Witness Name: Richard Earley, Head of UK Content Regulation Policy, for and on behalf of Meta Platforms, Inc.

Statement No.: 1

Exhibits: 13

Dated: 4 October 2024

UK COVID-19 INQUIRY

WITNESS STATEMENT OF RICHARD EARLEY

In relation to the issues raised by the Rule 9 request dated 6 March 2024 in connection with Module 4, I, RICHARD EARLEY, will say as follows:

Introduction

1 I provide this statement for and on behalf of Meta Platforms, Inc. in response to a request under Rule 9 of the Inquiry Rules 2006 dated 6 March 2024 issued under reference M4/META/01 by the COVID Inquiry (the "**Inquiry**").

2 I am Head of UK Content Regulation Policy at Meta.

3 I joined Facebook (as the organisation was then known) in 2018 as Policy Manager in the UK Public Policy team, responsible for Facebook's relationships with the UK Government, Parliament, certain regulators and connected parts of civil society.

4 In 2020, due to my portfolio covering all of health, misinformation, and harmful online content, I became the lead in our team for engagement with the UK Government on the COVID-19 pandemic.

5 I represented Meta in front of Ministers and in Parliament multiple times, and continued to support the relationship between the company and the British Government as the focus shifted to preparing for the launch of the vaccines. Since March 2022, I have been the Head of UK Content Regulation Policy, focusing largely on the company's involvement in the legislative process that resulted in the Online Safety Act 2023 and its ongoing implementation.

6 Meta Platforms, Inc. is the current provider of the Facebook and Instagram services in the United Kingdom. During the Period, the provider of the Facebook and Instagram services in the United Kingdom was Meta Platforms Ireland Limited (formerly, Facebook Ireland Limited). For the purposes of this statement, references to 'Meta' are to be interpreted as references to the relevant provider, and not to a specific corporate entity unless explicitly stated.

7 This statement sets out Meta's evidence on its policies relating to misinformation about COVID-19 vaccines, which is relevant to Module 4 of the Inquiry. I have focussed my response on evidence and information relating to the proposed date range as set by the Inquiry, between 30 January 2020 – 28 June 2022 (the "**Period**"). Given the focus of Module 4 of the Inquiry, my evidence will focus on Meta's online platforms during the Period: Facebook and Instagram.

8 I am authorised to make this statement on behalf of Meta. In making this statement, I have drawn on my own knowledge and information provided to me by colleagues from Meta.

Overview of Meta's approach to content moderation

9 Meta's mission is to give people the power to build community and bring the world closer together. We build technology that helps people connect, find communities, and grow businesses. Our useful and engaging products enable people to connect and share with friends and family through mobile devices, personal computers, virtual reality (VR) headsets, wearables, and in-home devices. We

also help people discover and learn about what is going on in the world around them, enable people to share their opinions, ideas, photos and videos, and other activities with audiences ranging from their closest family members and friends to the public at large, and stay connected everywhere by accessing our products.

10 Meta has policies that outline what is and is not allowed on Facebook and Instagram. These are the Community Standards (for Facebook) and the Community Guidelines (for Instagram).

11 These standards are based on feedback from people and the advice of experts in fields such as technology, public safety and human rights. They also reflect Meta's commitment to freedom of expression while recognising that at times we may need to limit this in line with one or more of the following values: authenticity, safety, privacy and dignity. Since 2016, we have used a strategy called "*remove, reduce and inform*" to manage problematic content: this involves *removing* content that violates our policies, *reducing* the spread of potentially harmful content that does not violate our policies and *informing* people with additional information so they can choose what to click, read or share.

Meta's approach to misinformation

12 Misinformation is content that we may remove or reduce the distribution of in line with our value of authenticity. In our Community Standards, misinformation is defined as "*content with a claim that is determined to be false by an authoritative third party*".

