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President, Global Affairs
Facebook Inc. (Meta)

Monika Bickert
Vice President, Content Policy
Facebook Inc. (Meta)

January 8, 2024

Dear Mr. Clegg and Ms. Bickert,

I am writing to you on behalf of Human Rights Watch to notify you of an upcoming campaign we will publish in January, and to solicit Meta's perspective. The campaign, in partnership with four organizations in the Middle East and North Africa (MENA) region, is based on research we have conducted on a range of online abuses faced by lesbian, gay, bisexual, and transgender (LGBT) people in the MENA region, including on Meta platforms.

In February 2023, Human Rights Watch documented 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. We also exposed how security forces employ digital targeting as a means of gathering or creating digital evidence to support prosecutions against LGBT people.¹ The report 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.

Prior to publishing the report, we sent a letter of inquiry to Meta's human rights department, which posed specific questions that had stemmed from the research and listed Human Rights Watch's findings that security forces have entrapped LGBT people on social media platforms, subjected them to online extortion, online

¹ Human Rights Watch, *"All This Terror Because of a Photo,"* (New York: Human Rights Watch, 2023),

<https://www.hrw.org/report/2023/02/21/all-terror-because-photo/digital-targeting-and-its-offline-consequences-lgbt>



HRW.org

harassment, doxxing, and outing in public social media posts on Meta platforms, particularly on Instagram and Facebook, and relied on illegitimately obtained digital photos, chats, and similar information in prosecutions.² We also provided detailed documentation of the harmful impact of these online targeting tactics, which often affected LGBT people's safety, online and offline, and in some cases contributed to ruining their lives. While we did not receive a written response from Meta to our letter, we have been engaging with relevant stakeholders at Meta since February.

As a follow up to our report and based on its recommendations, including to Meta, our upcoming campaign identifies select ongoing issues of concern, and aims to engage Meta platforms, particularly Instagram and Facebook, to publish meaningful data on investment in user safety, including regarding content moderation in the MENA region, and around the world.

Among other objectives, the campaign asks Meta to disclose its annual investment in user safety and security including reasoned justifications explaining how trust and safety investments are proportionate to the risk of harm, for each region, language, and dialect. In addition, we specifically inquire about the number, diversity, regional expertise, political independence, training qualifications, and relevant language (including dialect) proficiency of staff or contractors tasked with moderating content originating from the MENA region, and request that this information be made public as an initial step toward increased transparency. Relatedly, the campaign asks Meta to publish data on its investment in safe working conditions for content moderators, including psychosocial support, as well as data on such staff's adherence to nondiscrimination policies, including around sexual orientation and gender identity.

Regarding automated content moderation, we urge Meta to disclose the tools that are used for non-English languages, including Arabic, and which dialects of the Arabic language they are trained in as well as the sources of the training data for each dialect. In addition, we urge Meta to conduct and publish an independent audit of any language models and automated content analysis tools being applied to each dialect of the Arabic language and other languages in the MENA region for their relative accuracy and adequacy in addressing the human rights impacts on LGBT people where they are at heightened risk. Meta should publish information regarding when and how automated processes are used (whether alone or with human oversight), the extent to which there is human oversight over any automated processes, and should indicate how each model is reviewed and updated over

² Human Rights Watch letter to Meta, February 2, 2023,


https://www.hrw.org/sites/default/files/media_2023/02/lgbt_mena0223%20annex%20l.pdf

time. To do so, Meta should engage in deep and regular consultation with independent human rights groups to identify gaps in its practices that leave LGBT people at risk.

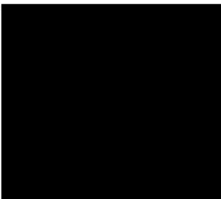
Regarding human rights due diligence, we recommend that Meta scope periodical human rights impact assessments to a particular country or regional context and dedicate adequate time and resources into engaging rightsholders who are adversely impacted, including LGBT people in the MENA region.

In the medium term, Human Rights Watch and its partners call on Meta to audit the adequacy of existing safety measures, communicate the outcome of the audit to affected stakeholders, and continue to engage with civil society groups to carry out gap analyses on existing content moderation and safety practices. At minimum, and in consultation with civil society groups, Meta should create a rapid response mechanism so that complaints, including LGBT-specific reports, regarding content are handled in an accessible and speedy manner. Finally, regarding safety features, we recommend that Meta implement a one-step account lockdown tool of user accounts, allow users to hide their contact lists, and introduce a mechanism to remotely wipe all Meta content and accounts (including from WhatsApp and Threads) on a given device.

We respectfully request that you provide us with any information that you wish to provide **in writing by January 22** so that we may have the opportunity to review and reflect it as appropriate. We may post on our website relevant parts of any response received after that date.

Thank you in advance for your engagement. Should you have any clarifying questions or comments, please feel free to reach out to my colleague Rasha Younes, Acting Deputy Director on LGBT Rights in the MENA region, at younesr@hrw.org 

Sincerely,



Lama Fakhri
Director, Middle East and North Africa
Human Rights Watch