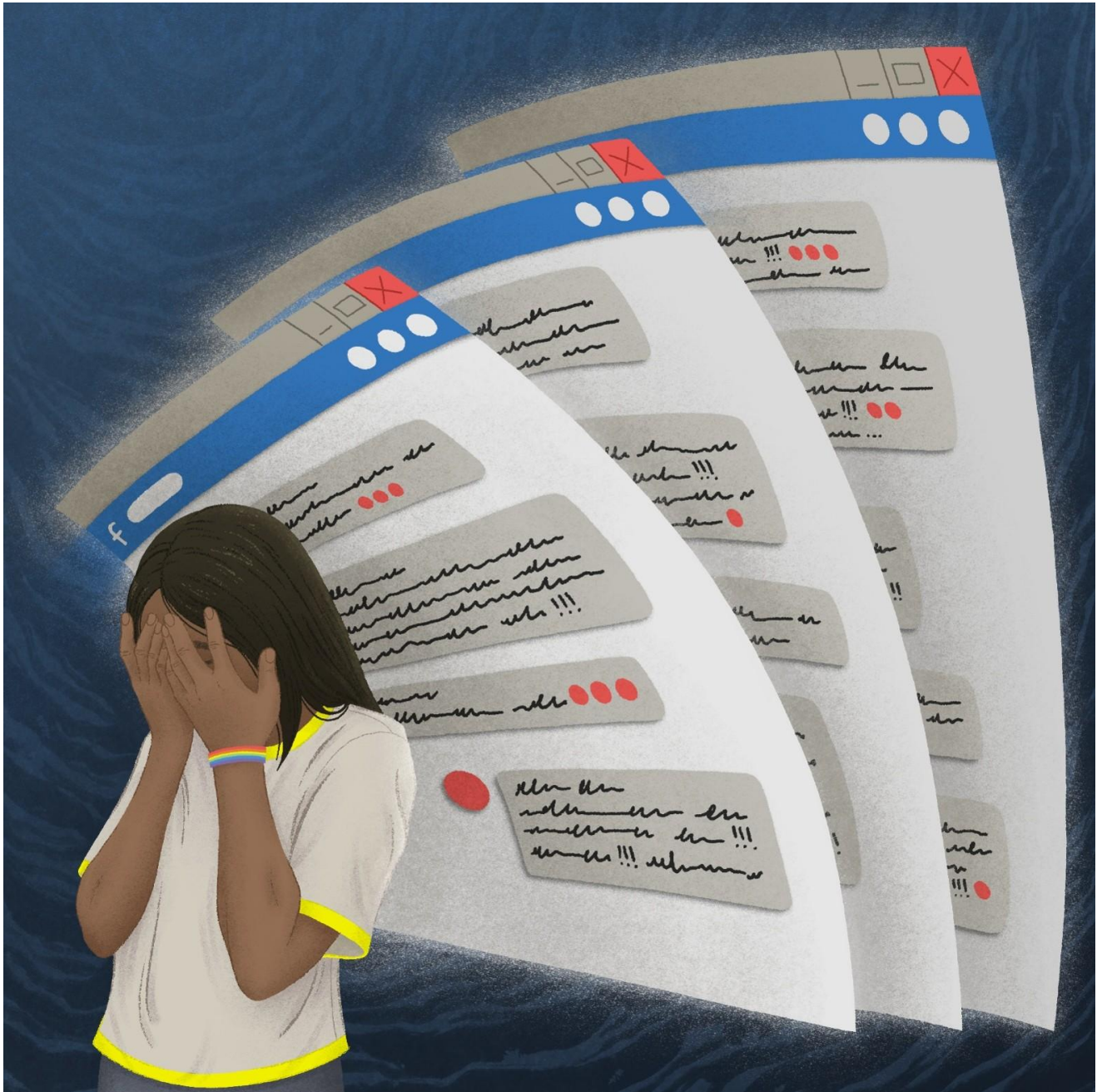




## **‘IT ERODES MY SOUL’**

META’S CONTRIBUTION TO ANTI-LGBTI DISCOURSE IN HUNGARY

**AMNESTY**  
INTERNATIONAL



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# 1. EXECUTIVE SUMMARY

**“Facebook is just another piece in the pile of my anxiety, it just puts more on it... to them [Meta], users are not people, they are just numbers”.<sup>1</sup>**

## CONTENT WARNING

**The following section contains examples of harmful online content directed at LGBTI people, including calls for violence, dehumanizing language, and severe hostility based on sexual orientation and gender identity. These examples are included as evidence relevant to the findings of this briefing. Readers may find the material distressing.**

This briefing examines the human rights impacts of Meta’s operations in Hungary and the experiences of lesbian, gay, bisexual, transgender and intersex (LGBTI) people on Facebook based on research conducted between January 2025 and May 2026. It assesses Meta’s conduct against international business and human rights standards and the company’s obligations under the European Union’s Digital Services Act (DSA).

The research was conducted against the backdrop of a worsening environment for the rights of LGBTI people in Hungary. For more than a decade, Hungarian authorities introduced discriminatory laws and policies while government and government-aligned actors increasingly portrayed LGBTI people as a threat to children, families and Hungarian values. These trends intensified in 2025 and 2026 through the adoption of legislation restricting LGBTI-related assemblies including Pride, constitutional amendments denying recognition to transgender, non-binary and intersex people, and heightened anti-LGBTI rhetoric during the 2026 parliamentary elections.

Facebook occupies a uniquely influential position within Hungary’s information environment, reaching over half of the population. Amnesty International’s research found that many LGBTI people feel unable to leave Facebook despite experiencing hostility and discrimination because of the platform’s importance for social, professional and civic participation.

In January 2025, Meta weakened key safeguards protecting groups at heightened risk of discrimination, including LGBTI people, and substantially reduced proactive content moderation. The changes were introduced despite warnings from civil society organizations, researchers, and Meta’s own Oversight Board regarding the foreseeable risks for marginalized communities. Amnesty International was unable to identify evidence that Meta conducted or publicly disclosed a meaningful assessment of how these changes would affect LGBTI people in high-risk environments such as Hungary.

This research draws on interviews with LGBTI people in Hungary, interviews with subject-matter experts, social listening research, reports from civil society organizations and examples of content reported to Meta by Háttér Society, a Hungarian organization founded in 1995 to represent and support LGBTI people. Amnesty

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<sup>1</sup> In-person interview with Butterfly, 17 March 2026, conducted in Pécs, Hungary, in English. Notes on file with Amnesty International.

International found that harmful anti-LGBTI content remained visible on Facebook throughout the period examined. Examples reported to Meta included comments stating: “Beat them to death immediately”; “Throw them off the bridge”; “I would shoot this”, and “Death to the extreme genderfluid vermin”. According to Hátér Society, a number of these posts remained available after being reported.

Interviewees described repeated exposure to hostile and discriminatory content, feelings of anxiety, frustration and helplessness, and a growing tendency to self-censor, withdraw from public discussion or avoid participation online. These experiences raise concerns under the rights to freedom of expression and non-discrimination, by undermining LGBTI people’s ability to participate in public and civic life on an equal basis with others. Interview evidence and external research further suggest that engagement-driven recommendation systems may contribute to repeated exposure to harmful and divisive content.