13 Misinformation is different from other types of speech addressed in our Community Standards because there is no way to articulate a comprehensive list of what is prohibited. The world is changing constantly and what is true one minute may not be true the next. A policy that simply prohibits "*misinformation*" would not provide useful notice to the people who use our services and would not be enforceable, as we do not have perfect access to information. Instead, our policies articulate different categories of misinformation and try to provide clear guidance about how we treat that content when we see it.

14 The provisional scope of Module 4 of the Inquiry does not refer to or define "*misinformation*" and "*disinformation*". Meta's Community Standards apply to potential misinformation regardless of the intent behind it. As a result, this statement focuses only on our approach to misinformation. Meta's Community Standards also prohibit content and behaviour in other areas that may overlap with the spread of misinformation such as coordinated inauthentic behaviour ("**CIB**").

15 CIB is defined by Meta as a coordinated effort to manipulate public debate for a strategic goal, often using fake or duplicate accounts. Tackling CIB at Meta is focussed on detecting and acting against inauthentic behaviour across networks of accounts, as opposed to focusing on the content of specific posts by individual users [RE/12 - **INQ000474411**]

Overview of Meta's approach to misinformation concerning COVID-19 vaccines

16 Even prior to the COVID-19 pandemic, Meta sought to manage harmful health misinformation on Facebook and Instagram. This involved removing false claims that could directly contribute to physical harm, reducing the distribution of content determined by third party fact-checkers to be misinformation and informing users about falsity.

17 During the pandemic, Meta's policies concerning content relating to COVID-19 evolved regularly to reflect the rapidly evolving scientific understanding about COVID-19 and the ability to verify claims about the virus and associated treatments. By way of example:

17.1 After the World Health Organisation declared COVID-19 a "*public health emergency*" on 30 January 2020, Meta announced it would be removing "*content with false claims or conspiracy theories that have been flagged by leading global health organisations and local health authorities that could cause harm to people who believe them*" (RE/01 - INQ000477449). This involved removing claims designed to discourage treatment for, or taking appropriate precautions related to, COVID-19, including claims relating to false cures or prevention methods or claims that create confusion about available health resources. This represented

the continued application of our pre-existing policy of removing false claims that could directly contribute to physical harm.

17.2 Similarly, on 25 March 2020, Meta announced it would remove additional false claims, including that physical distancing did not help prevent the spread of COVID-19 (RE/02 - INQ000477450). We also referenced the launch of our COVID-19 Information Centre, designed to help people access up to date information from local health authorities like the NHS.

17.3 In late-2020, it became clear that vaccines would shortly become available for COVID-19. Accordingly, in December 2020, Meta announced that it would remove false claims about the vaccines that had been debunked by public health experts, including false claims that COVID-19 vaccines contained microchips or that the vaccines are tested on specific populations without their consent (RE/01 - INQ000477449).

17.4 In February 2021, Meta announced that it would remove additional debunked false claims about vaccines, including that vaccines cause autism or cause the disease they are meant to protect against, and would prompt users to access relevant, authoritative results and provide third-party resources to connect people to expert information about vaccines (RE/03 - INQ000477451).

17.5 In August 2021, Meta announced certain steps it had taken against a number of '*vaccine misinformation superspreaders*', such as removing pages, groups and accounts and imposing penalties such as moving their posts lower in news feeds or not recommending them to others (RE/04 - INQ000477452).

18 How Meta reached these policy decisions is explained in detail in an article from the September 2022 edition of the *Journal of Online Trust and Safety* by Peter Stern, Sarah Shirazyan, and Abby Fanlo of Meta's Stakeholder Engagement team (RE/05 - INQ000477453). This explains how the policy development process at Meta involves gathering input from academics, civil society representatives, community leaders, and users around the world who have relevant subject matter expertise or lived experiences. It also explains the challenges that Meta faced in a public health crisis such as COVID-19, where the scientific understanding evolves rapidly and where the right approach involves balancing multiple stakeholders' interests.

