

UN Human Rights Office

Press briefing: Online content moderation and internet shutdowns

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Speaker: Peggy Hicks, Director of Thematic Engagement

We want to emphasise that we have the same rights online as offline. But look at the online landscape, and you see a digital world that is unwelcoming and frequently unsafe for people trying to exercise their rights. You also see a host of government and company responses that risk making the situation worse. Recent developments in countries including, for example among many others, India, Nigeria, the UK, the US and Vietnam have spotlighted these issues, and will be influential in how our online space evolves.

These challenges are not new – offline speech too has posed and continues to pose these problems. What is new is the reach and speed of this digital public square. Discussions on how to address “lawful but awful” speech online tend to devolve into finger-pointing between States and companies, with political and economic interests often eclipsing public interests.

We have one overarching message to bring to this debate and that is the critical importance of adopting human rights based approaches to confronting these challenges. It is of course, the only internationally agreed framework that allows us to do that effectively. We need to sound a loud and persistent alarm, given the tendency for flawed regulations to be cloned, and bad practices to flourish.

There are many examples of problematic legislation on online content. To give you an idea, about 40 new laws relating to social media have been adopted worldwide in the last 2 years, and another 30 are under consideration.

Virtually every country that has adopted laws relating to online content has jeopardized human rights in doing so. This happens both because governments respond to public pressure by rushing in with simple solutions for complex problems; and because some governments see this legislation as a way to limit speech they dislike and even silence civil society or other critics.

Let’s take Vietnam’s 2019 Law on Cybersecurity as an example, which prohibited conduct that includes “distorting history, denying revolutionary achievements,” and “providing false information, causing confusion amongst the citizens, causing harm to socioeconomic activities.” That legislation, along with the Penal code, has been used to force deletion of posts and many of those voicing critical opinions have been arrested and detained. Facebook initially challenged government orders to take down content, but reportedly has now agreed to restrict “significantly more content”, apparently as a condition for continuing to do business in Vietnam. In June, Vietnam adopted an additional new Social Media Code that prohibits posts, for example, that “affect the interests of the State.”

Laws in Australia, Bangladesh, Singapore and many other locations include overbroad and ill-defined language of this sort.

And the list keeps growing. The United Kingdom in May tabled its draft Online Safety Bill which has a worryingly overbroad standard that makes the removal of significant amounts of “protected speech” – i.e. speech that, under international law, should in fact be permitted -- almost inevitable. Now, in the wake of the abhorrent abuse of Black English football players earlier this week, there are demands to get that legislation in place more quickly, as if the bill could have somehow protected the players from the racism they faced.

These laws in general suffer from many of the same problems:

- Poor definitions of what constitutes unlawful or harmful content;
- Outsourcing regulatory functions to companies
- Over-emphasis on content take-downs, and the imposition of unrealistic timeframes
- Powers granted to State officials to remove content without judicial oversight
- Over-reliance on artificial intelligence / algorithms.

There is a better way. We can, and should, make the internet a safer place, but it doesn't need to be at the expense of fundamental rights.

Speaker: Marcelo Daher, Human Rights Officer

We've outlined five actions that could make a big difference:

- 1) Focus on process, not content. Look at *how* content is being amplified or restricted. Ensure actual people – not algorithms - review complex decisions.
- 2) Ensure content-based restrictions are based on laws, clear and narrowly-tailored, that are necessary, proportionate and non-discriminatory.
- 3) Be transparent. Companies should be transparent about how they curate and moderate content and how they share information with others. States should be transparent about their requests to take down content or access users' data.
- 4) Ensure users have effective opportunities to appeal against decisions they consider to be unfair, and make good remedies available for when actions by companies or States undermine their rights. Independent courts should have the final say over lawfulness of content.
- 5) Make sure civil society and experts are involved in designing and evaluating regulations. Participation is essential.

The EU is currently considering what promises to be a landmark law in this space – its Digital Services Act – and the choices being made in that legislation could have ripple effects worldwide. The draft has some very positive elements: it is grounded in human rights language; it is being developed through a participatory process; and it contains clear transparency requirements for platforms. Yet, some contradictory signals remain including the risk that over-broad liability will be imposed on companies for user-generated content, and that there will be limited judicial oversight.

