Meta

Meta's Progress on Civil Rights Audit Commitments

Author: Meta's Civil Rights Team

Meta

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Executive Summary

From May 2018 through July 2020, Meta underwent an extensive civil rights audit at the behest of the civil rights community, who wanted to see the company take on a more comprehensive and systemic approach to civil rights. The audit resulted in 117 recommendations and actions with input from over 100 civil rights and social justice organizations.

Just over one year later, Meta's Civil Rights Team—newly created in October 2020 as a result of the audit—is providing an update on the status of those items.

This report represents the next phase of Meta's work to enhance protections for marginalized communities and demonstrates its commitment to continuing the company's important work in moving towards equity across all its technologies. In total, 65 of the Auditors' recommendations and actions have been implemented and 42 are currently in progress or ongoing, given the nature of the recommendation. Of those remaining, we continue to evaluate the feasibility of eight, and two will not be implemented.

We, the Civil Rights Team, are just beginning our journey, and with our team and basic framework now in place, we believe that we and the company are better positioned to address the ever-changing landscape of civil rights challenges.

Civil Rights Accountability Infrastructure

Onboarded Civil Rights Expertise

Earlier this year, the company hired a new Vice President of Civil Rights and Deputy General Counsel. Roy L. Austin, Jr. leads the Civil Rights Team, a diverse team of nine full-time employees with expertise in a variety of areas touching on civil rights. The Civil Rights Team consults with outside experts and is increasingly represented at tables across the company.

Created Robust Processes

The Civil Rights Team has folded into existing processes and developed new ones. For example, we are included in policy development processes and working groups, and are working on an analysis that can assist with the development of products and features on Meta's technologies.

Designed Civil Rights Trainings

The Civil Rights Team is rolling out civil rights-related trainings to better equip employees to identify and address civil rights issues. The purpose of these trainings is to provide cross-company education and analysis regarding civil rights laws as part of our efforts to advance equity on our platforms.

Elections & Census 2020

Preventing Voter Suppression and Election Interference

Meta has worked to prevent voter suppression and intimidation, improve policy enforcement, and defend against coordinated threats and interference. Between July and November 2020, for example, the company expanded its voter interference policies and enforcement, including prohibiting threats related to COVID-19 to discourage voting, implementing broader protections for election officials, and prohibiting certain implicit misrepresentations that would mislead voters regarding the process by which to get a ballot, thereby impeding their right to vote.

Labeling Delegitimizing Content

In addition to placing neutrally-worded labels on all detected posts about voting, Meta attached stronger informational labels to content, beyond ads, that sought to delegitimize the outcome of the election in particular ways or the various methods by which people can vote, for example by claiming that lawful methods of voting would lead to fraud.

Empowering Voters and Promoting Civic Participation

The company also took a proactive approach to educate and empower voters in the lead-up to the 2020 U.S. presidential election. For example, Meta launched its Voting Information Center on Facebook and Instagram with content about how to register, request a mail-in ballot, and check polling places. Meta estimates that over 33 million people visited the Voter Information Center on Election Day alone.

U.S. 2020 Elections Research

In late 2020, the company launched a [research initiative](#) with outside academics and NORC at the University of Chicago to look at Facebook and Instagram's impact on key political attitudes and behaviors in the U.S. 2020 election, including examining the impact of how people interact with content, and the role of product, content, and policy.

Content Moderation & Enforcement

Revisiting the Discussion of State Use of Force

Meta has revisited its violence and incitement policies and developed a framework to evaluate content posted by a state official, weighing the risk of content contributing to offline harm against the importance of public awareness about the statement.

Violence and Incitement

In consultation with over 50 external experts, the company has adopted a policy that prohibits certain coded statements where the threat is veiled or implicit, as well as one that prohibits implicit statements that encourage people to bring guns to "high-risk locations" like schools, polling places, and houses of worship.

Bullying and Harassment

Meta expanded its bullying and harassment policies to cover the behavior of brigading and mass harassment, and also enhanced its policies to provide increased protections for involuntary public figures.

Hate Speech

The company has updated its hate speech policy to make clear that it prohibits attacks against concepts, ideas, practices, beliefs, and institutions related to protected characteristics in certain circumstances, when they pose a risk of harm, intimidation, or exclusion.

Diversity, Equity, & Inclusion

Representation in Our Workforce

The company has made progress on its ambitious goals to increase representation in its workforce and has increased representation of women and marginalized communities in its workforce and in leadership positions, including Black and Latinx leaders.

Diversification of Suppliers and Vendors

Last year, the company committed to spending $1 billion with diverse suppliers in 2021, including $100 million with Black-owned businesses. Meta has met or is on track to meet these goals. The company also developed the Invoice Fast Track Program, which includes a $100 million fund to buy non-Meta receivables from diverse-owned businesses for a low, fixed fee.

Investment in Diverse-Owned Business, Creators and Nonprofits

The company has distributed nearly $100 million in grants and ad credits to Black-owned small and medium-sized businesses, creators, and nonprofits in the U.S. Meta also donated $10 million to U.S. nonprofits, nominated by Meta

employees, that are working to address systemic barriers to racial inequity in the U.S., including in housing, education, and criminal justice.

Advertising Practices

Improvements to Advertising Products

Meta recently announced a decision regarding ad targeting options that fall within Detailed Targeting categories. Starting next year, companies, organizations, and other entities purchasing ads will not be able to select ad targeting options with names that relate to sensitive topics such as health, race or ethnicity, political opinions or affiliation, religion or philosophical beliefs, sex life, sexual orientation, or trade union membership.

More Transparency and Secure Access to Data for Researchers

The company announced a U.S.-based pilot to provide researchers with access to more than 1.65 million social issue, electoral, and political ads that ran during the three-month period prior to Election Day. This tool was created to enable academic researchers to study the impact of the company's technologies on elections and included measures to keep the platform secure.

Building Products with Civil Rights in Mind

Understanding the Impact of Our Products Based on Race

Meta cannot resolve potential differences in user experiences across groups if it does not understand the demographics of our community—in other words, it can't assess or address what it can't measure. To that end, the company, led by our Civil Rights and Responsible Artificial Intelligence Teams, is embarking on a path, in consultation with external experts, to better understand whether the experiences of our users differ across race, while preserving user privacy. We recognize that assessing potential differences in user experiences across these groups requires ongoing effort and intentional focus. The Civil Rights Team's long-term goal is to measure and better understand the user experience across all protected categories and groups.

Developing and Using AI Responsibly

The Civil Rights Team provides civil rights guidance and partners with the Responsible AI (RAI) team and other teams on the development and use of AI at Meta, bolstering the five key pillars RAI has outlined in Meta's efforts to build AI responsibly. Machine learning models are a significant tool in Meta's content

moderation work and we are always working to improve the development and use of models across our technologies.

Building Equitable, Accessible Products

The Civil Rights Team embarked on developing a civil rights review process for all Meta technologies. *Project Height* will provide an analysis framework for product teams to assess potential civil rights concerns presented in new product launches.

Privacy

Six-Month Assessment of Progress Under Meta's Agreement with the FTC

The Auditors underscored the requirement in the FTC agreement that Meta "engage an independent privacy assessor whose job will be to review Facebook's privacy program on an ongoing basis and report to the Board committee and the FTC, if they see compliance breakdowns or opportunities for improvement." Meta remains committed to addressing the areas for improvement in the Assessor's report, continuing to strengthen our privacy program, and prioritizing privacy in the Meta community.

Limiting Our Use of Facial Recognition

Recently, Meta announced that it will be shutting down the Face Recognition system on Facebook. We recognize and regret that the decision may impact people who are vision impaired. We continue to explore alternative options to address this regression and will continue to prioritize options that protect the privacy of individuals and provide access and assistance to those who need it. Looking ahead, we still see facial recognition technology as a powerful tool, for example, for people needing to verify their identity, or to prevent fraud and impersonation. We will continue working on these technologies and engaging outside experts.

The Road Ahead

The Audit laid the groundwork for the creation of the Civil Rights Team and provided the company with an initial roadmap. It was crucial but simply the beginning of and for the Civil Rights Team. As we envision a future beyond the Audit, we will continue to advance civil rights and civil liberties, including the values of justice, equity, dignity, and safety. For example, the Civil Rights Team has taken on a variety of work within its first few months, including law enforcement's use of Facebook to surveil marginalized communities, hate crime enforcement and bystander intervention trainings, reentry and reintegration for
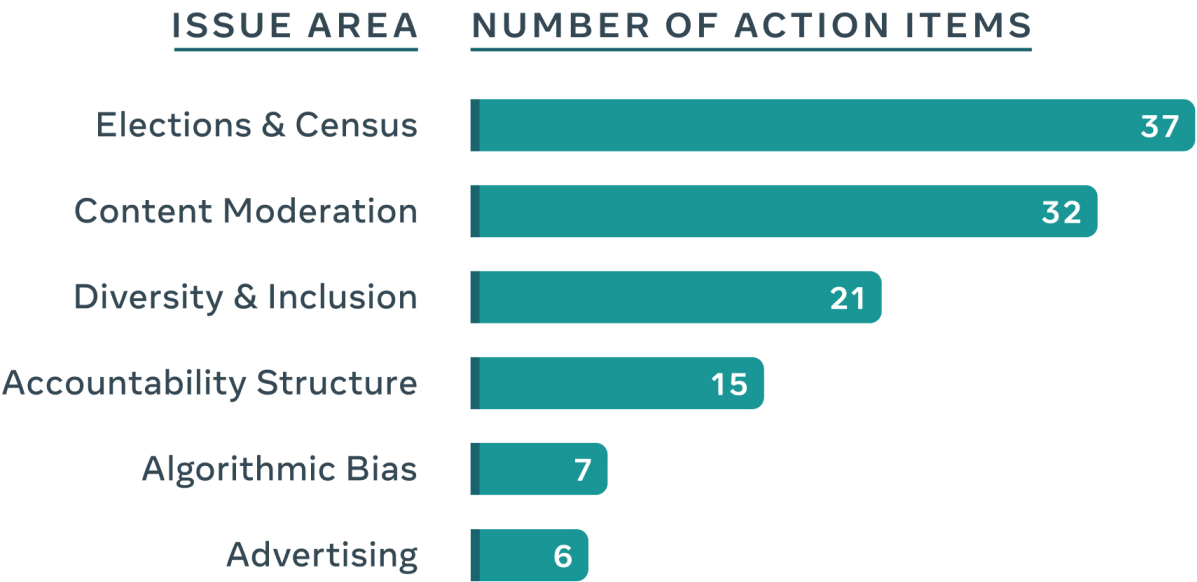
people who have been incarcerated, building products with, not for, the community, and Meta's role in the development of the metaverse.

Meta and the Civil Rights Team are committed to improving our existing technologies as well as proactively building new ones with the lessons learned. We are committed to protecting marginalized communities across our technologies and assessing our technologies to better understand whether marginalized communities are having different experiences than other users. The Civil Rights Team is committed to working to ensure that Meta embodies civil rights and human rights analysis in all of its work, so that we may build better, safer, and healthier communities online and offline.

I. Introduction

Audit Recommendations & Actions

ISSUE AREA	NUMBER OF ACTION ITEMS
Elections & Census	37
Content Moderation	32
Diversity & Inclusion	21
Accountability Structure	15
Algorithmic Bias	7
Advertising	6

Note: *In addition to the issues areas above, the Auditors highlighted eight focus areas with respect to privacy, rather than specific recommendations. Our progress on privacy is detailed in Section VIII of this report.*

Tracking Meta's Progress

55%
Implemented

36%
In progress or ongoing

7%
Under evaluation

2%
Declined
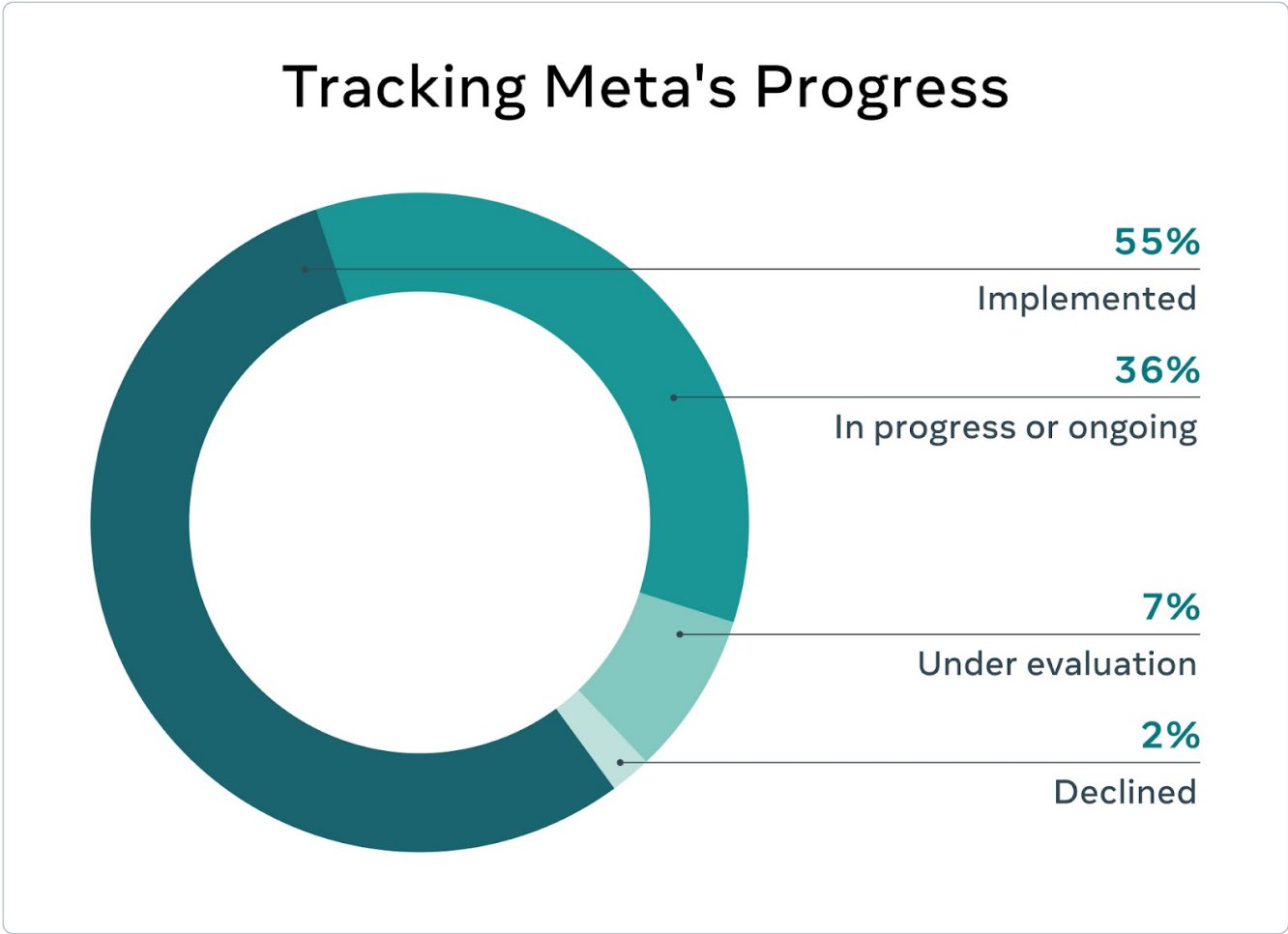
Note: *The Civil Rights Audit, which made 117 recommendations, has served as a roadmap for Meta's new Civil Rights Team in its first year at the company.*

In May 2018, Meta, formerly known as Facebook, undertook a civil rights[1] audit at the behest of the civil rights community, who wanted to see the company take a more comprehensive and systemic approach to civil rights. Over the course of the following two years, the company underwent an extensive audit, resulting in 117 recommendations and actions with input from over 100 civil rights and social justice organizations. Just over one year later, Meta's Civil Rights Team—newly created in October 2020 as a result of the audit—is providing an update on the status of those items.

