CURRENT ACTIVITIES & GAPS IN HATE SPEECH RESPONSES

A MAPPING REPORT FOR THE FACING FACTS NETWORK

FACING FACTS
NETWORK

Since 2022, the Facing Facts
Secretariats manages the Facing Facts
Network.

The network consists of members from
various EU countries who act as change
makers to make the impact of hate
visible and provide understandings
and responses to hate crime and hate
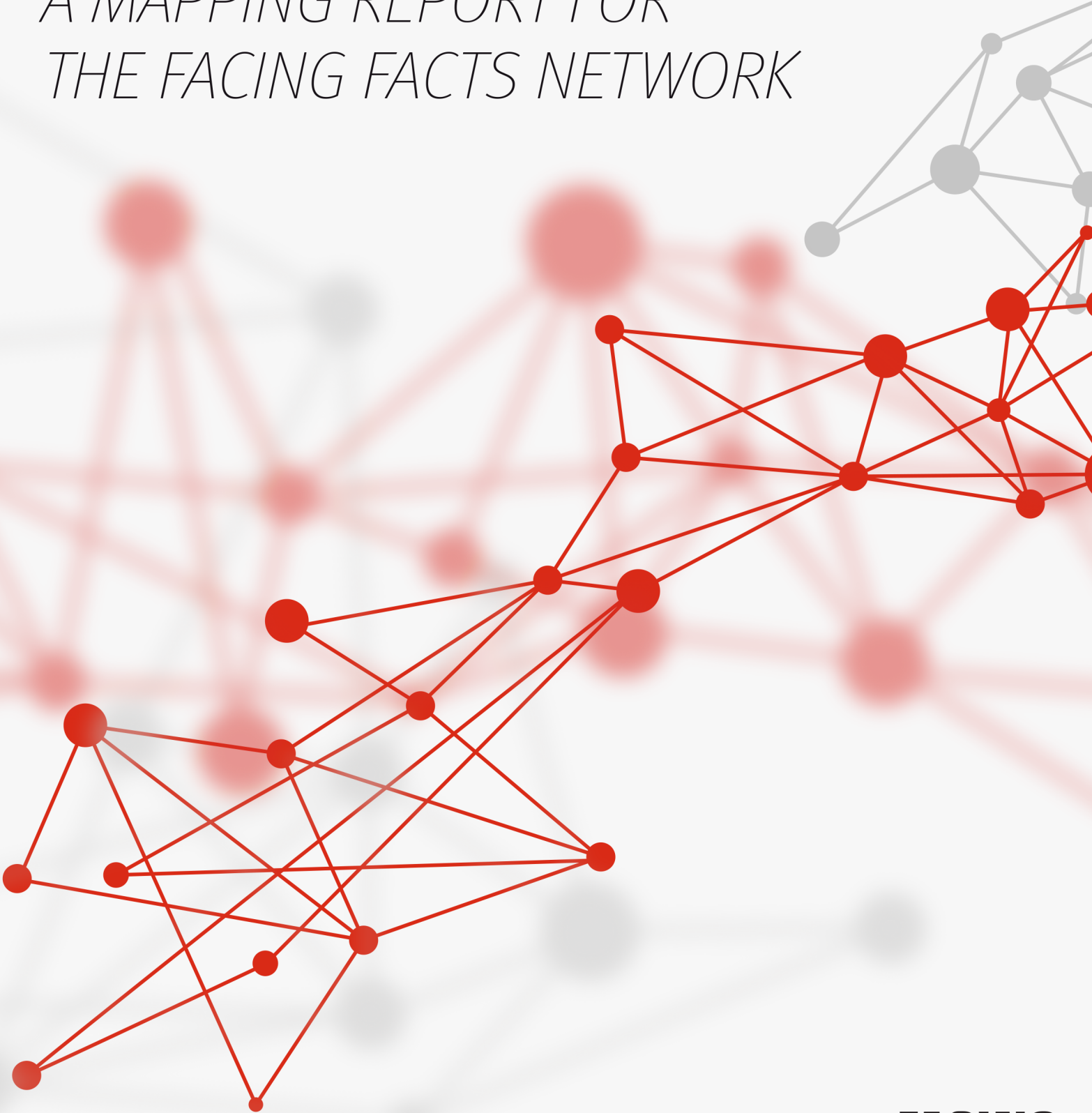speech in Europe and beyond.

www.facingfacts.eu/members

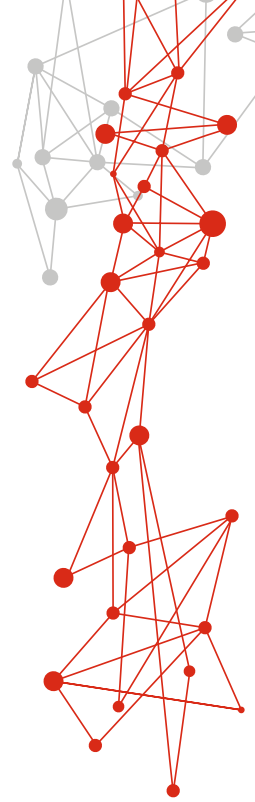# CURRENT ACTIVITIES & GAPS IN HATE SPEECH RESPONSES
A MAPPING REPORT FOR THE FACING FACTS NETWORK

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Contents

I – Introduction

The [Facing Facts Network](#) (the Network) aims to improve the understanding of and responses to hate crime and hate speech in Europe. In 2022, the Network received further funding from the European Commission to continue and strengthen its activities. In response to the growing prevalence and importance of hate speech with respect to the work of Network members, this mapping exercise has been carried out with the following aims:

- to map current research, resources and activities on hate speech;
- to identify gaps and opportunities for the benefit of Network members and activities;
- to identify questions for further research;
- to serve as a collection of practices and resources for the reference and use of Network members.

This work was based on seven research questions covering different aspects of Network members' experiences regarding hate speech.[1] Data was gathered through desk research, questionnaires for Network members, and interviews with key actors. Between August and October 2022, twelve interviews were conducted, and 8 questionnaires were completed. Data was then analysed and written up.

Although the perspectives of various actors are included, the gathered data mainly reflects the experiences and perspectives of civil society organisations. It is also important to emphasise that the scope of this mapping is limited to supporting the aims and work of the Facing Facts Network and its members. As such, it cannot be seen to represent the status quo across the EU, or in specific countries, or perspectives of all actors in the field.

Part two of this document presents key international standards that define and address hate speech generally and hate speech online in particular. The section includes a summary of the Digital Services Act, which came into effect in November 2022 and which has important implications for public authorities and specialist civil society organisations across the European Union.

Part three explains and maps the 'system' of actors and stakeholders that play some role in understanding and addressing hate speech at the national and international level. At least 16 categories of actors are identified, including law enforcement, civil society organisations, the media, internet intermediaries, international organisations and agencies and so on. The systems concept can be particularly useful for the Facing Facts Network, whose members operate across institutional and community boundaries and rely on effective multi-stakeholder relationships in their work. International standards which support this 'systems' and 'coordinated' approach are identified and described. Desk research and interviews identified important contexts and factors that influence 'hate speech response systems', including the challenge of resources and the context of misinformation, disinformation and conspiracy theories. Part three also includes a section on prevention, which was a strong theme in interviews and questionnaires. Priority areas for research and action are highlighted, including the need to evaluate the effectiveness of existing prevention efforts.

Part four focuses on the challenges experienced by civil society in monitoring and responding to hate speech. These include: the trend towards funding projects that

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[1] See Annex II

prioritise online monitoring in contrast to capacity-building and advocacy projects; patchy and ineffective responses by national authorities; and, with regard to social media companies, despite CSOs' 'trusted flagger' status and notwithstanding improvements as a result of the EU Code of Conduct on Countering Illegal Hate Speech Online, effective and consistent engagement with social media companies remains elusive. Part four concludes with reflections on the role CSOs should play with regard to monitoring online hate speech in the context of limited resources, and in light of the imminent impact of the Digital Services Act.

Part five focuses on the victim perspective in the context of social media, drawing attention to the finding that content flagged by 'general users' (including victims) is removed at a significantly lower rate than content reported by 'trusted flaggers[2]'. Part five concludes by outlining specific steps to strengthen the focus on victims' experiences, needs and rights in this context.

Finally, part six outlines key next steps, with a focus on the role of the Facing Facts Network.

II – Frameworks for addressing hate speech

A. International framework for addressing hate speech

This section provides an overview of international frameworks on addressing hate speech, in particular, the key legal, policy and 'soft' standards that touch upon state duties in relation to hate speech.