19 Meta's policies evolved throughout the period but generally they allowed users to share their personal experiences, including experiences of vaccine side-effects or injuries, in service of our value of giving people a voice, unless they promoted or advocated harmful action around that claim. Specifically, Meta's policies allowed personal anecdotes about the COVID-19 vaccine unless that content also included other Community Standards violations. This was consistent with the goal of Meta's policies during the pandemic, which was to reduce health harm to people while also allowing users to discuss, debate, and share their personal experiences, opinions, and news related to the COVID-19 pandemic.

Criteria used by Meta to determine whether information concerning COVID-19 vaccines constitutes misinformation

20 As noted above at paragraph 16, Meta's approach prior to the COVID-19 pandemic was to remove false claims that could directly contribute to physical harm. At that time, this approach was reflected in our Community Standards, albeit in various places rather than in one standalone 'misinformation' section.

21 Beginning in early 2021, these policies expanded to include COVID-19 specific policies, which were updated periodically to include all of the specific claims concerning COVID-19 that we would remove from our platforms. Over time, this policy developed to include the 80 false claims that we removed, and the criteria we applied to determine what COVID-19 related content violated the Community Standards (the "**COVID-19 Policy**") (RE/06 - INQ000477454).

22 In around early 2022, we updated our Community Standards to address 'misinformation' in its own distinct section (the "**Misinformation Community Standard**") (RE/07 - INQ000477455). This policy explains, amongst other things, the criteria that Meta applies to determine whether information concerning COVID-19 vaccines violates its policies such that it will be removed from Facebook or Instagram.

23 As explained above, our policy is to articulate the different types of misinformation that we remove. The '*Harmful health misinformation*' section of the Misinformation Community Standard contains three subsections that articulate the health misinformation we remove:

23.1 The first is called '*Misinformation about Vaccines'*, which explains that Meta removes misinformation about vaccines when public health authorities conclude that the information is false and likely to directly contribute to imminent vaccine refusals. Examples of these types of information are contained in the sub-section exhibited.

23.2 The second is called '*Misinformation about health during public health emergencies'*. This subsection was created in response to the Oversight Board's recommendations in the "*Claimed COVID-19 cure*" decision (RE/08 - INQ000477456). This section links to the COVID-19 Policy, which provides a complete set of rules regarding what misinformation we do not allow regarding COVID-19 and vaccines, including the 80 distinct false claims regarding COVID-19 and its associated vaccines.

23.3 The third is called '*Promoting or advocating for harmful miracle cures for health issues*'. This details how Meta removes content promoting or advocating for harmful miracle cures for health issues, including treatments where the recommended application is likely to directly contribute to the risk of serious injury or death, or the treatment has no legitimate health use (e.g. bleach, disinfectant, black salve, caustic soda).

24 Instagram's Community Guidelines also include a section titled '*COVID-19: Community Guidelines Updates and Protections'* which contains the following text:

"COVID-19: Community Guidelines Updates and Protections: As people around the world confront this unprecedented public health emergency, we want to make sure that our Community Guidelines protect people from harmful content and new types of abuse related to COVID-19. We're working to remove content that has the potential to contribute to real-world harm, including through our policies prohibiting coordination of harm, sale of medical masks and related goods, hate speech, bullying and harassment and misinformation that contributes to the risk of imminent violence or physical harm. To learn more about our policies on COVID-19 and vaccines, see here."

25 Meta itself determined its criteria for and definitions of COVID-19 misinformation during the Period. However, Meta was part of other initiatives that involved

collaboration with other social media and media companies designed to combat misinformation. For example, Meta collaborated with a range of parties in 2020, including the Department for Culture, Media and Sport and other technology companies such as Twitter (now X) and Google, to create the Full Fact framework for responding to "*information incidents*", essentially a process for responding to the proliferation of inaccurate or misleading claims or narratives.

Key themes, sources of and motives behind COVID-19 vaccine dis/misinformation

26 To develop Meta's COVID-19 misinformation strategy, Meta's Content Policy Stakeholder Engagement team surveyed existing literature around crisis informatics and health misinformation, gaining an insight into the key themes behind health misinformation more broadly and COVID-19 misinformation specifically.

