/32 - INQ000480899] 10,000 signatures triggers a government response, and 100,000 signatures leads to a debate in Parliament. Neither the petition nor the Tweet discussed the vaccine itself; the petition was explicitly about the negative human rights implications of vaccine passports – a view shared by many human rights organisations. [SC/34 INQ000480901] It is inconceivable that any reasonable person could view this as "disinformation". This raises questions about why the CDU's contractor was surveilling opposition to a policy among human rights groups, especially when the government had yet to decide on its appropriateness.

2.15. The issue of Covid-19 status certificates was a controversial, live and important debate in Britain at the time. It is my view, and Big Brother Watch's view, that it is an abuse of the "counter disinformation" remit for a private company to secretly monitor, record and report to government officials mainstream, lawful and accurate political dissent from recognised human rights advocates, or indeed anyone, under the guise of tackling "disinformation".

2.16. In addition to human rights advocates, the CDU also repeatedly recorded the lawful and accurate speech and opinions of journalists and academics. This included Dr Alexandre de Figueiredo, the statistics lead at the Vaccine Confidence Project which exists to "monitor public confidence in immunisation programmes" and "ensure sustained confidence in vaccines". [SC/35 INQ000480902] Some of his social media posts were recorded by Logically in its "Covid Mis/Disinformation Platform Terms of Service" report [SC/1 INQ000268260] (p20). The research fellow at the London School of Hygiene and Tropical Medicine published significant work looking at the negative impact Covid passports could have on vaccine confidence. Other examples are included in our *Ministry of Truth (2023)* report.

2.17. Parliamentarians were also impacted by the CDU. SARs sent by Green MP Caroline Lucas in the course of our investigation revealed that the CDU included a news report from the Independent [SC/36 INQ000480903] about Lucas and other MPs meeting the Speaker to raise concerns about then-Prime Minister Boris Johnson's "lies" in a "report on mis/disinformation narratives relating to 2021 local elections" compiled by

Logically. Speech classified as threatening democratic processes was placed at a higher risk level by the CDU and thus was more likely to be targeted for enforcement [SC/5 – INQ000477572] – whilst Lucas or the Independent may not have been censored, it is possible that other members of the public on social media sharing the same or similar views could have been. It is inconceivable that such democratic activity could be considered “disinformation” and treating it as within remit indicates the possibility of politicisation of the unit’s work. Ms Lucas described it as a “simply staggering overreach” and said:

“The right of citizens to share entirely valid and objective criticisms of Government Ministers without fear of the consequences is a cornerstone of our democracy, and must be protected.”

She added that if the disinformation units had focussed their efforts on “foreign hostility, rather than my tweets, our politics might be in a better place.” [SC/37 - INQ000480904] In terms of the information that parliamentarians and the public were provided by the Government, the (then) Parliamentary Under Secretary of State at the Department for Science, Innovation and Technology, Viscount Camrose, who was responsible for overseeing the unit’s work, told Lord Clement-Jones in response to a written parliamentary question in March 2024 that the CDU’s successor unit, NSOIT, was focused on “risks to election integrity”. **Parliamentary privilege**

Rapid Response Unit

3.1. The Rapid Response Unit (RRU) was another counter misinformation unit which was based in the heart of government, within the Cabinet Office. A Government Fact Sheet published in June 2023 confirmed that the Rapid Response Unit had been “disbanded in August 2022”. [SC/75 - INQ000000] Parliament had been informed of this previously: in a statement in Parliament in March 2023, (then) Parliamentary Secretary, Alex Burghart from the Cabinet Office, which was responsible for overseeing the RRU, had told Members that the RRU was disbanded in August 2022. **Parliamentary privilege** During August 2022, Big Brother Watch was pursuing Freedom of Information Requests with the Cabinet Office, among other departments of government, in preparation of our *Ministry of Truth* report on the RRU’s activities. Senior civil servants described it as a

"social media capability" set up to support "the reclaiming of a fact-based public debate" at the RRU's launch in 2018. [SC/40 INQ000480908] From early 2020, most of the unit's work was focused on Covid-19. [SC/11 INQ000361187] Officials denied that the RRU would be a "fake news unit" or a "rebuttal unit" at its launch, [SC/40 INQ000480908] but by March 2020 a government press release announced the unit would "crack down" and "combat false and misleading narratives" about coronavirus by either issuing "a direct rebuttal on social media" or "working with platforms to remove harmful content". [SC/11 - INQ000361187] The press release also said the RRU would co-ordinate government responses across Whitehall to "rebut false narratives" and "promote" government campaigns through "reliable sources". [SC/11 INQ000361187]. Much like the CDU, the RRU had no oversight or accountability mechanisms.