The first international legal document of significance to combating hate speech is the International Convention on the Elimination of Racial Discrimination (ICERD). While not specifically referring to 'hate speech', its Article 4 imposes on states an obligation to condemn propaganda based on ideas or theories of racial superiority in all its forms, and incitement to racial hatred and discrimination. The Convention calls on states to adopt legislation to combat racist hate speech[3] that falls within its scope, as well as to make it an offence punishable by law to give assistance to or finance such activities. Within ICERD, states have undertaken to adopt immediate and positive measures designed to eradicate all incitement to racial hatred and discrimination, which comprise 'legislative, executive, administrative, budgetary and regulatory instruments […] as well as plans, policies, programmes and […] regimes'.[4]

Along the same lines, Article 20(2) of the International Covenant on Civil and Political Rights places an obligation on states to prohibit hate speech by adopting law that prohibits 'any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence'.

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2 Trusted flaggers are organisations that are known and have expertise in hate speech. They flag illegal or hateful content in and to social platforms and internet intermediaries. Trusted flaggers is not a new concept. However, the Digital Services Act institutionalised the role of Trusted Flaggers in the EU's digital ecosystem. Organisations will interact with online platforms, national Digital Services Coordinators and the EU Commission.
3 As to the CERD's General recommendation No. 35 Combating racist hate speech, racist hate speech covers 'grounds of race, colour, descent, or national or ethnic origin — such as indigenous peoples, descent-based groups, and immigrants or non-citizens, including migrant domestic workers, refugees and asylum seekers, as well as speech directed against women members of these and other vulnerable groups … [as well as] persons belonging to certain ethnic groups who profess or practice a religion different from the majority, including expressions of Islamophobia, antisemitism and other similar manifestations of hatred against ethno-religious groups.'
4 CERD, General recommendation No. 35 Combating Racist Hate Speech, 26 September 2013.

At the European Union level, the [2008 Council Framework Decision on combating certain forms and expressions of racism and xenophobia by means of criminal law](#) (the Framework Decision) requires EU Member States to criminalise hate speech, i.e. 'the public incitement to violence or hatred … [on grounds of] … race, colour, religion, descent or national or ethnic origin'.[5] The European Commission against Racism and Intolerance (ECRI) [General Policy Recommendation N°15 on combating hate speech](#) (GPR 15) provides a key policy framework for national governments to address hate speech and outlines a broad range of duties. It includes the duty to take appropriate and effective action against the use of hate speech by means of criminal, civil and administrative laws, while respecting the right to freedom of expression and ensuring the proportionality of sanctions to the consequences that can result from the use of hate speech. GPR 15 also outlines a set of state duties in the area of prevention, including raising public awareness of the need for diversity, dialogue and mutual respect through education; as well as combating misinformation, negative stereotyping and stigmatisation. The duties also include measuring the extent of hate speech and the harm it causes through monitoring, collecting and disseminating disaggregated data on hate speech, beyond the criminal justice sector only. Importantly, GPR 15 recognises the role civil society plays in monitoring and prevention work, and thus calls on states to support and promote cooperation with civil society.

Furthermore, GPR 15 calls on states to provide support for those targeted by hate speech, both individually and collectively, and to facilitate their reporting of hate speech. Other aspects of state duties relate to the roles of elected bodies, political parties, educational institutions, and the media in combating hate speech. In particular, GPR 15 calls on states to provide support for self-regulation of public and private institutions by encouraging the adoption of codes of conduct; promoting the monitoring of misinformation, negative stereotyping and stigmatisation; and assisting in the establishment of complaints mechanisms. As regards media (including internet intermediaries and social media), the states should use regulatory powers to encourage the adoption and use of codes of conduct, including effective reporting channels; the monitoring and condemnation of the use and dissemination of hate speech; and the use of content restrictions.

The most recent Council of Europe's [Recommendation CM/Rec(2022)16 on combating hate speech](#) (the Recommendation CM/Rec(2022)16) is a political normative standard that outlines similar recommendations to GPR 15, adding an emphasis on the involvement of other key stakeholders (national human rights institutions, equality bodies, civil society organisations, the media, internet intermediaries and others) in addressing hate speech and the state's facilitating role.[6]

The Recommendation CM/Rec(2022)16 distinguishes the following different layers of hate speech according to their severity: i. hate speech that is prohibited under criminal law; ii. hate speech that does not attain the level of severity required for criminal liability, but is nevertheless subject to civil or administrative law; iii. offensive or harmful types of expression which are not sufficiently severe to be legitimately restricted, but nevertheless call for alternative responses.[7] These distinctions and related careful considerations are necessary not only to impose proportionate sanctions and preventative measures but also to safeguard freedom

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5 Article 1 of the Framework Decision.
6 More on the roles of various actors can be found in [III – Mapping the system of actors to understand and address hate speech](#)
7 Such as: counter-speech and other countermeasures; measures fostering intercultural dialogue and understanding, including via the media and social media; and relevant educational, information-sharing and awareness-raising activities.

of expression. The European Court of Human Rights' case law factsheet serves as key guidance in understanding the balance between freedom of expression and what constitutes illegal hate speech. Based on the case law, the Explanatory Memorandum to the Recommendation CM/Rec(2022)16 refers to a set of factors to be applied for assessing the severity of hate speech and for calibrating appropriate responses and remedies. Another important source for navigating the balance between prohibition of incitement to hatred and freedom of expression, is a six-part threshold test of the Rabat Plan of Action on the prohibition of advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence.

Online hate speech

The sustained increase of hate speech on the internet, its impact on the enjoyment of human rights, and the ever growing complexity of actors online (digital technologies and services), has led to the adoption of policy frameworks and undertaking of steps specifically focusing on the responsibilities of public authorities and private actors – including internet intermediaries[8] – with regard to addressing hate speech online.

In the EU, the E-Commerce Directive 2000/31/EC established liability rules and exemptions for providers of intermediary services, and was later complemented by the Directive 2010/13/EU on audiovisual media services (AVMSD) that specifically addressed hate speech. The AVMSD (as amended in 2018) obliges states to ensure that audiovisual commercial communications shared by media service providers, including video-sharing platform providers, do not include or promote any discrimination and do not contain any incitement to violence or hatred. It further requires that video-sharing platform providers take appropriate measures to protect the general public from content that contains incitement to violence or hatred. In doing so, they are obliged to take preventive measures concerning the organisation of the content and not to the content as such; this includes measures like user-friendly reporting and flagging mechanisms, effective complaint procedures, verification systems and transparency obligations.

In 2016, the European Commission agreed the voluntary Code of conduct on countering illegal hate speech online with the major IT companies to ensure that those companies monitor and remove – in a timely manner – illegal hate speech online, and coordinate with national authorities and civil society.[9] This was followed by the 2017 European Commission's Communication on Tackling Illegal Content Online – Towards an enhanced responsibility of online platforms that laid down a set of guidelines and principles for online platforms to improve responses to illegal content online in cooperation with national authorities and other relevant

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8 As per the Explanatory Memorandum to the Recommendation CM/Rec(2022)16, para 80, 'The term internet intermediaries can be defined as a wide, diverse, and rapidly evolving range of players, facilitating interactions on the internet between natural and legal persons by offering and performing a variety of functions and services. Some connect users to the internet, enable the processing of information and data, or host web-based services, including for user-generated content. Others aggregate information and enable searches; they give access to host and index content and services designed and/or operated by third parties. Some facilitate the sale of goods and services, including audio-visual services, and enable other commercial transactions, including payments. Intermediary services may also be offered by traditional media, for instance, when space for user-generated content – such as comments – is offered on their platform.'
9 In May 2016, the Commission agreed with Facebook, Microsoft, Twitter and YouTube. In the course of 2018, Instagram, Snapchat and Dailymotion joined, Jeuxvideo.com in January 2019, TikTok in 2020 and LinkedIn 2021. In May and June 2022, respectively, Rakuten Viber and Twitch announced their participation in the Code of Conduct. In 2018 the Commission added "antigypsyism" as one of the grounds for the following IT Code of conduct monitoring exercises, giving more visibility to this specific form of hate speech: https://www.gitanos.org/actualidad/archivo/125625.html.en

stakeholders.[10] It aims to provide clarifications to platforms on their liability when they take proactive steps to detect, remove or disable access to illegal content as well as to facilitate the implementation of good practices for preventing, detecting, removing and disabling access to illegal content.