**“I feel very sad after seeing all the abuse [on Facebook]. I feel helpless. This impacts my work and my everyday life. It is very hard to bear with this abuse and we [trans people] don’t get any help; we have to fight by ourselves. You have to armour yourself... I can handle it but it is very hard for my soul. It erodes my soul and I have to rest after these fights. I keep far from Facebook for a week to calm down and when I’m ready then I can take on the next fight”**

Zsófia<sup>2</sup>

Amnesty International concludes that Meta contributed to adverse human rights impacts experienced by LGBTI people in Hungary through policy decisions, failures of due diligence, shortcomings in risk mitigation and failures to effectively address harmful content. The briefing further finds that Meta has failed to publicly demonstrate compliance with key obligations under Articles 34 and 35 of the DSA, relating to systemic risk assessment and mitigation.

Amnesty International calls on Meta to conduct enhanced human rights due diligence, reassess the impact of its January 2025 policy changes globally, strengthen content moderation and enforcement, improve transparency and provide effective remedies. The briefing also calls on the European Commission to robustly enforce the DSA and to investigate Meta’s compliance with its obligations under the regulation.

The political transition following Hungary’s 2026 election provides an important opportunity to strengthen protection for LGBTI people online. The new government should robustly enforce the DSA and ensure that Hungary’s Digital Services Coordinator (DSC) is independent and adequately resourced. By doing so, it can help address the discrimination and hostility documented in this briefing and strengthen the protection of the human rights of LGBTI people in Hungary.

Amnesty International wrote to Meta on 28 July 2026 putting forward these conclusions. On 11 August 2026, Meta replied stating that, given the scope and detail of the findings presented, it could not share a response within the stipulated timeline.

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<sup>2</sup> In-person interview with Zsófia, 17 March 2026, conducted in Pécs, Hungary, in Hungarian and English through the assistance of a translator. Notes on file with Amnesty International.

# 2. METHODOLOGY

This briefing is based on research conducted by Amnesty International between January 2025 and May 2026. It examines the human rights impacts of Meta's operations in Hungary through analysis of company documentation – including Meta's Corporate Human Rights Policy, Human Rights Reports, DSA risk assessments, and transparency reporting – as well as reports by civil society organizations, national and international media and other publicly available sources. For clarity, this briefing refers to Meta Platforms Inc. as "Meta", and its social media platform Facebook as "Facebook".

The research combined participatory methods with interviews. In January 2025, Amnesty International held an in-person workshop with 14 participants who identified as LGBTI. In March 2026, Amnesty International conducted in-person interviews with 14 LGBTI people in Hungary. Ten interviews were conducted in English, with Hungarian interpretation where needed, and four were conducted in Hungarian with the support of an interpreter. Amnesty International also conducted seven interviews, online and in person, with subject matter experts, including digital rights specialists and experts on the rights of LGBTI people in Hungary.

All interviewees provided informed consent prior to participation. Consistent with Amnesty International's research practices and interviewees' preferences, some identifying details have been withheld, including through the use of pseudonyms. Amnesty International did not provide any incentives in exchange for participation in this research.

Amnesty International Hungary's Rainbow Project conducted a social listening exercise of public discourse on LGBTI issues in Hungary,<sup>3</sup> across blogs, websites, Reddit, Twitter (X), Instagram and Facebook, from April 2023 to April 2024. This research used Brandwatch, a social listening and media monitoring platform that aggregates and analyses online content, including news sites, blogs, and social media, to analyse broader discourse – capturing more than 380,000 mentions from approximately 29,000 unique authors – and CrowdTangle, a content discovery and analytics tool that tracked public posts and engagement data on Facebook and Instagram, to analyse public posts and engagement specifically on those two platforms, covering 13,685 Facebook posts (1.7 million interactions) and 1,030 Instagram posts (537,051 interactions). Data was coded thematically and analysed for sentiment to identify dominant narratives, key themes, and levels of hostility across platforms.

On 3 March 2026, Amnesty International wrote to Meta, posing questions regarding the company's actions in relation to its business activities in Hungary and in relation to Meta's January 2025 policy changes. On 16 March 2026, Meta replied that, before introducing the January 2025 changes, it identified and assessed the potential risks associated with the changes. Meta also stated that it confirmed through the assessment that it employed reasonable, proportionate and effective mitigations to address the potential risks associated with the changes.

Amnesty International further wrote to Meta on 28 July putting forward the conclusions contained in this briefing. On 11 August, Meta replied stating that, given the scope and detail of the findings presented, it could not share a response within the stipulated timeline but expressed willingness to discuss Amnesty International's concerns. It offered for Amnesty to share any specific URLs of on-platform content, including the examples cited in this briefing, so it could review and take appropriate action and confirmed it has shared the findings with relevant internal stakeholders. It also stated that it remains committed to respecting human rights as set out in the UN Guiding Principles on Business and Human Rights.

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<sup>3</sup> Amnesty International Hungary, *Rainbow Project: Social Listening Report, April 2023 – April 2024*. On file with Amnesty International. For further detail on the social listening research methodology, see Appendix 2.

# 3. BACKGROUND

## 3.1 ESCALATING RESTRICTIONS ON THE RIGHTS OF LGBTI PEOPLE IN HUNGARY

After coming to power in 2010, Viktor Orbán and the governing Fidesz party increasingly targeted LGBTI people through political rhetoric, legislative measures and constitutional reforms framed around the protection of “traditional family values” and “child protection”. Human rights organizations, European institutions and UN bodies have repeatedly raised concerns that these measures have stigmatized LGBTI people and contributed to a hostile environment for those advocating for equality.<sup>4</sup>

Over the past decade, Hungary has adopted a series of measures restricting the rights of LGBTI people. In 2020, parliament banned legal gender recognition<sup>5</sup> and amended the Fundamental Law to state that “the mother is a woman, the father is a man”, effectively barring same-sex couples from marriage and joint adoption, and excluding transgender people from legal recognition of their gender within family law.<sup>6</sup> In 2021, Hungary adopted Act LXXIX of 2021, commonly referred to as the “Propaganda Law”,<sup>7</sup> which restricts content depicting homosexuality or gender diversity for people under the age of 18 and has been widely criticized for linking LGBTI identities to child protection concerns.<sup>8</sup> In April 2026 the Court of Justice of the European Union found that Hungary had breached EU law, including provisions protecting freedom of expression and human dignity, and against discrimination, and that its government policies stigmatized and marginalized LGBTI people.<sup>9</sup>

Restrictions further intensified in 2025, when the Hungarian parliament adopted legislation widely known as the “Anti-Pride Law”,<sup>10</sup> and made constitutional amendments recognizing only two sexes, based on sex assigned at birth,<sup>11</sup> effectively denying constitutional recognition of transgender, non-binary and intersex

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<sup>4</sup> Amnesty International, “Hungary: Propaganda Law has ‘created cloud of fear’ pushing LGBTI+ community into the shadows”, 27 February 2024, <https://www.amnesty.org/en/latest/news/2024/02/hungarypropaganda-law-has-created-cloud-of-fear-pushing-lgbti-community-into-the-shadows/>

LGBTIQ+ Intergroup, “Hungary’s constitutional amendments crystallise state-sponsored LGBTI-phobia and the ongoing attacks on LGBTI Hungarians”, 15 December 2020, <https://lgbti-ep.eu/2020/12/15/press-release-hungarys-constitutional-amendments-crystallise-state-sponsored-lgbti-phobia-and-the-ongoing-attacks-on-lgbti-hungarians/>

See also: Civil Rights Defenders, “Orbán: The art of eroding a democracy”, <https://crd.org/vorban/> (accessed 3 July 2026).