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[1] In the context of the United States, civil rights guarantee individuals equal protection, due process, and social opportunities under the law regardless of one's membership to a particular group or class. Civil rights are protected under the Constitution and other laws, serving as the most powerful instrument in the struggle for equality, equity, and social justice in the United States, especially for members of marginalized communities. Meta's Human Rights Policy is framed to encourage an integrated approach between global human rights principles and civil rights protections. The tools and standards of the UN Guiding Principles of Business and Human Rights are relevant to, but don't displace, the goals and focus of civil rights experts and activists.

While addressing these recommendations and actions was no small feat, this report represents the next phase of Meta's work to enhance protections for marginalized communities[2] and demonstrates its commitment to continuing the company's important work in moving towards equity across all its technologies. Through the establishment of the Civil Rights Team within Meta and our work to date, the company has taken the first important steps towards embedding a civil rights infrastructure within the company and making progress on this important mission. We—the Civil Rights Team—are just beginning our journey and are committed to long term progress aligned with our broader goal of doing good and doing no harm. With our team and basic framework now in place, we believe that we and the company are better positioned to address the ever-changing landscape of civil rights challenges.

According to Vanita Gupta, then Chief Executive Officer of the Leadership Conference on Human and Civil Rights, Meta's civil rights audit was "the first of its kind" and one that all tech and social media companies should undertake. Meta's Civil Rights Audit ("Audit") covered seven substantive issue areas and spanned two years under the leadership of Laura Murphy, a veteran civil rights and civil liberties leader, and supported by Megan Cacace, a civil rights attorney and former partner at Relman Colfax PLLC ("the Auditors"). Meta set up an internal infrastructure to support the audit, with Sheryl Sandberg, Meta's Chief Operating Officer, overseeing the effort, and a staff-level working group that ensured the Auditors had access to subject matter experts and executives and could sufficiently investigate relevant civil rights concerns. At its end, Meta published the findings in full—a total of three publications,[3] the last of which was published in July 2020. The scope of the work on the Audit was primarily focused only on the U.S. and core Facebook app (rather than Instagram, WhatsApp, or other Meta products). Therefore, all references in this report to "Facebook" are referring to the core Facebook app. In some cases, the Auditors recommended and influenced policy changes, which impacted the core Facebook app, in addition to other Meta technologies.

The Auditors issued a number of recommendations and highlighted actions the company had or was taking that indicated civil rights progress. We have categorized these as recommendations and actions taken during the course of the Audit.

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[2] Marginalized communities are populations that are pushed to the periphery of society. These communities experience exclusion and discrimination as a result of unequal power relationships that cut across political, economic, ethnic, racial, and other cultural lines. Marginalized communities include, but are not limited to, groups that are discriminated against due to their race, ethnicity, color, religion, sexual orientation, gender, gender presentation, physical & mental disability, immigration status, veteran status, and economic status.

[3] Meta published an update on the Civil Rights Audit as a Newsroom post on 12/18/2018, a Civil Rights Audit Progress Report on 06/30/2019, and the final Civil Rights Audit Report on 07/08/2020.

In total, the Auditors described 117 recommendations and actions taken, 65 of which have been implemented, and 42 of which are in progress or ongoing, given the nature of the recommendation. Of those remaining, we continue to evaluate the feasibility of eight, and there are two that will not be implemented as evaluation determined they would not be as effective and efficient as current policies. This report details many of these actions and their status; an accounting of the 117 actions and their status can be found in the appendix to this report.

This report serves as a direct and transparent response to the Civil Rights Audit; it is not intended to address other company matters. The goal of this report is to provide an update on the specific recommendations and actions from the Civil Rights Audit and to provide insight into the current work of the Civil Rights Team.

II. Civil Rights Accountability Structure

The Civil Rights Audit provided an independent assessment of the civil rights implications of Meta's policies, practices, and products. The company understood and embraced publicly the need for a long-term infrastructure to support civil rights work once the audit ended. **To that end, the Auditors made 14 recommendations and actions to help the company effectively build out a civil rights accountability structure. To date, we've implemented nine of these and five are in progress or ongoing.**

Onboarded Civil Rights Expertise

Meta hired Roy L. Austin, Jr. in January 2021 as Vice President of Civil Rights and Deputy General Counsel, a role that is the first of its kind for Meta and the broader tech industry. In his first months at Meta, Roy prioritized internal[4] and external[5] engagements to help him better understand where the company needs to improve, which, in turn, informed the Civil Rights Team's hiring decisions.

> Under Roy's leadership, Meta has since grown the Civil Rights Team to include nine full-time employees, eight of whom are women and six of whom are women of color.

The team's expertise spans hate crimes, voting rights and elections, counterterrorism, immigration, national security, law enforcement and criminal justice, product inclusion, algorithmic fairness, and transparency. Our work is organized around five key pillars:

- **Law Enforcement & Hate:** Addressing the potential for harm is critical to enhancing protections for marginalized communities, including victims of hate speech, hate incidents, and hate crimes. It means continuing to work with law enforcement on these

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[4] Internally, Roy convened discussions with Meta resource groups that represent marginalized communities within the company (groups like Black@Meta, Pride@Meta, Vets@Meta), and has since had several follow-up meetings to discuss issues in depth.
[5] Externally, Roy, in partnership with Meta's External Affairs team, met with over 30 civil rights and social justice leaders and their organizations.

and other critical issues of safety. It also means continuing to work to address law enforcement misuse of our technologies. For example, law enforcement should not use our technologies to conduct unlawful or improper surveillance of marginalized communities as such activity risks violation of our policies and chills our users' First Amendment rights. The Civil Rights Team believes strongly in the principles of free expression represented by the U.S. Constitution and international human rights treaties like the International Covenant on Civil and Political Rights, and strives to create an environment where people can act on their freedoms, while simultaneously creating mechanisms for accountability to help protect communities from harm.

- **Policy & Enforcement:** Meta's approach to content moderation and enforcement reaches millions of people in the U.S., and billions around the world. Within the larger framework of Meta's content enforcement efforts, the Civil Rights Team works to surface civil rights concerns on the front end of policy development as well as in the processes and systems related to the enforcement of these policies. We also work to provide a more diverse and inclusive engagement process in collaboration with other teams, so that we may fully consider input from marginalized communities in our work to create safer and more equitable technologies for all users.

- **Product:** Innovative new products and features are constantly rolling out across Meta. The Civil Rights Team is involved in this work by closely innovating with teams and helping create product frameworks and guidance tools aimed at prioritizing protected classes and protecting historically marginalized communities. By working collaboratively with cross-functional teams across the company to surface and address civil rights issues during the product development process, our team is able to advance Meta's goals of building technology that brings people together while mitigating civil rights concerns before they arise.

- **Technology:** Technology plays a major role in virtually every aspect of our lives. There are countless benefits that come with introducing new technologies into our society, but there are also risks. From a civil rights perspective, technology can be used in innovative ways to mitigate the historic discrimination to which so many marginalized communities have been subjected. However, technology also has the potential to perpetuate or exacerbate these problems. A core element of the Civil Rights Team's mission at Meta is to help instill civil rights best practices throughout the company, including machine

learning, virtual and augmented reality, and emerging technologies, and lead engagement with external technology experts.

- **Voting & Civic Engagement:** Meta's products and services serve communities all around the world. The question is no longer whether technology and social media play a role in elections and the civic ecosystem, but what forms they will take. The Civil Rights Team recognizes the potential to help increase civic engagement and voter participation, and to strengthen the values of equity, dignity, and safety as core to free expression and free and fair self-government. We also understand the elevated risk environment and the need to counter threats to civic participation, particularly when targeted at systematically marginalized communities. We work to inform and connect people, communities, and civic institutions to come together and drive outcomes to improve lives, because when all people have an opportunity to participate and are considered political equals, societies make decisions optimized for the many, not the few, while respecting the fundamental rights of all.

In addition, the Civil Rights Team consults with a number of outside experts to help supplement the team's own expertise—among them, the civil rights law firm of Relman Colfax, which worked hand-in-hand with Laura Murphy on the company's Civil Rights Audit; Franita Tolson, Professor and Vice Dean at the USC Gould School of Law, who focuses on voting rights, election law, and the Fourteenth and Fifteenth Amendments; and Eve Hill, a disability rights attorney, who previously served as a Deputy Assistant Attorney General of the U.S. Department of Justice, Civil Rights Division, where she was responsible for oversight of the Division's disability rights portfolio.

The Civil Rights Team is increasingly represented at tables across the company from early decision-making with teams to engaging with our leadership. Working with others to develop best practices related to civil rights and equity will help broaden our impact. The Civil Rights Team works very closely with other teams in the company, including but not limited to the Human Rights Team, Responsible Innovation, Responsible Artificial Intelligence, Social Impact and Civic Equity, Integrity, and Privacy and Compliance. The Civil Rights Team also continues to convene the Civil Rights Task Force that was set up as part of the company's Audit. The Task Force, led by Sheryl Sandberg, ensures that senior leadership at the company remains actively involved, engaged, and invested in the work of the Civil Rights Team and in Meta's civil rights impact. Additionally, the company has started to embed civil rights expertise on critical teams,

including Content and Privacy Policy, Civics and Operations, Policy Communications, and Trust and Safety.

Created Robust Processes

The Auditors further urged the company to develop robust processes that allow for the integration of civil rights analysis at every level. At a company of Meta's size and scale, there are a number of ways that the Civil Rights Team has folded into existing processes and developed new ones.

On development of our content policies,[6] for example, the Civil Rights Team is included in the relevant policy development processes and working groups. This means that we help to develop, assess, and inform policy options prior to their implementation. The Civil Rights Team engages with civil rights and community-based organizations and leaders, working with Meta's external engagement teams to allow experts and impacted communities to raise concerns and provide valuable input on different policies. We support the incorporation of and response to civil rights feedback. Engaging closely with the civil rights community, we worked to develop robust policies to combat voter and census interference in conjunction with teams across the company. With input from the Civil Rights Team and the Diversity Team, Meta has established a Diversity Advisory Council, which is intended to ensure different internal teams with expertise and lived experience are also part of policy development processes.

Similarly, the Civil Rights Team is working on an analysis that can assist with the development of products and features on Meta technologies. *Project Height* will provide an analysis framework for product teams to build with civil rights in mind from a product's inception through its launch and subsequent iterations.

Civil Rights Trainings

In an effort to better equip Meta personnel to identify and address civil rights issues, the Civil Rights Team has developed and is rolling out civil rights-related trainings in collaboration with Relman Colfax. The purpose of these trainings is to provide cross-company education and analysis regarding civil rights laws as part of our efforts to advance equity across all of our technologies.

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[6] Facebook's content policies are referred to as Community Standards; Instagram's are called Community Guidelines.

These trainings provide an overview of civil rights laws and concepts for Meta personnel, as well as specialized trainings focusing on certain teams and/or subject matter areas. For example, the Civil Rights Team recently designed and launched civil rights training for the company's product lawyers who advise product teams as they conceptualize and build new products. These trainings are more granular and began with Civil Rights Core Concepts and Algorithms and Models. Future trainings will cover civil right laws focusing on housing, employment and credit; voting and civics; equity and empowerment; and accessibility. Additionally, the National Fair Housing Alliance is working with the Civil Rights Team to develop a training program focused on fair housing and lending.

The Civil Rights Team also plans to launch a training for employees working in the early stages of policy and product development, covering core civil rights concepts, issue-spotting questions, and scenarios for analysis to help employees apply these concepts to their day-to-day work. This training is anticipated for 2022.

III. Elections & Census 2020

As the Civil Rights Audit kicked off in May 2018, the 2018 midterm elections in the U.S. were top of mind for the Auditors and the civil rights community. Thereafter, attention turned to the 2020 U.S. elections and the decennial census. **As such, for the better part of the two-year audit, the Auditors prioritized and reported on the company's election and census preparedness efforts, making a total of 37 recommendations and actions, 31 of which have been implemented, two of which are ongoing or in progress, and two of which will not be implemented, as discussed below. The remaining two are still being evaluated.**

The Auditors' final report recognized that "Facebook has made consequential improvements directed at promoting census and voter participation, addressing suppression, preventing foreign interference, and increasing transparency." It also criticized the company's decision to exempt politicians' speech from fact checking, and its failure to remove select posts from former President Trump. While civil rights leaders recognize that "[f]ollowing the release of the audit, Facebook took some important steps to keep our democracy safer," we continue to hear and try to address concerns.

Preventing Voter Suppression and Election Interference

Since publication of the final Audit report in July 2020, Meta has taken additional actions beyond those recommended to help prevent voter suppression and intimidation, improve policy enforcement, and defend against coordinated threats and interference. Between July and November 2020, for example, the company expanded its voter interference policies and enforcement including:

- Prohibiting calls to go to an election site, voting location, or vote counting location to watch voters or monitor election officials' activity that use militarized language or suggest that the goal is to intimidate, exert control, or display power over election officials or voters;
- Prohibiting certain implicit misrepresentations that would mislead voters regarding the process by which to get a ballot, thereby impeding their right to vote;
- Implementing broader protections for election officials by removing any violent threats targeted at elections officials; and,
- Prohibiting threats related to COVID-19 to discourage voting.