3.2. Significant financial resources were allocated to the RRU, which was given a £600,000 budget across its work 2020/21, £451,000 solely for staffing in 2021/22 and £352,000 for staff in 2022/3. [SC/1 INQ000268260]. (p29)

3.3. The RRU spent £75,600 in November 2021 on a one-year license for Brandwatch, a social listening tool owned by public relations technology company Cision. [SC/41 - INQ000480909]. The tool allows users to "tap into conversations" on social networks and review sites. Procurement documents also show that RRU staff would have access to unlimited searches, a dashboard, and could monitor unlimited searches across 30 queries. [SC/41 INQ000480909]. Brandwatch is marketed as an AI-powered tool capable of monitoring "thousands" of conversations online, producing a huge range of analytics on both topics and individual accounts. This can include sentiment [positive, neutral, negative] and emotional [anger, disgust, fear, joy, sadness, surprise] analysis of interactions, examining the demographics of accounts involved in a conversation, producing word clouds of related terms in posts, topic wheels showing the different sections of online discussion as well as the more common volume and timing statistics. [SC/43 INQ000480911].

3.4. In March 2021, two Cabinet Office contracts collectively valued at more than £2.5 million were awarded to Engine Partners, a conglomerate of specialist marketing agencies, for work around vaccine hesitancy. [SC/43 INQ000480911]. [SC/44 INQ000480912]. With attitudes towards Covid vaccines being a key area of work for the RRU, these

contracts are likely to relate to the unit. The larger of the two deals, worth £2,503,792 was to create a Vaccine Hesitancy Platform for the Cabinet Office while the smaller, worth £68,000 was for intelligence and media monitoring relating to the platform.

3.5. No documents were published by the Cabinet Office about the massive outlay but Engine Partners gave some detail of their work on their website. The company said it built a database bringing together population and socio-demographic data, vaccination rate data, survey data relating to vaccine hesitancy among social groups, as well as both news media and social media monitoring of vaccine coverage, sentiment and discussion trends across the world.[SC/45 - INQ000000] The goal of the work was to create tools to support communications campaigns to increase vaccine uptake globally – starting by splitting the world into four groups at a global, national and regional level: already vaccinated; vaccine acceptors; vaccine rejectors and the undecided. Messaging was then designed to target these groups to "to increase vaccine confidence and raise awareness of misinformation", with the true source of the messaging obscured.[SC/45 - INQ000000]

3.6. The Cabinet Office's work with Engine Partners goes beyond mere monitoring of online narratives and correcting the record, towards behavioural influence. The project aimed to change behaviour in the marketing consultancy's own words. [SC/45 - INQ000000]

3.7. SARs sent by Green Party MP Caroline Lucas in the course of our investigation found that the RRU had recorded several of her Tweets, including noting her public support for the "People's Vaccine" campaign for fairer global access to vaccines in a "Report on Vaccine Hesitancy". [SC/37 INQ000480904]. The RRU also recorded her Tweets discussing "Brexit Over Breathing", in which she criticised the government's pandemic preparedness, in a "Covid Mis/Disinformation Report"[SC/6 INQ000477569]. p3) [SC/37 INQ000480904]. That report was later found to be composed by the 77th Brigade on behalf of the RRU. The inclusions of Lucas' viewpoints in such reports appears to be markedly political and far from the government's public descriptions of the kind of work that the unit would be undertaking.