<sup>5</sup> Amnesty International, “Tell Hungary that trans rights are human rights”, 28 May 2020,

<https://www.amnesty.org/en/latest/campaigns/2020/05/hungary-drop33/>

<sup>6</sup> According to the explanatory memorandum, the amendment established: “sex at birth is a given or a factor that cannot be changed: it is a biological principle. Human dignity thus includes the right of every child to self-identity according to their sex at birth, part of which is to be protected against mental or biological interference affecting their physical and mental integrity”. The Fundamental Law of Hungary, Article L(1), English translation of the consolidated version as in force on 23 December 2020, Ministry of Justice, 2021, available on the Hungarian Parliament website at: <https://www.parlament.hu/documents/125505/138409/Fundamental+law/>

See also: Amnesty International, *Hungary: From Freedom to Censorship: The Consequences of the Hungarian Propaganda Law* (Index: EUR 27/7754/2024), 27 February 2024, <https://www.amnesty.org/en/documents/eur27/7754/2024/en/> p. 14.

<sup>7</sup> Hungary, 2021. évi LXXIX. Törvény [Act LXXIX of 2021 amending child protection and related legislation], 2021, <https://njt.jog.gov.hu/jogszabaly/2021-79-00-00.0#NR> (in Hungarian).

<sup>8</sup> Amnesty International, “Hungary: From Freedom to Censorship” (previously cited).

<sup>9</sup> Court of Justice of the European Union, C-769/22, *Commission v. Hungary*, [eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:62022CJ0769](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:62022CJ0769)

See also: ILGA Europe, “Infringement ruling tests whether Magyar will Put pro-EU commitments into practice”, 21 April 2026, <https://www.ilga-europe.org/press-release/infringement-ruling-tests-whether-magyar-will-put-pro-eu-commitments-into-practice/>

<sup>10</sup> European Parliament, *Hungary’s Pride Ban*, June 2025,

[https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/775839/EPRS\\_BRI\(2025\)775839\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/775839/EPRS_BRI(2025)775839_EN.pdf)

<sup>11</sup> Hungary, *Magyarország Alaptörvényének tizenötödik módosítása* [Fifteenth Amendment to Hungary’s Fundamental Law (Constitution)], 14 April 2025, <https://njt.jog.gov.hu/jogszabaly/2025-15-04-00.0#PB1> (in Hungarian).

people, reinforcing the 2020 ban on legal gender recognition.<sup>12</sup> Together, these amendments further entrenched the government's approach to the rights of LGBTI people and prompted criticism from international and regional human rights bodies, which warned that Hungary's legal framework was undermining the rights to equality, freedom of expression and freedom of peaceful assembly.<sup>13</sup>

According to the European Union Agency for Fundamental Rights' "EU LGBTIQ Survey III", carried out in 2023, 63% of respondents in Hungary reported that violence against LGBTI people had increased in recent years, while many reported feeling unsafe expressing affection in public.<sup>14</sup>

## 3.2 THE PRIDE BAN AND THE 2026 ELECTION

The April 2026 parliamentary elections<sup>15</sup> took place against the backdrop of an increasingly polarized political environment and an unprecedented challenge to Fidesz from the opposition Tisza party.<sup>16</sup> In the years preceding the elections, researchers and civil society organizations documented extensive disinformation campaigns, the growing use of AI-generated content,<sup>17</sup> and the expansion of coordinated online influence networks linked to pro-government actors.<sup>18</sup>

During this period, anti-LGBTI narratives continued to feature prominently in government messaging. Public discourse frequently portrayed the rights of LGBTI people as a threat to children, families and Hungarian values, reinforcing themes that had underpinned earlier legislative measures.<sup>19</sup> Amnesty International's social media listening research found that discussions concerning LGBTI people were characterized by fearmongering, misinformation and derogatory rhetoric, with Facebook serving as a central forum for these debates.<sup>20</sup> Government and government-linked actors were among those amplifying these narratives online.

Researchers monitoring Hungary's information environment also documented the growing use of organized online influence networks, coordinated amplification strategies and political advertising campaigns by government-aligned actors during the period preceding the 2026 elections.<sup>21</sup> These developments are

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<sup>12</sup> Hungary, *Magyarország Alaptörvényének tizenötödik módosítása* [Fifteenth Amendment to Hungary's Fundamental Law (Constitution)], (previously cited). See also: Hátér Society, "Hungarian Constitutional Court goes against its own previous position: Legal gender recognition remains impossible", 3 February 2023, <https://en.hatter.hu/news/hungarian-constitutional-court-goes-against-its-own-previous-position-legal-gender-recognition>

<sup>13</sup> Office of the UN High Commissioner for Human Rights (OHCHR), "Concern at Hungary's new anti-LGBTIQ+ law", 21 March 2025, <https://www.ohchr.org/en/press-releases/2025/03/concern-hungarys-new-anti-lgbtqi-law>  
Council of Europe (CoE), "Commissioner calls on Hungary to uphold the human rights of LGBTI people and reverse clampdowns on civic space", 27 June 2025, <https://www.coe.int/en/web/commissioner/-/commissioner-calls-on-hungary-to-uphold-the-human-rights-of-lgbti-people-and-reverse-clampdowns-on-civic-space>

Venice Commission of the Council of Europe, Opinion on the compatibility with international human rights standards of the Fifteenth Amendment to the Fundamental Law of Hungary, CDL-AD(2025)043-e, 13 October 2025, <https://www.coe.int/en/web/venice-commission/-/cdl-ad-2025-043-e>

See also: Civicus Lens, "Hungary's latest assault on LGBTIQ+ rights: Proposed law adds to the pressure on a community vilified for political advantage", 2 July 2023, <https://lens.civicus.org/hungarys-latest-assault-on-lgbtqi-rights/>

<sup>14</sup> European Union Agency for Fundamental Rights, "EU LGBTIQ survey III LGBTIQ equality at a crossroads: Country data – Hungary", May 2024, [https://fra.europa.eu/sites/default/files/fra\\_uploads/lgbtiq-survey-2024-country-sheet-hungary.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/lgbtiq-survey-2024-country-sheet-hungary.pdf)

European Union Agency for Fundamental Rights, "EU LGBTIQ survey III LGBTIQ equality at a crossroads, progress and challenges", 2024, [https://fra.europa.eu/sites/default/files/fra\\_uploads/fra-2024-lgbtiq-equality\\_en.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/fra-2024-lgbtiq-equality_en.pdf)

<sup>15</sup> National Election Office of Hungary, "Voting has concluded in the general parliamentary elections", 12 April 2026, <https://www.valasztas.hu/en/sajtokozlemenye?id=69dbe2a2182149000258c869%230001&p=true>

<sup>16</sup> Central European Media Observatory, "Normalized digital warfare in Hungary was running rampant as the country approached election day", 14 April 2026, <https://cedmohub.eu/normalized-digital-warfare-in-hungary-running-rampant-as-the-country-approached-election-day/>

András Biró-nagy, Foundation for European Progressive Studies, "Hungary: Fidesz wins amid the rise of new opposition challenger", 13 June 2024, <https://feps-europe.eu/hungary-fidesz-wins-amid-the-rise-of-new-opposition-challenger/>

<sup>17</sup> Central European Media Observatory, "Normalized digital warfare in Hungary was running rampant as the country approached election day" (previously cited); Hungarian Helsinki Committee, "Threat assessment of the 2026 Hungarian parliamentary elections", December 2025, [https://helsinki.hu/en/wp-content/uploads/sites/2/2025/12/2026\\_HU\\_Elections\\_Threat\\_Assessment\\_final\\_15122025.pdf?](https://helsinki.hu/en/wp-content/uploads/sites/2/2025/12/2026_HU_Elections_Threat_Assessment_final_15122025.pdf?)