We are also concerned about other approaches to regulating companies including requirements for legal representation mixed with threats of criminal liability, data storage and access, and taxation.

India has faced serious incidents of incitement to violence online, clearly a factor in recent attempts to regulate online space. In February, India unveiled new [Guidelines for Intermediaries and a Digital Media Ethics Code](#). This new law introduces some useful obligations for companies relating to transparency and redress, but a number of provisions raise significant concerns, including those empowering non-judicial authorities to request quick take-downs, obliging platforms to identify originators of messages and stipulating that companies must appoint local representatives whose potential liability could threaten their ability to protect speech, and even to operate. The threat of limiting protected speech and privacy has already surfaced, including in legal disputes with both Twitter and WhatsApp in the past month, which are now before the Indian courts.

A number of other countries have introduced or are considering extensive requirements for platforms to operate, including amendments adopted last year in Turkey, a ministerial regulation in Indonesia, and a recent proposal in the Mexican Senate, the impact of which varies significantly based on the political and legal context in which they are being enforced.

Of course, the ultimate tool to control online speech are **internet shutdowns**, including blocking specific apps, and the partial or complete shutdown of internet access.

Access Now's #KeepItOn campaign has documented 155 shutdowns in some 30 countries during 2020, and 50 shutdowns already this year up until the end of May. The High Commissioner has expressed specific concerns on shutdowns in Belarus, Myanmar, Tanzania, and Iran.

In June, the Nigerian Government announced the "indefinite suspension" of Twitter after the platform deleted a post from President Buhari's account that Twitter said violated its policy on abusive behaviour. Within hours, the country's major telecommunications companies blocked millions from accessing Twitter, and later Nigerian authorities threatened to prosecute Nigerians who bypassed the ban. The ECOWAS Court of Justice has reportedly recently ordered Nigeria to refrain from such prosecutions pending the outcome of a case filed against the Twitter ban by a Nigerian civil society organization.

Restrictions do not always violate human rights, but any limits need to be necessary, proportionate, and non-discriminatory. To be proportionate, restrictions should be the "least intrusive" method available, yet we see shutdowns far exceeding any need.

Shutdowns don't just interfere with speech - people rely on the internet for their jobs, their health and their education. The impact of shutdowns on elections – when open and safe spaces for public debates and public protests are vital – is particularly serious.

In the face of all these challenges, social media companies have become something of a punching bag for everything that goes wrong online – they are harshly criticized both for failing to take down harmful content, and often suffer equally severe abuse when they actually do so.

Much of this criticism is justified – the companies open themselves up for such complaints by their ill-defined and opaque policies and processes. The Facebook Oversight Board has engendered a great deal of skepticism, but it has already succeeded in one important way –

its cases have shone light on previous unknown or unexplained practices that have enormous consequences for fundamental rights online.

Nowhere was this more true than its review of Facebook's decision to subject former US President Trump to an "indefinite suspension" of his account. The Board's decision led Facebook to admit that it had not applied its "newsworthiness" exception to President Trump's account, to explain a "cross-checks" process we had not known existed, and to provide information on how its "strikes" policy works.

Another huge gap relates to the opaque and insufficient avenues people have to challenge companies' content moderation decisions. For example, last May when conflict began in Israel and Palestine, critics alleged that Palestinian voices were disproportionately affected by social media company actions. Facebook acknowledged problems arising in its automated moderation systems, and described as an error Instagram's blocking of hashtags referring to the Al Aqsa Mosque because "Al Aqsa is also the name of an organization sanctioned by the United States Government."

Speaker: Peggy Hicks

The UN Guiding Principles on Business and Human Rights stipulate that all companies have a responsibility to respect human rights. For tech companies, this means they should take steps to ensure they are not contributing or linked to human rights abuses committed by those who use their products and services.

The actions companies take should be proportionate to the severity of the risk. Their options include a range of measures, not just take-downs but flagging content, limiting amplification, and attaching warning labels. Companies need to do much more to be transparent and actively share information about their actions and company policies and processes

Social media companies also need to grapple with how they address content moderation issues globally. Context is essential to understanding the potential of speech to incite violence, for example. While Facebook's experience in Myanmar led to greater investment in what it calls other "at-risk countries", social media companies' capacity to understand language, politics and society in many locations around the globe remains limited.