Recognising the need for legal clarity for both online platforms and their users, the EU began work to harmonise rules for addressing illegal content online, liability exemptions, content moderation, clear reporting and transparency responsibilities for platforms and authorities. This materialised with the introduction of the Digital Services Act (DSA) in December 2020 and its approval by the European Council in October 2022. The DSA defines clear responsibilities and accountability for providers of intermediary services, such as social media, online marketplaces, very large online platforms (VLOPs) and very large online search engines (VLOSEs). The rules are designed asymmetrically, which means that larger intermediary services with significant societal impact (VLOPs and VLOSEs) are subject to stricter rules. The aim of the DSA is to ensure platforms become more transparent and be held accountable for their role in disseminating illegal and harmful content.[11]

The EU also introduced the 2018 Code of Practice on Disinformation that brought together, for the first time, worldwide industry players who committed to counter disinformation.[12] The document was subsequently updated to the 2022 Strengthened Code of Practice on Disinformation, which constitutes self-regulatory standards to counter online disinformation. Signatories[13] committed to take action in several domains, such as: demonetising the dissemination of disinformation; ensuring the transparency of political advertising; empowering users; enhancing the cooperation with fact-checkers; and providing researchers with better access to data. Signatories agreed to establish a framework for further collaboration through a permanent Task-force, and also committed to set up a Transparency Centre, providing a clear overview to the public of the policies they put in place to implement their commitments, and to update it regularly with the relevant data.[14]

The Council of Europe's policy framework that is specifically concerned with online hate speech includes Recommendation CM/Rec(2016)3 on Human Rights and Business and Recommendation CM/Rec(2018)2 on the roles and responsibilities of internet intermediaries and the Additional Protocol to the Convention on Cybercrime, concerning the criminalisation of acts of a racist and xenophobic nature committed through computer systems. Furthermore, the above-mentioned Recommendation CM/Rec(2022)16 on combating hate speech builds on the above standards. This standard provides a list of recommendations addressed to internet intermediaries in relation to: their content moderation policies and practices; online advertising systems and the use of micro-targeting, content amplification and recommendation systems; and their internal review processes and the importance of regular human rights impact assessments and audits. It further notices the need to establish effective co-operation with civil society organisations that work on hate speech, including on the collection and analysis of data, and to support civil society efforts to strengthen policies, practices and campaigns to address hate speech.

10 That later was complemented by the Commission's Recommendation of 1.3.2018 on measures to effectively tackle illegal content online, https://ec.europa.eu/newsroom/dae/document.cfm?doc_id=50095
11 https://www.consilium.europa.eu/en/press/press-releases/2022/10/04/dsa-council-gives-final-approval-to-the-protection-of-users-rights-online.
12 More information on the implementation see here: Assessment of the Code of Practice on Disinformation – Achievements and areas for further improvement, https://digital-strategy.ec.europa.eu/en/library/assessment-code-practice-disinformation-achievements-and-areas-further-improvement.
13 The list of signatories, including Meta, Microsoft, Vimeo, TikTok and Twitter, is here: https://digital-strategy.ec.europa.eu/en/library/signatories-2022-strengthened-code-practice-disinformation.
14 https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation.

The Digital Services Act

The [Digital Services Act (DSA)](#) came into force on November 16th, 2022. It aims to regulate how online platforms, social media and digital services operate in Europe and to be a key element of a 'comprehensive framework to ensure a safer, more fair digital space for all'. According to the Commission, the new rules contained in the DSA aim to both 'foster innovation, growth and competitiveness' and to increase protection of European values, 'placing citizens at the centre'.[15]

The European Commission plays a key supervisory role in the implementation of the DSA. In its statements around the introduction of the Act, it explains that the 'rules specified in the DSA primarily concern online intermediaries and platforms. For example, online marketplaces, social networks, content-sharing platforms, app stores, and online travel and accommodation platforms.'[16] The Act introduces a series of new, harmonised EU-wide obligations for digital services.[17] The European Commission clarifies that 'all online intermediaries will have to comply with wide-ranging new transparency obligations to increase accountability and oversight, for example with new flagging mechanisms for illegal content.'

These include:

- Rules for the removal of illegal goods, services or content online;
- Safeguards for users whose content has been erroneously deleted by platforms;
- New obligations for very large platforms to take risk-based action to prevent abuse of their systems;
- Wide-ranging transparency measures, including on online advertising and on the algorithms used to recommend content to users;
- New powers to scrutinise how platforms work, including by facilitating access by researchers to key platform data;
- New rules on traceability of business users in online market places, to help track down sellers of illegal goods or services;
- An innovative cooperation process among public authorities to ensure effective enforcement across the single market.

The DSA introduces the direct supervision of Very Large Online Platforms (VLOPs) and Search Engines (VLOSEs) that reach more than 10% of the EU population. Furthermore, the Act calls on Member States to designate a Digital Services Coordinator that can cooperate with the European Board of Digital Services instituted by the EC to supervise entities as well as VLOPs and VLOSEs[18]. This accountability framework can supervise and sanction directly.

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15 See https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment_en
16 See https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package
17 The Digital Services Act introduces a distinction between platforms with more than 45 million users – defined as Very Large Online Platforms (VLOPs) and search engines–, and smaller platforms and start-ups. VLOPs and search engines have stronger obligations including wide-ranging assessments of the risks for online harms on their services on an annual basis. Moreover, risk mitigation measures will have to be put in place and are subject to independent auditing. According to the DSA, smaller platforms will have a reduced set of obligations and rules to operate in the EU single market.
18 The Commission is setting up a European Centre for Algorithmic Transparency (ECAT) to support its supervisory role with in-house and external multidisciplinary knowledge. The Centre will provide support with assessments as to whether the functioning of algorithmic systems are in line with the risk management obligations that the DSA establishes for VLOPs and VLOSEs to ensure a safe, predictable and trusted online environment.

Timeline for Digital Services Act

Publication of the Commission proposal	Political agreement on the DSA	DSA rules enter into force	Platforms and search engines to publish user numbers	Designation of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs)	DSA rules apply for all regulated entities and deadline for EU Members States to establish Digital Service Coordinators
15/12/2020	23/04/2022	16/11/2022	17/02/2023	+4 months maximum	17/02/2024

VLOPs and VLOSEs to comply with rules, including publishing the risk assessment

Source: https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package

B. Frameworks and resources used by the Facing Facts Network members

This section highlights the international norms and standards that are considered to be the most relevant and frequently used by the Facing Facts Network members in their hate speech work.

Frameworks used by Network members differ depending on the type of work to address hate speech that they engage in. For monitoring, advocacy and victim support work, the main reference frameworks for members are national frameworks (legal, policy) and the case law of national courts. Experiences of Network members surveyed for this mapping suggest that national legal systems are not sufficient to effectively respond to hate speech. Various reasons for this conclusion include: lack of clarity of the applicability of national laws to hate speech cases; laws not explicitly mentioning certain protected characteristics, thus difficulty in applying law to these groups; a missing or ineffective institutional framework, thus presenting difficulties in operationalising national law; as well as a lack of political will to recognise hate speech as a problem, and thus to address it.[19] An overview of the national frameworks to address hate speech across the EU is presented in the Study for the European Commission to include hate crimes and hate speech in the EU crimes list. Detailed analysis of the national law applicable to hate speech is given in the ECRI's country monitoring reports.

In addition to national frameworks, Facing Facts Network members rely on the international sources mentioned in the overview above, primarily ECRI's GPR 15, case law of the European Court of Human Rights, OHCHR Rabat Plan of Action, and UN Strategy and Plan of Action on Hate Speech. They also refer to those policy documents focusing on international standards specific to certain affected groups, e.g. IHRA's working definition of antisemitism, EU Strategy on Combating

19 Regarding national laws, in 2022 Spain updated its criminal code to include anti-Roma hate speech – antigypsyism –, article 510, which regulates hate speech): https://www.gitanos.org/actualidad/archivo/136052.html

Antisemitism and Fostering Jewish Life, the EU Anti-Racism Action Plan and ECRI Recommendation nº 13 on combating antigypsyism.

The main reference document for the interlocutors that engage in monitoring hate speech online, in particular on social media, is the EU Code of conduct on countering illegal hate speech online, as well as the rules and regulations of social media platforms. With the passing of the DSA, it will be a key reference and standard in efforts to monitor its impact on the roles, responsibilities of relevant stakeholders and the effectiveness of their responses to hate speech online.