3.8. Social media monitoring made up a significant part of the RRU's work, as shown by the contracts already outlined. Whilst the CDU was being set up in DCMS, the RRU was also involved in flagging content for enforcement to social media platforms. We found, via heavily redacted FOIs, that in April 2020 the RRU flagged six posts to social networks that resulted in the content being removed; [SC/46 INQ000480913]. we were able to obtain redacted correspondence relating to only one of the six posts taken down. [SC/46 INQ000480913]. In the released emails, dated 10th April 2020, a member of the RRU contacted Facebook staff, copying officials from the Department of Health and Social Care. The content flagged was a post written by a courier who was delivering batches of Randox Covid-19 tests to test centres and shared details of his route. The RRU member expressed concern that this was a breach of GDPR, claimed it could put testing centres at risk, and asked for it to be removed "urgently". The post was restricted to be seen by "Friends Only", meaning that only the courier's Facebook friends could see it. Questions remain over how RRU staff found the post given the privacy settings, and why they felt generic information about test deliveries posed a risk – the location of test centres was public knowledge. A member of Facebook's staff passed the post onto the review team but the social media company told the Cabinet Office hours later that the account had been disabled by the courier himself, with no reason why given.

3.9. Like the CDU, our investigation found that the RRU targeted scrutiny of lockdown modelling. The RRU flagged an article by Ross Clark published in print by the Daily Mail and online on MailOnline on 20th November 2020, which questioned some of the modelling used by the government when formulating coronavirus policy. [SC/47 - INQ000480914]. [SC/48 INQ000480915]. Emails we obtained from the Department of Health and Social Care [DHSC] under FOI, with the subject line "Covid-19 stats claims: RRU flag and recommendation", show how officials discussed first the flagging of the story, related to its social media traction, and how government should respond. The initial message, sent at around 10am on the 21st of November, appears to come from the Cabinet Office and is identified as an "RRU Flag". Staff highlighted the 6,600 social media engagements with the article and added that it had been picked up by "several high-profile lockdown sceptics", specifically naming publican Adam Brooks.¹ (As a publican, Mr Brooks stood to be affected by lockdowns and Covid passes, and his

¹ Mr Brooks is now a TV political commentator, but was a vocal critic on Twitter, not a media personality, at the time of RRU's monitoring.

opinions were recorded repeatedly in RRU "vaccine hesitancy reports" despite not spreading vaccine misinformation in any of the examples I have seen)[SC/1 – INQ000268260]. (p43). The email ends by encouraging DHSC press officers to contact the Daily Mail to "make them aware of the public health impact" and ask them to put a government line in the piece. This is justified by a Cabinet Office official claiming that the article could "affect compliance" with coronavirus restrictions. No inaccuracies or "disinformation" is identified in the article. The RRU and DHSC appeared to be more concerned with the impact of the story on compliance with coronavirus restrictions than factual accuracy, and yet still used the term "misleading" to delegitimise the journalism. The official Department of Health Twitter account responded with a Tweet reading: [SC/49 – INQ000480916].

"This article is misleading. This is a global pandemic – national restrictions have been introduced to keep people safe and save lives".

3.10. The Tweet triggered a significant backlash from the newspaper, which accused DHSC of censoring the press in an article on November 23rd. The Daily Mail's article also contained comments from two university professors supporting the paper's attempts to interpret difficult data. DHSC also chose to delete its Tweet before the newspaper's response was published. [SC/49 – INQ000480916]. In my view, *particularly* in a public health emergency, people and newspapers must be free to question those in power.

3.11. Whilst this was a public intervention, and we were (unusually) able to obtain correspondence about it, most of the RRU and government counter-disinformation units' work remains secret. The use of terms such as "misleading", as revealed by this incident, in attempt to favour the government's policy positions can be controversial and is certainly deserving of external scrutiny and oversight.

3.12. The Government had to issue a formal apology to journalist Julia Hartley-Brewer after SARs she sent in the course of our investigation revealed that RRU officials wrongly and unlawfully branded her a "vaccine sceptic" in a secret report on vaccine hesitancy sent to 64 officials across UK, as well as counter-terror officials in the US government [SC/1 – INQ000268260]. (p42). RRU staff had monitored online responses to a Telegraph article published in October 2021 about the Health Secretary and Education

