

# Annex I: Letter to Meta

## HUMAN RIGHTS WATCH

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Miranda Sissons  
Director of Human Rights  
Facebook Inc. (Meta)  
February 2, 2023

Iain Levine  
Senior Human Rights Advisor  
Facebook Inc. (Meta)  
February 2, 2023

Dear Ms. Sissons, Dear Mr. Levine,

I am writing to you on behalf of Human Rights Watch to notify you of research we have conducted on a range of online abuses faced by lesbian, gay, bisexual, and transgender (LGBT) people in the Middle East and North Africa (MENA) region, including on Meta platforms, and to ask you to solicit Meta's perspective. In addition, I would like to invite your response to several specific questions that have stemmed from the research.

Our research documents the use of digital targeting by security forces and its far-reaching offline consequences—including arbitrary detention and torture—in five countries: Egypt, Iraq, Jordan, Lebanon, and Tunisia. It also exposes how security forces employ digital targeting as a means of gathering or creating digital evidence to support prosecutions against LGBT people. It is based on 120 interviews, including 90 with LGBT people affected by digital targeting and 30 with expert representatives, such as lawyers and digital rights professionals. As you will know, authorities in the MENA region systematically target LGBT people, including by weaponizing laws that criminalize same-sex conduct and discriminate against LGBT people.<sup>1</sup>

Human Rights Watch found that security forces have entrapped LGBT people on social media platforms, subjected them to online extortion, online harassment, and outing, and relied on illegitimately obtained digital photos, chats, and similar information in prosecutions, in violation of the right to privacy and other human rights.

Of the dozens of digital targeting cases Human Rights Watch documented, 26 cases of online harassment, including doxing and outing, were on Facebook and Instagram in Jordan, Lebanon, and Tunisia. We also documented 25 cases of online death threats by armed groups on Facebook and Instagram in Iraq. Human Rights Watch found that as a result of online harassment, LGBT people reported losing their jobs, suffering family violence, including physical abuse, threats to their lives, and conversion practices, being forced to change their residence and phone numbers, deleting their social media accounts,

<sup>1</sup> Human Rights Watch, *"The Love that Dare Not Speak Its Name,"* (New York: Human Rights Watch, 2019), [http://internap.hrw.org/features/features/lgbt\\_laws/](http://internap.hrw.org/features/features/lgbt_laws/)



[www.hrw.org](http://www.hrw.org)

fleeing the country for risk of persecution, and suffering severe mental health consequences. In most cases, LGBT individuals harassed with public social media posts reported the abusive content to Facebook or Instagram. However, in all cases of reporting, these platforms did not remove the content, claiming it did not violate company guidelines or standards.

Human Rights Watch documented 20 cases of online entrapment, including on Facebook, by security forces, who impersonated LGBT people, in Egypt, Iraq, and Jordan. Sixteen of those entrapped were arrested by security forces and subsequently detained. The immediate offline consequences of entrapment range from arbitrary arrest to torture and other ill-treatment, including sexual assault, in detention.

Human Rights Watch documented 17 cases of online extortion by private individuals, including on Instagram and Facebook, in Egypt, Iraq, Jordan, and Lebanon. Extortionists often pretended to be LGBT people online in order to gain their victim's trust, along with details about their personal lives—particularly digital information relating to their sexual orientation or gender identity—that can be used as blackmail. In most cases, the alleged extortionist used that online information to extort people offline. Organized gangs in Egypt and armed groups in Iraq are among the perpetrators of extortion.

In order for our report to be as complete as possible, we would greatly appreciate your responses to the following questions:

- 1) What steps, if any, has Meta undertaken or does Meta plan to undertake to effectively moderate content on public platforms for hate speech, incitement to violence, discrimination, or hostility, against LGBT people in the MENA region, including by proactively removing abusive content that violates platform guidelines or standards?