<sup>18</sup> European Media Observatory, "Normalized digital warfare in Hungary was running rampant as the country approached election day" (previously cited); Hungarian Helsinki Committee, "Threat assessment of the 2026 Hungarian parliamentary elections" (previously cited).

See also: Telex, "'The situation is tense' – How Orbán has tried to overcome Fidesz' internal crisis", 3 November 2025, <https://telex.hu/direkt36/2025/11/03/the-situation-is-tense-how-orban-has-tried-to-overcome-fidesz-internal-crisis?utm>  
EuroNews, "'Fabricating proof': The disinformation tactics that shaped Hungary's election", 13 April 2026, <https://www.euronews.com/next/2026/04/13/fabricating-proof-the-disinformation-tactics-that-shaped-hungarys-election>

<sup>19</sup> Amnesty International, "Hungary: From Freedom to Censorship" (previously cited); Amnesty International, "Hungary: Propaganda Law has 'created cloud of fear' pushing LGBTI+ community into the shadows" (previously cited).

<sup>20</sup> Amnesty International Hungary, *Rainbow Project: Social Listening Report, April 2023 – April 2024* (previously cited).

<sup>21</sup> Central European Media Observatory, "Normalized digital warfare in Hungary was running rampant as the country approached election day" (previously cited); Hungarian Helsinki Committee, "Threat assessment of the 2026 Hungarian parliamentary elections" (previously cited). See also: EuroNews, "'Fabricating proof': The disinformation tactics that shaped Hungary's election" (previously cited); Telex, "'The situation is tense' – How Orbán has tried to overcome Fidesz' internal crisis", (previously cited); European Consortium for Political Research, "How Hungary reframed LGBTQ Pride as a national security issue", The Loop, <https://theloop.ecpr.eu/how-hungary-reframed-lgbtq-pride-as-a-national-security-issue/> (accessed 18 August 2026); Political Capital, "Pro-government political advertisements are in record heights in

relevant because they heightened the likelihood that anti-LGBTI narratives would reach large audiences online and therefore increased the importance of robust risk assessment and mitigation measures by online platforms operating in the country.

The risks associated with such narratives were particularly significant in the context of the 2026 elections, when political actors increasingly used Facebook to communicate with voters,<sup>22</sup> and public discussion surrounding Pride-related restrictions intensified.<sup>23</sup>

The implementation of the 2025 Anti-Pride Law became a focal point of these tensions. Citing child protection concerns, the law was used to restrict LGBTI-related assemblies, including Pride,<sup>24</sup> and enabled the use of facial recognition technology against participants.<sup>25</sup> The measures attracted widespread criticism from international human rights bodies and European institutions, which warned that they further marginalized LGBTI people and undermined democratic freedoms.<sup>26</sup>

### 3.3 FACEBOOK'S ROLE IN HUNGARY'S POLITICAL AND INFORMATION LANDSCAPE

Facebook is the leading social media platform in Hungary.<sup>27</sup> According to available data, at the end of 2025 there were 9.05 million internet users in Hungary, of whom 6.84 million used social media user identities.<sup>28</sup> Facebook alone accounted for 5.55 million users in the country,<sup>29</sup> representing approximately 57.7% of Hungary's entire population.<sup>30</sup> Studies have shown Facebook plays a central social role in daily life in Hungary, with users relying on it to stay in touch with friends and family, follow news, and engage with local communities and interest groups.<sup>31</sup> Amnesty International conducted in-person interviews with LGBTI people in Hungary from 17-20 March 2026. Most participants said that, although they would prefer to avoid Facebook, they feel unable to do so because of its widespread popularity, especially among older generations, making it an essential platform for staying in touch with relatives and friends, and for work.<sup>32</sup>

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Hungary, promoting hostile narratives against the West", 25 April 2024, [https://politicalcapital.hu/news.php?article\\_read=1&article\\_id=3364#:~:text=In%20addition%2C%20domestic%20opponents%20of,in%20the%20EU%20and%20NATO](https://politicalcapital.hu/news.php?article_read=1&article_id=3364#:~:text=In%20addition%2C%20domestic%20opponents%20of,in%20the%20EU%20and%20NATO)

<sup>22</sup> European Consortium for Political Research, "How Hungary reframed LGBTQ Pride as a national security issue" (previously cited). See also: Political Capital, "Pro-government political advertisements are in record heights in Hungary, promoting hostile narratives against the West" (previously cited); EuroNews, "'Fabricating proof': The disinformation tactics that shaped Hungary's election" (previously cited).

<sup>23</sup> European Parliament, "Hungary's Pride Ban" (previously cited).

<sup>24</sup> European Parliament, "Hungary's Pride Ban" (previously cited).

<sup>25</sup> European Parliament, "Hungary's Pride Ban" (previously cited).

<sup>26</sup> OHCHR, "Concern at Hungary's new anti-LGBTIQ+ law", (previously cited); CoE, "Commissioner calls on Hungary to uphold the human rights of LGBTI people and reverse clampdowns on civic space" (previously cited). See also: Reuters, "Embassies urge Hungary to protect LGBT rights ahead of Pride march", 14 July 2023, <https://www.reuters.com/world/europe/embassies-urge-hungary-protect-lgbt-rights-ahead-pride-march-2023-07-14/>

<sup>27</sup> Media & Journalism Research Center, "Hooked on the feed: An analysis of how Facebook, TikTok, and X shape information consumption in Eastern Europe", 7 May 2025, [journalismresearch.org/2025/05/hooked-on-the-feed-an-analysis-of-how-facebook-tiktok-and-x-shape-information-consumption-in-eastern-europe/](https://journalismresearch.org/2025/05/hooked-on-the-feed-an-analysis-of-how-facebook-tiktok-and-x-shape-information-consumption-in-eastern-europe/)

<sup>28</sup> Simon Kemp, "Digital 2026: Hungary", 8 November 2025, DataReportal, <https://datareportal.com/reports/digital-2026-hungary>. DataReportal's figure for "social media identities" reflects the number of active social media accounts in Hungary, as reported by the platforms' own advertising tools. This is not a direct count of unique individuals, since one person may hold accounts on multiple platforms. DataReportal's methodology adjusts for some duplication, but the figure should be treated as an estimate of social media adoption rather than a precise count of individual users.

<sup>29</sup> Simon Kemp, "Digital 2026: Hungary" (previously cited).

<sup>30</sup> Simon Kemp, "Digital 2026: Hungary" (previously cited). The figure is drawn from Meta's advertising audience data, not a verified active-user count, so it should be read as an estimate of potential ad reach, rather than a confirmed measure of Facebook's active user number.

<sup>31</sup> Civis, "Social media reshapes news consumption in Eastern Europe, new study finds", 9 June 2025, <https://civis.eu/en/the-civis-newsroom/social-media-reshapes-news-consumption-in-eastern-europe-new-study-finds>

See also: Krisztina Burai and others, "Feel local, post local: An ethnographic investigation of a social media-based local public", 2024, *New Media & Society*, Volume 27, Issue 11, <https://doi.org/10.1177/14614448241262988>

<sup>32</sup> Amnesty International interviews with LGBTI actors in Hungary, March 2026. Notes on file with Amnesty International.