The UN Guiding Principles on Business and Human Rights also make clear that governments have a duty to protect against human rights abuses by companies. Given the propensity for online harm, States need to put in place effective guardrails for company actions, including by requiring greater transparency and accountability. But the dangers of States overstepping the mark are painfully clear, as countless people currently detained for online posts that contained protected speech make clear. State regulation, if done precipitously, sloppily or with ill intent can easily consolidate undemocratic and discriminatory approaches that limit free speech, suppress dissent, and undermine a variety of other rights.

We face competing visions for our privacy, our expression and our lives, spurred on by competing economies, and competing businesses. Companies and States alike have all agreed to respect human rights. Let's start holding them to that.

Q&A:

Peggy Hicks: That is the end of our introductory statement, and we are now open to questions, I will be watching online for raised hands so please let me know.

Journalist: Yeah, I just wanted to ask, you know, you were talking about this is relating to businesses and States, but how does this apply to bigger organizations like the UN, for instance, in terms of access to information? Because I think journalists sometimes have complaints that the system that operates does not always give them full and free access to information that they need in press conferences and such like. Instances when they cannot easily question and access the information that is needed. Thank you.

Peggy Hicks: Thanks. We are looking very closely, and my colleague Scott Campbell may want to add on this, at the way that the UN implements human rights standards with regards to new technologies. The Secretary-General, in his roadmap on digital cooperation, specifically looked at how the UN itself does human rights due diligence, on how it deploys new technologies. With regards to access to information and content online, obviously, the UN isn't itself a social media provider, nor a State. But the idea that the UN needs to be careful in the way that it uses these spaces, that it needs to provide free access to relevant information and avoid missing disinformation is obviously part and parcel of what the UN is committed to doing. Scott, anything you want to add on that front?

Scott Campbell: Thanks Peggy. Maybe just quickly that indeed, I mean, the Secretary-General has stressed he has a new strategy out last year on how to use data, how to leverage information so that we can be more effective at meeting the SDGs and promoting and protecting human rights around the world. A challenge there and a challenge in access to information is, of course, as it relates to issues of confidentiality and information that may be sensitive. And this is something, of course, that's a very frequent concern in our work in the UN Human Rights Office. So access to information, access to data, the Secretary-General obviously underscored that this is key in terms of making us more effective as the UN. But at the same time, there are those concerns about data protection and data privacy. And the Secretary-General, in parallel with his efforts to make sure that we're applying the human rights due diligence in how we're using information and how we're using data, is also undertaking an effort to develop a policy that is specifically around data protection and data privacy, which is something that my colleague Tim Englehardt has been working on as well.

Peggy Hicks: Thanks Scott.

Journalist: Thanks very much Peggy. Two questions, if I may, because I think there's general interest. One would be regarding former President Trump's lawsuits filed recently against Facebook, Google as a parent company and Twitter alleging that they tried to silence conservative viewpoints unlawfully. So I realize this is under adjudication, but would you say that, you know, that that he has a case against such media companies that have, in the case of Twitter at least, put out an indefinite ban? And then if I could come back with a second question after you're able to address that, please. Thank you. Or would you rather have that first?

Peggy Hicks: I'm fine with just taking that one, so we make sure. So thanks for the question. It's obviously really interesting issues. I'm not, in this instance going to opine specifically on US law, but the two points that I'd make in response to those lawsuits. The first is that what we have seen in monitoring the space and what I think has been fairly well documented is that while there are many ways in which the company's policies towards content moderation are subject to criticism or improvement, the idea that there is some sort of overall silencing of conservative voices that's disproportionate compared to other voices, I think doesn't have a solid evidentiary base. Now, what impact that will have ultimately on a legal suit - that's for the lawyers to say. I would also mention that, as you said, as it relates to sort of the silencing of speech generally, the idea of either indefinite or permanent bans.