In terms of Meta's content moderation, we request the following information:

- a. Please provide the number of content moderators at Meta currently moderating content originating from the MENA region. What number of these content moderators are proficient in Arabic, including the dialects of the countries they work on?
- b. Please indicate if content moderators working to moderate content originating from the MENA region receive any training on human rights in general, and LGBT rights in particular.
- c. Please indicate if content moderators working to moderate content originating from the MENA region are trained on the adverse impacts of digital targeting by security forces, particularly against vulnerable groups, such as LGBT people in the MENA region.
- d. Please provide an overview of Meta's content moderation in the Arabic language, including figures indicating the extent to which moderation in Arabic depends on automation, as well as figures on Meta's expenditure on content moderation in Arabic.
- e. Please indicate Meta's criteria for content moderation relating to hate speech, incitement to violence, discrimination, or hostility, against LGBT people.
- f. Please provide a breakdown of content moderation outcomes related to hate speech, incitement to violence, discrimination, or hostility, against LGBT people in the MENA region in the last five years.

- 2) What steps, if any, has Meta undertaken or does Meta plan to undertake to ensure a more effective, survivor-centered response to account reporting?

In terms of Meta's reporting mechanisms, we request the following information:

- a. Please indicate if Meta is taking any measures to offer people the ability to track and manage their reports.
  - b. Please indicate if Meta is taking any measures to present people who flag content with a log of content they have reported and the outcomes of moderation processes.
  - c. Please indicate if Meta is taking any measures to establish additional avenues for all users, including LGBT people, to access help and support during the reporting process.
  - d. Please indicate if Meta is taking any measures to create an avenue for people to provide anonymous feedback about the reporting experience and outcomes.
  - e. Please indicate if Meta is taking any measures to provide opportunities for people to provide additional context when reporting accounts or content.
  - f. Please indicate if Meta is taking any measures to allow people to flag if they are reporting in the same language as the abuse, and if they are not, to offer robust translation options.
- 3) What steps, if any, has Meta undertaken or does Meta plan to undertake to protect LGBT people in MENA from being targeted by law enforcement impersonating LGBT people on its platforms?
  - 4) What procedures does Meta have in place so that people who are victims of extortion can quickly and expeditiously notify the company and seek a remedy?
  - 5) What steps, if any, has Meta undertaken or does Meta plan to undertake to ensure meaningful engagement with organizations defending LGBT and digital rights in the MENA region on the development of policies and features, from design to implementation and enforcement?
  - 6) What steps, if any, has Meta undertaken or does Meta plan to undertake to establish direct lines of communication between users and local or regional advocacy and support groups for rapid response to digital targeting threats?
  - 7) What tangible steps has Meta undertaken or does Meta plan to undertake to ensure its platforms are adequately staffed to develop and enforce policy that meets the needs of LGBT people in MENA, and build trust with groups defending their rights?
  - 8) Does Meta plan to conduct human rights due diligence, including periodical human rights impact assessments, that fully capture the adverse human rights impacts of digital targeting, and that include identifying, preventing, ceasing, mitigating, remediating, and accounting for potential and actual adverse impacts on human rights, including the rights of LGBT people in the MENA region? If so, please provide a concrete timeline for these reports.
  - 9) Does Meta plan to scope human rights impact assessments to a particular country or regional context, and dedicate adequate time and resources into engaging rightsholders who are adversely impacted, including LGBT people? If so, please provide a concrete timeline for these assessments.
  - 10) What steps, if any, has Meta undertaken or does Meta plan to undertake to preserve and archive material of human rights violations and abuses that may have evidentiary value?
  - 11) What steps, if any, has Meta undertaken or does Meta plan to undertake to provide access to data for independent researchers, including but not limited to those in the fields of

human rights hate speech, incitement to violence, discrimination, or hostility, to allow them to fully assess the platform's implementation of human rights due diligence?

We respectfully request that you provide us with a written response to these questions and any other information that you wish to provide by **February 20** so that we may have the opportunity to review and reflect it as appropriate in our reporting. We will post on our website relevant parts of any response received after that date. If you would like to meet with us to discuss our questions, please let us know.

Thank you in advance for considering our request. Should you have any clarificatory questions or comments, please feel free to reach out to my colleague Rasha Younes at [REDACTED].org or [REDACTED]

Sincerely,

[REDACTED]

Graeme Reid  
Director, LGBT Rights Program  
Human Rights Watch