# 4. LEGAL FRAMEWORK

## 4.1 BUSINESS AND HUMAN RIGHTS STANDARDS

All companies have a responsibility to respect human rights, regardless of their size, sector or where they operate. This responsibility is enshrined in the UN Guiding Principles on Business and Human Rights (UN Guiding Principles),<sup>33</sup> which outline the minimum a company must do to comply with its human rights responsibilities. This includes the requirement that companies prevent, address and remedy any human rights abuses committed in connection with their business operations, goods or services.<sup>34</sup> This responsibility of companies is independent of states' human rights obligations and exists over and above compliance with national laws and regulations that may or may not be in line with international human rights law and standards.<sup>35</sup>

States also have an obligation to protect against human rights abuses by private actors, including through the regulation of companies and other economic actors, and to provide effective remedies when corporate actors within their territory or jurisdiction cause or contribute to human rights abuses.<sup>36</sup> The UN Guiding Principles explicitly reiterate that states have an obligation to protect people from human rights harms linked to corporate activities.<sup>37</sup>

The OECD Guidelines for Multinational Enterprises on Responsible Conduct (OECD Guidelines)<sup>38</sup> reinforce these responsibilities and require that companies conduct human rights due diligence across the lifecycle of technologies and services, including foreseeable harm arising from their use or misuse. The Guidelines also emphasize addressing risks at the design and development stage, wherever possible.<sup>39</sup>

The OECD Due Diligence Guidance for Responsible Business Conduct (Due Diligence Guidance) was created to provide practical support to businesses in implementing the OECD Guidelines. According to the Due Diligence Guidance, an enterprise “contributes” to an adverse impact if its activities, in combination with the activities of other entities, cause, facilitate or incentivize another entity to cause an adverse impact.<sup>40</sup> For a determination of “contribution” to be made, the enterprise’s contribution must be substantial, meaning it does not include minor or trivial contributions.<sup>41</sup>

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<sup>33</sup> United Nations Guiding Principles on Business and Human Rights: Implementing the UN “Protect, Respect and Remedy” Framework. [guidingprinciplesbusinesshr\\_en.pdf](https://www.unhcr.org/refugees/pdf/guidingprinciplesbusinesshr_en.pdf)

<sup>34</sup> UN Guiding Principles, Principles 13 and 22.

<sup>35</sup> UN Guiding Principles, Principle 11 including Commentary.

<sup>36</sup> UN Guiding Principles, Principle 1.

<sup>37</sup> UN Guiding Principles, Principle 1.

<sup>38</sup> Organization for Economic Co-Operation and Development (OECD), “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct”, 2023 edition, <https://doi.org/10.1787/81f92357-en>

<sup>39</sup> OECD Guidelines, p. 45, para. 103: “Paragraph 7 underscores the importance of enterprises to work with public authorities to help prevent and combat deceptive marketing practices more effectively. Co-operation is also called for to diminish or prevent risks to public health and safety and to the environment. This includes risks associated with the disposal of goods, as well as their consumption and use. This reflects recognition of the importance of considering and managing risks to the safety of products throughout their lifetime, in particular at the design, manufacture, distribution, use and disposal stages”.

<sup>40</sup> OECD, OECD Due Diligence Guidance for Responsible Business Conduct, 2018, <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>, p. 70.

<sup>41</sup> OECD, OECD Due Diligence Guidance for Responsible Business Conduct (previously cited), p. 70.

## 4.2 HUMAN RIGHTS DUE DILIGENCE AND REMEDY

The UN Guiding Principles outline that companies are expected to conduct ongoing and proactive human rights due diligence to identify, prevent, mitigate and account for adverse human rights impacts linked to their operations, products and services.<sup>42</sup> Due diligence should be conducted proactively and at an early stage to identify risk before harm occurs. Where a company identifies that its activities are causing or contributing to adverse impacts, it should take appropriate steps to prevent or cease those impacts.<sup>43</sup> Where prevention is not possible, companies should consider stopping activities that are causing or contributing to adverse impacts.<sup>44</sup>

Given how risks evolve over time, businesses should regularly assess the effectiveness of their mitigation measures<sup>45</sup> using both qualitative and quantitative indicators and drawing on the experience of both internal and external sources, including affected stakeholders.<sup>46</sup> This is particularly important in contexts where political shifts can rapidly change the nature and severity of online harm.

These responsibilities apply equally to automated systems and algorithmic technologies, including content moderation tools.<sup>47</sup> The Office of the High Commissioner for Human Rights (OHCHR) has emphasized that companies should assess and address human rights risks arising from business model-driven practices and design choices.<sup>48</sup>

Relevant standards and guidance further stress that content moderation systems should incorporate transparency, effective remedy, meaningful human oversight of automated decisions and safeguards for groups facing heightened risks of discrimination and abuse.<sup>49</sup>

Access to remedy is a key pillar of the corporate responsibility to respect human rights. The UN Guiding Principles stipulate that, where a company causes or contributes to adverse impacts, it should “provide for or cooperate in their remediation through legitimate processes”.<sup>50</sup> A company cannot fully meet its responsibility to respect human rights if it contributes to human rights abuses and fails to take meaningful steps to remedy them.<sup>51</sup>

## 4.3 BUSINESS AND THE RIGHTS OF LGBTI PEOPLE

Companies are expected to identify and address the human rights risks faced by LGBTI people across their operations. In 2017, OHCHR published standards of conduct for business aimed at combating discrimination against LGBTI people.<sup>52</sup> The standards emphasize that “where higher levels of human rights violations against LGBTI people have been documented, including in countries with discriminatory laws and

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<sup>42</sup> UN Guiding Principles, Principles 15 and 16.

<sup>43</sup> UN Guiding Principles, Commentary to Principle 19.

<sup>44</sup> OHCHR, “Frequently asked questions about the UN Guiding Principles on Business and Human Rights”, 2014, question 32

<https://www.ohchr.org/en/publications/special-issue-publications/frequently-asked-questions-about-guiding-principles>

OECD Due Diligence Guidance, 3.1: “Stop activities that are causing or contributing to adverse impacts on RBC issues, based on the enterprise’s assessment of its involvement with adverse impacts as per 2.3. Develop and implement plans that are fit-for-purpose to prevent and mitigate potential (future) adverse impacts” and Q33: “First and foremost, enterprises should cease any activities that are causing or contributing to actual adverse impacts.”

<sup>45</sup> UN Guiding Principles, Commentary to Principle 20.

<sup>46</sup> UN Guiding Principles, Commentary to Principle 20.

<sup>47</sup> OHCHR, *Addressing Business Model Related Human Rights Risks: A B-Tech Foundational Paper*, July 2020,

[https://www.ohchr.org/sites/default/files/Documents/Issues/Business/B-Tech/B\\_Tech\\_Foundational\\_Paper.pdf](https://www.ohchr.org/sites/default/files/Documents/Issues/Business/B-Tech/B_Tech_Foundational_Paper.pdf)

UN Human Rights Council, Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, David Kaye, 6 April 2018, UN Doc. A/HRC/38/35, <https://www.ohchr.org/en/documents/thematic-reports/ahrc3835-report-special-rapporteur-promotion-and-protection-right-freedom>

OHCHR, “The right to privacy in the digital age”, 15 September 2021, UN Doc. A/HRC/48/31.

<sup>48</sup> OHCHR, *Addressing Business Model Related Human Rights Risks: A B-Tech Foundational Paper* (previously cited).

<sup>49</sup> UN Human Rights Council, Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, David Kaye (previously cited); The Santa Clara Principles on Transparency and Accountability in Content Moderation, second edition, <https://santaclaraprinciples.org/>

UNESCO, Guidelines for the Governance of Digital Platforms: Safeguarding Freedom of Expression and Access to Information through a Multistakeholder Approach, 2023, <https://www.unesco.org/en/internet-trust/guidelines>

<sup>50</sup> UN Guiding Principles, Principle 22.