Actually, it's interesting that Facebook did an indefinite suspension and that got them into trouble. Twitter, on the other hand, it's supposedly a permanent suspension or ban. What has happened, of course, in that case is that the Facebook oversight board has said explicitly first that that Facebook didn't follow its own rules because they didn't have a provision for indefinite suspension and then has said, looking very explicitly, Facebook looked at the relevant human rights standards, referring to, for example, the International Covenant on Civil and Political Rights and the commentary there to the Rabat declaration. So a very detailed analysis of human rights law, which we are pleased to see. And what they found is that the original decision to suspend was supportable, but that, again, the response has to be proportionate, as we've said in our introductory remarks. And so one of the questions there will be, and I think will continue to arise, is whether a permanent or indefinite suspension can ever be determined to be fully proportionate. And I think that's a question that we'll see coming up again. Back to you, for your second question.

Journalist: Second question, please, regarding to the racist epithets and behavior following the euro final at Wembley in the UK last Sunday, and your concerns about that sort of behavior on and off the pitch. I guess the UK is considering some new legislation. Can you expand a little bit about any concerns you have about that, please?

Peggy Hicks: Great. Thanks. I'm glad you asked about the situation in the UK because it's a good current example of where these issues have arisen. I think first we need to be clear that you can't wave a magic wand and make racism on the Internet disappear. A lot of attention has been and can and should be paid to how to make online space less threatening and damaging for people of African descent and for women and for many others. But the reality is that what we see online is mirroring what people face day to day offline.

The High Commissioner, just earlier this week, released a groundbreaking report that looks at systemic racism. And it's important to note that that report arose in the context of George Floyd's murder and the concern over racism within law enforcement. But part of what the report makes clear is that you can't address systemic racism by only looking within law enforcement. You have to also look at within society, look at the legacies that racism is built on, and address those issues. So she's called for a transformative approach that looks across all of the ways in which racism is occurring. And that's, of course, what we'd want to see in the context of the racism experienced in sport in the UK and elsewhere. At the same time, I think we also have to be clear about what we can expect companies to do.

Clearly, there are ways to improve and they should be looking at them. But the idea that they could uniformly and easily tackle it isn't so clear. To block racist speech through algorithm, you would need, the type of speech that we've seen in this case at least, a really sweeping approach that would undoubtedly block more speech than what we'd want to see blocked. And I think it's really important to note that some studies have shown that, in fact, when we use automated moderation tools like that, they end up censoring more heavily the exact people we want to protect. So common hate speech detectors have been found to be one point five times more likely to flag content by Black people as inappropriate than content posted by white people. So we need to be careful of what we ask for in terms of solving this problem. And we need to address both the online environment but racism offline as well. So I'd stop there, but maybe we should say a few more words on the Online Safety Bill that the UK has introduced. Marcelo, would you like to take that up?

Marcelo Daher: I think with the Online Safety Bill, we have the same kind of concern we had with other previous legislation adopted in some European countries that are replicated elsewhere. We have the problem with the vague definition of what would be the harm to be covered by this law. So there's still very broad categories of content that could be considered offensive, indecent, obscene, that could be targeted by these new piece of legislation. There are also serious concerns with the immense powers it gives to the Office of Communications (OFCOM) in the preparation of codes of practice and in the implementation of these norms. This is a typical channel for abuse in other locations where rule of law guarantees are not there. And even in the UK context, if every time you create a channel that is too close to government authorities, you offer risk for abuse. There are also risks to privacy, of course, because it has lots of requirements on providing information that could undermine encryption, which is another aspect of concern that we see in other legislation around the world. So it has some of these typical features that we see in this sequence of norms that we just spoke about. Thanks.

Peggy Hicks: Thanks Marcelo. I see a question, and I'll come to you next. But just to add on to that briefly, sorry for the long answer. Marcelo referenced sort of other European models. The one that that we wanted to flag, of course, is the German Netzky law, which is not only a major one, but one that has been replicated in dozens of countries in various forms. And one of the questions we're often asked is if that law didn't have some of the dramatic consequences that we feared for protecting speech, why do we need to be worried about this replication? And I think what we need to emphasize is that the replica laws often go far beyond what was in the German law in a variety of ways, both in terms of the types of speech that they effect, but also that it looks at fines for systemic failure rather than specific posts. And importantly, and this is something that's coming up a lot in today's context, it's the company that's held liable under that law, not managers that are threatened with ending up in jail if they fail to take down a post. So the bottom line is that the political, legal and economic context in which these laws are implemented really matters. And so a strong judiciary and mandated review can mitigate some of the effects of overbroad laws. But when we see them replicated in places without those guarantees, we see really disastrous consequences. Over to you for the next question.

