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Julian Knight MP
Digital, Culture, Media and Sport Committee
House of Commons
London
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11th May 2020

Dear Mr Knight

Thank you very much for your letter dated 4 May following the committee to discuss COVID-19 misinformation.

Google is keen to participate fully in Parliamentary committees, answering questions and providing detailed clarity on our approach, policies, implementation and further areas of importance. I was pleased to be able to share with the committee new information on the work I have led in the UK including surfacing authoritative information from the NHS, partnering with the Government on promoting their public messages, supporting fact checkers and taking action against content that infringes YouTube's Community Guidelines. As with every committee, when questions arise which are outside of the main focus of the inquiry, or further information is requested, we are very pleased to follow up in writing.

1. Why has Google not implemented a report function for low quality or misleading search results, given the limitations of its automated systems and algorithms? How else can Google address these limitations?

Every search result page has a "send feedback" link at the bottom where users can provide exactly this sort of feedback, along with other observations or suggestions for how to improve. We have found that this kind of anecdotal reporting is not always the best way to address the important issues of low quality or misleading web pages in search results. Google indexes hundreds of billions of webpages and handles trillions of searches each year. Notably, every day, 15% of the queries we process are ones we've never seen before. Ensuring high quality results at that scale requires systemic approaches.

We continuously measure and assess the quality of our systems to ensure that we're achieving the right balance of information relevance and authoritativeness to maintain user trust in the results that they see. Google's algorithms identify signals about pages that correlate with trustworthiness and authoritativeness. We are constantly evolving these algorithms to improve results – not least because the web itself keeps changing. To that end, we continuously improve upon our systems using different mechanisms to capture feedback and continue to improve the quality of our results. These mechanisms include 1) Regular quality testing and evaluation and 2) Feedback mechanisms for reporting policy violations and illegal content, in line with applicable laws.

Regular quality testing and evaluation:

Google Search uses ranking algorithms to ensure we are meeting users' expectations of surfacing relevant and high quality sources. To help ensure Search algorithms meet high standards of relevance and quality, we have a [rigorous process](#) that involves both live tests and thousands of trained external Search Quality Raters from around the world. These Search Quality Raters must complete standard training and are tested on our rater guidelines before they can begin to provide ratings. These [guidelines](#) are publicly available and define our goals for Search algorithms – including defining pages that potentially misinform users as “lowest quality.”

Search Quality Raters assess whether a website provides users with the content they were looking for, and they evaluate the quality of results based on the expertise, authoritativeness, and trustworthiness of the content. These ratings do not directly impact ranking, but they do help us benchmark the quality of our results, which in turn allows us to build algorithms that globally recognize results that meet high-quality criteria. Search Quality Raters also perform evaluations of each improvement to Search we roll out: in side-by-side experiments, we show evaluators two different sets of Search results, one with the proposed change already implemented and one without. We ask them which results they prefer and why. This feedback is central to our launch decisions. In 2019 we ran over 464,065 experiments, with trained external Search Raters and live tests resulting in more than 3620 improvements to Search.

Feedback mechanisms for reporting policy violations and illegal content:

Google Search also contains some features, including [knowledge panels](#), that are proactive in providing information. For these features, we have content policies to prevent content like hate speech, sexually explicit or misleading or inaccurate content from appearing. To that end, we provide more specific feedback channels alongside these types of features, in addition to the general feedback channel at the bottom of the Search results page that allow users to provide feedback on content that they believe is

in violation of our published content policies. We also provide an [online form](#) for requesting removal of content for legal reasons.

2. Do you accept the Global Disinformation Index's findings that Google has provided adverts for almost 90% of sites spreading coronavirus-related conspiracies? Can you point to where your policies have been updated publicly to ensure your advertising does not run on these types of websites?

Preserving the integrity of the ads and publishers on our platforms, as we're doing during the COVID-19 outbreak, is a continuation of the work we do every day to minimise content that violates our policies and stop malicious actors. We have thousands of people working across our teams to make sure we're protecting our users and enabling a safe ecosystem for advertisers and publishers. In 2019 alone, we [terminated](#) over 1.2 million accounts and removed ads from over 21 million web pages that are part of our publisher network for violating our policies. Terminating accounts—not just removing an individual ad or page—is an especially effective enforcement tool that we use if advertisers or publishers engage in egregious policy violations or have a history of violating policy.

Since the beginning of the COVID-19 outbreak, we've closely monitored advertiser behavior to protect users from ads looking to take advantage of the crisis. These often come from sophisticated actors attempting to evade our enforcement systems with advanced tactics. We have a dedicated COVID-19 task force that's been working around the clock. They have built new detection technology and have also improved our existing enforcement systems to stop bad actors. As per our policies, they are demonetising publisher content that includes claims about the propagation of COVID-19 that contradict the WHO or NHS guidance (such as theories involving 5G towers as a transmission vector). This is part of our existing Dangerous or Derogatory Content policy which prohibits monetization of content "promoting or advocating for harmful health or medical claims or practices".