<sup>51</sup> OHCHR, “Frequently asked questions about the UN Guiding Principles on Business and Human Rights” (previously cited), question 35, p. 36.

<sup>52</sup> OHCHR, *Tackling Discrimination against Lesbian, Gay, Bi, Trans & Intersex People: Standards of Conduct for Business*, 2017, [https://www.unfe.org/sites/default/files/documents/UN-Standards-of-Conduct\\_0.pdf](https://www.unfe.org/sites/default/files/documents/UN-Standards-of-Conduct_0.pdf)

practices, companies will need to undertake more extensive due diligence to ensure they respect the rights of LGBTI people”.<sup>53</sup>

In a 2024 report, the UN Working Group on Business and Human Rights reiterated that states and businesses must increase their efforts to address the disproportionate adverse human rights impacts experienced by LGBTI people in the context of business activities.<sup>54</sup> The Working Group noted that social media platforms have frequently failed to adequately address abuses targeting LGBTI communities and highlighted shortcomings in automated content moderation systems and grievance mechanisms.<sup>55</sup> It emphasized the importance of meaningful consultation with LGBTI people to ensure that human rights due diligence and access to remedy effectively respond to the risks they face.<sup>56</sup>

## 4.4 THE RIGHT TO LIVE FREE FROM GENDER-BASED VIOLENCE

Gender-based violence (GBV) disproportionately affects women and girls but can also affect people because of their real and/or perceived sexual orientation, gender, gender identity and/or expression, or sex characteristics.<sup>57</sup> International human rights bodies recognize that GBV can occur online and through digital technologies.<sup>58</sup>

Discrimination based on sexual orientation, gender identity and/or expression, and sex characteristics (SOGIESC) can shape and exacerbate GBV, including technology-facilitated gender-based violence (TfGBV). Amnesty International understands TfGBV as any act of violence, or threat thereof, perpetrated by one or more individuals that is committed, assisted, aggravated and amplified in part or fully by the use of information and communication technologies or digital media, that disproportionately impacts women, girls and other people based on their real and/or perceived sexual orientation, gender identity and/or expression, causing physical, psychological, economic and sexual harm. GBV, including TfGBV, exists in a continuum between physical and digital spaces.<sup>59</sup>

Human rights bodies have recognized that violence and discrimination targeting LGBTI people, including homophobic and transphobic attacks, may constitute forms of GBV.<sup>60</sup> The Yogyakarta Principles Plus Ten affirm that LGBTI people are entitled to access and use digital technologies free from violence and discrimination.<sup>61</sup>

The right to live free from GBV is closely connected to other human rights, such as the rights to privacy and freedom of expression, peaceful assembly and association.<sup>62</sup> TfGBV can deter individuals from participating in online spaces, limit access to digital technologies, and have serious impacts on mental health and broader social, economic and political participation.<sup>63</sup>

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<sup>53</sup> OHCHR, Tackling Discrimination against Lesbian, Gay, Bi, Trans & Intersex People: Standards of Conduct for Business (previously cited), Standard 1.

<sup>54</sup> OHCHR, “UN Working Group calls for urgent efforts to address violations and abuses of the rights of LGBTI+ persons in business contexts”, 1 November 2024, <https://www.ohchr.org/en/press-releases/2024/11/un-working-group-calls-urgent-efforts-address-violations-and-abuses-rights>

<sup>55</sup> Working Group on the issue of human rights and transnational business enterprises, “Protecting and respecting the rights of lesbian, gay, bisexual, transgender and intersex persons in the context of business activities: fulfilling obligations and responsibilities under the UN Guiding Principles on Business and Human Rights”, 18 July 2024, UN Doc. A/79/178, para 71.

<sup>56</sup> OHCHR, “UN Working Group calls for urgent efforts to address violations and abuses of the rights of LGBTI+ persons in business contexts” (previously cited), p. 12.

<sup>57</sup> Amnesty International, *Human Rights Implications of Technology-Facilitated Gender-Based Violence: Submission to the Human Rights Council Advisory Committee* (Index: IOR 40/9284/2025), 24 April 2025, <https://www.amnesty.org/en/documents/ior40/9284/2025/en/>; Amnesty International, Yemen: “My Life Was Destroyed”: *Technology-Facilitated Gender-Based Violence in Yemen* (Index: MDE 31/7730/2024), 5 November 2024, <https://www.amnesty.org/en/wp-content/uploads/2024/11/MDE3177302024ENGLISH.pdf>

<sup>58</sup> Committee on the Elimination of Discrimination Against Women (CEDAW Committee), General Recommendation 35: Gender-Based Violence Against Women, Updating General Recommendation 19 (1992), 26 July 2017, UN Doc. CEDAW/C/GC/35, para. 20.

<sup>59</sup> Amnesty International, *Human Rights Implications of Technology-Facilitated Gender-Based Violence: Submission to the Human Rights Council Advisory Committee* (previously cited); Amnesty International, Yemen: “My Life Was Destroyed” (previously cited). See also: Amnesty International, “Everybody Here is Having Two Lives or Phones”: *The Devastating Impact of Criminalization on Digital Spaces for LGBTQ People in Uganda*, (Index: AFR 59/8571/2024), 23 October 2024, <https://www.amnesty.org/en/documents/afr59/8571/2024/en/>

<sup>60</sup> OHCHR, “Discriminatory laws and practices and acts of violence against individuals based on their sexual orientation and gender identity”, 17 November 2011, UN Doc. A/HRC/19/41, para. 20.

<sup>61</sup> The Yogyakarta Principles Plus Ten (YP+10), Principle 36, <https://yogyakartaprinciples.org/principles-en/yp10/>

<sup>62</sup> CEDAW Committee, General Recommendation 35 (previously cited), para. 15; Amnesty International, *Human Rights Implications of Technology-Facilitated Gender-Based Violence: Submission to the Human Rights Council Advisory Committee* (previously cited).

<sup>63</sup> Amnesty International, *Human Rights Implications of Technology-Facilitated Gender-Based Violence: Submission to the Human Rights Council Advisory Committee* (previously cited).

## 4.5 THE PROHIBITION OF ADVOCACY OF HATRED UNDER INTERNATIONAL HUMAN RIGHTS LAW

International human rights law requires states to prohibit advocacy of hatred that constitutes incitement to discrimination, hostility or violence, while also protecting the right to freedom of expression.<sup>64</sup> Although freedom of expression protects many forms of offensive, shocking or disturbing speech, restrictions may be imposed where they are provided by law and are necessary and proportionate to protect the rights of others.<sup>65</sup>

The right to equality and non-discrimination is a fundamental principle of human rights law.<sup>66</sup> Individuals whose rights are affected by discriminatory conduct must have access to effective remedies.<sup>67</sup>

The Rabat Plan of Action distinguishes between expression that constitutes advocacy of hatred amounting to incitement to discrimination, hostility or violence, which must be prohibited, and speech that does not meet the threshold but may nevertheless raise concerns regarding equality, dignity and non-discrimination.<sup>68</sup>

For the purposes of this briefing, the term “advocacy of hatred” refers to expression that constitutes incitement to discrimination, hostility or violence in accordance with Article 20 of the International Covenant on Civil and Political Rights (ICCPR). The briefing also examines harmful expression that may fall below this threshold but can still contribute to discrimination and other human rights harms experienced by LGBTI people in Hungary. Amnesty International does not seek to determine whether individual pieces of content on Facebook meet the legal threshold of incitement; rather, the briefing assesses Meta’s overall contribution to negative human rights impacts through its management of the platform.