Journalist: Thank you. I'm sorry, my Internet connection is so bad, I've missed chunks of what you've been talking about, so I hope I'm not asking you to repeat, but I did catch you, Peggy, saying something about some of the mechanisms for protecting speech are likely to affect the people you are trying to protect more than the people you're trying to protect them against. And I just wonder if you could elaborate a little bit on how that works and where you find that most evident. And that leads me to also the question about really, where do you see a best practice legislation here? You speak of the laws and of having a rating, particular issues and problems. Is there a model code that anybody could point to as good?

Peggy Hicks: Great, thanks very much, and sorry about the sound quality, we will distribute the statement that we delivered if that's helpful later. But the first part of your question was about the fact that some of these measures that are designed to protect people can ultimately have a negative impact on the various people they're trying to protect. I don't have a specific case study that I can point to on that for you. But what I would say is that what we see is the real impact of all of these measures on oppositional speech and on civil society and journalists. I mean, we see that happening from context to context, where the types of speech that are really, in many cases, the most important for us to have public space for are the speech that's being affected. And those are the people that are often being detained and arrested.

The statistic I cited was that, and it's a study that was done and published by Vox, that found that hate speech detectors were 1.5 times more likely to flag content by black people as inappropriate than content by white users. So we can't take that one statistic too far. But the reality is, the point is, we have to be very careful about using automated approaches and we need human review of complex decisions. So we can't expect that simply putting in place the right algorithm is going to get rid of everything we want to get rid of online. And any approach that would try to do that comprehensively would likely have really adverse impacts by bringing in lots and lots of speech that really ought to be there and needs to be there for our societies to operate effectively as well.

The second part of your question was one that we were hoping somebody would ask because it's really important one, which is about is there a model law that we think is one that we want to see replicated? In my notes was a call for the fact that that's one of the things that we're really looking for, is to try to get some of the States that are legislating right now to really engage in a serious, thoughtful process, to bring in and consult with those that have expertise on these issues to learn from the examples that we're citing here and many, many others, and to really make a better law. And then once you've made the better law, really monitor it to see if you've gotten it right and whether there have been mistakes.

The place where this is coming up right now, and it's a really important environment for this conversation, is within the European Union, which is considering a comprehensive Digital Services Act. And we know that what the EU will do in the space will be very influential. Look at the impact that the GDPR on data protection issued by the EU had. So it will be influential for both good and for bad. And we do see some promising approaches, as we mentioned, in the Digital Services Act, referred to as the DSA. But there's still some work to be done in our view, to come up with legislation that's the model that we're looking for. I'd point out

a couple of issues in it that we still have. One is the use of trusted flaggers under the law. Law enforcement agencies, for example, will be able themselves to remove content and bypass some of the procedural standards and judicial review that we think is really necessary.

Also, we think this is an opportunity to look more carefully at micro targeted advertising and the impacts of that on our societies and would encourage that to be picked up as well. And thirdly, we're looking at oversight rules and how oversight works within this type of legislation. And in this instance, we really want to emphasize the need for oversight to be insulated from political and commercial influences. And so to really set in place an independent oversight mechanism for how this is put in place. I wanted to also emphasize, though, that within the EU context, it's not just the DSA that is relevant to these discussions of freedom of expression online. There were new EU rules that came into effect on removing terrorist content online just on June 7th, and they give online platforms only one hour to act in removing or evaluating content. And we're concerned that that short time limit will result in overbroad takedowns. And we've urged the European Commission to closely monitor the impact of those rules and revise as needed.

So that's an example of a place where the type of oversight I was mentioning would be really helpful. I'm looking to see other questions and I don't see any off the top. Do any of my colleagues have things that I've missed that you'd like to add in. Scott, anything from your end?