Meta also announced a number of [additional prohibitions](#) in its ads policies following publication of the final Audit report, including:

- Ads that delegitimize the U.S. 2020 election as fraudulent or corrupt because the result cannot be determined on the final day of voting and/or before ballots received after the final day of voting are lawfully counted;
- Ads that contained a presidential candidate prematurely claiming election victory;
- Ads that used COVID-19 to discourage voting; and,
- New political and issue ads in the week leading up to the 2020 U.S. presidential election, which was extended through March (with an allowance for new ads in the U.S. Senate elections in Georgia).

This chart reflects the development of Facebook's Community Standards on voting-related issues over the period from the Audit's launch, to the Audit's final report, to the publication of this report.

Voter & Census Content Policies	

Pre-Civil Rights Audit	**Voter Fraud & Interference**
	Statements of intent, calls to action, representing, supporting or advocacy for the following:
	• Voter fraud, defined as any offers to buy or sell votes with cash or gifts.
	• Voter interference, defined as:
	  ○ Misrepresentation of the dates, locations, and times, and methods for voting or voter registration
	  ○ Misrepresentation of who can vote, qualifications for voting, whether a vote will be counted, and what information and/or materials must be provided to vote
	  ○ Other misrepresentations related to voting in an official election may be subject to Section 18: False News

At Civil Rights Audit Final Report	**Voter and/or Census Fraud** • Offers to buy or sell votes with cash or gifts • Statements that advocate, provide instructions, or show explicit intent to illegally participate in a voting or census process **Voter and/or Census Interference** **Census only:** • Misrepresentation of who can participate in the census and what information or materials must be provided to participate

	• Misrepresentation of government involvement in the census, including, where applicable, that an individual's census information will be shared with another (non-census) government agency **Voting only:** • Misrepresentation of the dates, locations and times, and methods for voting or voter registration • Misrepresentation of who can vote, qualifications for voting, whether a vote will be counted, and what information and/or materials must be provided to vote • Content claiming that the U.S. Immigration and Customs Enforcement (ICE) is at a voting location • Misrepresentation of whether a candidate is running or not **Census and/or Voting:** • Misrepresentation of the dates, locations, times, or methods for voting or voter registration or census participation • Calls for coordinated interference that would affect an individual's ability to participate in an official census or election • Content stating that census or voting participation may or will result in law enforcement consequences (for example, arrest, deport or imprisonment)
Progress Since Civil Rights Audit	**Voter and/or Census Fraud** • Offers to buy or sell votes with cash or gifts • Statements that advocate, provide instructions, or show explicit intent to illegally participate in a voting or census process **Voter and/or Census Interference** **Census only:** • Misrepresentation of who can participate in the census and what information or materials must be provided to participate • Misrepresentation of government involvement in the census, including, where applicable, that an individual's census information will be shared with another (non-census) government agency **Voting only:** • Misrepresentation of the dates, locations and times, and methods for voting or voter registration • Misrepresentation of who can vote, qualifications for voting, whether a vote will be counted, and what information and/or materials must be provided to vote • Content claiming that the U.S. Immigration and Customs Enforcement (ICE) is at a voting location • Misrepresentation of whether a candidate is running or not

- Explicit claims that people will be infected by COVID (or another communicable disease) if they participate in the voting process
- Statements of intent, support, or advocacy to go to an election site, voting location, or vote counting location when the purpose of going to the site is to monitor or watch voters or election officials' activity using militaristic language (e.g. "war," "army," or "soldier") or an expressed goal to intimidate, exert control or display power (e.g. "let's show them who's boss!," "if they're scared, they won't vote!")
- Statements of intent, support, or advocacy to go to sites of post-election activity, including, but not limited to, election administration offices, election-related court hearings, or election-related demonstrations where the content uses a signal of violence

Census and/or Voting:
- Misrepresentation of the dates, locations, times, or methods for voting or voter registration or census participation
- Calls for coordinated interference that would affect an individual's ability to participate in an official census or election
- Content stating that census or voting participation may or will result in law enforcement consequences (for example, arrest, deport or imprisonment)

Violence & Incitement Content Policies

Pre–Civil Rights Audit	Any content containing statements of intent, calls for action, or advocating for violence due to the outcome of an election
At Civil Rights Audit Final Report	- Any content containing statements of intent, calls for action, or advocating for violence due to voting, voter registration, or the outcome of an election - Statements of intent or advocacy, calls to action, or aspirational or conditional statements to bring weapons to high-risk or temporarily high-risk locations, including but not limited to places of worship, educational facilities polling places, or locations used to count votes or administer an election (or encouraging others to do the same) - Calls to action, statements of intent or advocating to bring weapons to any event or location when the stated intent is to intimidate people
Progress Since Civil Rights Audit	- Any content containing statements of intent, calls for action, or advocating for violence due to voting, voter registration, or the outcome of an election - Statements of intent or advocacy, calls to action, or aspirational or conditional statements to bring weapons to high-risk or temporarily high-risk locations, including but not limited to places of worship, educational facilities polling places, or locations used to count votes or administer an election (or encouraging others to do the same)

- Calls to action, statements of intent, or advocating to bring weapons to any event or location when the stated intent is to intimidate people
- Implicit calls to action, statements of intent, statements advocating, and aspirational or conditional statements to bring armaments to temporary high-risk locations and high-risk locations
- Coded statements where the method of violence or harm is not clearly articulated, but the threat is veiled or implicit
- Threats against election officials
- Content referencing election-related gatherings or events when combined with a signal of violence
- Assertions, claims, allegations, speculation or verifiably false statements about election-related corruption, fraud, irregularities, or bias when combined with a signal of violence
- Assertions, allegations, speculation, or verifiably false statements about election-related corruption, fraud, irregularities, or bias in a specific location (state or smaller) when combined with a signal of violence

Labeling Delegitimizing Content

At the time that the final Audit report was published in July 2020, the company added a neutrally worded label directing users to its Voting Information Center, on all posts detected to be about voting, no matter the content. The Auditors recognized the value of the labels, citing "the need to ensure access to correct voting information…particularly at a time when confusion about voting and the U.S. presidential election may be rampant," but went on to express concern that "labeling all voting-related posts (both those that are accurate and those that are spreading misinformation) with neutral language will ultimately be confusing to users and make it more difficult for them to discern accurate from misleading information."

The Auditors' feedback informed how the company approached labels in the months leading up to and immediately following the 2020 U.S. presidential election. In addition to the neutrally worded labels on all posts detected to be about voting, Meta attached stronger informational labels to content, beyond ads, that sought to delegitimize the outcome of the election in particular ways or the various methods by which people can vote, for example, by claiming that lawful methods of voting would lead to fraud. The labels included information from the Bipartisan Policy Center that addressed the underlying claim. The company also used its Voting Information Center to amplify authoritative information about important election deadlines, how and when to register, how to vote, and details about the protections around voting. Meta

highlighted facts about voting to help educate the public and inoculate against claims and misinformation that could delegitimize the voting process.

Empowering Voters and Promoting Civic Participation

The Audit recognized that "Facebook has a host of products and programs focused on promoting civic participation," and discussed the company's proactive approach to educate and empower voters in the lead-up to the 2020 U.S. presidential election.

Meta ran the largest voter information campaign in American history, connecting people with reliable information about voting from state election authorities and nonpartisan civic partners. As a result of Meta's strong emphasis on this effort, the company exceeded its goal and estimates it helped 4.5 million people register to vote in 2020 across Facebook, Instagram, and Messenger. This was more than double the estimated 2 million people Meta helped register in both 2016 and 2018.
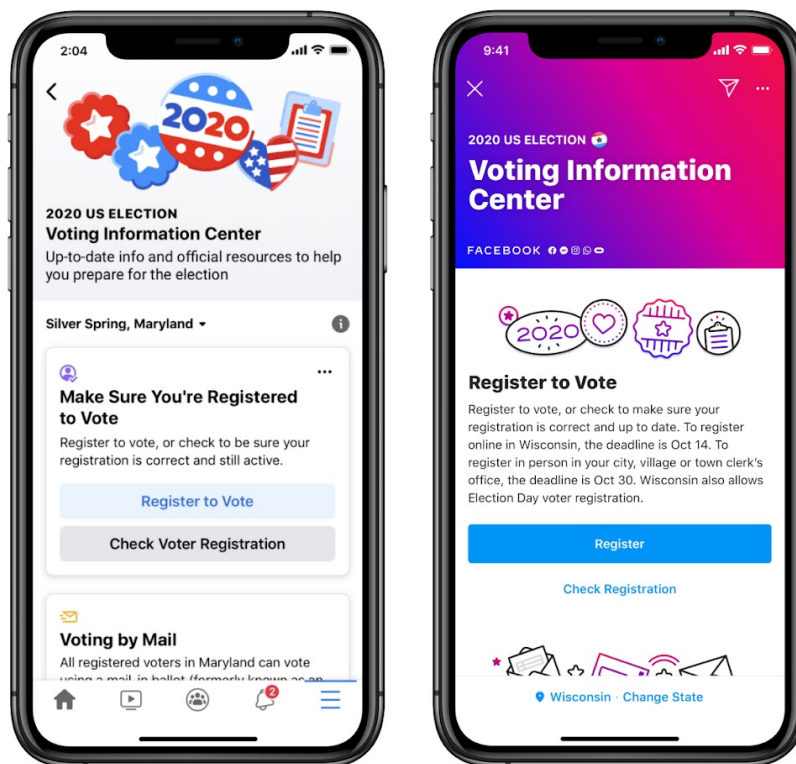
To help people get the information they needed, Meta launched its Voting Information Center in thirteen languages on Facebook and Instagram with state-by-state content about how to register, request a mail-in ballot, check polling places, and more. The company also added labels to posts it detected were about voting and the election with a link to the Voting Information Center. Meta estimates that 140 million people visited the Voting Information Center, with over 33 million people visiting it on Election Day alone.
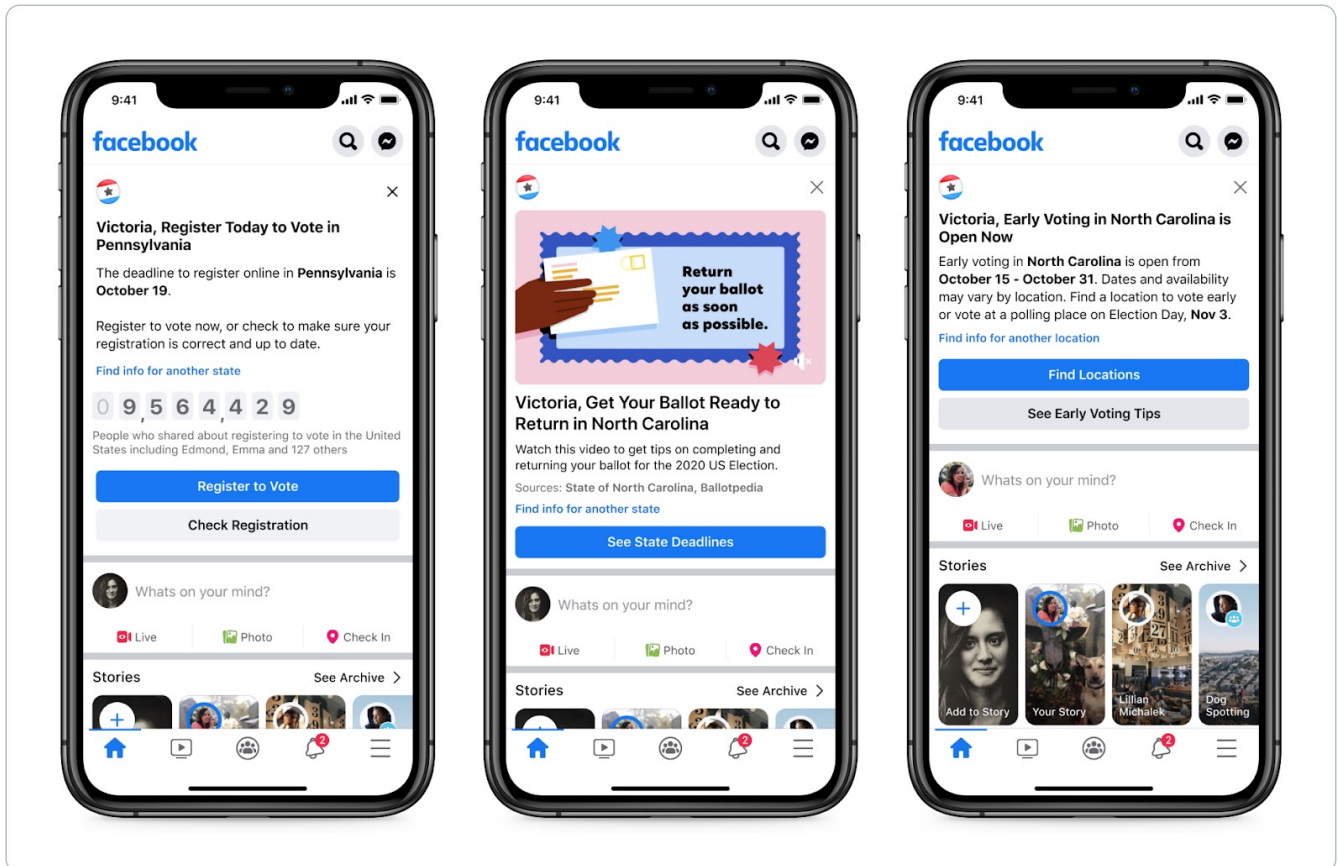
In an effort to actively engage and educate voters, the company also featured voting information at the top of the Facebook, Instagram, and Messenger apps to people of voting age nearly every day between Labor Day and Election Day. These notifications provided accurate information about how to register and connect people with their state authorities—or its nonpartisan partner, Democracy Works, in states that don't have online registration—so people could register to vote off-platform. Meta also included information about different voting options, including voting by mail, early voting, and voting on Election Day, as well as facts about

voting from the Bipartisan Policy Center. For voters living outside the U.S., including military members and their families, the company sent information to help them access tools to vote.