In terms of tools and resources, members of the Network rely on those developed and produced by intergovernmental organisations and agencies (IGOs)[20], networks[21], national authorities[22] and civil society[23], and community-based organisations, national authorities, and legal decisions by, for example, national authorities for data protection, freedom of information, media and info communications.

The CSOs that are engaged in EU online monitoring exercises also rely on official documents issued by social media companies about their terms of service and internal assessment reports, as well as evaluations of EU monitoring exercises on the implementation of the Code of Conduct on countering illegal hate speech online.

Another important part of learning and capacity-building to address hate speech is exchanges among CSOs and other actors, from different countries, within the frameworks of specialised networks and at regional/international events on the matter. Lastly, thematic articles, podcasts, newsletters were also identified as useful resources.

Annex I outlines the main resources and tools, in particular, on hate speech research, capacity building, monitoring, advocacy and prevention, and shall act as a repository for the use of the Facing Facts Network members.

III – Mapping the system of actors to understand and address hate speech

The mapping exercise attempted to identify all actors that have a role in addressing hate speech at the national level with the aim to understand the following questions: which actors are engaged and which actors are left out and yet should play a role? What roles should those be and what do we need to understand more to facilitate an effective multi-stakeholder approach to addressing hate speech?

A. Describing and understanding the hate speech response 'system'

In the case of a hate speech response system, the key actors are numerous and diverse. They include public authorities such as ministries of interior and justice, law enforcement institutions and equality bodies, civil society organisations, social media companies, and international organisations. They operate at both

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20 i.e. capacity building tools, mapping reports, surveys, monitoring reports, etc.
21 e.g. Facing Facts, International Network Against Cyber-Hate (INACH)
22 Particularly in the area of education, prevention and awareness-raising
23 Including in frameworks of international projects, such as national campaigns of the Council of Europe's NO HATE SPEECH MOVEMENT

the international and national level as well as criminal and civil legal spaces (see section c. Mapping the actors of this report).

The success of the 'systems' approach depends on the strength and effectiveness of the relationships among the actors. The mapping showed that in many instances, contextual to the political and institutional realities, such relationships do not even exist, for example between specialist civil society organisations and responsible public authorities.[24] Having in place a framework that requires and facilitates cooperation and communication among actors would help in building these relationships, and is a point we return to below.

ECRI's GPR 15 arguably supports this 'systems' approach. It identifies a wide range of responsible actors and recommends cooperation between public authorities, civil society, equality bodies and national human rights institutions for hate speech monitoring and data gathering, and highlights the importance of efficient coordination of activities between the police and prosecution authorities when investigating and prosecuting hate speech cases. In relation to prevention work, GPR15 underlines that more significant impact can be achieved from the efforts undertaken in cooperation and coordination between national stakeholders, including through developing and adopting national strategies and action plans, compared to the efforts by individual actors.

The Council of Europe's Recommendation CM/Rec(2022)16 on combating hate speech, for example, recommends coordination among legislative, executive and judicial actors as well as other relevant stakeholders to ensure 'a clear understanding of the different manifestations of hate speech and how to assess the level of severity of hate speech; support to those targeted by hate speech; implementation of non-legal measures, especially in the field of education; and, the effective identification, monitoring, and analysis of hate speech.'[25]

While the references to coordination and cooperation are made in a few international documents, it is unclear to what extent they are sufficient and are taken on board by the national authorities. Further research is needed to understand practices across Europe and to understand whether putting together a clearer framework would support national actors to understand themselves as a 'hate speech response system' with all that entails.

24 See Section D
25 Explanatory Memorandum, para 224.
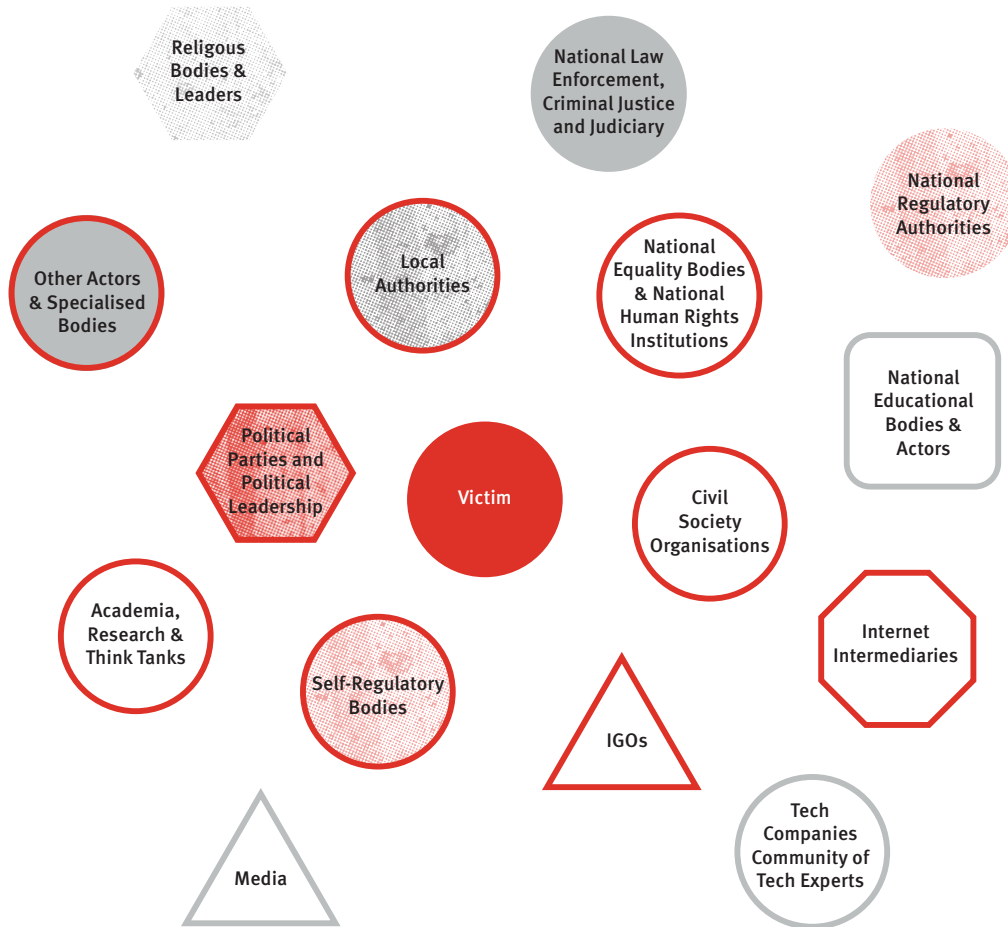
As indicated by the above image, there are many actors that make up national hate speech response systems, including public authorities such as the police and private organisations such as media companies, international organisations. Mechanisms of prevention and response within one hate speech system implies engagement and coordination of a broad range of actors. Our mapping, including desk research, questionnaires and interviews identified the following stakeholders, their role(s), and the challenges they face.

1. **National law enforcement, criminal justice authorities and judiciary** have an essential role in a response to hate speech. Key aspects cover the effective investigation and prosecution of illegal hate speech, as well as systematic monitoring and data collection of hate speech cases, including online. This mapping identified the following challenges facing these actors in relation to hate speech:

   • a lack of understanding of hate speech and its impact on human rights, thus, not taking the matter seriously;
   • a lack of knowledge of hate speech, especially online;

- little exposure to dealing with hate speech cases due to underreporting and de-prioritisation, thus mischaracterisation of crimes (i.e. not classifying as a hate speech offence), misinterpretation of the law, or inadequate approach to victims and their needs;
- insufficient or a lack of clear and comprehensive law in place to address hate speech;
- disputes over jurisdiction for online cases;
- an array of hate speech cases online, and lack of resources to deal with them;
- a lack of competences and tools to gather and assess evidence of hate speech online;
- challenges to record hate speech cases in all its proliferations[26];
- a lack of communication and coordination among various chains of the criminal justice system;
- a lack of cooperation with civil society and insufficient reaching out to the communities targeted by hate speech.
- The following points were identified as areas for improvement on the part of the authorities:
- Knowledge of community-specific hate words/symbols;
- Understanding of the impact and extent of conspiracy theories;
- Ability to apply an intersectional analysis[27] to hateful content;
- Knowledge of specific communities, their vulnerabilities and impact and nature of victimisation;
- Increased and more effective application of existing legal frameworks.