## 4.6 OBLIGATIONS UNDER THE EU DIGITAL SERVICES ACT

The Digital Services Act (DSA) is the European Union’s regulatory framework for digital services and online platforms. The DSA establishes legally binding obligations aimed at increasing transparency, accountability and user protection online.<sup>69</sup>

Among other requirements, the DSA obliges social media companies to be transparent about their content moderation policies and practices, and to provide users with information about, and avenues to challenge, content moderation decisions.<sup>70</sup>

The DSA also requires platforms to identify, assess and mitigate systemic risks arising from their services, including through measures such as adapting platform design, content moderation processes and recommender systems.<sup>71</sup> These measures must be reasonable, proportionate, and implemented with due regard to fundamental rights.<sup>72</sup>

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<sup>64</sup> International Covenant on Civil and Political Right (ICCPR), Article 19 (Freedom of expression) and Article 20(2) (Prohibition of advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence); UN Human Rights Committee (HRC), General Comment 34: Article 19: freedoms of opinion and expression, 29 July 2011, UN Doc. CCPR/C/GC/34, paras 11, 21 and 50-52; UN Human Rights Council, Rabat Plan of Action, 11 January 2013, UN Doc. A/HRC/22/17/Ad.4, para. 20.

<sup>65</sup> HRC, General Comment 34 (previously cited), para. 11.

<sup>66</sup> HRC, General Comment 18: Non-discrimination, 1989, UN Doc. RI/GEN/1/Rev.9 Vol I, para. 1.

<sup>67</sup> See, Amnesty International and Access Now, *The Toronto Declaration: Protecting the Rights to Equality and Non-Discrimination in Machine Learning Systems* (Index: POL 30/8447/2018), 17 May 2018, <https://www.amnesty.org/es/documents/pol30/8447/2018/en/>

<sup>68</sup> UN Human Rights Council, Rabat Plan of Action (previously cited), para. 20.

<sup>69</sup> Digital Services Act, Chapter 3: Due Diligence Obligations for a Transparent and Safe Online Environment; Amnesty International, *What the EU’s Digital Services Act Means for Human Rights* (Index: POL 30/5830/2022), 7 July 2022, <https://www.amnesty.org/en/documents/pol30/5830/2022/en/>

<sup>70</sup> Digital Services Act, Article 34: Risk Assessment; European Commission, “Questions and answers on the Digital Services Act”, 23 February 2024, [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_20\\_2348](https://ec.europa.eu/commission/presscorner/detail/en/qanda_20_2348)

<sup>71</sup> Digital Services Act, Articles 34 and 35.

<sup>72</sup> Digital Services Act, Article 35.

Importantly, the DSA requires companies to engage relevant stakeholders as part of their risk assessment and mitigation processes, including by testing assumptions with groups most affected by identified risks.<sup>73</sup> Very Large Online Platforms (VLOPs)<sup>74</sup> must also undergo annual independent audits to assess compliance with their obligations.<sup>75</sup>

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<sup>73</sup> Digital Services Act, Recital 90.

<sup>74</sup> Under Article 33 of the Digital Services Act, online platforms which have a number of average monthly active recipients of the service in the European Union equal to or higher than 45 million, are designated as Very Large Online Platforms. Facebook was formally designated a VLOP by the European Commission in April 2023.

<sup>75</sup> Digital Services Act, Article 37.

# 5. META'S 2025 POLICY AND ENFORCEMENT CHANGES

## 5.1 THE JANUARY 2025 POLICY CHANGES

On 7 January 2025, shortly before US President Donald Trump's inauguration for a second term, Meta announced a series of changes to its content moderation policies and enforcement systems, including modifications to its Hateful Conduct Policy, a reduction in proactive content moderation, and changes to its approach to fact-checking and political content.<sup>76</sup>

Among other measures, Meta lifted certain restrictions on speech targeting protected groups and amended provisions relating to gender identity and sexual orientation contained in its Hateful Conduct Policy.<sup>77</sup> The revised policy permits allegations of "mental illness or abnormality" based on sexual orientation or gender identity in the context of political or religious discourse and allows certain forms of previously prohibited language directed at protected groups.<sup>78</sup> The company also removed language from its policies that had explicitly acknowledged that hateful speech can contribute to offline violence.<sup>79</sup>

These changes represented a significant shift from Meta's previous approach to content moderation and reduced certain protections previously afforded to groups that have historically faced discrimination, including LGBTI people.<sup>80</sup>

While Meta announced that the replacement of third-party fact-checking with Community Notes would begin in the United States of America (USA),<sup>81</sup> the changes to its Hateful Conduct Policy were reflected in Meta's global policy framework<sup>82</sup> and were reported by civil society organizations as having immediate worldwide implications for users of Meta's platforms, including Facebook.<sup>83</sup> Meta stated it would "allow more speech by

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<sup>76</sup> Meta, "More speech and fewer mistakes", 7 January 2025, <https://about.fb.com/news/2025/01/meta-more-speech-fewer-mistakes/>

<sup>77</sup> Meta, *Hateful Conduct Policy*, <https://transparency.meta.com/policies/community-standards/hateful-conduct/> (accessed 18 August 2026). See also: GLAAD, "GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program", 7 January 2025, <https://glaad.org/releases/meta-removes-anti-lgbtq-hate-speech-policies-ends-fact-checking/>

<sup>78</sup> Meta, *Hateful Conduct Policy* (previously cited).

<sup>79</sup> GLAAD, "GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program" (previously cited). See also: The Associated Press, "Meta rolls back hate speech rules as Zuckerberg cites 'recent elections' as a catalyst", 9 January 2025, <https://apnews.com/article/meta-facebook-hate-speech-trump-immigrant-transgender-41191638cd7c720b950c05f9395a2b49>

<sup>80</sup> GLAAD, "GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program" (previously cited). See also: Amnesty International, "Meta's new content policies risk fueling more mass violence and genocide", 17 February 2025, <https://www.amnesty.org/en/latest/news/2025/02/meta-new-policy-changes/>; Dia Kayyali, "Meta's content moderation changes are going to have a real world impact. It's not going to be good", 9 January 2025, Tech Policy Press, <https://www.techpolicy.press/metass-content-moderation-changes-are-going-to-have-a-real-world-impact-its-not-going-to-be-good/>

<sup>81</sup> Meta, "More speech and fewer mistakes" (previously cited).

<sup>82</sup> Meta, *Hateful Conduct Policy* (previously cited).