Secretary's joint letter to parents encouraging them to vaccinate their children against Covid, headlined "Pupils could lose out on face-to-face lessons if they don't get vaccinated, warn ministers". Ms Hartley-Brewer shared the article on X, formerly Twitter, with the words "No. No. No. NO!!!!", leading the RRU to note in a "vaccine hesitancy report" that this was among the "top tweets" about the Telegraph article and that Ms Hartley-Brewer had "express(ed) opposition to the news" – describing the broadcaster as a "known vaccine sceptic". However, Ms Hartley-Brewer was vaccinated against Covid-19 herself and spoke regularly about vaccine benefits on her show. Ms Hartley-Brewer, supported by Big Brother Watch, instructed data rights lawyers AWO to enforce her rights to rectification of the inaccurate data by the Cabinet Office. The government responded in writing to admit that the RRU's conduct had been unlawful. It was obliged to "apologise for the error that the Rapid Response Unit made" and to,

"formally acknowledge that the reference to yourself as a 'known vaccine sceptic' was inaccurate and not impartial. It does not reflect the Government's view." [SC/50 - INQ000480918].

Ms Hartley-Brewer said:

"I am particularly concerned by the fact that the British government shared this false information about me with a US government counter-terrorism unit set up to tackle Russian, Chinese and Iranian propaganda. This is very sinister." [SC/51 -

INQ000480919].

3.13. Our research uncovered a wide range of people, research and views caught in the RRU's work during its pandemic efforts against "false narratives", ranging from HM Leader of the Opposition Sir Keir Starmer, to world-leading academics such as Professor Carl Heneghan from Oxford University's Centre for Evidence-Based Medicine and biostatistician Professor Jon Deeks, to ordinary members of the public with small social media followings. These examples and more are explained in more detail in our *Ministry of Truth* report. The examples in our report are of speech that is broadly critical

of the Government's pandemic management – but not a single one is an example of mis or disinformation.

77 Brigade

4.1. The 77th Brigade is part of the British Army and conducts information operations within the military, with its work spanning from audience analysis to disseminating counter-propaganda. The Brigade has conducted operations against both the Taliban and al-Qaeda.[SC/52 -INQ000480920]. In April 2020 General Sir Nick Carter, the UK chief of defence staff, announced that the Brigade was working to counter Covid-19 related misinformation online.[SC/53 -INQ000480921]. It was subsequently revealed in November 2020 by The Times newspaper that the 77th Brigade ("77x") was supporting the RRU's counter-disinformation work around vaccinations – however, it is understood that this ended by late 2021.[SC/54 -INQ000480922]. SC/55 - INQ000480923].

4.2. After 77x's controversial involvement in pandemic information operations was revealed, the Ministry of Defence claimed that soldiers were not deployed against UK citizens:

"Defence are supporting the Cabinet Office to tackle disinformation and hostile state narratives which seek to undermine the UK's reputation. All work is internationally focused, and the military do not and have never conducted any kind of action against British citizens." [SC/55 - INQ000480923].

4.3. However, our investigation found that British citizens had indeed been caught up in 77x online monitoring [SC/1 -INQ000268260]. (p63)[SC/6 - INQ000477569]. As such, the above statement was arguably misinformation – it was not true. This was confirmed both by our FOI investigation and by a 77x whistleblower who I interviewed extensively; his account was subsequently published (on agreement of anonymity) in the Mail on Sunday. [SC/56 -INQ000480924].

4.4. The whistleblower told us he was seconded to 77x on the basis that he would be helping to find foreign state misinformation on social media. However, when he joined

77x, he said he found the operation was unskilled and appeared to orientate around the day's political news and public opinions of the government's performance. He described:

"(...) running searches of Twitter by keywords that were often dictated by the central team leader in 77x – usually in the morning, leaving me with the impression that the search terms were directed by that day's newspapers. (...) We would send screenshots of Tweets from people who appeared to be British expressing dissatisfaction with the UK Government's action against Covid, such as Labour activists concerned about inadequate supplies of ventilators, to our team leader who would gather them together and send them to the project lead." SC/1 -INQ000268260]. (p66)

This, he claimed, led to a feedback loop for what the Cabinet Office wanted from 77x's work:

"The project lead would then gather these screenshots into a slide pack and send them to the Cabinet Office. Feedback from the Cabinet Office, via the project lead, would direct us what to look for the next day (...) We learned from the feedback that the government were very keen on hearing what the public thought about their Covid response (...). However, these posts did not contain information that was untrue or co-ordinated – it was simply fear and domestic dissent." [SC/1 -INQ000268260]. (p66)

4.5. He further claimed surveillance laws were circumvented by wilful ignorance:

"To skirt the clear legal issues with a military unit monitoring domestic dissent, the leading view was that unless a profile explicitly stated their real name and nationality, which is of course vanishingly rare, they could be a foreign agent and were fair game to flag up."