Meta created Voting Alerts for state and local authorities to send updates about the voting process to their constituents. These notifications were sent to people in their jurisdictions and were included in the Voting Information Center. For example, the State of Alaska used Voting Alerts three weeks before Election Day to tell Alaskans they were no longer required to have someone witness them signing their mail ballot and have the witness also sign. Beyond helping people register and vote, Meta prioritized helping people sign up as poll workers to fill the shortage caused by the pandemic. To make it easier for people to sign up with their state and local election authorities for this critical role, the company ran notifications at the top of the Facebook and Instagram apps to people in the U.S. over the age of 18. Estimates indicate that this played a role in signing up more than 100,000 people as poll workers. Meta also offered free ad credits to every state election authority in order to recruit poll workers across our technologies.
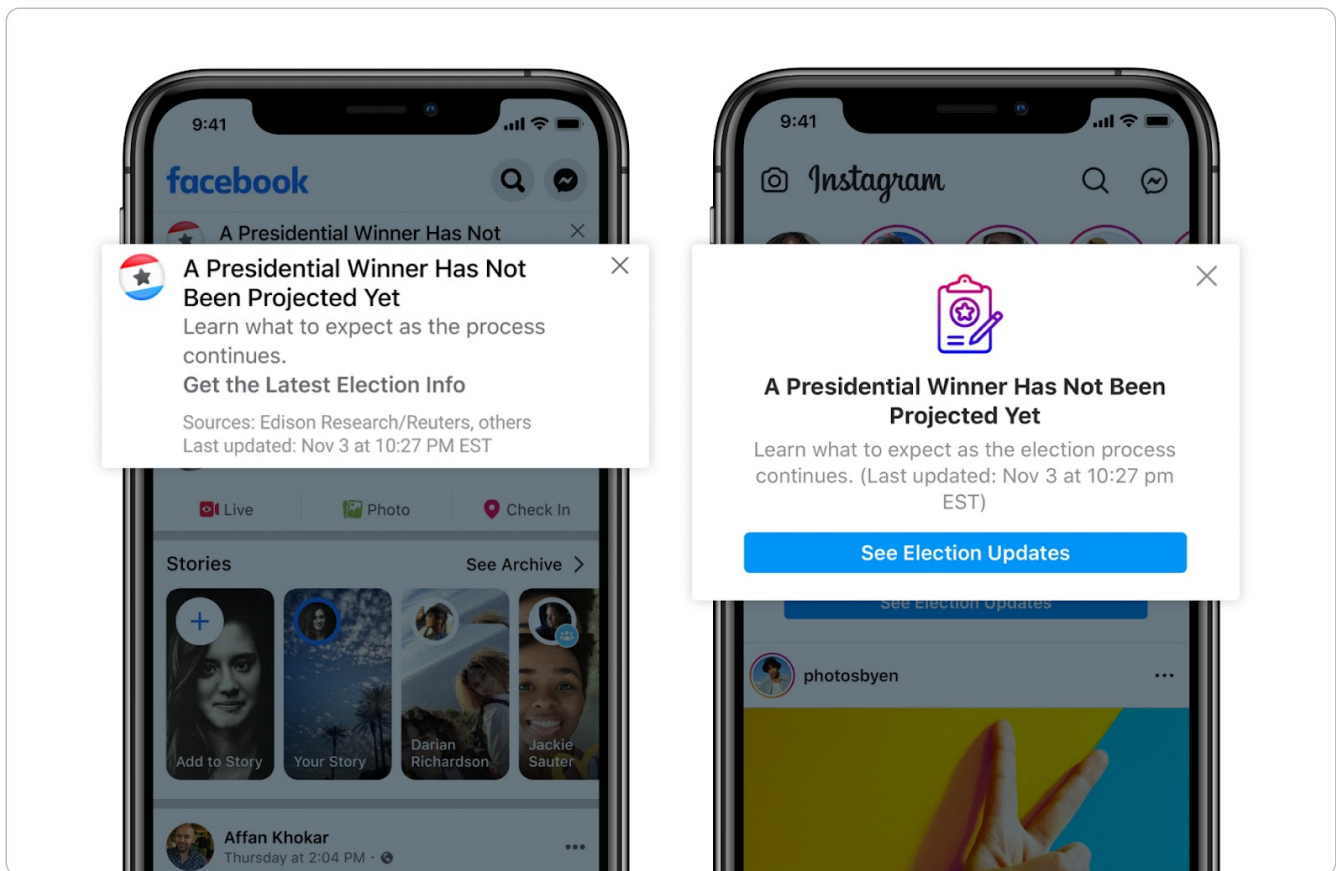
Once polls closed, Meta used the Voting Information Center as a source of reliable information on election results to help people understand the vote-counting process. It included updated results of the presidential, Senate, and House elections from the National Election Pool, Edison Research and Reuters.

As Meta reported in A Look at Facebook and US 2020 Elections, when President Trump declared premature victory while votes were still being counted, the company started running top-of-feed notifications on Facebook and Instagram so that everyone knew the winner had not been projected. It also started applying labels to both presidential candidates' posts automatically with this information. The notifications and labels directed people to the Voting Information Center for the latest state-by-state results.

Meta activated the notifications running across the top of Facebook and Instagram to show that Vice President Biden was the projected winner of the election on November 7, 2020, once a majority of independent decision desks at major media outlets projected a winner. The company also started applying labels with this information on presidential candidates' posts with a link to our Voting Information Center to see more about the election results.

None of this work would have been possible without the help of state election authorities, civil society organizations like the Bipartisan Policy Center and Democracy Works, and other organizations that provided their expertise and support. It is another example of how Meta makes its most beneficial impact when it is able to engage in substantive collaboration with a range of subject matter experts in their fields.

U.S. 2020 Elections Research

There are continued calls for Meta to allow for and engage in transparent, accountable, academic research to understand the impact of Meta technologies on key political attitudes and behaviors. For example, the Audit recommended that the company do more to understand the way hate is targeted, and disclose further data on voter suppression, including information about content across different communities.

After the Audit publication, in 2020, Meta launched a research initiative with 17 outside academics to look at Facebook and Instagram's impact on key political attitudes and behaviors

in the U.S. 2020 election, including examining the impact of how people interact with content, and the role of product, content, and policy choices. The effort, led by Professors [Talia Stroud](#) and [Joshua A. Tucker](#), is a partnership between Meta researchers and independent external academics who were selected by Stroud and Tucker.

These independent academics have worked with Meta researchers to design a diverse set of objective, empirically grounded studies to better understand a range of topics, including whether social media contributes to polarization, or largely reflects existing divisions; causes people to become more or less informed about politics; or affects people's attitudes towards government and democracy, including whether they vote. The initiative is designed to integrate Meta researchers' knowledge and access to internal Meta data with the expertise of independent scholars so that together we can conduct scientifically rigorous research that relies on sound methodology.

The study started in August 2020 and data collection was extended through February 2021. To collect the information for the study, Meta is partnering with NORC at the University of Chicago, a nonpartisan and objective research organization that has been studying public opinion since 1941. NORC possesses deep expertise in survey research, policy evaluation, data collection, advanced analytics, and data science. The studies were approved by NORC's Institutional Review Board. The research is ongoing and the final publication will occur after peer-review.

Recommendations to be Further Evaluated

We will continue to evaluate two recommendations to disclose additional data regarding voter suppression, including information about content across groups, and to revise content policies so that Facebook's policy prohibiting calls to exclude people from political participation based on protected characteristics is applied to content from politicians that might otherwise be deemed "newsworthy."

Recommendations Declined Upon Further Analysis

There were two recommendations that the company is not implementing upon further evaluation. The Auditors recommended that all user-generated reports of voter interference be routed to content reviewers to make a determination on whether the content violates our policies, and that an appeals option be added for reported voter interference content.

The company evaluates and monitors voter interference content to identify trends, as opposed to always sending individual reports to content reviewers. Upon reviewing the Auditors' recommendations, Meta has decided to continue our current policies. Routing all voter interference reports to content reviewers to make a determination may unintentionally slow our review process, rendering us less effective at removing voter interference content at scale. As the vast majority of content reported as voter interference does not violate the company's policies, it is not building a process for appeals of this specific reported content. The company believes the content review operation is more effective and efficient when content reviewers are leveraged to review content that is proactively detected by our technology, and hone in on trends in voter interference reports.

IV. Content Moderation & Enforcement

For content moderation and enforcement, the Auditors focused on how Facebook might better protect users from hate and racism, enhance equitable enforcement of content policies, and prevent the voices of activists and civil rights advocates from being silenced. While the Civil Rights Audit focused on what content is and isn't allowed under Facebook's Community Standards, the Civil Rights Team is also looking at how that content is distributed across our technologies. All of this work is important to advancing and protecting civil rights and to our [Corporate Human Rights Policy](#), and will always be ripe for discussion given the ever-changing ways that people use (and misuse) Meta technologies. It is also important to look at policies and enforcement separately. While Meta may have changed a particular policy, it may take longer for the many moving parts of enforcement (from the building of the artificial intelligence to the training of human reviewers) to reflect that policy change. **In total, the Auditors made 32 recommendations and actions related to content moderation and enforcement, 16 of which we have implemented, 13 of which are in progress or ongoing, and three of which are still being evaluated.**

Revisiting The Discussion of State Use of Force

The Auditors criticized the company's decision to not take action against President Trump's post during the Black Lives Matter protests in response to the police murder of George Floyd. CEO Mark Zuckerberg [publicly explained the company's decision](#).

Since publication of the final Audit report, Meta has done the important work of revisiting its violence and incitement policies—specifically, the allowance around discussion of state use of force—and has developed a framework to evaluate content posted by a state official, weighing the risk of content contributing to offline harm against the importance of public awareness about the statement. In doing so, Meta has drawn from established expertise, including the Rabat Principles,[7] about the use of lethal force by state actors and their proxies, in a wide variety of contexts such as demonstrations, civil unrest, and armed conflict.

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[7] The [Rabat Principles](#) are a set of global human rights principles defining certain criminal consequences for incitement to racial, religious, or national hatred.

The framework is used specifically to assess content related to state use of force when posted by a senior-level state actor. It considers multiple contextual factors, including whether the state actor has the capacity to use or order the use of force; legality of the use of force in the given context; the target of the act; whether the country, region, or community at issue is in a state of civil unrest; the severity of the force; and, whether there is otherwise sufficient notice about the state use of force outside of Meta's services to those targeted. Meta's Content Policy team will work in consultation with the Human Rights and Civil Rights Teams on these assessments as appropriate.

With this new framework, in combination with Meta's existing prohibition on content that encourages violence by non-state actors, Meta continues to enhance its policies prohibiting violence and incitement.

Violence & Incitement

In their reports, the Auditors suggest that Meta takes a rigid and literal approach to applying its policies to content on the platform, encouraging the company to double down on existing work to better account for the spirit of its policies and new applications of policy not currently anticipated by existing policy language. Content Policy is in constant collaboration with operational enforcement teams to iterate on policy language in order to consistently capture and enforce against harmful content globally.

In the case of our [Violence and Incitement policies](#), the company consulted with over 50 external experts—experts in dangerous speech, human rights defenders, linguists, journalists and others who have been the subject of veiled and implicit threats. As a result, Meta has adopted a policy that prohibits certain coded statements where the threat is veiled or implicit, even if the method of violence or harm is not clearly articulated. In determining whether the content violates our policies, a specialized team now looks at a number of signals, including the context in which the content was shared, references to historical or fictional incidents of violence, or local context or subject matter expertise that more credibly establishes the threat of harm.

Meta's policies have also gone further, prohibiting implicit statements that encourage people to bring guns to "high risk locations" like schools, polling places, and houses of worship. This designation is based on signals such as the heightened risk of violence, civil unrest, or increased police presence. This may be the case, for example, when there is a protest and counter-protest

planned, or recent violence broke out at a protest in the same city. Relatedly, the Auditors also pointed to the speed with which we enforce this policy, recommending that "an effective and expedited review process to remove such content quickly is critical given its potential for real-world harm." The company has accepted the Auditors' recommendation and has worked to more effectively enforce these policies. Meta has, for example, built proactive detection technology that can more quickly identify Event pages that may violate our policies. It also does proactive manual sweeps for potentially violating Event pages using relevant keywords as needed.

Bullying & Harassment

Meta has made several updates to its bullying and harassment policies in an effort to better protect people across our technologies.

Meta's policies already covered individual posts that harass our users, but these have been expanded to cover the behavior of brigading[8] and mass harassment, a practice that can disproportionately affect leaders and individuals from marginalized communities. Some dimensions of brigading behavior are captured by existing Community Standards, including bullying and harassment, spam, inauthentic behavior, and coordinated inauthentic behavior. However, these policies address the issue in a piecemeal fashion, often only focusing on the content that is being posted rather than looking at the bigger picture of mass harassment, such as the person posting the content and the behavior in which they engage. Meta wanted to develop a holistic approach to help protect people from mass harassment and brigading, without penalizing people engaging in legitimate forms of communication or protest, such as activism, campaigning, or other calls to action, as these are key components of organizing on social media. As part of the process, the company looked at the range of brigading and mass harassment behaviors on its services and consulted with nearly 100 external experts and community members to develop a policy that takes down networks and penalizes people for engaging in adversarial brigading or mass harassment. The company's engagements included victims of mass harassment, journalists and activists, safety organizations, and advocacy groups that represent marginalized communities.

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[8] While a "brigade" is historically a group of troops or fighting force, the word has seen new use relevant to the internet and social media. We have defined "brigading" as mass activity coordinated by a set of authentic actors that deploy behavioral tactics devised to directly impact the target's on or off-platform activity. The origin and target of brigading also varies, and is relevant.

The updated policy is distinct from Meta's work on coordinated inauthentic behavior in that the actors are often using their authentic accounts and may be more loosely coordinated. The signals being looked at are also different; for example, Meta assesses the type of content being sent and the target of the harassment. The company's policies also prohibit content that is considered mass harassment towards any individual, including direct messages or comments on personal profiles. Unfortunately, as hatred and attacks persist, we continue to look for ways to better protect users and evolve those policies as needed to address harassment and attacks, as was the case with athletes this summer.

Meta has also taken a more nuanced approach to the way it categorizes people under its bullying and harassment policies. Generally, the bullying and harassment policy differentiates between public figures and private individuals to enable freedom of expression and legitimate public discourse around those in the public eye. However, the company recognizes that becoming a public figure isn't always a choice, and fame is sometimes thrust upon people, particularly on social media.