These concerted efforts are working. We've blocked and removed tens of millions of coronavirus-related ads over the past few months for policy violations including price-gouging, capitalizing on global medical supply shortages, making misleading claims about cures and promoting illegitimate unemployment benefits.

On the specific research from Global Disinformation Index, the report does not explain what GDI defines as disinformation, nor does it provide the full list of domains sampled. So unfortunately, it is hard to peer review its findings. From what we gather, the revenue

estimates also do not accurately represent how publishers earn money on our advertising platforms.

3. What trends have you observed regarding the prevalence and targeting of gambling adverts during lockdown, and has this differed to previous trends? Are 'problem gamblers' ever targeted with gambling adverts and how do you protect them?

The safety of our users has always been our priority, and we do not target vulnerable users with any of our advertising tools. We require that any gambling advertisers using our services abide by local gambling laws and industry standards.

Beyond this, we restrict all gambling ads from showing to known minors, and only run display and YouTube ads to logged in over-18s. We do not allow gambling advertisers to use personalised advertising, nor do we allow the use of data collected by gambling advertisers to target their users on search with gambling ads.

On Search, gambling ads are not served against our gambling addiction related queries. This list consists of thousands of keywords and restricts gambling advertisers from targeting specific keywords such as "addiction". Our policy teams work to update this list on a regular basis. Google also provides a SafeSearch tool which can be utilised by those who have issues around gambling. With SafeSearch switched on, users will not see gambling ads.

4. How quickly does YouTube take action against content flagged as misleading? Has this response been expedited during the crisis?

We use a mix of machines and humans to enforce our policies at scale. Machines help us with scale and speed, whereas humans can bring judgement and can understand context. Our automated systems flag content that may be violative, helping us to more quickly and accurately enforce our Community Guidelines. Once potentially problematic content is flagged by our automated systems, human review verifies whether it indeed violates our policies. Our goal is to minimize views of violative content, and we've made significant strides in doing so. For example, between October and December 2019, we removed over 5.8 million videos from YouTube for violating our Community Guidelines. Of those removed videos, 90% were first flagged by machines, and 64.7% of those had never received a single view.

Because of the complicated and ever-changing nature of misinformation, we holistically approach misinformation through several policies in our Community Guidelines, including policies against spam, deceptive practices, scams, impersonation, hate, harassment, and content that encourages dangerous activities that could result in real-world harm. The policy in our Community Guidelines under which we've removed most violative coronavirus content is our "Harmful or dangerous content policy", which prohibits content promoting dangerous remedies or cures—e.g., videos that claim harmful substances or treatments can have health benefits. Context matters; each video is reviewed on its own merits and we are actively monitoring trends around COVID-19 content to ensure that our policies and enforcement evolve as the content does. We have removed thousands of videos promoting COVID misinformation from our platform, and the majority of these videos were viewed 100 times or fewer.

5. Regarding the London Real YouTube livestream of 5G conspiracy theories (the same interview was sanctioned by Ofcom for the radio broadcast by London Live), Google donated its video revenue to charity. However, the BBC reported that YouTube allowed London Real to keep its Super Chat revenue raised whilst the video was online. Can you clarify whether this was the case, and if so, why?

Our YouTube policies prohibit videos that promote medically unsubstantiated cures or treatments and we quickly remove flagged videos that violate these policies. Any content that disputes the existence or transmission of COVID-19, as described by the NHS and WHO, is in violation of YouTube policies. This includes conspiracy theories which claim that the symptoms are caused by 5G.

In line with this, the David Icke video which was referenced by the Committee has been removed due to violation of our policies. This action was taken, before any measures against the TV broadcast had been in place.

Users that repeatedly abuse the system and violate our policies can be penalised by being prevented from using livestream features, by having their channel demonetised, or by having their channel terminated. In line with this, David Icke's YouTube channel has been terminated.

In the case of the video referenced, following its removal, the revenue we received for Super Chats was donated to charity, however, the creator kept the revenue generated by this video while it was available.

As the situation evolves, so will our approach. That includes looking at further action as necessary to combat the threat of misinformation, and working with Government and industry to maintain the highest standards.

6. Facebook claimed that it only became aware of the London Real video after it was flagged to them by ITV. Do you think this is evidence that more cross-platform collaboration is needed in tackling misinformation? Did Google flag this through the Trusted News Initiative to other companies, and if not why not?

We believe collaboration with partners is the best way to ensure that everyone can get the information they need during this crisis, through whichever channel they use. The TNI is one of the forums where escalations happen and pieces of content are discussed among partners. The video in question was discussed in that forum after platforms had already taken action against it. We have also been working very closely with the Government, traditional media and, indeed, other tech companies, so that we can ensure that the overwhelming majority of what people find online is accurate and medically sound.