4.6. However, documents we obtained via FOI showed that 77x recorded tweets of individuals that *had* stated their location within the UK on their profiles [SC/1 -INQ000268260]. (p63). In fact, in one disinformation presentation made by 77x for the Cabinet Office as part of this work dated 27th March 2020, which we obtained after the

publication of our *Ministry of Truth* report following months of FOI requests, the speech logged and monitored was *entirely* domestic (except one sole reference to a RT article) [SC/6 [INQ000477569](#)]. Disturbingly, rather than disinformation, it includes speech of clear democratic importance from government criticism by Green MP Caroline Lucas to questions raised on BBC Question Time. The document's executive summary acknowledged its focus on "narratives (that) question government decision making". Others included analysis of the Daily Telegraph's criticism of Professor Neil Ferguson's credentials and coverage in the Sun of warnings over death projections. [SC/8 - [INQ000477570](#)].

4.7. Jennifer Rankin, a Guardian journalist, featured in another presentation made by 77x on 26th March 2020, following a Twitter thread she posted about the UK's decision not to enter into a procurement scheme alongside the European Union [SC/7 - [INQ000477568](#)]. The reporting was confirmed to be correct, with confirmation from the government in an article written by the same journalist days later. [SC/57 [INQ000480925](#)]. The presentation described it as a "malinformation" event, which was defined in the document as "information that is potentially truthful but aimed at harming outcomes or personnel". Alongside the journalist's reporting 77x looked at the online response to the news, which connected it to Brexit, as well as criticising the lack of PPE availability and the overall decision.

4.8. It is the role of journalists in a democracy to break news stories and inform the public, especially in times such as the early pandemic when reliable information was scarce. Rankin reported the facts and sparked a public debate about international co-operation, however the "malinformation" label suggests an ulterior motive, which is not borne out in her reporting on the issue. It is my view that the reporting, or the public expressing their vies on it, cannot reasonably be called "malinformation" – as that equates accurate journalism that disfavors the government with hostile state efforts.

4.9. The whistleblower gave a powerful testimony of how the political misdirection of 77x resources meant that genuine hostile foreign disinformation was not adequately dealt with by the unit. Due to the importance of what he said, I quote him here at length:

"As someone who has dedicated my career to serving and defending my country, I entered this role believing I would be surfacing foreign information warfare against our country. Instead, I found the banner of disinformation was a guise under which the British military was being deployed to monitor and flag our own concerned citizens to the government.

"Since my deployment in this unit, I have become aware of evidence that there may have in fact been real social media campaigns from China, involving copy and paste pro-lockdown propaganda from newly created sock-puppet accounts, to promote lockdown policies to Europe and the world. However, because we were directed to monitor public sentiment towards government policies, such as the success of the lockdown policy, the unit supposedly formed to discover such foreign interference would have completely missed it if it were there. In fact, I developed the impression that the government were more interested in protecting the success of their Covid policies than uncovering any potential foreign interference that might have influenced what those policies were in the first place.

"(...) During Covid, the role of the 77th Brigade was not to work for the country discovering foreign disinformation, but to work for the Conservative government monitoring the British public's opinion of their controversial Covid response.

"I am concerned that the government was so interested in individual Twitter posts that they devoted an entire unit to monitoring what scared and otherwise powerless people had to say, and I regret that I was a part of it." [SC/1 -

INQ000268260].(p66)

4.10. After the publication of our investigation and the whistleblower's testimony, the then Defence Secretary Ben Wallace appeared to publicly renege on the Army's previous statements.

Parliamentary privilege

Parliamentary privilege

Parliamentary privilege [SC/52 [INQ000480920].] In any event, the apparent conflict in information given to the public was cause for concern and confusion.

Flagging speech for enforcement

5.1. One of the functions of the Government's counter-disinformation units that causes us the greatest concern is the flagging of content to social media platforms for enforcement. In paragraph 1.19 of her witness statement, Susannah Storey claimed,

"The primary purpose of the CDU is not to monitor for harmful content to flag to social media platforms, but to understand the disinformation landscape which has the potential to impact UK audiences (...)."