Marcelo Daher: Just a short point. I think one clear point here is that when, for example, with this confusing signals, clarity is essential when you regulate expression and with these overlapping different norms and different attempts from different sides, and done just out like as a reaction to different events accumulating, the system that is created is a system that is extremely confusing. And it's hard for the companies, it's hard for the users and ultimately hard even for the courts to then make their minds about what is permitted, what's not, how it's going to be implemented. So clarity is the aspect that we need to look at and that it's concerning where any time that a government takes action to fast and without consultation.

Journalist: I just had a question, there seems to be a big tension between the speed of Internet, the sheer size of the data that comes out and the solution that you offer, which is for complex solutions, for complex problems, to have people looking into it. And second, to have independent courts deciding. This is all on the time span that is completely different from what you have on the Internet. And meanwhile, you know, the message keeps going on. How do you reconcile those two very different speeds and possibilities to manage the data?

Peggy Hicks: I'll take an initial step, but I think my colleagues may want to come in on this and sorry for not getting your name right the first time. I think it's really a valid and important question. And it's one where there isn't a slam dunk answer that will solve the problems of the scale and speed required to do these things. And we will always be trying to do things at scale as quickly as needed to protect rights while infringing on rights as minimally as possible. That's what the whole standards of necessity and proportionality are about. But what we do find, we're not saying that every decision needs to be subjected to human review, but what we're saying is there are ways to bring human review into the process that can ensure that

the algorithmic approaches are working effectively. And there are, of course, instances where things should be reviewed more than once.

I mean, that's actually another thing that came out of some of the Facebook oversight board's review of the Trump case - it came up that they do crosschecking on some cases, and that gave rise to a lot of questions about, well, how do they decide which things are going to be cross-checked? But the idea that some sort of crosschecking on certain types of things that could have enormous societal impact is appropriate, I think we can probably all agree on. So we need to find those solutions to allow it to be done at scale and at speed. If we look at the German NextG law, I think that was one of the big questions because it is a very quick timeline. And as I said, I think what we've seen is that while there have been some takedowns of protected speech, it has not had the huge ripple effect that it might have. And it does, of course, involve a system for judicial review. So it's an example of something that, there are varying opinions on this, has worked in many of the ways that the authors hoped it would, I think. And so we can learn from it and improve on it and hopefully address those questions of scale and speed. Would others like to come in?

Tim Engelhardt: Yes, thanks for the question. Of course, one of the core problems we face in this area and as Peggy said, there is no simple answer to that. And I think acknowledging that is really part of the solution. And that points to some important elements that regulation of any sort needs to ensure. These are mass decisions but we, as the public, know very little about how they are being done, what the impacts are, et cetera. So that points to the need to have a massive increase of transparency about decision making processes. Only that can enable an appropriate level of accountability. So actually, people can go back to the companies and say, hey, here's a problem, please fix it. That points to the need to have avenues for review, for remedies, etc. if there are mistakes that are being done. And that also points again to something we have referred to several times, the need to keep these processes as far removed as possible from undue political influence and hence the involvement of independent judiciary bodies, hence the need to have oversight that is not linked to a ministry of some sort. And that's actually something that we see all around the world now happening . Even the online safety bill we mentioned before has one part where the Secretary of State can determine the strategic direction of OFCOM, which really collides with the idea of independence. And you see it in many other instruments we have referred to - Singapore for example, where various authorities can just go to Twitter and say, please take this down. So there's not one single solution, but we need to have a whole set. And I don't think this will be easy. I don't think that this will be free of mistakes. But what we need to keep in mind, it will certainly not be a solution if we abandon the fundamental principles we have built our societies on, and this is rule of law, democracy and human rights.

Journalist: I have another question, if I may, simply to ask whether we're reaching the point where we could use another mandate holder to essentially address these particular issues, given the rapid expansion of issues and the extraordinary scope of the problem. I mean, at the moment, it sort of seems to fall on the on the head of the freedom of expression. But we're talking about issues that go beyond freedom of expression and race, very complex issues. So I just wonder if you think that we've reached a point where we need another

mandate or we need some other form of ombudsman, neutral arbiter to provide a point of reference for civil society and State?