2. **National regulatory authorities** (media councils, audio-visual councils, advertising councils, etc.) play a role in response to (non-criminal) hate speech by monitoring, disputes adjudication, complaints consideration and sanctioning within their mandates. For these authorities to work effectively, national legislation on online hate speech should clearly elaborate their roles and responsibilities; and their capacities should be built in particular on hate speech and its impact on individuals and communities.

3. **National equality bodies and national human rights institutions** play a role in dealing with hate speech cases by pursuing litigation on behalf of people targeted by hate speech, by bringing cases in their own name, or by intervening as *amicus curiae* or third party before institutions, adjudicatory bodies and the courts.[28] Depending on the mandate, national equality bodies and national human rights institutions can have a decision-making function to examine complaints and take legal decisions; impose sanctions, such as fines and compensation; or require deletion, blocking of sites and publication of an acknowledgement that something the media, including social media, published constituted hate speech. They are also instrumental in providing assistance and support to those targeted by hate speech, including representing them before adjudicatory bodies and courts. Further, these actors should play an active role in prevention and in addressing the root causes of hate speech (both illegal

26 For this mapping exercise the hate speech proliferations refer both to the rapid reproductions of the phenomenon and to its intersectional aspects.

27 Intersectional analysis looks at the issue from the perspective of an identity of a possible target, recognizing that any human being has multiple personal identity traits that can be targeted by hateful content. For example, hateful content can be aimed at women, or at Roma women specifically. In this scenario, hateful content is intersectional as it targets both gender and ethnic origin. See also Hate speech in online social platforms: An intersectional case of antisemitism and homolesbobitransphobia in the Italian context on the concept of intersectional hate speech online with a focus on the Italian context.

28 ECRI's GPR N°2 on Equality Bodies provides a framework for the role of equality bodies in combating intolerance at national level in general.

and legal yet harmful) through measures such as awareness-raising, education and promotion of counter-narratives. They are also well positioned to play a more active role in the online space, in particular regarding the monitoring of hate speech, making policy recommendations and assessing the effectiveness of content moderation systems in place on various social media platforms. For example, in Croatia, the Ombudsperson's Office regularly reports on patterns of hate speech and makes recommendations to a range of national institutions in the areas of response and prevention, including awareness raising and education.[29] UNIA, the Belgian equality body, among other tasks, can intervene as a third party, request damages and represent the public interest in cases of hate speech online. The European Network of Equality Bodies' reports provide an overview of practices of equality bodies on hate speech across Europe.

4. **National educational authorities and actors** (ministry of education, universities, schools, educators, teachers) play an essential role in prevention through education, awareness raising and dialogue facilitation activities. The mapping suggests that at the moment the education field is not sufficiently covering the hate speech area, and is generally fragmented. There is a need for more guidance on prevention of bullying, harassment, and radicalisation in schools and universities, which should be incorporated in educational standards.

5. The role of **local authorities**, especially their role in prevention, should also be considered, further explored and included in the 'systems' approach to address hate speech. The work of the European Coalition of Cities Against Racism and in particular the mapping reports on local authorities' responses to antisemitism and anti-Muslim racism present practical tools for local authorities to combat racism and hate speech, as well as highlight promising practices of cities across Europe.

6. **Self-regulatory bodies** (of both public and private entities, such as parliaments, ministries, political parties, media, professional associations, business and sport organisations) should also take part in prevention by condemning and taking actions to prevent or sanction hate speech used by a person affiliated with their entities. This can be done through the adoption of codes of conduct or codes of ethics, and establishment of complaints mechanisms.

7. Considering that **Internet intermediaries**, including social media, are essential in providing platforms for and enabling exchange and debates online, their role is key in response and prevention of hate speech online. In this regard, they need to have responsibilities and accountability for addressing hate speech on their platforms. This can include effective and timely content moderation, measures to address the spread of conspiracy theories and disinformation, accessible mechanisms for reporting hate content, complaint mechanisms and other measures. The CoE's publication Models of Governance of Online Hate Speech provides ways to approach governance of online platforms.

8. The **media** should contribute by adhering to ethical reporting (including mindfulness of language used, to avoid negative stereotyping and stigmatisation), by raising awareness of the general public of hate speech and harm it is causing, and by addressing the dissemination of conspiracy theories and disinformation.

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29 Annual report of the Ombudswoman of Croatia for 2018, https://www.ombudsman.hr/en/download/annual-ombudsman-report-for-2018/?wpdmdl=6777&refresh=635e545807f941667126360

9. **Civil society organisations** play a fundamental role in response and prevention of hate speech. This includes activities in the area of education, awareness raising, monitoring, reporting, victim support, and advocacy. More on the role and challenge the CSOs are facing can be found in IV – Addressing hate speech: a focus on civil society below.

10. The role of **political parties and political leadership** is particularly important as they are viewed as role models for their electorate. They should refrain from stereotyping and stigmatising language, and should publicly condemn hate speech instances. The role and responsibilities of political leaders in combating hate speech and intolerance are detailed in the PACE's Resolution 2275 (2019). Special attention is required during election campaigning, when minoritised communities are often being instrumentalised for political gains.

11. **Religious bodies** (including interfaith/intercultural bodies) and **leaders** should play a role in prevention, through awareness raising, promotion and facilitation of dialogue, and condemnation of acts of hate speech.

12. Other actors that should be included in the discussions and the response of 'one system' are **tech companies** and a **community of tech experts** (those that develop tech solutions). As the tech aspect plays an important role in dealing with online hate speech (e.g. tech and automated tools for detection and monitoring, recording and analysing of arrays of hate content data, storing evidences, dealing with anonymity online/identifying an author, etc.), there needs to be more access to and engagement with tech companies and experts who can develop such tech solutions. Further, engagement of communities of tech experts would allow us to foresee certain trends and processes that may occur in the near future that would have an impact on how efficient hate speech online can be addressed.

13. Also **academia, researchers and think tanks** should play a role. Equipped with the necessary resources, they are able to provide qualitative and quantitative evidence on some of the under-research areas; applying an interdisciplinary approach they bring focus on different perspectives and possible solutions.[30] Given this, academics are also well positioned to conduct high volume monitoring.

14. Other actors mentioned during the mapping are **specialised bodies** such as National Envoy for Antisemitism and interministerial bodies (e.g. Interministerial Delegation for the Fight Against Racism, Anti-Semitism and Anti-LGBT Hate (DILCRAH) in France).

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30 For example, see the work of Hate Lab, https://hatelab.net/ and https://www.mediavox.network

B. Contexts and factors that influence 'hate speech response systems'

Our mapping distinguished the following situational factors that influence hate speech mapping systems:

- **National political and ideological contexts** have a direct impact on the work of actors and their relationships. The level of engagement with national authorities depends on a political willingness to recognise hate speech as a problem, and on the leadership of law enforcement agencies to monitor, record and investigate hate speech. How authorities view civil society is another strong influencing factor regarding the effectiveness of responses. For example, in some national contexts the political narrative can be hostile towards civil society, so no cooperation is possible in principle; in other contexts – the work that civil society do in one area (e.g. challenging public authority responses to migration) can negatively impact the willingness of authorities to cooperate in other areas, including on hate speech; in other contexts — state-run victim support services do not engage with civil society working with particular minority groups (e.g. LGBT). When it comes to engaging with the media, the ideological divide (right/central vs liberal, or on specific issues e.g. Israeli-Palestinian conflict) prevents cooperation. Similarly, journalists' associations and media self-regulatory bodies might not be able to agree on one code of conduct due to political divides.

- The **globalisation of hate speech highlights a need for coordination on regional and global levels**. What is happening in one country (including if there is no effective response to hate speech), might have a significant impact on another country. Online hate can be directly available in other jurisdictions; and with social media platforms it can be quickly shared and go viral in multiple jurisdictions. Thus, social media moderation and its efficiency anywhere in the world can impact the online space in Europe. For policy making, this nature of online hate poses challenges as it implies a need for broader international cooperation and to somehow hold actors outside of the EU accountable. This also requires a shared understanding of hate speech concepts, the harm it causes and a commitment to address it.

- In addition to hate and other harmful speech, **the online space is conducive to dissemination of disinformation, misinformation and conspiracy theories,** which have negative impacts on individuals, communities and social cohesion. For example, the COVID-19 and monkeypox outbreaks acted as catalysts for the spread of disinformation about different minoritised groups, which had a direct impact on them and led to an increase in hate speech, incidents and crimes against members of these groups.[31]

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31 See for example, report 'COVID-19 crisis and hate speech. Transnational report', Open Code for Hate-free Communication project, https://www.nigdywiecej.org/docstation/com_docstation/20/covid_19_crisis_and_hate_speech. pdf. And report 'Antisemitism and anti-vax discourse in Europe', a report on conspiracy ideologies and anti-Jewish hatred on Facebook and Twitter, Get The Trolls Out! project, https://www.media-diversity.org/wp-content/uploads/2021/12/ Antisemitism-and-anti-vax-discourse-in-Europe_MDI_GTTO.pdf.