5.2. **Parliamentary privilege**

Parliamentary privilege

5.3. **Parliamentary privilege**

Parliamentary privilege

5.4. **Parliamentary privilege**

Parliamentary privilege

Parliamentary privilege

5.5. It is my belief, based on research spanning over two years, that the Government effectively established a system of de facto secret extrajudicial censorship carried out by foreign corporate partners, affecting lawful domestic speech with no oversight, in a similar manner to the way the Government deals with illegal terror content.

5.6. Parliamentary privilege

Parliamentary privilege

Parliamentary privilege

Parliamentary privilege

5.7. Indeed, as noted by the Royal Society in its January 2022 report, *The Online Information Environment: Understanding how the internet shapes people's engagement with scientific information*, [SC/14 INQ000480879], there is little evidence of a causal link between online misinformation and offline harm. [SC/61 INQ000480929]. The report also acknowledged the risk that censorship on major social media platforms could cause harm by driving misinformation to "harder-to-address" corners of the internet, causing distrust of authorities, and inadvertently promoting the censored content.

5.8. DCMS refused to tell us whether it had "trusted flagger" status in response to our Freedom of Information requests, claiming that doing so would undermine its relationship with tech companies [SC/9 INQ000477576]. Parliamentary privilege

Parliamentary privilege

Parliamentary privilege

5.9. YouTube, owned by Google, states that its Trusted Flagger program includes:

[SC/63 INQ000480931]

- A web form that government agencies and NGOs can use to contact YouTube directly
- Visibility into decisions on reported content
- Prioritised flag reviews for increased actionability
- Ongoing discussion and feedback about YouTube content areas
- Occasional online training

5.10. Similarly, Meta handles requests for review from arms of the government "at escalation" meaning they are sent to specialist internal teams at Meta, rather than general content moderators as per usual content reports.[SC/64 INQ000480932]. It is important to note that social media companies' content policies are not free expression safeguards in and of themselves. Rather, they are corporate terms and conditions designed to protect the companies' interests rather than democracies, and they are unaligned with both the UK's domestic communications laws and human rights frameworks.

5.11. It appears that trusted flagger status is designed to give government officials prioritisation and a degree of power when flagging content for review. We find it likely that Meta and Google (and subsidiaries) have a strong presumption in favour of acceding to government enforcement requests – a view the Facebook Oversight Board said was the case when police issued requests [SC/64 INQ000480932]. and that this presumption was even stronger during the pandemic. Indeed, the government claimed that "When referrals were made during Covid, over 90 per cent of them were ultimately found to be in breach of terms of service", which could lead to content being censored or algorithmically suppressed. [SC/65 INQ000480933].

5.12. However, the power such flags have varies per platform, according to their different approaches. Whilst Ms Storey's witness statement stated that in response to

the CDU's work, "major platforms acted to ensure their terms of service address this (disinformation) and subsequently took action" (WS para. 3.10), the CDU's work did not always merit platform action. Following pressure, the social media company X, formerly Twitter, revealed in a letter to Big Brother Watch that the majority (58%) of the content flags it received from the CDU during the pandemic period (November 2020 – February 2023) did not violate the company's expansive terms of service. [SC/76 - INQ000000] Twitter's terms of service at the time were very broad: on 1st April 2020, the platform publicly "broadened" its definition of prohibited "harm" to include speech "that goes directly against guidance from authoritative sources of global and local public health information." [SC/66 INQ000480934]. Therefore, according to Twitter/X, 58% of the speech flagged to the platform that the CDU claimed was disinformation that breached the platform's terms of service did not in fact breach the platform's terms of service, and did not contradict authoritative public health guidance. The government has refused to provide us with information about what content was flagged and why.

5.13. Whilst technically, flagging content is a request for the social media company to review the content, the impression given to the public by officials was that the power dynamic creates clear expectations and obtains clear results (as per the government's 90% enforcement claim, referenced above)

Parliamentary privilege

Parliamentary privilege

5.14. **Parliamentary privilege**

Parliamentary privilege

Parliamentary privilege

5.15. There is no accountability mechanism to determine what content the government deems "harmful" or "inappropriate", and the government has refused transparency as to how it defines these terms.