27 The key themes of COVID-19 vaccine misinformation are therefore reflected in Meta's relevant policies during the pandemic, described in the previous section. As noted, we removed 80 distinct false claims regarding COVID-19 and its associated vaccines. Such false claims concerned the safety, efficacy, ingredients, development, existence, or conspiracies related to the vaccine or vaccination programme. For example, we removed false claims that COVID-19 vaccines contained microchips or indeed anything else that was not on the official ingredient list. We also removed conspiracy theories that were known to be false, for instance the claim that specific populations were being used without their consent to test the vaccine's safety.

28 In terms of potential motivations for COVID-19 vaccine misinformation, social sciences research suggests that individuals look to social networks for information during crises, and consequently engage in "*collective sensemaking*", trying to make sense of uncertain and devastating circumstances. In such situations, people feel that information sharing is critical due to the importance of the topic, yet the ambiguity of the situation makes verifying facts and sources difficult. This can lead to people posting and/or sharing misinformation, often without intending to do so.

29 We also identified that the source of some COVID-19 vaccine misinformation was networks of accounts acting in a coordinated manner. For instance, a network of accounts that originated in Italy and France targeted medical professionals, journalists and elected officials with mass harassment. This included calling doctors, journalists and media "*Nazi supporters*" for promoting COVID vaccines and claiming that mandatory vaccination would lead to "*healthcare dictatorship*". We removed a network of accounts linked to this movement [RE/13 - **INQ000474412**

Strategy and procedures for monitoring and countering COVID-19 vaccine misinformation

30 Meta's strategy for monitoring and countering COVID-19 vaccine misinformation was consistent with our approach to enforcing the rest of our Community Standards (for Facebook) and Community Guidelines (for Instagram). We use technology and review teams to detect, review and take action against potentially violating content and accounts. This may lead to us removing content, reducing its distribution or providing context on sensitive or misleading content. It may also lead to us removing Groups, Pages or accounts that repeatedly violate our Community Standards or policies.

31 Removal is just one way we dealt with COVID-19 misinformation. Content that does not meet the standard for removal can also be reviewed by third-party fact checkers (for example, after a third-party fact checker rates content as "*false*" or "*partly false*", Meta may apply a label and links to the fact-checker article on the subject) or demoted (meaning it appears less frequently and prominently in users' feeds). We also may apply "*neutral labels*" to COVID-19 related content, for instance labelling content to say "*some unapproved COVID-19 treatments may cause serious harm*" and then directing people to Meta's COVID-19 Information Centre, and helped people find relevant, authoritative results and third-party resources to connect people to expert information when they searched for vaccine or COVID-19 related content on Facebook. For COVID-19 misinformation, we also required some admins for groups with members who have violated our COVID-19 policies to temporarily approve all posts within their group.

32 Our approach combines human review and the use of technology. Meta has in place extensive technologies, systems and controls to find and remove content that violates our policies, sometimes before it is disseminated. Under the COVID-19 Policy, Meta began removing false claims about masking, social distancing and the transmissibility of the virus on Facebook and Instagram. Meta regularly updated the claims removed based on guidance from public health authorities, as detailed in the iterative updates to our policy described at paragraph 17 above.

33 Globally, we removed more than 27 million pieces of COVID-19 misinformation from Facebook and Instagram between March 2020 and July 2022, 1.3 million of which were restored through appeal. Furthermore, we removed more than 15 million false claims related to COVID-19 and the vaccines.

Counter-Disinformation Unit and Rapid Response Unit

34 Meta first began interacting with the UK Government's Counter Disinformation Unit (the "**CDU**") shortly after its establishment in 2019. Following the outbreak of the COVID-19 pandemic in early 2020, Meta began cooperating more closely with the CDU in relation to the CDU's efforts to counter COVID-19 related misinformation.

35 In particular, this cooperation included periodic meetings with representatives of the CDU to share information on our work and high-level trends (including those from our third-party fact checkers), as well as a dedicated email address through which the CDU could refer to Meta examples of potential COVID-19 related misinformation content. When the CDU would send Meta specific pieces of potential COVID-19 related misinformation content, we reviewed that content and removed it from our platforms when it violated our Community Standards and/or Community Guidelines.