C. Prevention work

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Another finding that came out very strongly during the mapping was the need for a stronger focus on prevention, and, consequently, that more focus should be given to the actors who can contribute to prevention. Societal divides and polarisation are growing, even more so in the online space. Interviewees and respondents explained that a low level of media literacy and the anonymity factor contribute to more harmful speech online. Conspiracy theories and disinformation are manipulating people's views, which then lead them to engage in hate speech online and offline. In addition, online extremism, a complex cross-border ecosystem with effective propaganda, evolves with right-wing groups, in ways that are different and separate from regular users, yet which can be deeply influential.

Prevention work should address all the aspects and levels of online and offline divides, manipulation and hate speech. This could include general human rights and civic education, promotion of respect for diversity, democratic values and pluralism[32]; awareness on basic media literacy for youth and adults; work on prevention of bullying, harassment, radicalisation in schools/universities and dealing with controversial topics in classrooms[33]; and counter-speech.[34] Lastly, prevention implies understanding radicalisation[35], and focused work with people at risk of radicalisation.

There is little existing data on the effectiveness of prevention efforts. The lack of sufficient evaluation and institutionalisation of evidenced good practice was already highlighted in the most recent (2017) review of the implementation of the Council of Europe Charter on Education for democratic citizenship and human rights.[36] Limited progress can be found in the existing body of transnational research vis a vis the approaches and conditions needed to effectively prevent hate. More focused research and evaluation is needed to inform and incentivise policy-makers to undertake the educational reforms required for inclusive democracy to thrive.

IV – Addressing hate speech: a focus on civil society

The mapping exercise particularly aimed at understanding the experiences of CSOs working on hate speech, their engagement with other actors, the challenges they face and the role they play.

A. Challenges faced by CSOs

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The mapping found that one of the key challenges faced by CSOs is the stretching of resources. With more hate online, CSOs have felt they need to respond and have taken a monitoring role in addition to their existing roles in prevention and in working with victims. This has led to a significant stretch in resources (time, human and financial). Many interlocutors mentioned a lack of personnel to monitor hate speech or to ensure a quality and wide-spread monitoring, as well as a shortage

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32 e.g. the Facing Facts Network member ZARA – Zivilcourage & Anti-Rasismus-Arbeit trainings for children, youth and adults
33 e.g. Amadeu Antonio Stiftung's projects
34 e.g. ZARA's project LEAD-Online and Schneller Konter; project Get The Trolls Out implemented also by Facing Facts Network members Never Again Association and Ligue internationale contre le racisme et l'antisémitisme (LICRA)
35 e.g. BRaVE project
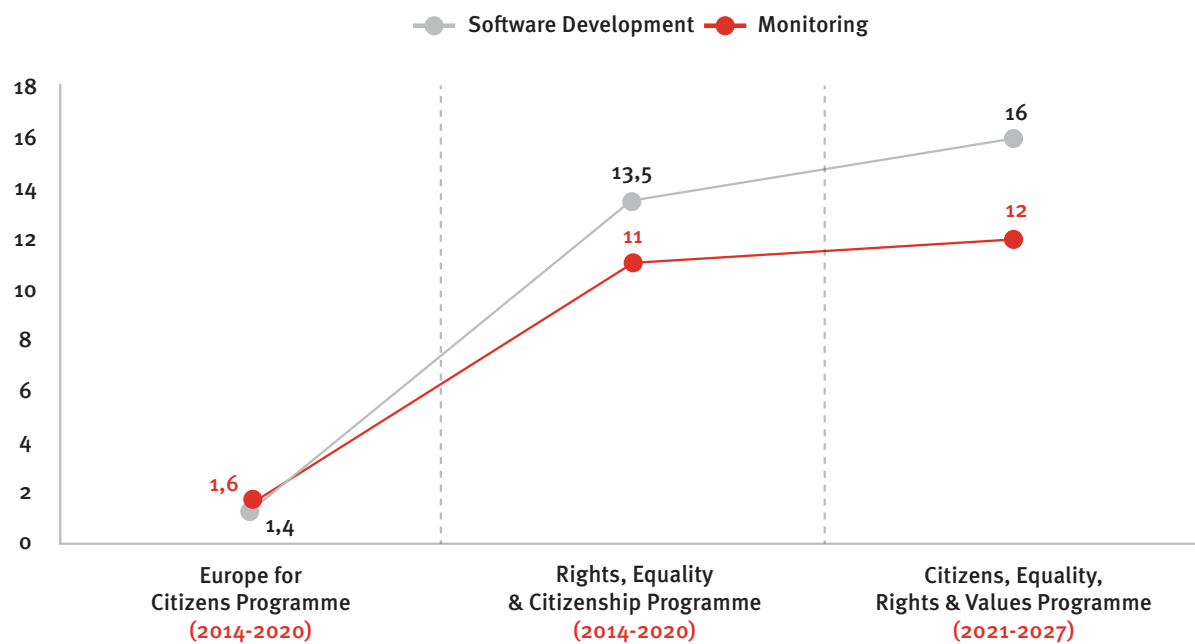**36** Recommendation CM/Rec(2010)7

of personnel to deal with reports and work on communication (writing articles/making content for awareness on hate speech/counterspeech). CSOs also feel limited in their scope of work by funding programmes (EC and other donors), which are not necessarily aimed at systemic changes, but rather at addressing relatively superficial issues.

The graphs below provide some indications about shifts in the areas that CSOs have channelled their efforts in the last eight years. The graph analyses the projects funded under the EU programmes, i.e. the Citizens, Equality, Rights and Values Programme (CERV), the Rights, Equality and Citizenship Programme (REC) and the Europe for Citizens Programme (EFC) from 2014 until 2027.
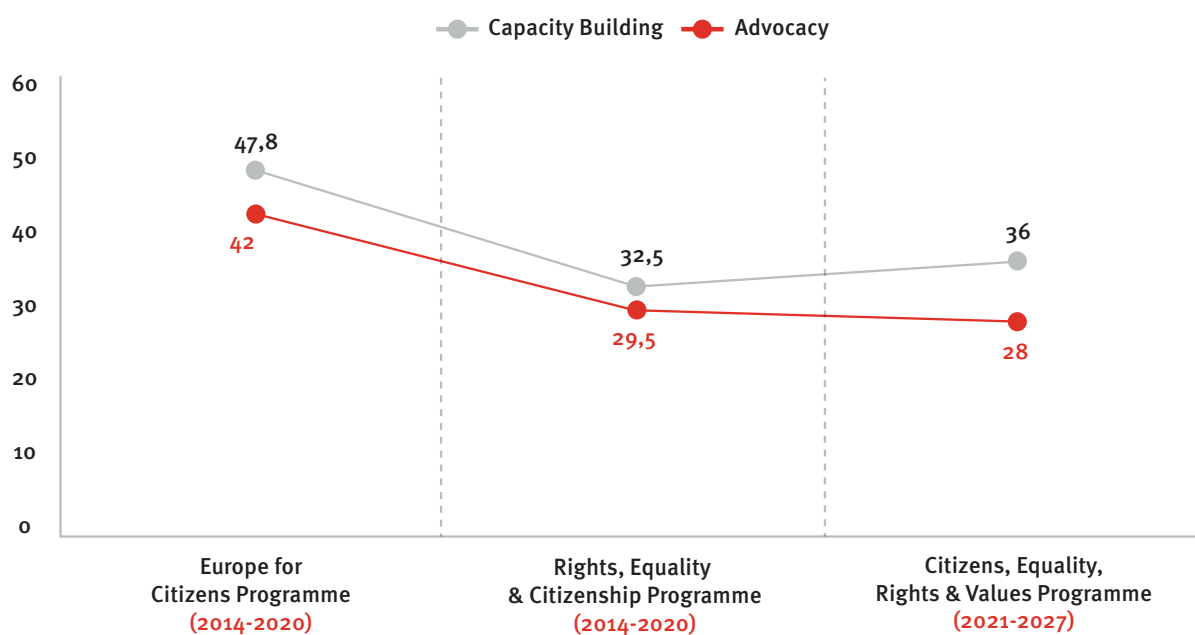
In the charts we can see that over time, the areas of monitoring and tech tools development receive more funding than core civil society activities such as capacity building and advocacy. This trend partly reflects the institutionalisation of the role of CSOs in monitoring the implementation of the Code of Conduct, and as such there has been an accompanying pressure on CSOs to conduct increasingly systematic and effective online monitoring.[37] A trend towards funding software development and monitoring started with the Rights, Equality and Citizenship (REC) programme in 2014-2020 and continued with Citizens, Equality, Rights and Values (CERV) 2021-2027 (see graph 1). At the same time, a second trend towards reducing funding for capacity building and advocacy projects can be observed in graph 2.