As such, Meta introduced a new category of "involuntary public figures" that includes journalists and civil rights activists who have become famous involuntarily or because of their work. Consistent with the commitments we've made in our Corporate Human Rights Policy, involuntary public figures now receive increased protections against bullying and harassment, including against attacks comparing them to animals or amplifying negative physical descriptions.

In updating the above policies, the company consulted approximately 100 different external experts and groups, including free speech advocates, human rights experts, women's safety groups and our Women's Safety Expert Advisors, cartoonists and satirists, female politicians and journalists, representatives of the LGBTQ+ community, content creators, and public figures. The full list of protections for public figures, including involuntary public figures, can be found in our Community Standards.

Hate Speech

The Auditors also recommended updates to Facebook's hate speech policies, using anti-Muslim hate speech as an example of trends in the way that people attack different communities online. They noted, for example, that attacks against people, which are prohibited under our

Community Standards, often masquerade as references to religious concepts or ideologies, which have historically been permitted, and urged us to "evaluate potential solutions or ways to better distinguish between discussion of religious concepts and dehumanizing or hateful attacks masquerading as references to religious concepts or ideologies."

In response, the company has undertaken a rigorous policy development process involving over 110 experts from across the world. These engagements included experts in how hate speech works, such as social psychologists and sociologists; experts in how existing laws, codes, and norms have sought to address the issue of "concepts versus people," such as legal scholars and human rights experts; representatives of marginalized communities potentially affected by this aspect of our hate speech policies; and, freedom of expression advocates such as journalists, political cartoonists, and artists. Additionally, Meta conducted specialized human rights due diligence regarding hate speech in this context.

At the conclusion of this process, Meta updated its hate speech policy to make clear that it prohibits attacks against concepts, ideas, practices, beliefs, and institutions related to protected characteristics in certain circumstances, when they pose a risk of harm, intimidation or exclusion. The [hate speech section our Community Standards](#) now includes the following policy:

> *Do not post:*
>
> - *Content attacking concepts, institutions, ideas, practices, or beliefs associated with protected characteristics, which are likely to contribute to imminent physical harm, intimidation or discrimination against the people associated with that protected characteristic. Facebook looks at a range of signs to determine whether there is a threat of harm in the content. These include but are not limited to:*
>   - *content that could incite imminent violence or intimidation;*
>   - *whether there is a period of heightened tension such as an election or ongoing conflict; and*
>   - *whether there is a recent history of violence against the targeted protected group.*
>   - *In some cases, we may also consider whether the speaker is a public figure or occupies a position of authority.*

Specialized teams will look at this range of signals to determine whether there is a risk of harm posed by the content.

Recommendations to be Further Evaluated

Though implementing these 16 recommendations is important to improving our content moderation policies, needless to say, there is much that still needs to be done and policies are constantly evolving to meet the needs of our users. The Civil Rights Team will also continue to lead the company's work to evaluate the outstanding recommendations from the Audit regarding content moderation, including transparency and consistency of appeals decisions, metrics and data, and enhanced reporting in the Community Standards Enforcement Report.

V. Diversity, Equity, & Inclusion

The Auditors' chapter on Diversity, Equity, and Inclusion[9] leads with a reminder of the tragedies and ensuing protests in response to police brutality against Black people and the "wave of corporate statements against the racism and injustice facing communities of color" that followed, including a [response](#) from Meta's CEO, Mark Zuckerberg. **In making recommendations on Meta's diversity, equity, and inclusion practices, the Auditors expressed their hope that Meta's own commitments start with actual, concrete progress to further instill principles of diversity, equity, and inclusion in all aspects of the company's work, making 21 specific recommendations and actions, of which nine have been implemented, 11 are in progress or ongoing, and one is still being evaluated.**

The Auditors' recommendations related to improving representation of women and marginalized communities in the company's workforce and in leadership positions, diversification of suppliers and vendors, and investment in underrepresented businesses, nonprofits, and creators. The company believes strongly in the importance of diversity, equity, and inclusion and is fully committed to continuing to improve in these areas.

Representation in Our Workforce

In order to build the best products and services for users, Meta knows it needs an inclusive workforce that reflects the diversity of the people it serves. The company understands it has work to do when it comes to representation of many marginalized communities, both in technical roles and leadership positions. Meta is committed to addressing this issue.

Over the last two years, Meta set three goals to increase representation of women and marginalized communities in our workforce over five years. Specifically, the company said it would aim to:

1. Double the number of female employees globally and double the number of Black and Latinx employees in the U.S.;

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[9] In the Auditors' publications, this section was referred to as Diversity and Inclusion.

2. Increase the number of people from underrepresented groups such that at least 50% of our workforce is comprised of women globally, and underrepresented minorities,[10] people with two or more ethnicities, people with disabilities, and veterans in the U.S.; and

3. Increase the number of U.S.-based leaders (Director-level employees and above) who are people of color by 30%.

In 2014, the company began publicly reporting on representation in its Diversity Report. Meta has since increased representation of women in technical, non-technical, and leadership roles as defined in the report globally to 36.7% (totaling 24.8% technical; 59.6% non-technical; and 35.5% leadership). Zooming out, 45.6% of our workforce is made up of underrepresented groups globally.

In the U.S., Meta has increased representation of employees who are from marginalized communities with Black and Latinx employees now making up more than 10.9 percent of our U.S. workforce, and 10.6 percent of our employees identifying as LGBTQ+, 4.7 percent of people disclosing disabilities, and 2.4 percent identifying as veterans globally.

> With regard to leadership positions, Meta has similarly made progress, increasing the number of U.S.-based Black and Latinx leaders at the company by 38.2 percent and 18.6 percent respectively in the first year of our five-year goal. U.S.-based Black leaders at Meta now represent 4.7 percent of leadership, and U.S.-based Latinx leaders represent 5.1 percent of leadership.

The company also understands that to truly diversify our industry, it must begin earlier by providing education and opportunities and opening our doors. There are a number of ways Meta is working to help increase the number of diverse candidates, among them a new Summer News Fellowship for undergraduate students and recent graduates of Historically Black Colleges and Universities. These are in addition to existing partnerships and programs we have with CodePath.org, Align, TechPrep and other organizations dedicated to leveling the playing field.

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[10] The term "underrepresented minorities" here specifically refers to groups underrepresented at Meta and is defined as people who are Black, Hispanic, Native American, and/or Pacific Islanders.

These programs help students from marginalized communities, who face disproportionate challenges, gain equitable access and opportunity to pursue degrees, and eventually careers, in computer science.

While Meta has made progress, it recognizes that there is more to do both to achieve the ambitious goals the company has set for itself, to improve representation at Meta, and to work towards a future in which the tech industry represents the people it serves. Diversifying Meta and the industry is critical to building inclusive, safe, and equitable technologies for everyone.

Diversification of Suppliers and Vendors

In an effort to consciously provide opportunities to engage with and empower diverse businesses, Meta also pledged to diversify our suppliers and vendors. Last year, the company committed to spending $1 billion with diverse suppliers in 2021, including $100 million with Black-owned businesses.

Meta has met or is on track to meet all of these goals. The company's utilization of diverse suppliers has increased in categories including marketing, construction, contingent workforce, and network security. Perhaps most notable are new relationships that Meta has established with diverse-owned, including Black-owned, financial services firms. At present, the company has administered over $30 billion in share repurchases with four diverse firms. It has also hired two diverse asset managers to invest over $2.5 billion in fixed income assets, and has invested over $1.2 billion in money market funds co-sponsored by three diverse firms.

In response to the devastating economic impacts of the pandemic—particularly on minority and women-owned businesses—Meta also developed the Invoice Fast Track program. Through this program, Meta has committed $100 million to buy eligible, non-Meta receivables from diverse-owned businesses for a low, fixed fee. The goal is to reduce the time it takes these businesses to get paid for work they have completed from many months to a few days. According to many businesses who have participated in the program, having access to this affordable and immediate working capital has served as a lifeline and allowed them to stay afloat during the pandemic.

Investment in Diverse-Owned Businesses, Creators and Nonprofits

Meta has invested in diverse-owned businesses, creators, and non-profits with grants and by building programs that provide technical assistance designed to holistically support our partners' goals and community impact.

Grants and Financial Stimulus

In June 2020, Meta [pledged](#) another $100 million in grants and ad credits to Black-owned small businesses, creators, and nonprofits in the U.S., in addition to the diverse supplier commitments discussed in the section above.

- The bulk of Meta's commitments were deployed via the business grants program, which was designed specifically to boost liquidity for Black-owned small businesses, which had shuttered at nearly twice the rate of non-diverse businesses due to COVID-19.
- Meta invested $20 million in nonprofit grants and support programs, which were designed to support Black-serving and Black-led nonprofits and to address systemic barriers to racial equity.
- The $25 million in funding and programs designed to help Black creators scale their creativity, amplify their voices, grow their communities, and help them build a business across Meta technologies.

Since announcing the pledge last year, Meta has distributed nearly all of the additional $100 million in grants and ad credits to Black-owned small- and medium-sized businesses (SMBs), creators and nonprofits, having worked with organizations like the National Urban League, U.S. Black Chambers of Commerce, and the Association of Black Foundation Executives to structure the programs.

In addition to our financial support of Black communities, in the sections below we highlight an additional $15 million commitment to nonprofit grants for organizations working to address systemic barriers to racial justice, $10 million for Black Gaming creators, and $5 million to provide news to historically marginalized communities through Meta Journalism Project.

Programmatic Support

1. Media Equity and Representation

In early 2020, Meta established a new team within their Media Partnerships organization responsible for supporting equity for historically-underrepresented communities in Meta's work to help publishers, creators, and communities reach their audiences and build their businesses on its technologies. The founding of this team formalized years of work organically led by diverse employees across the company and led to the development of new initiatives intended to better support Black and Latinx communities in the U.S, and to drive justice and equity through media.

Meta sees this initiative as not only a business imperative—as these diverse audiences are highly engaged on Meta technologies, are generally growing faster than the general population, and often have outsized culture-shaping influence—but also as a part of Meta's mission to serve all communities across its technologies.

- *Creators:* Meta invested $25 million to [launch](#) the first Black creator program at Meta, We The Culture. We The Culture elevates Black creators to share their vision with the world, spark community, and empower them to build successful, entertaining and sustainable networks across our apps. In addition to content funding, participating creators receive access to education and development, product support, access to exclusive community building activities and partner management. In year one, We the Culture supported 600+ Black creators across its funded content, accelerator, and incubator programs. Meta recently [announced](#) its continued investment in the Black creator community with a second year of We The Culture. In December 2020, Meta separately allocated $10 million to its Black Gaming Creator Program.

- **News and Media Organizations:** In September 2020, the [Meta Journalism Project invested $5 million](#) in local news organizations that serve historically-marginalized communities. These organizations and newsrooms ensure that important stories and perspectives that reflect the diversity of our communities are told. The project welcomed 20 media organizations focused on communities of color into its global Accelerator program, a journalism sustainability training initiative. Half of the program group was composed of Black-owned, Black-led publishers, including some of the nation's oldest Black newspapers as well as digitally native organizations.

The Meta Journalism Project also supported Robert C. Maynard Institute's Digital Education Initiative, allowing the Institute to bring on a director of education initiatives to scale its world-class training programs to more local news companies. In December 2020, Meta made a $2 million investment to the Pulitzer Center, a news media organization that sponsors independent reporting, to support its educational initiatives on racial justice. The organization recently served as guest curators for the [Lift Black Voices](#) hub, with content amplifying the themes of The 1619 Project, which aims to contextualize American history through the Black experience.

2. Community and Learning Support Through Elevate

In 2019, Meta established a team within its Community Partnerships organization called Elevate, responsible for accelerating the growth of Black, Latinx, and Hispanic small businesses, nonprofits, community leaders, creators, students, and job seekers. Elevate is dedicated to closing the equity divide by bringing targeted support and assistance to these communities to accelerate their economic success to spur generational impact. The increased demand for culturally-relevant content, support, and education in digital marketing and Facebook's advertising technologies is the fuel behind Elevate's mission and work.

In June 2020, Elevate set a new three-year goal to reach 1 million Black and 1 million Latinx and Hispanic members of the community with free training and support in digital skills and to disburse 100,000 scholarships to Black learners. To date, the Elevate community and learning platform has reached 2 million learners and have disbursed 20,000 scholarships.

3. Support for Nonprofits that Center and Serve Communities of Color

Meta is investing more than $35 million in nonprofits focused on serving communities of color in the U.S. and has supported 400+ nonprofits working to address systemic barriers to racial equity. In addition, Meta is serving these organizations through its partnerships team by building programs focused on digital skills, peer community, and racial equity training as well as helping hundreds more to fundraise via Meta's fundraising tools.

- Meta donated $10 million to 36 U.S. nonprofit organizations, nominated by employees, that are working to address the systemic barriers to racial equity in the U.S., including in housing, education, and criminal justice.

- In May 2021, in response to the rise in anti-Asian violence in the U.S., Meta announced an additional $5 million commitment for organizations focused on racial justice and equity for the Asian and Pacific Islander communities and other marginalized communities.

- Meta launched a $20 million U.S. grant program in partnership with 20 community foundations. These foundations are distributing funding to more than 400 local nonprofits that center and serve Black communities, with a preference for Black-led organizations.

Recommendations to be Further Evaluated

Meta intends to continue making progress, including by evaluating the final recommendation in the Audit. This outstanding recommendation includes a number of actions, including developing and publicizing data and feedback related to diversity, equity, and inclusion efforts as well as assessments of the company's efforts on personnel and culture.

As a company, Meta firmly believes that these actions are just the beginning of its work to build equitable spaces online and offline, inside the company and outside in the world. Meta will continue to explore ways that it can strengthen diversity, equity, and inclusion in everything it does.

VI.   Advertising Practices

With respect to advertising practices, the Auditors acknowledged improvements to Facebook's advertising platform to help prevent advertisers from using ad targeting tools in potentially discriminatory ways, while also calling for attention to ads delivery. **In total, the Auditors made six recommendations and actions related to advertising, all of which are in progress or ongoing.**

On ads targeting, the company is continuing ongoing efforts for all of the recommendations made in the Audit report, and introduced additional improvements to our advertising products to protect users and expand the advertising data sets provided to researchers so that people can better understand patterns and trends in ads targeting.