Reflections and lessons learned concerning COVID-19 vaccine misinformation

36 The COVID-19 health emergency was an unprecedented situation for everyone. Meta took extensive steps to try to help keep people safe and informed during the

crisis, by providing access to accurate information, removing harmful content and supporting health researchers with data and tools.

37 We helped over two billion people find credible COVID-19 information and provided tools and resources to help communities stay safe and connected during the pandemic. Through Meta's 'Data for Good' programme, we provided tools and critical data to over 450 organisations in 70 countries to help track the spread of the virus, measure the effectiveness of prevention measures and better understand attitudes towards COVID-19 vaccines. In the U.S., we partnered with health organisations to help individuals find nearby places to get vaccinated against COVID-19.

38 In the UK, Meta also partnered with health organisations to help keep vaccine acceptance rates high as the vaccines were rolled out. On 19 February 2021, Meta announced support for the UK Government and NHS vaccination programme through the promotion of specially designed profile frames and GIPHY stickers and through our plans to boost credible voices speaking positively about the vaccines.

39 As part of this programme, UK users were able to update their Facebook profile frames to say they had been vaccinated or to announce their intent to be vaccinated while giving thanks to the NHS. We also helped launch a suite of stickers across Instagram and Facebook stories through GIPHY to allow people to show their support and encourage their friends and family to do the same.

40 We saw initial uptake from a range of public figures including the minister for health Matt Hancock and the Vaccine Minister Nadhim Zahawi, Chef Gordon Ramsay, former footballer Gary Lineker, TV presenters Lorraine Kelly and Davina McCall, London Mayor Sadiq Khan and many others. There were also supportive posts from the UK Government Facebook page with messaging from Meta directly. For example, a video from Nicola Mendelsohn, Head of Global Business Group at Meta, was shared on the Department for Health and Social Care Facebook page reinforcing a message of collaboration.

41 We have learned lessons concerning vaccine misinformation from our experience of COVID-19. In particular, we learned that developing these policies during a public health emergency is extremely challenging. The Period was one of considerable uncertainty: people questioned what was true and who could be trusted. At the same time, scientific understanding about COVID-19 was evolving and, eventually, vaccines that had previously not existed were developed and rolled out at scale. Helping to protect public safety while respecting freedom of expression is a core challenge of policy development, especially concerning health content. Therefore, one of the lessons we learned at Meta was that developing the right policies requires engagement with a broad range of stakeholders.

42 Meta also took concrete steps to learn from the COVID-19 pandemic. In July 2022, we asked the Oversight Board whether continuing to remove COVID-19 misinformation is consistent with our values of promoting users' voice and safety, along with recognised international human rights principles, or whether we should begin addressing this misinformation through less restrictive means, particularly through labels, demotions, or our third-party fact checking programme (RE/09 - INQ000477457). The Oversight Board is an independent oversight body, distinct from Meta, which is responsible for precedent-setting content moderation decisions on the social media platforms Facebook and Instagram.

43 In April 2023, the Oversight Board published their policy advisory opinion on the removal of COVID-19 misinformation (RE/10 - INQ000477458).The Oversight Board made several key findings and recommendations.

44 The Oversight Board advised that we should stop removing false claims about COVID-19 in countries that were no longer experiencing a state of emergency from COVID-19, but that we should continue to remove COVID-19 misinformation that is likely to directly contribute to the risk of imminent and significant physical harm. The Oversight Board also made a number of recommendations to which Meta provided public responses (RE/11 - INQ000477459).

45 In light of the Oversight Board's opinion and the World Health Organization's 5 May 2023 decision to lift the Public Health Emergency of International Concern (PHEIC) status for COVID-19, our COVID-19 Policy is no longer in effect globally.

46 On behalf of Meta, I'd like to thank the Inquiry for giving us the opportunity to provide evidence and to contribute to the Inquiry's important work.

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: 4 October 2024