Information Requests
information.requests@ofcom.org.uk

9 June 2025

Dear,

Freedom of Information request: Right to know request

Thank you for your request for information concerning Disclosure of Operational Language Frameworks, Algorithmic Broadcast Framing Protocols, and Jurisdictional Basis for Narrative Arbitration.

We received this request on 9 May 2025 and we have considered your request under the Freedom of Information Act 2000.

Your request & our response

"This request covers all internal and external communications, data, contracts, frameworks, algorithmic documents, and linguistic policies drafted, tested, deployed, or reviewed by Ofcom or its partners between January 2020 and December 2023 — inclusive.

II. SPECIFIC DISCLOSURE REQUESTS

DEFINITIONS & CONTROL LANGUAGE MAPPING

Please provide official Ofcom policy definitions, application protocols, and memo-based instructions used in the moderation or suppression of content designated as:

"Misinformation"

"Disinformation"

"Harmful but not illegal"

"Conspiratorial content"

"Narrative divergence"

"Unverified theories"

"Unsafe opinion constructs"

"Amplification of cognitive dissonance"

Please include any strategic use of these terms in internal training or external guidance issued to content providers.

(Plain English: What's your internal mental vocabulary map for censorship-by-language?)"

For context, you may find it helpful to note that Ofcom's statutory powers under the Online Safety Act 2023 are primarily focused on the improvement of systems and processes of regulated services, to protect users from harm. The Online Safety Act does not grant Ofcom powers or functions to

regulate or moderate individual pieces of content. Information relating to our functions, duties and associated work in relation to Online Safety is set out on our website.

Ofcom does not have a specific definition of misinformation or disinformation which we use for all purposes nor are those terms defined by the Online Safety Act. Whether content amounts to misinformation or disinformation turns on several factors including context and the right to freedom of expression.

However, you may be interested in our Discussion paper: Understanding false information in the UK, which provides some commentary on that terminology and the potential harms that may arise (see pages 7-9).

We can confirm that we do not hold official Ofcom policy definitions, 'application protocols' or 'memo-based instructions' relating to the following:
- "Conspiratorial content"
- "Narrative divergence"
- "Unverified theories"
- "Unsafe opinion constructs"
- "Amplification of cognitive dissonance"

However, you may be interested in this recent research report, commissioned by our Making Sense of Media team, which discusses 'minority views and beliefs' online.

Content which is legal but harmful to children is defined in section 60 of the Online Safety Act 2023.

"CONTRACTUAL ARRANGEMENTS FOR STRATEGIC CONTENT FILTERING Please disclose all existing MOUs, contractual service agreements, or enforcement authorisations between Ofcom and:

BBC

Full Fact

Meta (Facebook/Instagram)

Google / YouTube

Microsoft

TikTok / ByteDance

Twitter / X

The Cabinet Office or GCHQ

Including any policies regarding:

"Prebunking and inoculation messaging"

"Trusted voice reinforcement"

"Narrative containment"

"Emotionally-triggered flagging escalation"

(Plain English: Who are your partners in subconscious content control?)"

We can confirm we have no MOUs, contractual service agreements, or enforcement authorisations regarding strategic content filtering between us and the BBC. Our role in relation to the BBC is set out in the BBC charter and agreement and our enforceable conditions are in the Operating Licence we set.

We can confirm that we do not have an MOU, contractual service agreement or enforcement authorisation regarding strategic content filtering with any of the other services and organisations you refer to.

"ALGORITHMIC TOOLKITS AND FLAGGING PROTOCOLS Provide documentation on algorithmic moderation systems used to:

Downrank content based on tone, topic, or emotionality Adjust public visibility thresholds via "signal correction"

Rate broadcaster "narrative compliance"

Auto-flag or throttle alternative explanations of mainstream events Implement content "decay cycles" for harmful truths Apply "pattern break overlays" to news cycles (Plain English: What AI do you use to suppress reality's viral potential?)"

As noted above, Ofcom is not a content moderator, and as such does not use 'algorithmic moderation systems'.

"LEGAL & JURISDICTIONAL JUSTIFICATION FOR BROADCAST REALITY MODULATION Please confirm:

The legal origin of Ofcom's authority to determine the validity of public beliefs Any statutory amendments or emergency provisions used to expand this authority between 2020–2023 If and how Ofcom is authorised to override first-hand testimony, peer-reviewed data, or lived experience if it conflicts with designated "public safety narratives"

(Plain english: Where's the law that says you can replace truth with state approval?)"

Ofcom does not have a duty or function to 'determine the validity of public beliefs' therefore we do not hold any information in relation to this aspect of your request.

"EMOTIONAL PSYCHOMETRICS & CONTENT DESIGN GUIDELINES Please provide any documents used to measure or guide:Public emotional volatility metrics

Cognitive fragility scoring

Trauma reactivation patterns (used to increase compliance) Use of symbolic tone modulation (e.g. black/red graphics, countdown clocks, threat colours) "Pre-viral suppression modelling" (content deemed dangerous before it trends) (Plain English: Show us how you tuned fear and obedience through screen-based rituals.)"

We do not hold any documents used to measure or guide the metrics you have listed relating to public emotional volatility, cognitive fragility, or trauma reactivation patterns. However, you may be interested in this wellbeing study which examines the feasibility of using wellbeing metrics to evaluate outcomes in online safety.

I hope this information is helpful. If you have any further queries, then please send them to information.requests@ofcom.org.uk – quoting the reference number above in any future communications.

Yours sincerely,

Information Requests

Request an internal review
If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress.

Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further
If you are unhappy with the outcome of our internal review, then you have the right to complain to the Information Commissioner's Office.