Improvements to Advertising Products

In 2019, as part of a settlement with leading civil rights organizations, Meta announced changes to help prevent discrimination in ads that offer housing, employment, and credit opportunities. These types of ads are now considered Special Ad Categories and have restricted targeting options in Ads Manager. These ads are not allowed to target by age, gender, zip code, or any detailed options describing or appearing to relate to protected characteristics.

Recently, the company announced another change in response to feedback from civil rights experts and other interested parties, which will apply not only to housing, employment, and credit ads, but to all ads on our technologies.

> Starting next year, companies, organizations, and other entities purchasing ads will not be able to select ad targeting options with names that relate to sensitive topics such as health, race or ethnicity, political opinions or affiliation, religion or philosophical beliefs, sex life, sexual orientation, or trade union membership.

This restriction also includes associated causes, social issues, public figures, and organizations. For example, Meta will remove the following detailed targeting options, which mean they are no longer available to advertisers.

- Health causes (e.g., "Lung cancer awareness", "World Diabetes Day", "Chemotherapy")
- Gender identity and sexual orientation (e.g., "same-sex marriage" and "LGBTQ culture")
- Religious practices and groups (e.g., "Catholic Church" and "Jewish holidays")
- Political beliefs, social issues, causes, organizations, and figures

While not based on people's physical characteristics or personal attributes, these targeting options have been an important way for small businesses, non-profits, and advocacy groups to fundraise and organize by selecting audiences based on interactions with similar content. They also gave consumers the opportunity to engage with organizations or causes of interest to them. At the same time, Meta wants to better match people's evolving expectations of how advertisers may reach them on its technologies and address feedback from civil rights experts and other interested parties on the importance of preventing advertisers from abusing the targeting options made available. This was a difficult decision for the company.

Meta recognizes that the change may negatively impact some advertisers and users that are interested in being targeted for these ads. For that reason, the company has sought to publicize the different ways that advertisers might still accomplish their goals. For example, an advocacy group looking to drive donations or a small business trying to connect with its customers can use Engagement Custom Audiences to reach people who have liked their Page or people who have watched their videos that may have appeared in News Feed (Video View Engagement Custom Audiences). This audience has already proactively opted to engage with specific advertisers by showing a direct interest in and interacting with the advertiser's cause or brand, and may be interested in further engagement or support when an advertiser reaches back out.

More Transparency and Secure Access to Data for Researchers

The Auditors described Facebook's Ad Library as "a useful tool" and noted that it can be used "for uncovering and analyzing voter suppression and misinformation targeted at specific communities." At the time the final Audit report was published, however, the Ad Library did not offer details, such as demographics or zip codes, about the advertiser-selected audiences for political ads, data that could be instrumental in identifying and addressing advertiser patterns of online voter suppression.

Meta has maintained that it must balance protecting people's privacy while striving to provide more information on how digital advertising impacts elections. Earlier this year, the company announced a U.S.-based pilot to provide researchers with access to more than 1.65 million social issue, electoral, and political ads that ran during the three-month period prior to Election Day (August 3 to November 3, 2020) through the Facebook Open Research & Transparency (FORT) platform. This tool was created to enable academic researchers to study the impact of the company's technologies on elections and included measures to keep the platform secure.

Meta continues to explore how to provide more of this data in additional countries and for extended time periods, opening the door for new research.

VII.   Building Products with Civil Rights in Mind

Building Inclusive Products: Understanding the Impact of our Products Based on Race

The Civil Rights Team has heard from users of Meta products and services, particularly those in marginalized communities, who are concerned that their experiences using our technologies may be different depending on their race, color, national origin, ethnicity, religion, gender, sexual orientation, gender identity, or disability. Meta cannot resolve potential differences in user experiences across these groups without understanding the demographics of our community—in other words, we can't assess or address what we can't measure. That is why the Meta Responsible AI Team and the Civil Rights Team are embarking on a path to better understand whether the experiences of our users differ across race, while preserving user privacy. We are approaching this process consciously and deliberately as we recognize that assessing potential differences in user experiences across these groups requires ongoing effort and intentional focus.

In the first phase of this approach, Meta will focus on race as the protected class for initial measurement. We have begun to explore and get feedback on approaches that honor people's privacy, while enabling progress in this important area.

> The long-term goal is to measure and better understand the user experience across all protected categories and groups. We know that this work must be done intentionally, and in partnership with civil rights experts and leaders, privacy experts, and regulators.

We have initiated these conversations to gain insight and perspective on how to best approach this work.

We also understand that for this work to be successful, we must engage and collaborate with users, especially marginalized communities. In the coming months, the Civil Rights Team, in partnership with our colleagues across Meta's product, policy, and privacy teams, will work with

marginalized communities to identify potential differences in their experiences and how to address concerns raised by any differences we may discover. While this work will initially focus on the U.S., based on our continued commitment to responding to the Audit, our goal is to use our learnings to build for our global community. We know that this journey will not be easy, particularly as marginalized communities may not want to come to the table based upon previous experiences using our technologies or with the company. Our hope is to rebuild trust by working to make progress that protects marginalized communities.

Developing and Using AI Responsibly

In their final report, the Auditors stated that "Facebook has an existing responsibility to ensure that the algorithms and machine learning models that can have important impacts on billions of people do not have unfair or adverse consequences." Meta is committed to evaluating its models and products (beyond those that rely on algorithms) to assess these concerns.

Within Meta and across the industry, principles and approaches to fairness in the use of AI and inclusivity are emerging, as this is an active area of academic and corporate research. While there is not yet consensus on how to approach issues of algorithmic fairness or the inclusivity of technology products, we are following this research and the emerging best practices closely. Each of the Auditors' recommendations require ongoing work, as products that use AI are continually introduced at Meta and as the research on best practices emerges. **Of the seven Audit recommendations and actions specific to algorithmic bias, five are in progress or ongoing and two require further evaluation.**

Earlier this year, Meta's Responsible AI ("RAI") team published a detailed blog post outlining the five key pillars around which the company has organized its efforts to build AI responsibly: Privacy & Security, Fairness & Inclusion, Robustness & Safety, Transparency & Control, and Accountability & Governance. RAI is a multidisciplinary team of ethicists, social and political scientists, policy experts, data scientists, attorneys, AI researchers, and engineers. RAI develops guidelines, tools and processes to help understand and promote fairness and inclusion in AI at Meta and makes these resources widely available across the entire company so there is greater consistency in approaching questions of AI fairness.

The Civil Rights Team provides civil rights guidance and works with cross-functional partners, including RAI, on the development and use of AI at Meta including: (1) how the inclusivity and

other quality of data sets is evaluated that goes into machine learning models and analytics decisions; (2) the diversity and training of people who develop the models; (3) potential bias in the algorithms; (4) the potential differences of the model outputs for communities of users; (5) reviews to create inclusivity in the models; and, (6) best practices for the use of models.

Machine learning models are a significant tool in Meta's content moderation work and we are always working to improve the development and use of models across our technologies. Some product teams that employ AI are piloting a promising approach that increases transparency of our AI models. If this pilot is successful, we may advocate for this approach more broadly across Meta.

Building Equitable, Accessible Products: Cross-Company Collaboration

Project Height: Civil Rights Product Review Process
The Auditors recommended "embedding a civil rights screening criteria within certain existing product review processes so that teams can better identify and evaluate potential civil rights concerns." To that end, the Civil Rights Team is leading a company-wide cross-functional team, including partners from Responsible Innovation, Privacy, and Legal (Facebook's Community Trust and Safety, Facebook App, Privacy, Reality Labs, Research, Responsible AI), and has embarked on developing a pilot for building new products with civil rights in mind.

> This pilot, *Project Height*, will provide an analysis framework for product teams to assess potential civil rights concerns presented in new product launches.

In the absence of a regulatory framework providing clear rules around the intersection of civil rights and tech products, the Civil Rights Team's goal is for *Project Height* to incorporate civil rights considerations into the product development process.

Civil Rights Training and Weekly Consultations

The Civil Rights Team supports Meta's effort to build products in a way that considers civil rights concerns. In order to do this, there are two weekly consultative forums that review product questions and provide guidance/feedback in real-time: (1) the Civil Rights Team and Social Justice Cross-Functional working group's weekly office hours provides civil rights, privacy, and research guidance to product and research teams; and, (2) the Data Analytics and Responsible AI Team's weekly meetings at which we provide civil rights feedback on responsible uses of models, algorithms, analytics, and research methods to product and research teams. We also aim to work with cross-functional partners to offer regular consultations for data scientists and engineers on civil rights to counsel on challenges they face.

The Civil Rights Team also offers civil rights training to Meta colleagues in Legal who support and advise product teams who use AI in their work. We plan to work with cross-functional partners to expand civil rights training to include technical employees, embedding civil rights concepts into the problems these employees address and solve in their boot camp orientation as they join the company.

Civil Rights Team & Product Legal Partnership

At Meta, the Product Legal team is the first point of legal contact for product teams as they are developing and building new tools and products that will further enhance the way the world connects. The Civil Rights Team has partnered with this team in offering six civil rights training sessions to support product lawyers in spotting potential civil rights concerns that may arise in the development of a product. As the legal framework continues to evolve at the intersection of civil rights and product, the Civil Rights Team will continue to partner deeply with the Product Legal team to make sure we are equipping product teams with the latest guidance.

Recommendations to be Further Evaluated

We will continue to evaluate the two outstanding recommendations in this subject matter of the Audit, including whether the company can put in place mandatory, rather than voluntary, processes and training regarding these issues.

VIII. Privacy

The Auditors' final chapter focused on Facebook's privacy practices, summarizing the changes we made as a result of our 2019 settlement with the Federal Trade Commission (FTC) as well as the company's policies on facial recognition technology, law enforcement's use of Facebook, and access to Facebook data, data scraping, end-to-end encryption, and COVID-19 tracing. **In the last 16 months, we've made progress on the ways that we protect people's privacy, continuing progress on the Auditors' eight focus areas with respect to privacy.**

A Six-Month Assessment of Our Progress Under the FTC's Agreement

The Auditors underscored the requirement in the FTC agreement that Meta "engage an independent privacy assessor whose job will be to review Facebook's privacy program on an ongoing basis and report to the Board committee and the FTC, if they see compliance breakdowns or opportunities for improvement." A qualified, independent Assessor approved by the agency now produces reports at regular intervals on the effectiveness of our implementation and maintenance of our privacy program.

The Assessor's initial report notes that the scope of our privacy program and the structure we've used to organize it are comprehensive, and that the key foundational elements necessary for an effective program are now in place even if some are still developing. The company's progress includes:

- Implementing a governance structure that incorporates an independent Privacy Committee of Meta's Board of Directors. The Committee provides ongoing oversight of our Privacy Program and other privacy-related matters.
- Creating a new privacy program from the ground up in consultation with outside experts, based on the significant changes required by the FTC Order.
- Rebuilding and continuing to grow an internal central privacy organization, supported by thousands of people working on privacy-related projects across the company.
- Developing new teams and processes to assess and mitigate risk, including a dedicated Privacy Review function to evaluate potential privacy risks posed by new or modified products or data practices.

Meta remains committed to addressing the areas for improvement identified in the Assessor's report, continuing to strengthen our privacy program, and prioritizing privacy in the Meta community.

Limiting Our Use of Facial Recognition

At the time the final Audit report was published, Meta had several products that use facial recognition technology. According to the Auditors, "[b]ecause facial recognition relies on algorithms, it necessarily raises the same questions of bias, fairness, and discrimination associated with AI more broadly."

> Recently, we shared <u>Meta will be shutting down the "Face Recognition system"</u> on Facebook.

As part of this change, people who have opted in to our Face Recognition setting will no longer be automatically recognized in photos and videos, and the company will delete the facial recognition templates used to identify them.

Shutting down the use of our facial recognition system on Facebook will lead to the following changes:

- Our technology will no longer automatically recognize if people's faces appear in Memories, photos or videos.
- People will no longer be able to turn on Face Recognition for suggested tagging or see a suggested tag with their name in photos and videos they may appear in. People can still tag posts manually, so that they can connect and share photos or videos with each other.
- Automatic Alt Text ("AAT"), a technology used to create image descriptions for people who are blind or visually impaired, will no longer be able to identify each person in an image using facial recognition. AAT currently identifies people in about 4% of photos. After the change, AAT will still be able to recognize how many people are in a photo, but cannot identify who each person is using facial recognition. AAT will continue to function without this feature, and we will work closely with the blind and visually impaired

community on technologies to continually improve AAT. You can learn more about what these changes mean for people who use AAT on the [Facebook Accessibility page](#).

We recognize and regret that the decision may impact people who are vision impaired and use our Automatic Alt Text system (as described above), which relies, in part, on the Face Recognition system. Even without Face Recognition, AAT remains highly valued and as recently as January 2021, was improved to recognize more than 1200 objects and concepts—a more than 10x improvement over previous versions. Even so, we continue to explore alternative options to address this regression and will continue to prioritize options that protect the privacy of individuals and provide access and assistance to those who need it. Looking ahead, we still see facial recognition technology as a powerful tool, for example, for people needing to verify their identity, or to prevent fraud and impersonation. We will continue working on these technologies and engaging outside experts.

Data Scraping

Scraping is the automated collection of data from a website or app and can be either authorized or unauthorized. Every time you use a search engine, for example, you are likely using data which was scraped in automated ways with the authorization of the website or app. This is a form of scraping known as crawling and it is what helps make the internet searchable.

Using automation to access or collect metadata without permission, however, is a violation of Meta's Terms. Scrapers may not access or collect data from the company's products using automated means without our prior permission.

Meta recognizes that imposing tight scraping prohibitions can result in limiting potentially valuable research. But the company also believes that it must address the issue of third-party data collection and impose appropriate restrictions, even when that collection is being done in good faith and to further legitimate academic research.

The Auditors noted that, "[s]ince 2004, Facebook has prohibited data scraping and other efforts to collect or access data using automated technology from Facebook products or tools without prior permission from Facebook." Meta remains committed to deterring data scraping and continues to devote substantial resources to combating unauthorized scraping on Meta products. The company has a dedicated External Data Misuse ("EDM") team made up of more

than 100 people, including data scientists, analysts, and engineers focused on our efforts to detect, block, and deter scraping.

Meta's EDM team also investigates suspected scrapers to learn more about what they are doing and make our systems stronger. The company has taken a variety of actions against data misuse. These can include sending cease and desist letters, disabling accounts, filing lawsuits against scrapers engaging in egregious behavior, and requesting companies that host scraped data to take them down. In the past year, Facebook has taken over 300 enforcement actions against people who abuse it.

