



FSU
FREE SPEECH UNION

THE FREE SPEECH UNION
85 GREAT PORTLAND ST.
LONDON W1W 7LT
[FREESPEECHUNION.ORG](https://www.freespeechunion.org)

Nick Clegg
Vice-President for Global Affairs and Communications
Facebook

20th February 2021

Dear Mr Clegg,

We, the undersigned, would like to express our concern about Facebook's blocking of certain advertising accounts due to lobbying by political activists.

A current case that has been brought to our attention is that of [ThinkScotland.org](https://www.thinkscotland.org). Think Scotland is long-standing Scottish think-tank, established in 2006 and edited by Brian Monteith, a former Member of the Scottish Parliament, a columnist for *The Scotsman* and a founding member of the Free Speech Union, which has pulled this response together. Think Scotland's purpose is to encourage greater discussion in Scotland about economic, social and constitutional issues. It is an independent, not-for-profit, debating forum with a cross-section of topical, political and cultural writing published on a daily basis. It has been advertising on Facebook since August of last year.

Facebook suspended Think Scotland's advertising on 27th January 2021 on the grounds that three articles Mr Monteith wished to promote breached its "Vaccine Discourager" policy. This was odd because none of the articles in question criticised Covid vaccines. One was on the similarities between Nicola Sturgeon and Nicolai Ceausescu, the second was about how more devolution would not appease the SNP, and the third was on lockdown policy – none of the articles included the word "vaccine". Mr Monteith immediately asked that the decision be reviewed – but no response has been forthcoming.

On 30th January Mr Monteith then tried to advertise two articles that were not in any way political – one about a tank commander reminiscing about the first Gulf war, the second about a young mother's experiences of toilet training her daughter. Both were again rejected because they had breached the "Vaccine Discourager" policy and neither mentioned vaccines. Again Mr Monteith immediately asked for the decision to be reviewed – and again no response.

To try and establish how Facebook was applying its policy, Mr Monteith then sought to advertise his Facebook post of his weekly column that had already been published by *The Scotsman*, Scotland's most well-known daily newspaper, on 1st February. This did discuss vaccines – but in the context of how the Scottish Government had failed to distribute them efficiently. The article's point was that the Scottish people were not being vaccinated quickly enough. There is no way it could be viewed other than as a ringing endorsement of the Covid vaccines. Again, the advert was rejected by Facebook. When Mr Monteith appealed, Facebook rejected it a second time with no possibility of another appeal.

Even more bizarre was that on looking through past Facebook adverts that had run earlier in January Mr Monteith found that many of these too had a “rejected” notice attached to them because of the “Vaccine Discourager” policy, a notice that had been applied retrospectively because they had already been advertised on Facebook. Mr Monteith asked for these decisions to be reviewed – not because he wants to advertise them again, but because he doesn’t want a rejection notice on his advertising record. Once again, Facebook didn’t respond. (A full description of the 17 adverts is listed in the appendices with hyperlinks to the articles.)

We suspect the reason Mr Monteith has been unable to advertise these articles on Facebook, and the reason articles that have already been advertised now have a “rejected” notice attached to them, has nothing to do with the “Vaccine Discourager” policy and is the result of vexatious, politically motivated complaints by SNP activists. Articles that are critical of Scotland’s SNP Government receive a torrent of abuse from independence supporters when they are published, either in *The Scotsman* or on Think Scotland’s website, and many of these comments are offensive. It appears the Facebook complaints system – in particular, complaints under the “Vaccine Discourager” heading – is being exploited to prevent Mr Monteith publishing articles not just about the SNP but about practically anything.

Mr Monteith has tried to communicate through the normal online Facebook channels about this, but no personal contact is possible – even by email. We suspect this blanket advertising ban may have been triggered by an algorithm rather than imposed by an actual human being.

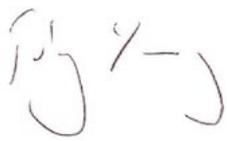
Facebook has a duty to run its advertising business in a professional way and without political bias. After all, the SNP was permitted to spend almost [£100,000 on Facebook advertising in the 2014 referendum](#) and the company’s “global government and policy” team [bragged about](#) the impact of the SNP’s paid advertising on Facebook on the 2015 Scottish election, which the SNP won.

It is not appropriate for Facebook to allow one side in the ongoing debate about Scottish independence to advertise on its platform, but not the other. No doubt this is not intentional, but Facebook needs to put more robust checks in place to neutralise the effect of baseless, politically-motivated complaints submitted by activists, regardless of how voluminous these complaints are. It must apply its own policies in an even-handed, transparent manner.

In light of these events and the concerns raised here, we ask that Facebook does the following:

- Prioritise Mr Monteith’s complaint, which he has submitted through the proper channels, for immediate review – noting that he is not a “Vaccine Discourager” and that cannot therefore be a reason for preventing him from advertising Think Scotland articles, particularly when the word “vaccine” does not even occur in the article;
- Reinstate Think Scotland’s advertising account and apologise to Mr Monteith for the inconvenience caused;
- Change its policies and procedures to ensure that political activists cannot prevent their ideological opponents from advertising on Facebook by submitting an endless stream of vexatious complaints;
- Improve its customer service, so if a complaint is made about an advertisement the subject of that complaint is given an opportunity to respond and the complaint is then reviewed by an actual human being.