Section 3: Parliamentary and regulatory calls for transparency

6.1. Without strong policies to ensure that only disinformation is targeted, and that lawful, domestic speech is protected from government monitoring and flagging, individuals' rights to privacy and free speech were at risk from the CDU and remain at risk from NSOIT. As of June 2023, the Information Commissioner's Office was probing the unit's use of personal data.

6.2. The CDU's content flags were effectively secret, extrajudicial requests by the British government for foreign companies to suppress or censor lawful speech without oversight. Furthermore, such activity puts the efficacy of the Unit in tackling actual disinformation in serious doubt. Trusted flagger status with inadequate policies and safeguards created a risk of the Unit suffering from function creep and its activities being politicised. Our research found evidence that this was the case.

6.3. Ordinarily, government functions that impact protected rights such as privacy and freedom of expression are subject to oversight mechanisms. This remains the case where surveillance is undertaken, and even where national security considerations are involved. Indeed, oversight of such government functions is an area of my, and Big Brother Watch's, expertise. Unusually, the various functions of the CDU including its surveillance and flagging functions, lacked oversight and it remains that NSOIT lacks oversight.

Parliamentary Privilege

Parliamentary Privilege

Parliamentary Privilege

6.4. However, the government refused this request. **Parliamentary privilege**

Parliamentary privilege

Parliamentary privilege

For context, even the intelligence services are subject to some oversight by the ISC.

6.5. Senior MPs from across parties, including Sir David Davis and Caroline Lucas, called for the CDU to be immediately suspended and investigated prior to its rebranding as a "national security" unit.[SC/71 - **INQ000480940**]

6.6. For context, in April 2024, the Culture, Media and Sport Committee called for an independent review of the CDU **Parliamentary privilege**

Parliamentary privilege

Section 4: Public health lessons

7.1. The problems with the UK's counter disinformation activities during the pandemic are multitudinous, but two may stand out as of particular relevance to the Inquiry.

7.2. First, the unnecessary, disproportionate, illegitimate and on occasion unlawful activity of the counter disinformation teams necessarily meant that their efforts against genuinely unlawful speech and foreign propaganda were negatively impacted and were neither as focused nor as effective as they could have been. Counter disinformation efforts across government were poorly defined, poorly targeted, and appear to have been politicised to focus more on generating a public opinion feedback loop and protecting the government's reputation than discovering and countering genuine hostile disinformation attacks. Such activity risks a negative, rather than a positive, impact on our democracy.

7.3. Second, it is dangerously undemocratic to cast scrutiny of and disagreement with government policies as subversive and deserving of surveillance or even censorship – on the contrary, the scrutiny of a robust, diverse civil society is vital in a rights-respecting country, particularly in a time of extraordinary risks and exceptional powers. Likewise, the job of the Inquiry is precisely to scrutinise the UK government's response to the pandemic so that lessons can be learned for the future. Where such scrutiny and criticism of government policies or actions is baselessly maligned by the government as "disinformation", it is failing in its duties to maintain accountability for power and freedom of expression for the public. The government's willingness to learn lessons for the future from the pandemic relies on a willingness to listen to and reflect on criticism, rather than to cynically dismiss it in the same category as hostile foreign state propaganda.

7.4. An informed and lawful approach to mis/disinformation must start with an understanding of the importance of freedom of speech both for democracy and public health – such an understanding was missing during the pandemic. Censorship never benefits science; rather, it benefits power. As the Royal Society stated:

"The Royal Society has long believed that the scientific community has a duty to communicate with the public in order to help people make informed decisions about their lives. Removing content and driving users away from platforms which engage with scientific authorities risks making this harder, not easier, to achieve. A more nuanced, sustainable, and focused approach towards misinformation is needed." [SC/14 – INQ000480879]

7.5. Any government counter mis/disinformation activity must be fully transparent; subject to clear, stringent, published policies that ensure the rule of law is upheld and privacy and freedom of expression is respected in accordance with the state's obligations under Articles 8 and 10 respectively of the European Convention on Human Rights (ECHR); subject to independent, external oversight by an individual or body with expertise and a remit to protect freedom of expression; and democratically authorised by Parliament. Secret content flags by government officials to foreign companies must not be used to evade the UK's strict legal framework on communications suppression and censorship.