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37 This chart is based on the following information: The European Commission's websites for the Europe for Citizens – EFC (2014-2020) (https://ec.europa.eu/programmes/europe-for-citizens/projects/), Rights, Equality and Citizenship Programme – REC (2014-2020) (https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-results;programCode=REC), and Citizens, Equality, Rights and Values programme – CERV (2021-2027) (https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-results;programCode=CERV) programmes were consulted to create this graph. The graphic reports data for the projects that were identified by the system with the keywords 'Hate Speech' and 'hate speech'. Projects were then analysed looking at the activities reported in the Fact sheet — Objective section of the project description. This graphic was produced based on the data available on the European Commission's websites. The graphic together with the information reported do not aim to be complete, but rather offer a non-scientific indication about shifts in the areas that CSOs channel their efforts on hate speech.

Graph 1:

Graph 2:

Graphs based on data available on European mission websites.

Current Activities & Gaps in Hate Speech Responses: A Mapping Report for the Facing Facts Network

Another identified challenge is a lack of response from authorities. Experiences of interviewed interlocutors suggest that many authorities have not measurably improved their knowledge and skills despite EU and CSOs resources being invested in their learning. Further, there are many instances where existing laws are not used to pursue hate speech cases, either because there is no political will or no recognition that hate speech is a problem that should be addressed. Further, there is a lack of communication among various state actors, as well as among local authorities and country level governments.

One more notable challenge is communication with and the response of social media companies regarding hate speech on their platforms. While the participation in the EU Code of Conduct on countering Illegal hate speech online has significantly improved signatory tech companies' review and removal of hate speech content, and has led to increased trust and cooperation between social media companies and CSOs, the challenges in response and communication remain. Experiences of interviewed CSOs suggest barriers in contacting social media companies (even for the 'trusted flaggers'), slow response time and low response rates to reported cases, few actions on dissemination of disinformation online, as well as lack of transparency, vague guidelines and bias in moderation (e.g. different interpretation of rules for different bias grounds). Further, CSOs that have a 'trusted flagger' status raised concerns over tech companies' lack of knowledge on national political and social contexts, linguistic expertise and law, which is detrimental to the assessment of the reported case, as well as reluctance to remove the reported content that is illegal according to national law.

B. Monitoring online hate speech: what role should CSOs play?

The mapping exercise highlighted the imbalance in roles to monitor and report hate speech online, in particular on social media. From one side, we have private companies with enormous financial and human resources, and easy access to and ownership of codes of their platforms. From another side, we have CSOs with stretched resources racing for tech solutions to get some help in monitoring hate speech. Further, as outlined above, social media are not always timely, sufficient and transparent in their responses, despite the fact that they are signatories to the EC Code of Conduct.

CSO's core work on hate speech prevention and working with victims—areas where CSOs traditionally make the most impact and needed contribution— can be affected as a result of investing their resources in online monitoring. In light of insufficient victim support provided by the state (in particular, as there is lack of response to hate speech in general as mentioned above), CSOs' role in this area is even more crucial.

The mapping of CSOs' experiences, including those with 'trusted flagger' status, shows that CSOs are integral to social media companies' moderation in terms of their expertise on national context, ever changing hate linguistic and sources of hate, and their advice on trends and warnings on current and potential developments. Further, CSOs are fundamental to act as external monitors regarding the effectiveness of social media's moderation and user communication and feedback. CSOs can also be part of oversight mechanisms.[38]

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38 For example, the Oversight Board, is an independent body that makes consequential precedent-setting content moderation decisions on the social media platforms Facebook and Instagram, https://www.oversightboard.com

What needs to be explored further is how social media companies could take more ownership and responsibility in addressing hate speech on their platforms.[39] This includes responding better to reported cases, making their platform less accessible to hate and disinformation through expanding their own monitoring capacities, building their expertise, using coding and other methods to prevent or minimise the posting/dissemination of hate, monitoring hate (using a combination of tech solutions and human monitors), improving communication with the users and making reporting easy and accessible for the users. It can also include working more closely with expert CSOs to build their own capacity and knowledge with regard to particular forms of hate. It will be key to observe the impact of the Digital Services Act in facilitating these outcomes.

V – Hate speech in social media: taking the victim's perspective

The mapping exercise highlighted deficiencies in social media responses to the reporting of hateful content by both the 'trusted flaggers' and general users. In 2022, according to the 7th evaluation of the Code of Conduct factsheet by the European Commission, a total of 3634 notifications were submitted to the IT companies taking part in the Code of Conduct. Of these, '2765 notifications were submitted through the reporting channels available to general users, while 869 were submitted through specific channels available only to trusted flaggers/reporters.' Looking at the data from 2021, the EC highlighted '[t]he divergence in removal rates between content reported using trusted reporting channels as compared to channels available to all users was 25.4 percentage points, much higher than the 13.5 percentage points observed in 2021. This seems to suggest that there is a growing difference of treatment between the notifications from general users and those sent through special channels for 'trusted flaggers'. While this difference in responses undermines the effectiveness of a hate speech response in general, it is particularly harmful for victims impacted by hateful content, and can be a form of secondary victimisation (in addition to the harm caused by being targeted with hate or hateful content). The negative experience of reporting of users on social media, such as having their reports of hateful content not considered, reported content re-appearing or even being actively promoted by social media on their feed, also impacts their willingness to report these cases in the future. If hateful content is left unaddressed, there is a risk of further harm and disengagement from the online space altogether. These considerations and experiences are directly relevant to understanding why victims do not report, which is an important area for future research.

To address the above, a victim's perspective should be at the centre of development and implementation of social media's moderation rules, reporting mechanisms and responses to reported cases. This requires more understanding of what motivates victims to report hate speech; and, connected to this, what do access to justice, support and safety mean to victims online.

Our mapping led to the following related questions that require further exploration: What is the impact of a harmful hate speech that is not illegal, for example in creating hostile environments and strengthening negative stereotypes? What redress is available to victims (and all those impacted) of harmful yet not illegal hate speech?

39 This point is further explored in the next steps.

VI – Next steps

This explains the steps that the Facing Facts Network will take based on the findings of this mapping report in the areas of: training and capacity building, dissemination, advocacy and further research.

Training and capacity-building

Facing Facts Online's hate speech programmes will be reviewed in light of the findings of this report. Specifically, the 'systems' approach outlined in section three will be digitally developed and integrated into future national and European capacity-building activities and online learning programmes, in particular the hate speech course planned for 2023.

Further research

The report has identified several specific areas for further research, and generated ideas for further exploration with key partners. This includes research to:

- better understand people's experience in reporting cases of hate speech to social media platforms, including what they expect as an outcome of their report. Further, their reasons for (not) reporting also need further exploration. These questions could be appropriate for large scale surveys – also designed to fully account for intersectional experiences – such as those carried out by the Fundamental Rights Agency.
- better understand the experience of trusted flagger organisations when interacting with social media companies, the most prominent hate speech phenomena for the community/organisation and, also, the most important challenges and pressing points they face and advocate for.
- evaluate current prevention measures. Tech companies are aware of the information they need, the context that needs to be provided in order to remove online content, and how content moderation works. They can build, together with civil society, a tool that works for them. The Commission should have a role in this process.
- create an IT tool that would increase the rate of immediate and appropriate removal of online hate speech. This work should also aim to better understand barriers to implementing the Code of Conduct at the national level, including evidence from monitoring exercises that suggests that social platforms are reluctant to discuss cases that are illegal under national law.[40]
- more systematically gather learning from ongoing projects to identify synergies and to map out the strengths and weaknesses of various existing reporting tools.[41] These efforts should include sharing learning from work that focuses on specific communities and bias affecting them. For example, sharing learning

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40 See section IVa of this report.