IX. The Road Ahead

The Audit laid the groundwork for the creation of the Civil Rights Team and provided the company with an initial roadmap. This infrastructure is further enhanced by Meta's already-existing Human Rights Team, which led the 2021 creation and adoption of our Corporate Human Rights Policy, now also embedded in the company Code of Conduct.

The Audit was crucial but simply the beginning of and for the Civil Rights Team. In order to effectively enhance protections for marginalized communities and build equitable technologies for all our users, we must continue to develop and advance proactive strategies across all our services from inception to implementation.

Meta and the Civil Rights Team are committed to improving our existing technologies as well as proactively building new ones with the lessons learned. We are committed to protecting marginalized communities and assessing our technologies to better understand whether marginalized communities are having different experiences than other users.

> We are committed to working to ensure that Meta incorporates civil rights and human rights analysis in all of its work, so that we may build better, safer, and healthier communities online and offline.

This section details some of the additional work that the Civil Rights Team has taken on in its first months, in collaboration with other teams across the company. As the Civil Rights Team envisions a future beyond the Audit, we will continue to advance civil rights and civil liberties, including the values of justice, equity, dignity, and safety.

Speech Free from Surveillance: Law Enforcement's Use of Facebook and Instagram

The Civil Rights Team believes strongly in the principles of free speech and privacy provided under the Constitution and international human rights treaties like the International Covenant on Civil and Political Rights. Meta has adopted a detailed Corporate Human Rights Policy, and strives to create an environment in which people can exercise their rights. People using our technologies speak their minds, organize rallies and protests, and share their personal experiences. It is our intention that they do so in a space that is free from surveillance that is unlawful or that violates our policies.

Simultaneously, we must protect the safety of users online and offline, and safeguard their data, including by complying with legal requests when appropriate. To fulfill that commitment, Meta discloses account records in response to valid legal requests in accordance with our terms of service, applicable law, our commitments as a member of the Global Network Initiative, and international human rights principles. When the company does not believe those standards have been met because, for example, the requesting government has exceeded its authority in making the data request, Meta generally declines to provide the requested data and, if necessary, challenges the request in court.

When law enforcement agencies use our technologies to conduct surveillance of marginalized communities, including those engaged in protest, Meta takes a strong position to combat and deter the behavior. In 2018, for example, when we learned that the Memphis Police Department set up fake accounts as part of a criminal investigation, we disabled the fake accounts we identified and issued [a public letter to the Department](#) calling out the policy violations and directing it to cease such activities. We have learned of other law enforcement agencies engaging in similar conduct and the Civil Rights Team has advocated for similar action to be taken against those departments, to enhance compliance with company rules. More recently, the Brennan Center reported that the Los Angeles Police Department was engaged in similar activity in violation of our policies, prompting Roy Austin to send a [letter](#) advising that they cease these activities as well.

Anyone—including law enforcement authorities—creating a Facebook account must abide by our Community Standards, which expressly prohibit the creation and use of fake accounts.

These practices chill our users' free speech, and Meta will continue to protect the privacy, data and rights of our users from law enforcement misuse of our platform to surveil them. Meta will also continue working individually, and through the Reform Government Surveillance Coalition and our trade associations, to amend existing surveillance laws to improve privacy protections, oversight and transparency, and to push back on proposals that do not include appropriate safeguards.

Hate Crime Enforcement & Bystander Intervention Trainings

Unfortunately, many states and police academies do not provide hate crime training to their officers and new recruits, which leaves them ill-equipped to recognize the indicators of a bias-motivated incident and unprepared to successfully investigate a possible hate crime. Prior to joining Meta, Civil Rights Team Director and Associate General Counsel Cynthia M. Deitle partnered with the James Byrd, Jr. Center to Stop Hate at the Lawyers' Committee for Civil Rights Under Law to provide hate crime enforcement training to over 400 law enforcement agencies, including local and federal prosecutors' offices, in order to enhance education and awareness of these issues in the field. This training is unique as it incorporates instruction on state and federal hate crime laws, an examination of the history of hate crime statutes, and the role law enforcement officers and prosecutors played in inflicting racial violence on marginalized communities. The training also includes a presentation from one or more families of bias crime victims so the participants may hear directly from those impacted by hate. Finally, the seminar concludes with a section on the importance of hate crime reporting. At a time when the number of reported hate crimes is increasing as the number of agencies reporting their hate crime data to the Federal Bureau of Investigation is decreasing, Ms. Deitle has continued to provide this training pro bono to the law enforcement agencies and is exploring the concept of expanding the scope of this training.

Upon the recommendation of the Civil Rights Team, Meta became a supporter of the Active Bystandership for Law Enforcement ("ABLE") Project. The Georgetown Innovative Policing Program, in collaboration with global law firm Sheppard Mullin, created and developed the ABLE Project to teach law enforcement officers how to effectively intervene when they observe an officer engage in illegal or unnecessary harmful behavior. We believe that law enforcement agencies must foster a culture of peer intervention to build and sustain trust and productive relationships with not only communities who have been historically and systematically marginalized, but also all those they swore to serve and protect. Two members of the Civil

Rights Team are certified ABLE instructors and we anticipate continuing to support this important initiative.

Reentry, Reintegration, and Connection for People Who Have Been Incarcerated

As part of the company's commitment to build products to advance racial justice, Meta's New Product Experimentation ("NPE") organization is exploring the development of products and experiences to support those who were formerly incarcerated. The U.S. has the world's highest recidivism rate at 77%, with 77 million people living with the consequences of having a criminal record. While several factors contribute to recidivism, one of the main reasons is difficulty adjusting back into "normal" life. As a company focused on connecting people, we are leveraging our technology to give justice-impacted people the power to build community and successfully reintegrate back into society. The Civil Rights Team strongly supported this exploration and continues to connect NPE with leaders in the criminal justice reform space, which has led to their establishment of an advisory council composed of members with lived experiences. Proximity to the communities we aim to serve enables us to build with integrity, work through challenges faster, and see risks earlier.

Building Products With, and Not For, the Community

The Civil Rights Team strives to integrate disability rights leaders, civil rights leaders, industry experts, and regulators as thought partners in the product development process. Our goal is to build trust with communities at a product's inception stage by soliciting feedback on how we can make our products more safe and inclusive, uplifting the concerns of groups pushed to the margins, and understanding how Meta can be a better proactive partner in meeting the needs of marginalized communities.

Not only do we aim to be an industry leader for civil rights in technology, but also, we aim to have a positive industry-wide impact that allows and encourages product teams to build with protected class considerations from the start. However, no one can do this work alone. By working collaboratively with our counterparts at other tech and similarly-situated companies and organizations, Meta, through its Civil Rights Team, is working towards building an inclusive technology community.

We also believe that product teams should be representative of the communities their products serve. Unfortunately, the diversity statistics are daunting and severely lacking in representation. To that end, diverse representation on product teams must be a priority. Playing our part to increase the number of diverse engineers, product managers, data scientists, and technologists through mutually beneficial institutional partnerships with Historically Black Colleges and Universities (HBCUs), and Minority-Serving Institutions (MSIs) is vital in building an inclusive technology ecosystem.

At Meta, we have an Accessibility Team whose mission is to advance equal access and inclusion for people with disabilities through the product development process. Recent examples include live event/stream captioning, Automatic Alt Text, accessibility settings in Oculus, and creating feedback mechanisms for the accessibility community within our products. The Civil Rights Team partners closely with the Accessibility Team in identifying potential issues and engaging people with disabilities to build responsibly.

The Metaverse

As the company embarks on a collaborative journey to build for the metaverse, we—as a society— have the opportunity to redefine systems, and to build a better, safer environment for our future. But such a large undertaking is not just Meta's. In fact, Meta won't build the metaverse alone, and it is not trying to. The metaverse will be richer and better than ever imagined if it is built with human rights, civil rights, disability rights, and privacy experts, community-based organizations, and future users in order to create spaces in which access, safety, and equity are prioritized.

Today's internet provides opportunities to connect with others, organize rallies and protests, and provide real-time information regarding crises and global events. Simultaneously, it in many ways exacerbates inequity, abuse, and attacks on marginalized communities. Society is in a unique moment where it can build on lessons learned to more effectively respond to the real-time challenge of abuse and lack of representation and inclusion. Indeed, the struggles many people have endured on the internet cannot be dismissed or forgotten. The construction of the metaverse presents a new opportunity for us all, including those who have not always been given a seat at the table, to reimagine systems of power and privilege, to build an environment that puts people at the center.

The metaverse belongs to no one and yet to everyone, which means we all have a role to play in its development and our futures. It essentially gives us an opportunity to revisit how the current online world is constructed and build a better, safer environment for everyone. But, the only way to do that is together. The Civil Rights Team will continue to advocate for this version of the metaverse.

APPENDIX

Civil Rights Audit Actions

The Auditors issued a number of recommendations and highlighted actions the company had or was taking that indicated civil rights progress. Throughout the report, these are categorized as recommendations and actions taken during the course of the Audit. For ease of reading below, they are referred to as actions.

Action #	Chapter	Auditors' Description[11]	Current State
1	Accountability Structure	Hire Civil Rights VP	Implemented
2	Accountability Structure	Continue to consult with Laura W. Murphy and Relman Colfax for civil rights guidance and resources	Implemented
3	Accountability Structure	Include the Civil Rights VP in Policy Working Groups and provide Civil Rights VP with visibility into policy development	Implemented
4	Accountability Structure	Include the Civil Rights VP in escalations to leadership of policy decisions that could have civil rights implications	Implemented
5	Accountability Structure	Include Civil Rights screening criteria and considerations, such as issue-spotting questions, in certain existing product review processes and related training	In Progress or Ongoing
6	Accountability Structure	Develop and launch Civil Rights training	In Progress or Ongoing
7	Accountability Structure	Launch and run Civil Rights Task Force	Implemented
8	Accountability Structure	Embed employees with civil rights knowledge and expertise on key product teams	Implemented

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[11] The descriptions listed in this appendix are consistent with the language used by the Auditors in their three Civil Rights Audit publications.

9	Accountability Structure	Embed employees with civil rights knowledge and expertise on key policy teams	Implemented
10	Accountability Structure	Continue to add in-house Civil Rights expertise on teams whose work is likely to have Civil Rights implications (including elections, hate speech, algorithmic bias, advertising, etc.)	In Progress or Ongoing
11	Accountability Structure	Expand Civil Rights VP's team	Implemented
12	Accountability Structure	Adopt comprehensive and mandatory[12] Civil Rights screening across all products	In Progress or Ongoing
13	Accountability Structure	Require Civil Rights VP's voice in escalation process for decisions with key content decisions with Civil Rights implications	In Progress or Ongoing
14	Accountability Structure	Increase internal visibility of the Civil Rights Task Force	Implemented
15	Advertising	In keeping with the settlement of discrimination lawsuits filed by the National Fair Housing Alliance, Communications Workers of America, the American Civil Liberties Union, and others: create a new, more restrictive process for advertisers offering housing, employment, or credit opportunities that only offers a limited set of targeting options and redirects all housing, employment, or credit ads to the new system by September 30, 2019; build a tool that allows users to search and view active housing ads by advertiser and location targeted, regardless of whether they were in the targeted audience; require all housing, employment, and credit advertisers, as well as all advertisers over time, to certify that they will comply with	In Progress or Ongoing

[12] This screening is in progress. No decision has been made as to whether it will be mandatory.

		Facebook's policies prohibiting discrimination and all applicable anti-discrimination laws; train key Facebook employees with responsibilities relating to advertising on fair housing and fair lending laws; engage with academics, researchers, civil rights, and privacy advocates, and civil society experts to study alogirthmic modeling by social media platforms (and specifically the potential for unintended bias in algorithms and algorithmic systems)	
16	Advertising	Continue to conduct "Design Jam" workshops with external stakeholders focused on topics such as algorithmic fairness and transparency	In Progress or Ongoing
17	Advertising	Meet regularly with the National Fair Housing Alliance, Communications Workers of America, the American Civil Liberties Union, and other plaintiffs with whom discrimination claims were settled and permit them to test Facebook's ad platform to ensure reforms promised under the settlements are implemented effectively	In Progress or Ongoing
18	Advertising	Engage with developer and research communities to improve Ads API	In Progress or Ongoing
19	Advertising	Conduct periodic refresher training sessions on Fair Housing and Fair Lending laws	In Progress or Ongoing
20	Advertising	Engage with experts knowledgable in Civil Rights, bias, and discrimination concepts in relation to algorithmic fairness, and ad delivery in particular	In Progress or Ongoing
21	Algorithmic Bias	Engage with outside experts to study unintended bias in algorithms	In Progress or Ongoing

22	Algorithmic Bias	Create guidelines and tools to identify and mitigate unintentional biases in AI algorithms	In Progress or Ongoing
23	Algorithmic Bias	Invest in the diversity of the AI team	In Progress or Ongoing
24	Algorithmic Bias	Pilot a Fairness Consultation process	In Progress or Ongoing
25	Algorithmic Bias	Continue to consult with diverse stakeholders regarding whether and how to collect sensitive data	In Progress or Ongoing
26	Algorithmic Bias	Implement mandatory, rather than voluntary, company-wide systems, processes, and guidance to avoid, identify, and address potential sources of bias and discriminatory outcomes when developing or deploying AI and machine learning models; require all teams building models to follow comprehensive best practice guidance; and regularly test existing algorithms and machine-learning models	Under Evaluation
27	Algorithmic Bias	Introduce mandatory training on understanding and mitigating sources of bias and discrimination in AI for all teams building algorithms and machine-learning models	Under Evaluation
28	Content Moderation	Continue to build new tools for detecting organized harassment and taking enforcement action	Implemented
29	Content Moderation	Improve transparency and consistency of content moderation appeals decisions	Under Evaluation
30	Content Moderation	Improve transparency of content moderation and address unjustified penalties	In Progress or Ongoing
31	Content Moderation	Complete pilot program regarding specialization by hate speech reviewers	Implemented
32	Content Moderation	Complete hate speech false-positives	Implemented

		action items: (1) updating review tools to better highlight important context; (2) including in the review tool a prompt to evaluate whether the content is condemning hate speech; and (3) updating training materials to make clear that hate speech appearing in a context that denounces the hateful content does not violate policy	
33	Content Moderation	Complete pilot program regarding guided review process for hate speech	Implemented
34	Content Moderation	Release final charter of Oversight Board	Implemented
35	Content Moderation	Implement the provisions of the company's settlement agreement resolving a class action brought by content moderators employed by third-party vendors	Implemented
36	Content Moderation	Ban content that explicitly calls for harassment on the platform	Implemented
37	Content Moderation	Explore a semi-specialization approach to content review, in which reviewers specialize in related policy areas (e.g. hate speech, bullying, and harassment)[13]	In Progress or Ongoing
38	Content Moderation	Revisit Violence and Incitement Policy, including the scope of the exception for threats of state action	Implemented
39	Content Moderation	Take steps to identify and remove harmful content that has surfaced in response to the COVID-19 pandemic	Implemented
40	Content Moderation	Update content reviewer guidance to make clear that claims that people of certain races or religions (a) have the COVID-19 virus, (b) created the	Implemented

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[13] Meta does currently provide this semi-specialization approach to content review for some, but not all, community standards.