7.6. The state has a legitimate role to play in combatting foreign hostile disinformation. In all but very exceptional cases, there is no reason to shield such work from the British public – where there is evidence that foreign hostile disinformation campaigns are underway in our country, that should be exhibited and shared with the public rather than used as a premise to build a shroud of secrecy under which other, illegitimate, domestic activities of the type revealed in our investigation took place. Indeed, with the recent growth of 'disinformation reporters', many journalists seek to provide exactly this kind of information.

7.7. The state does not have a legitimate role in domestic surveillance or censorship of lawful speech. The government should not be flagging lawful speech to social media companies for enforcement – to do so risks failing the UK's obligations to protect and promote individuals' right to freedom of expression under Article 10 ECHR. Article 10 is a qualified right, meaning the state can justify interfering with it in certain circumstances, but such interferences must be prescribed by law and for a legitimate aim. As stated in legal advice about the government's pandemic counter-disinformation activity that we commissioned from barrister Gavin Millar KC, who is a recognised expert in media law and free expression:

"In many of these cases the interference is likely to have been unlawful (...) Suppressing lawful political opinion, opposition or dissent is not a legitimate aim. Yet the cases discussed in the report suggests that this type of content has often been targeted by the units. Ostensibly the aim appears to be countering

misinformation, i.e. harmful false narratives. But the evidence suggests dissenting narratives, rather than false or harmful ones are being targeted. Big Brother Watch and the subjects of the SARs have managed to identify examples of this. But these are likely only the tip of the iceberg." [SC/1 – [INQ000268260] p.98)

7.8. As such, the 'counter-disinformation' activities of the CDU, RRU and 77x should be subject to an independent inquiry. Meanwhile, and until it operates with full transparency and parliamentary authorisation/oversight, the counter-disinformation activity of NSOIT should be immediately suspended.

7.9. The UK has extensive legal frameworks governing lawful and unlawful communications. In January 2024, the Online Safety Act (s.179) created a criminal offence of sending false communications where a person sends a message conveying information they know to be false where they intend it to cause non-trivial psychological or physical harm. This new offence effectively addresses harmful disinformation, that is, false information that is intended to deceive and cause harm.

7.10. 'Misinformation', on the other hand, is 'wrong information'. The only obligation the state has with regards to wrong information is to ensure correct information is available. The state has no role in suppressing or censoring, either directly or indirectly, lawful information simply because it is wrong.

7.11. The internet contains large volumes of incorrect information. It is a defining feature of an open forum, not a flaw. The basis of a belief in freedom of expression and its necessity for democracy is not only that truth can withstand the mistruths that exist in an open forum, but that it *requires* it – the discovery of truth and the evolution of knowledge is achieved in the most open possible forum.

7.12. In the new information environment, building the public's critical literacy from school-age is particularly important. [SC/73 – [INQ000480942] Online, critical literacy and counter-speech is more effective than censorship – questioning and testing ideas mirrors the scientific method.

7.13. Despite 'science' being invoked as the moral justification for greater speech restrictions online and secret government counter-disinformation activity during the pandemic, the dominance of science in our society is rooted in the moral and epistemic idealisation of freedom of speech since the Enlightenment. This is perhaps best captured in John Milton's 1644 essay *Areopagitica*, in which he wrote, "Let [Truth] and Falsehood grapple; whoever knew Truth put to the worse, in a free and open encounter?" More recently, in advocating against excessive online censorship, the former Supreme Court judge Lord Sumption wrote,

"Some of what people say will be wrong. Some of it may even be harmful. But we cannot discover truth without accommodating error. It is the price that we pay for allowing knowledge and understanding to develop and human civilisation to progress." [SC/74 - INQ000480943]

7.14. Article 10 defends the right of individuals to both freely impart *and* receive information. As discussed, as well as harming rights and democracy, there is also evidence that censorship harms trust in authority, can inadvertently boost misinformation, and as such can harm public health during a pandemic. On the contrary, the state does have a role and duty to ensure information about health and science is freely available. [SC/12 - INQ000480877] However, such provision of information does not require the suppression or censorship of other information.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

Signed: _____

Personal Data

Dated: 19 NOVEMBER 2024