41 For example, the EU-funded projects SAFENET and Bridges. SAFENET involves 22 partners from different countries. The project focuses on the continuous monitoring and reporting of hate speech content to the IT companies and responsible authorities, and on awareness raising activities with social media companies and national authorities. It aims to offer consolidated and interpreted data involving different stakeholders including IT Companies, public authorities, civil society organisations and the media sector. Bridges brings together stakeholders to monitor, reinforce and implement the EU Strategy on combating antisemitism and fostering Jewish life on different levels. The project involves different stakeholders to build strong coalitions and strengthen the capacities of Jewish communities with tools, expertise in advocacy, and methods on combating online hate.

from projects that monitoring antisemitic hate speech with projects that focus on other forms of bias and hate speech.

- explore needs and practices regarding both artificial intelligence (AI) and human monitoring of hate speech.
- better understand how hate speech is disseminated and the extent to which hate speech online leads to hate speech and hate crime offline or in the physical world with a view to influencing activities at a regional/municipal level. This is particularly important in light of DSA implementation and the work of national contact points.
- develop an up to date 'lexicon of hate speech' in partnership with members of the High Level Group on Hate Crime and Hate Speech, and building on existing work in this area in several languages, coordinated by the European Commission. This includes words or combinations of words that are perceived as hate speech by communities, bearing in mind the need to protect freedom of expression.
- better understand the impact of the Digital Services Act where CSOs play a dual role of both monitor and being monitored.

Annex I – List of resources

Capacity building

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- EU — Outputs of the HLG working group on training;
- Projects developed through EU funding programmes (current projects Commission website — HateMeter; 43 Projects under REC; and Projects under EFC);
- CoE's HELP tutored courses on hate speech;
- FFN Online Hate Speech trainings;
- INACH training on counter speech online;
- Trainings organised by Social Media companies for CSOs[42] (e.g. Twitter organises training on community standards and guidelines and how to report for CSOs).

Research

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- ECtHR, Knowledge Sharing Platform, brief on Hate Speech, brief on protection against hate speech, hate speech factsheet;
- CoE mapping on national hate speech responses;
- FRA's surveys on minority groups' experiences in the EU: 2022 Report Roma in 10 European Countries, 2020 Report A long way to go for LGBTI equality, 2020 Report Antisemitism: Overview of antisemitic incidents recorded in the European Union 2009-2019, 2018 Report From institutions to community living for persons with disabilities: perspectives from the ground, 2017 Report Second European Union Minorities and Discrimination Survey — Main results;
- FRA's Fundamental Rights Reports;
- CEJI mapping exercise (including NOA Compass and lessons learned);
- INACH research and resources;
- Relevant academic work (see INHS library);
- Article19's resources;
- Selected national initiatives;
- FRA: A persisting concern: anti-Gypsyism as a barrier to Roma inclusion;
- Fundación Secretariado Gitano, 2021: The Covid-19 Crisis and Anti-Roma Hate Speech: Analysis through case studies of the origins, dissemination and impact upon people.
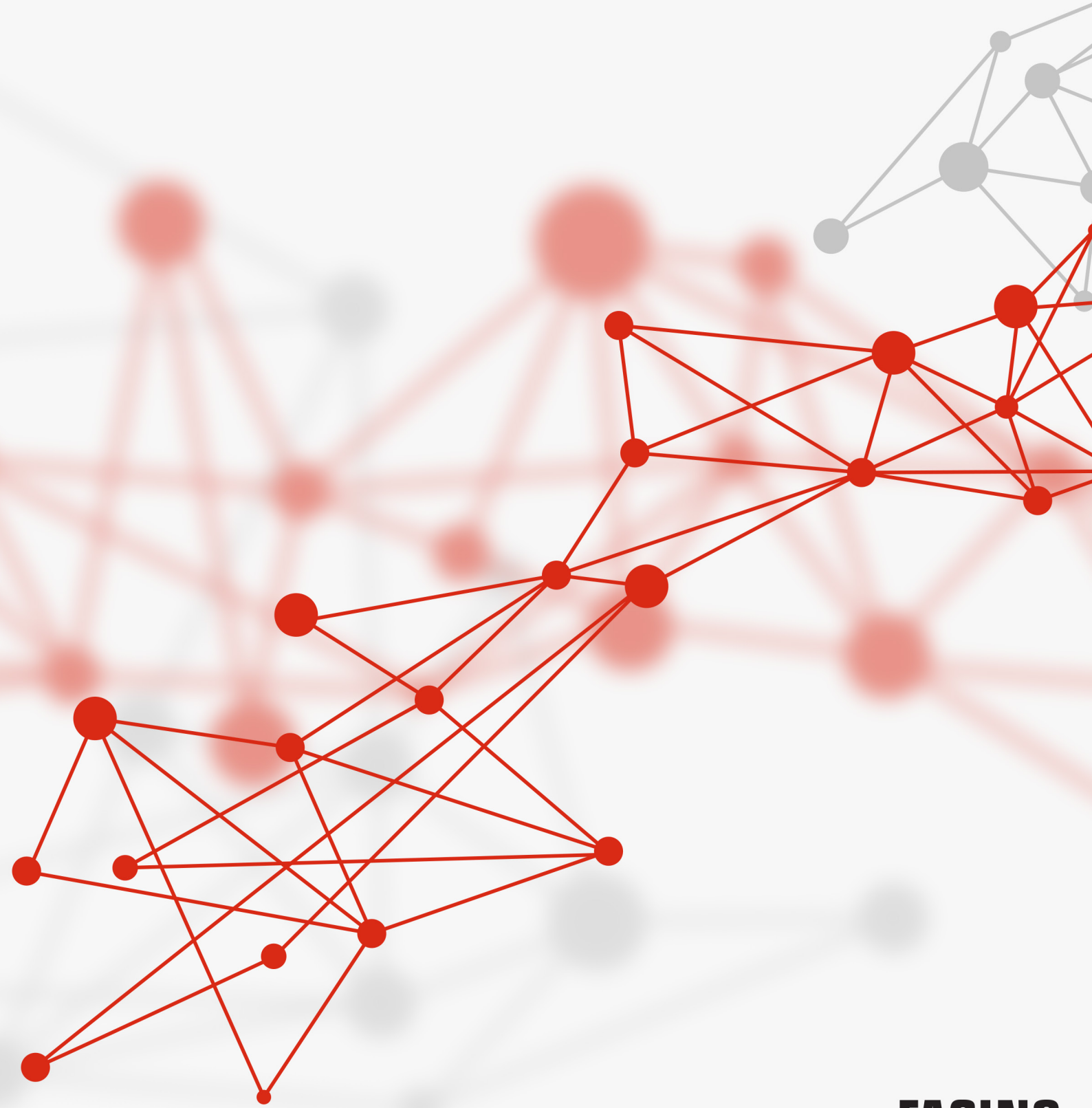
Monitoring

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- sCAN project – Platforms, Experts, Tools: Specialised Cyber-Activists Network (2018-2020);
- eMORE Project — MONITORING AND REPORTING ONLINE HATE SPEECH IN EUROPE;
- INACH's project SafeNet;
- EC's monitoring exercise on the implementation of the Code of Conduct on countering illegal hate speech online — reports from the last six years;
- CoE's Commissioner for Human Rights' thematic reports and country monitoring.

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42 As part of the Code of Conduct, IT companies organise training on how to report content in their platforms. This has been conducted by Twitter, Tik Tok, Meta (Instagram and Facebook), Twitch, Rakuten Viber in 2022. As the number of signatories grows, the number of these training will also increase.

- CoE's NO HATE SPEECH MOVEMENT and its national campaigns;
- Prevention work;
- BRaVE Project — brings together innovative projects in the fields of Arts and Sports from across Europe that tackle the current issues of polarisation and violent extremisms;
- Resources of Amadeu Antonio Stiftung — works to strengthen democratic civic society, promotes alternative youth cultures and community networks to make social structures resilient against intolerance and racism, engages with hate and other forms of group-focused enmity online while promoting the development of a democratic digital civil society.

Annex II: Hate speech mapping research questions

1. What are the most important and relevant international standards (legal, policy, soft standards) in the area of hate speech?

2. What are the most important and relevant activities that are currently being undertaken across the EU in the area of hate speech (capacity-building, research, monitoring, policy/advocacy)?

3. Who are and who should be the key target learning groups/ individuals/ organisations for these activities?

4. What knowledge and skills do key target groups lack and what do they need?

5. What are the most significant challenges?

6. What do we need to understand more about?

7. What should the role of the Facing Facts Network be in understanding and meeting the most significant challenges that have been identified?