Yours sincerely,



Toby Young, General Secretary, The Free Speech Union
Brian Monteith, Editor, Think Scotland
Sir Graham Brady MP, Chairman, 1922 Committee
Lord Bridges
David Campbell Bannerman, Former Conservative and UKIP MEP 2009-2019
Lord Cavendish
Lord Dobbs
Lord Forsyth
Baroness Fox
Murdo Fraser MSP, Conservative Shadow Finance Secretary, Scottish Parliament
Jamie Greene MSP, Conservative Shadow Education Secretary, Scottish Parliament
Lord Hamilton
Lord Hannan
Baroness Hoey
Lord Howard of Rising
Liam Kerr MSP, Conservative Shadow Justice Secretary, Scottish Parliament
Lord Lamont of Lerwick
Andrew Lewer MP
Lord Lilley
Lord Mancroft
Baroness Meyer
Baroness Neville-Rolfe
Baroness Noakes
Lord Ridley
Lord Robathan
Lord Shinkwin
Jim Sillars, Former Labour and then SNP MP and former Deputy Leader of the SNP
Struan Stevenson, Former Conservative MEP 1999-2014
Lord Trefgarne
Lord Trenchard

Appendix 1

Facebook posts of ThinkScotland.org articles using Facebook advertising since 1 January 2021.
Adverts originally declined. (Ranked by date of declination.)

<i>Date</i>	<i>Subject</i>	<i>Author</i>	<i>Title</i>
29 Jan 20	Gulf War	Lt Col Crawford	How I brought down Saddam Hussein & other myths
<i>Advert 30 Jan – 3 Feb originally declined 31 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			
19 Jan 21	Parenting	Emma Hargan	The Mummy Diaries: Toilet training part 2
<i>Advert 30 Jan – 3 Feb originally declined 31 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			
27 Jan 21	Lockdowns	Jon Dobinson	Take the next exit...
<i>Advert 27-31 Jan originally declined 27 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			
27 Jan 21	Secession	Ewen Stewart	The separatists cannot be appeased
<i>Advert 27-31 Jan originally declined 27 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			
25 Jan 21	Sturgeon	Prof Gallagher	Dictators trembled at Ceausescu's fall
<i>Advert 27-31 Jan originally declined 27 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			

Appendix 2

Facebook posts of ThinkScotland.org articles using Facebook advertising since 1 January 2021.
Adverts originally approved and then retrospectively declined. (Ranked by date of declination.)

21 Jan 21	Lockdowns	M Ballantyne MSP	If the vaccine is our saviour what's the tipping point?
<i>Advert 21-25 Jan originally approved and completed run</i>			
<i>Retrospectively declined 31 Jan as Vaccine Discourager</i>			
<i>No <u>criticism</u> of vaccines in article</i>			
19 Jan 21	Sturgeon	Prof Gallagher	Ceausescu's messiah complex...
<i>Advert 19-23 Jan originally approved and completed run</i>			
<i>Retrospectively declined 31 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			
12 Jan 21	Sturgeon	Prof Stephenson	No deal Nicola: Does the SNP care about EU?
<i>Advert 12-16 Jan originally approved and completed run</i>			
<i>Retrospectively declined 31 Jan as Vaccine Discourager</i>			
<i>No <u>mention</u> of vaccines in article</i>			
11 Jan 21	Education	Max Young	The SNP has failed Scotland's children
<i>Advert 12-16 Jan originally approved and completed run</i>			

Retrospectively declined 31 Jan as Vaccine Discourager
No mention of vaccines in article

7 Jan 21 Secession Eben Wilson [A Scottish currency? The economic choice is yours](#)
Advert 12-16 Jan originally approved and completed run
Retrospectively declined 31 Jan as Vaccine Discourager
No mention of vaccines in article

27 Jan 21 Lockdowns Jon Dobinson [Take Junction 3 off the Road to hell](#)
Advert 21-25 Jan originally approved and completed run
Retrospectively declined 27 Jan as Vaccine Discourager
No criticism of vaccines in article

27 Jan 21 Lockdowns Jon Dobinson [Take Junction 3 off the Road to hell](#)
Advert 21-25 Jan originally approved and completed run
Retrospectively declined 27 Jan as Vaccine Discourager
No criticism of vaccines in article

20 Jan 21 NHS Dr Halliday [Is the NHS really British?](#)
Advert 20-23 Jan originally approved and completed run
Retrospectively declined 27 Jan as Vaccine Discourager
No mention of vaccines in article

19 Jan 21 Venezuela Max Young [Madurovirus & Coronavirus: Venezuela's hell-on-earth](#)
Advert 19-23 Jan originally approved and completed run
Retrospectively declined 27 Jan as Vaccine Discourager
No mention of vaccines in article

18 Jan 21 Sturgeon Prof Sked [Can Brexit save the union?](#)
Advert 19-23 Jan originally approved and completed run
Retrospectively declined 27 Jan as Vaccine Discourager
No mention of vaccines in article

18 Jan 21 Sturgeon Robert Kilgour [Sturgeon and Freeman can't hide...](#)
Advert 19-23 Jan originally approved and completed run
Retrospectively declined 27 Jan as Vaccine Discourager
No mention of vaccines in article

Appendix 3

Facebook posts of [The Scotsman](#) articles using Facebook advertising since 1 January 2021.
Adverts originally declined.

1 Feb 21 Vaccine Brian Monteith [Putting EU ahead of Britain was gross dereliction](#)
Advert 1-5 Feb originally declined 2 Feb as Vaccine Discourager
No criticism of vaccines in article