		COVID-19 virus, or (c) are spreading the COVID-19 virus violate Facebook's hate speech policies	
41	Content Moderation	Ban organized hate groups, including white supremacist organizations, from the platform, and remove content praising or supporting those organizations	Implemented
42	Content Moderation	Develop mechanisms for enhanced reporting and functionality regarding mass harassment[14]	In Progress or Ongoing
43	Content Moderation	Ensure content reviewers have access to sufficient psychological support and wellness resources	Implemented
44	Content Moderation	More systematically examine appeals data by violation type and use insights to internally assess where the appeals process is working well, where it may need additional resources, and where there may be gaps, ambiguity, or unanticipated consequences in policies or enforcement protocols	In Progress or Ongoing
45	Content Moderation	Revise the definition of national origin in Facebook's Community Standards to include continents and regions larger than a single country where used to attack people from that region or continent	Implemented
46	Content Moderation	Remove humor as an exception to the hate speech policy (and ensure that any future humor-related carve-outs are limited and precisely and objectively defined)	Implemented
47	Content Moderation	Ensure that the Oversight Board includes representation from individuals with expertise relating to civil rights	In Progress or Ongoing

[14] The Auditors recommended that Meta develop a mechanism for user-based "bulk" reporting of harassment. Currently, the company has devised ways to address harassment when user-reported or proactively detected. Additionally, the company has developed a policy prohibiting brigading and mass harassment, as detailed in the report.

		issues, and consult with civil rights leaders and organizations during the development process	
48	Content Moderation	Ensure Community Standards are described accurately and consistently across different appeals contexts (e.g., appeals regarding an individual post, a violation by a group, a violation by a page, etc.)	In Process or Ongoing
49	Content Moderation	Fully implement additional user messaging identifying the reasons behind a penalty at the time it is imposed, including the specific underlying content violations, across all products, interfaces, and types of violations	In Progress or Ongoing
50	Content Moderation	Compile data and further study how hate speech manifests on the platform against particular protected groups to enable it to devote additional resources to understanding the form and prevalence of different kinds of hate on the platform, its causes (e.g., policy gaps, global enforcement trends, or training issues, etc.), and to identify potential remedial steps the company could take	In Progress or Ongoing
51	Content Moderation	Gather data on the enforcement of events policies to identify how long it takes Facebook to remove violating content (and whether those response times vary based on the type of content or group targeted) and use those metrics to identify patterns, gaps, or areas for improvement; capture data so that new spikes and trends can be identified quickly and systematically; invest in further study and analysis of hate on the platform and commit to taking steps to address trends, policy gaps, or enforcement issues and to understand how different groups are	Under Evaluation

		targeted for hate, how well Facebook is alerting content reviewers to the specific ways that violating content manifests against certain groups, how to more quickly identify and remove attempts to organize events designed to intimidate and harass targeted groups, and where Facebook could focus its improvement efforts	
52	Content Moderation	Document and publicly acknowledge the issue of hate	In Progress or Ongoing
53	Content Moderation	Include in the Community Standards Enforcement Report more detailed information about the type of hate speech being reported and removed from the platform, including information on the groups being targeted	Under Evaluation
54	Content Moderation	Ban the express praise, support, or representation of white nationalism and white separatism on Facebook, regardless of whether the content explicitly uses the terms "white nationalism" or "white separatism"	In Progress or Ongoing
55	Content Moderation	Improve the design and enforcement of the Dangerous Individuals & Organizations policy, including the definition of a "dangerous organization" and the accuracy, consistency, and comprehensiveness of enforcement of the policy	Implemented
56	Content Moderation	Capture data on the protected characteristic referenced in anti-Muslim posts to enable the study of anti-Muslim hate speech on the platform	In Progress or Ongoing
57	Content Moderation	Study the issue of anti-Muslim attacks against people that are disguised as attacks against religious concepts and	Implemented

		evaluate potential solutions or ways to better distinguish between discussions of religious concepts and dehumanizing or hateful attacks	
58	Content Moderation	Assess and expand the capacity of Facebook's program that redirects users who search for extremist terms to rehabilitation resources to better ensure more consistent redirection of these users	In Progress or Ongoing
59	Content Moderation	Examine the impact of the "Related Pages" feature and look into additional ways to ensure that Facebook is not pushing users toward extremist echo chambers	In Progress or Ongoing
60	Diversity and Inclusion	Provide greater transparency regarding the company's diversity and inclusion strategies, including efforts to increase representation of employees from under-represented groups	Implemented
61	Diversity and Inclusion	Elevated the role of the Chief Diversity Officer to report directly to the COO	Implemented
62	Diversity and Inclusion	Strongly resourced the D&I team; supported the D&I team with members of other internal teams with various forms of expertise	Implemented
63	Diversity and Inclusion	Globally adopt the "Diverse Slate Approach," which sets the expectation that candidates from under-represented backgrounds be considered when interviewing for an open position, including for open positions on the Board of Directors	Implemented
64	Diversity and Inclusion	Make changes to the performance review process to counteract the risk that bias or stereotyped assumptions could affect the process	Implemented

65	Diversity and Inclusion	Better hold department leaders accountable for implementing the company's diversity and inclusion policies	Implemented
66	Diversity and Inclusion	Adopt programs and initiatives designed to build out the pipeline of underrepresented minorities into tech jobs, including educational and training programs and courses	Implemented
67	Diversity and Inclusion	Spend at least $1 billion per year with diverse suppliers starting in 2021	In Progress or Ongoing
68	Diversity and Inclusion	Spend at least $100 million per year with Black-owned suppliers	In Progress or Ongoing
69	Diversity and Inclusion	Committed to having 50% of Facebook's workforce be from underrepresented communities by the end of 2024	In Progress or Ongoing
70	Diversity and Inclusion	Within five years of the audit report, committed to having 30% more people of color, including 30% more Black people, in leadership positions	In Progress or Ongoing
71	Diversity and Inclusion	Train 1 million members of the Black community on developing digital skills	Implemented
72	Diversity and Inclusion	Give 100,000 scholarships to Black students working toward digital skills certifications	In Progress or Ongoing
73	Diversity and Inclusion	Increase Facebook's previous global grant commitment by an additional $75 million for Black-owned businesses in the U.S. and non-profits who support Black communities, as well as $25 million to Black creators to help amplify their stories on Facebook	In Progress or Ongoing
74	Diversity and Inclusion	Gather and report information regarding how goals related to the recruitment of under-represented minorities has changed behavior or prompted action, and how the	In Progress or Ongoing

		company plans to ensure representation of each sub-group in related goals	
75	Diversity and Inclusion	Publicize data and feedback related to D&I efforts from quantitative and qualitative assessments, feedback from surveys and focus groups, and third-party research in the annual Diversity Report so that the civil rights community and general public can better understand the effectiveness of the company's programs and initiatives; develop data and metrics for assessing the effectiveness of inclusion and D&I integration efforts, including whether/how Facebook's initiatives, policies, trainings, and tools designed to advance inclusion and D&I integration have impacted employee experiences or have translated to progress in cultivating a culture of inclusion	Under Evaluation
76	Diversity and Inclusion	Invest in building out systems and internal infrastructure to make sure diversity and inclusion strategies are prioritized, applied with consistency, embedded in everyday company practice, and ultimately create an inclusive culture, with a focus on accountability, consistency, and D&I integration so that practices can be effectively adopted at scale	In Progress or Ongoing
77	Diversity and Inclusion	Describe all of Facebook's diversity and inclusion programs and initiatives in a single user-friendly resource; explain how the programs all fit together and the strategies behind them	In Progress or Ongoing
78	Diversity and Inclusion	Enable diverse-owned companies to be identified and surfaced through Facebook's products to provide more visibility for those seeking to partner with diverse-owned companies	Implemented

79	Diversity and Inclusion	Continue to explore ways of holding vendors accountable for meeting expected diversity and inclusion benchmarks, such as by imposing penalties and/or canceling contracts with outside counsel who fail to staff Facebook projects with diverse teams	In Progress or Ongoing
80	Diversity and Inclusion	Increase the diversity of the outside asset managers and financial services providers the company engages	In Progress or Ongoing
81	Elections and Census[15]	Set up an Elections Operations Center for the U.S. 2020 election season to be fully operational by the end of 2019	Implemented
82	Elections and Census	Expand voter interference policies to prohibit other forms of interference beyond misrepresentations regarding voting logistics and election-related threats of violence	Implemented
83	Elections and Census	Launch a policy prohibiting paid advertising that urges users not to vote prior to the 2019 gubernatorial elections, and apply the same policy to advertisements urging non-participation in the census	Implemented
84	Elections and Census	Hire one or more voting rights consultant(s) to advise and train employees	Implemented
85	Elections and Census	Refine and publicly share inflammatory ads policy (now referred to as sensational ads policy) and explore ways to expand the policy to include non-physical threats as well as physical threats	Implemented
86	Elections and Census	Continue external partnerships and engagement on election- and census-related issues	Implemented

[15] Some recommendations and actions were implemented for the U.S. 2020 elections but are not currently active.

87	Elections and Census	Hire an expert census consultant to advise and provide training regarding the census, including histories of census interference, for relevant employees	Implemented
88	Elections and Census	Use technology to proactively detect census misinformation and other content violating the census interference policy	Implemented
89	Elections and Census	Partner with census protection groups and establish an escalation channel for groups to flag potentially suppressive census-related content	Implemented
90	Elections and Census	Revise hate speech policy to specifically prohibit calls for political exclusion (e.g. inability to run for office, vote, or have votes counted) based on protected characteristics	Implemented
91	Elections and Census	Launch census interference policy by the fall of 2019	Implemented
92	Elections and Census	Continue to promote census participation	Implemented
93	Elections and Census	Removed pieces of Facebook and Instagram content for violating voting and census suppression policies[16]	Implemented
94	Elections and Census	Provide greater transparency on Facebook's plans to address census suppression	Implemented
95	Elections and Census	Develop a landing page in order to clarify all voting and census-related policies for all platforms, including Facebook, Whatsapp, and Instagram	Implemented
96	Elections and Census	Provide training and resources to groups seeking to identify and prevent voter and census suppression on Facebook	Implemented

[16] At the time of the audit in July 2020, the auditor reported that from March to May 2020, Meta "removed more than 100,000 pieces of Facebook and Instagram content in the US (a majority of which were COVID-related) for violating its voter interference policies—virtually all of which were removed proactively before being reported."

97	Elections and Census	Issue guidance clarifying that statements claiming that ICE and other immigration enforcement agencies are present at polling locations violate the existing voter interference content policy	Implemented
98	Elections and Census	Launch new process for addressing hyperlocal voter suppression such as false statements about conditions at polling places designed to discourage people from voting	Implemented
99	Elections and Census	Improve proactive voter suppression detection mechanisms by accounting for language and tactics used in past examples of off-line voter suppression	Implemented
100	Elections and Census	Revise the terminology used in the user reporting interface to more clearly encompass the full range of voter interference or suppression prohibited by the applicable content policies	Implemented
101	Elections and Census	Increased capacity to combat "coordinated inauthentic behavior," which included 50+ takedowns in 2019 and 20+ takedowns in 2020	Implemented
102	Elections and Census	Increase transparency and controls for political ads	Implemented
103	Elections and Census	Retain the "sponsored by" designation when political ads are shared by users	Implemented
104	Elections and Census	Revise the Newsworthiness Policy (which permits otherwise violating content to remain up if it is deemed newsworthy) so that it does not apply to content that violates the prohibitions on threats of violence related to voting and statements of intent or advocacy regarding bringing weapons to polling places	Implemented

105	Elections and Census	Apply a transparency label to content that violates Facebook policies but has been allowed to remain up because it has been deemed "newsworthy"	In Progress or Ongoing
106	Elections and Census	Promote voter participation, including meeting company goal of helping 4 million people register to vote	Implemented
107	Elections and Census	Provide authoritative voter information, including through the Voter Information Center and labels on voting-related content	Implemented
108	Elections and Census	Append a link to the Voting Information Center to posts that reference voting in some form, including those from politicians, to ensure dissemination of accurate and up-to-date voting information	Implemented
109	Elections and Census	Attach up-to-date, real-time voting information to posts that claim COVID-19 resulted in changes to election times and voting methods	Implemented
110	Elections and Census	Provide financial support to coalitions conducting census-related outreach in undercounted communities	Implemented
111	Elections and Census	Disclose additional data regarding voter suppression on the platform, including information about the groups targeted by this content	Under Evaluation
112	Elections and Census	Commit to privacy-protective ways to provide more transparency within the Ads Library into the targeting criteria used by political advertisers	In Progress or Ongoing
113	Elections and Census	Begin routing user reports of voter interference to content reviewers to determine whether reported content	Declined

		violates the Voter Interference Policy and should be removed	
114	Elections and Census	Allow users to appeal if they report content they believe violates the Voter Interference policy but the content reviewer determines there was no violation	Declined
115	Elections and Census	Revise interpretation of what constitutes "misrepresentations of methods for voting" in the Voter Interference Policy to prohibit content that labels official voting methods or ballots as illegal, fraudulent, or issued through unofficial channels	Implemented
116	Elections and Census	Revise interpretation of what constitutes misrepresentation of "what information and/or materials must be provided in order to vote" in the Voter Interference Policy to prohibit content that misrepresents the steps or requirements for obtaining or submitting a ballot	Implemented
117	Elections and Census	Revise content policies so that Facebook's policy prohibiting calls to exclude people from political participation based on protected characteristics is applied to posts from politicians, even if the post is deemed "newsworthy"	Under Evaluation