Peggy Hicks: Thanks. So next question was about whether we need another mandate to go beyond the Special Rapporteur on freedom of expression and potentially have more in place to look at these issues and provide guidance on them. This is a question that you won't be surprised to hear that we've talked about a lot within our Office. I think that I want to emphasize that while the freedom of expression mandate has been exceptional in terms of the work that's been done both by David Kaye and now by Irene Khan, it is the case that across the mandates, there's an enormous body of work relating to these issues of digital technologies and human rights. So obviously, the Special Rapporteur on freedom of expression was David Kaye, writing to the Australian authorities on their abhorrent Violent Material Act that was passed in the wake of Christchurch, a situation where, in fact, they wrote to request information on the law that had just been introduced. And by the time they were able to make their letter public, the law had already been adopted. An example of that sort of quick approach to legislate that I mentioned earlier.

But it's not just expression and freedom of association and the political and civil rights, but there's also been really good reporting on these issues from the mandate holder, on older persons, on health, on violence against women. So it's across the spectrum of the mandates that exist within the Human Rights Council. But I do think that it's not as accessible and it's not pulled together in the ways that might make it most useful to States and others that want to look at the space. We've made one step in that direction. So it's my chance to advertise for you the digital hub that's been created that pulls together all of those special procedures, reports that relate to this. And I'm going to let Scott give you the website address because I don't have it in front of me. But that's one way that we're trying to address the gap that you mentioned. But I wanted to mention that we've also talked a bit about the need for models, about review of legislation, about more support and ability to advise governments as they're making these tough, tough decisions. And we do think that more space to do that, not just from sort of a Special Rapporteur approach, but actually a sort of advisory opinions and engagement with States around these issues could be really useful.

The model we sometimes mentioned is that of the Venice Commission within the Council of Europe that advises on rule of law and other issues. So some sort of mechanism of that sort is something that we've we said might be useful. And obviously, there's the new office of the tech envoy set up by the Secretary-General that we will obviously have some role in the space and will, I'm sure, be advising and supporting on this. I should also mention that as an office, we are working very diligently to address how companies address these challenges. We have a big project called the B-tech Project that works with companies on how they apply the UN Guiding Principles on Business and Human Rights in the tech space. Because what we hear, of course, is the guiding principles may make sense in a traditional supply chain or in extractive industries.

But the same sort of question that has been raised, how do they work, given the scale and the speed of the digital world? And so we're really trying to unpack those issues and try to be very clear what are companies responsibilities under the guiding principles to do human

rights, due diligence, to avoid the types of impacts that we're talking about. And that guidance also even looks, for example, at business models and the extent to which they need to look at their business models and the extent their business models actually feed some of the offline harms that we're talking about here. Scott, over to you for any additional comments and the link to the website.

Scott Campbell: I just I put the link in the chat to UNTV, hopefully that's accessible to everyone, if not UNTV colleagues, please do pass that on. I mean, I think you covered it, Peggy. We have made a first step in trying to pull together really the enormous and the rapidly growing amount of information of guidance and recommendations and reports coming from not only the Special Procedures and the different mandate holders, but also from the Treaty Bodies and from our own Office. So there is a clearinghouse, if you will, of information out there. But it is just a first step. And I think there are still a number of gaps, despite quite a lot going on by the special procedures. And that's something we're looking at - where are those gaps, where is guidance yet to be developed. And what we're seeing initially is there are a lot of gaps around economic and social rights. And the other area, I think, where there's room for improvement, is in coordination and perhaps in rather than adding an additional mandate holder, as so many of the mandate holders are already involved, it's a question of improving some of the communications and coordination going on between the different mandates that are working on the impact of a digital tax on the respective rights issues that they're working on over.

Peggy Hicks: Thanks, Scott, and I should just add, I reference the work by the Special Procedures, but it's all human rights mechanisms. The Treaty Bodies have done enormous work in these areas as well. And we try to reference that in the hub too. I don't see any more questions at this stage. So unless my colleagues tell me differently, we'll bring it to a close. We thank you all for your interest. As I said, we focused today on freedom of expression online, but there are lots of other issues in the space that we're looking at, and would be very glad to do this sort of briefing in the future on other issues in the digital space, looking at things like the impacts of artificial intelligence on social and economic rights, facial recognition and its impact on policing, and so many issues that keep us all occupied quite a bit of the time. Thanks very much for joining us.