On March 16th, Google, YouTube, Facebook, LinkedIn, Microsoft, Reddit, and Twitter issued a joint statement saying “We are working closely together on COVID-19 response efforts. We’re helping millions of people stay connected while also jointly combating fraud and misinformation about the virus, elevating authoritative content on our platforms, and sharing critical updates in coordination with government healthcare agencies around the world. We invite other companies to join us as we work to keep our communities healthy and safe.”

7. How have you been working with partners in the Trusted News Initiative to ensure that authoritative information is surfaced appropriately and misinformation is demoted on your platforms?

As part of our efforts to collaborate with publishers and other platforms, we have continued to be an active and engaged partner within the Trust News Initiative - more recently focused on misinformation surrounding [coronavirus](#), and previously on the [UK election](#).

Partners within the initiative are able to share emerging trends, alert each other to misinformation about Coronavirus so that content can be reviewed promptly by platforms, whilst publishers ensure they don’t unwittingly republish misinformation.

Alerts also flag up content that undermines trust in partner news providers by identifying imposter content which claims to come from trusted brand identities or sources.

I want to stress that this partnership builds on our existing efforts to ensure authoritative information, including the work of fact checkers, is surfaced on our platforms. Google has highlighted fact checks in Search and News for over three years as a way to help people make more informed judgments about the content they encounter online.

These fact checks appear more than 11 million times a day in Search results globally and in Google News. That adds up to roughly 4 billion impressions a year. We have also created a library of over 40,000 fact checks which is publicly available for both users and journalists to consult through a dedicated search tool and for researchers to access through an open API.

8. Are you supporting or amplifying the output of traditional news organisations? If so, how, and if not, why not?

Throughout this crisis, we have sought to amplify the output of traditional news organisations and help direct users to their sites. Our business is built upon connecting users with authoritative, timely and relevant information. Never has this been more important than during the current crisis. We're committed to supporting the news ecosystem because we know high-quality journalism is vital during this difficult time.

To make it easier to find authoritative news, YouTube's Top News shelf prominently highlights videos from news sources in search results. And when a breaking news event happens, our Breaking News shelf highlights videos from news organizations about that event directly on the YouTube homepage. During the COVID-19 pandemic, we are displaying a Top News Shelf on YouTube search results pages for certain COVID-19 searches, and a Breaking News Shelf may also appear on the home page for users who are regular consumers of news content on YouTube. We are also displaying a dedicated COVID-19 news shelf to users in over 30 countries.

Throughout this period, we've seen a six and a half times increase in the amount of time people in the UK spend watching authoritative content and publishers such as The Guardian and The Telegraph have reached over one million YouTube subscribers for the first time.

In Google News, we've created a new COVID-19 section with up-to-date, relevant stories from the international to local level from a variety of authoritative sources. The section is now available to users across 25 top impacted markets, including the UK – and we continue to expand. The COVID-19 feature in Google News puts local news front and center with a dedicated section highlighting stories about the virus from local publishers in the reader's area. You can find more detailed information about these updates [here](#).

We also recognise that the news industry is under increased pressure due to the economic impact of COVID-19, and at this critical time we are exploring additional ways we can continue to help support publishers and tackle fake news:

- The Google News Initiative has made a \$6.5m investment into fact checking organisations. In the UK, we'll be supporting First Draft - one of the world's leading NGOs working on tackling disinformation - in their work to ensure journalists have the best training to be able to spot misinformation.
- To support local journalists throughout the crisis, the Google News Initiative has also launched a global Journalism Emergency Relief Fund, which will support small- and medium-sized news organisations producing original news for local communities.
- We've provided fee relief to support our news partners, as well as a \$1 million Google.org donation to the International Center for Journalists, providing immediate resources to support reporters globally.

9. On 23 April, the US President asked the Coronavirus Response Coordinator to test exposure to ultraviolet light and injections of disinfectant on patients. The White House streams its daily briefings to YouTube. Would YouTube therefore take action against the White House's video if the claims were streamed unchallenged, given YouTube's statement that it will ban conspiracy theories from the site?

At YouTube, we enforce our [Community Guidelines](#) across the board, regardless of who is the content creator. The application of these policies is always a function of the content at stake and of the context in which it was posted. For instance, educational or journalistic organisations' reasons for posting potentially problematic content are very different from those users who'd be less well intentioned.

It's difficult to make general statements about hypothetical videos, as the exact nature and context of the content would be of paramount importance for a determination.

However, we have not taken action against the White House video that you mention. It is important to note that the video included context provided by others who spoke during the conference, for example, William Bryan, Undersecretary for Science and Technology at the Department of Homeland Security.

Thank you again for the opportunity to share these details about our fight against disinformation. Please do not hesitate to get in touch if we can help with anything else.

Yours sincerely,

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