<sup>83</sup> See, The Associated Press, "Meta rolls back hate speech rules as Zuckerberg cites 'recent elections' as a catalyst" (previously cited); Dia Kayyali, "Meta's content moderation changes are going to have a real world impact. It's not going to be good" (previously cited).

lifting restrictions on some topics that are part of mainstream discourse and focusing our enforcement on illegal and high-severity violations” and that it would “take a more personalized approach to political content, so that people who want to see more of it in their feeds can.”<sup>84</sup> The announcement came at a time of broader political debate in the USA regarding content moderation, online speech, and the role of technology companies in regulating content on their platforms.<sup>85</sup>

Meta also announced that it would substantially reduce proactive enforcement, thereby increasing its reliance on user reporting mechanisms to identify potentially violating content.<sup>86</sup>

## 5.2 CONCERNS REGARDING HUMAN RIGHTS RISKS

The changes were met with concern from civil society organizations, researchers, and Meta’s own Oversight Board.<sup>87</sup>

In April 2025, Meta’s Oversight Board stated that the changes had been announced “hastily” and represented a departure from the company’s usual procedures. The Board further noted that Meta had provided no public information about whether it had conducted prior human rights due diligence before implementing the changes.<sup>88</sup> The Board subsequently urged Meta to assess the impact of the policy changes on groups facing heightened risks of discrimination, including LGBTI people, and to adopt measures to monitor and mitigate any resulting harms.<sup>89</sup>

Concerns were also raised by civil society actors and other experts regarding Meta’s decision to remove language acknowledging that hateful speech can contribute to offline violence.<sup>90</sup> While the practical effect of this change remains unclear, it removed explicit recognition within the company’s policies of the potential link between harmful online speech and offline harms,<sup>91</sup> and therefore the role that Meta’s platforms can play in enabling these offline harms.

The changes generated concerns regarding potential adverse impacts on groups already exposed to heightened risk of discrimination and abuse. International business and human rights standards require companies to assess actual and potential adverse human rights impacts before implementing significant policy changes, paying particular attention to the impacts on affected groups, and to adopt appropriate measures to prevent and mitigate identified risks.<sup>92</sup>

These concerns were particularly acute in Hungary, where anti-LGBTI rhetoric had become increasingly prominent in political discourse and where LGBTI people continued to face elevated risks of discrimination, exclusion and stigmatization.<sup>93</sup>

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<sup>84</sup> Meta, “More speech and fewer mistakes” (previously cited).

<sup>85</sup> See The Associated Press, “Meta rolls back hate speech rules as Zuckerberg cites ‘recent elections’ as a catalyst”, 9 January 2025, (previously cited); Dia Kayyali, “Meta’s content moderation changes are going to have a real world impact. It’s not going to be good” (previously cited).

<sup>86</sup> Meta, “More speech and fewer mistakes” (previously cited).

<sup>87</sup> Oversight Board, “Wide-ranging decisions protect speech and address harms”, 23 April 2025, <https://www.oversightboard.com/news/wide-ranging-decisions-protect-speech-and-address-harms/>

Oversight Board, “Multiple case decision: Gender identity debate videos”, 23 April 2025, <https://www.oversightboard.com/decision/bun-1ynnk264/>

GLAAD, “Make Meta safe: new report finds increase in harmful content targeting marginalized groups following policy rollbacks”, 16 June 2025, <https://glaad.org/make-meta-safe-new-report-finds-increase-in-harmful-content-targeting-marginalized-groups-following-policy-rollbacks/>

European Observatory of Online Hate, “How Meta’s new content moderation policies affect gender-based violence”, <https://eoooh.eu/articles/meta/online/gender/based/violence/content/moderation> (accessed 18 August 2026).

<sup>88</sup> Oversight Board, “Wide-ranging decisions protect speech and address harms” (previously cited).

<sup>89</sup> Oversight Board, “Wide-ranging decisions protect speech and address harms” (previously cited); Oversight Board, “Multiple case decision: Gender identity debate videos” (previously cited).

<sup>90</sup> GLAAD, “GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program” (previously cited). See also: The Associated Press, “Meta rolls back hate speech rules as Zuckerberg cites ‘recent elections’ as a catalyst” (previously cited).

<sup>91</sup> GLAAD, “GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program” (previously cited). See also: The Associated Press, “Meta rolls back hate speech rules as Zuckerberg cites ‘recent elections’ as a catalyst” (previously cited).

<sup>92</sup> UN Guiding Principles, Principles 17, 18, and 19 including Commentary; Digital Services Act, Articles 34 and 35.

<sup>93</sup> Amnesty International, “Hungary: From Freedom to Censorship” (previously cited); LGBTIQ+ Intergroup, “Hungary’s constitutional amendments crystallise state-sponsored LGBTI-phobia and the ongoing attacks on LGBTI Hungarians” (previously cited); European Union Agency for Fundamental Rights, “EU LGBTIQ survey III LGBTIQ equality at a crossroads, progress and challenges” (previously cited).

## 5.3 EVIDENCE OF HARM FOLLOWING THE POLICY CHANGES

In the months following the introduction of the changes, several organizations documented growing concerns regarding their impact on marginalized communities. Research conducted by the Center for Countering Digital Hate (CCDH) in February 2025 found evidence suggesting a substantial reduction in content enforcement in areas including hate speech following the policy changes.<sup>94</sup> While the research did not conclusively establish causation, it raised concerns that reductions in proactive moderation may be resulting in lower levels of enforcement of harmful content.<sup>95</sup>

Similarly, GLAAD's<sup>96</sup> 2025 Social Media Safety Index and its Make Meta Safe survey, based on responses from more than 7,000 users across 86 countries, found widespread concern among users regarding the increase of harmful content on Meta's platforms.<sup>97</sup> Among LGBTI respondents, 75% reported that harmful content had increased following the policy changes, while 77% of all respondents reported feeling less safe expressing themselves freely on Meta's platforms.<sup>98</sup> A total of 92% of respondents reported concerns that harmful content would continue to increase and that they felt less protected from exposure to or targeting by harmful content.<sup>99</sup>

Additional research by the European Observatory of Online Hate documented increased levels of harmful content and online abuse, including GBV, following the rollout of the changes.<sup>100</sup>

Together, these findings suggest that the risks associated with the January 2025 policy changes were not theoretical. They indicate growing concern among users, civil society organizations and independent experts that the reduction of safeguards and enforcement mechanisms might be contributing to increased exposure to harmful content, with risks being particularly significant for groups already facing heightened levels of discrimination and hostility.<sup>101</sup>

Dr. Joan Barata, an international expert in freedom of expression, media regulation and intermediary liability and member of the academic constituency of the Global Network Initiative,<sup>102</sup> described the interaction between restrictive national environments and reduced platform protections as:

**"[A] very bad combination. The outcome is of course a clear erosion of possibilities for the LGBTI community to disseminate certain types of content. Either because it might be illegal or because content that targets their rights might not be considered violating the terms of service of platforms. This combination of factors deteriorates the space for this community".<sup>103</sup>**

In April 2025, Meta's Oversight Board specifically recommended that Meta identify and assess how the January 2025 policy changes could adversely affect LGBTI people, especially in environments where those communities face elevated risks.<sup>104</sup> The Board further recommended that Meta regularly monitor those risks and publicly report on the effectiveness of mitigation measures adopted in response.<sup>105</sup> In a related recommendation arising from the same case, the Board also called on Meta to remove the term "transgenderism" from its Hateful Conduct policy, finding that the term frames transgender identity as an

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<sup>94</sup> Center for Countering Digital Hate, "More transparency and less spin. Analyzing Meta's sweeping policy changes and their impact on users", 24 February 2025, <https://counterhate.com/blog/metass-rollback-of-safety-measures-has-big-implications-for-social-media-users-in-the-uk/> p. 10.

<sup>95</sup> Center for Countering Digital Hate, "More transparency and less spin" (previously cited).

<sup>96</sup> GLAAD is a US-based LGBTQ media advocacy and monitoring organisation founded in 1985.

<sup>97</sup> GLAAD, "Make Meta safe: New report finds increase in harmful content targeting marginalized groups following policy rollbacks", (previously cited); GLAAD, Social Media Safety Index 2025, <https://assets.glaad.org/m/346d7b38bb818f6d/original/2025-Social-Media-Safety-Index.pdf>

<sup>98</sup> GLAAD, "Make Meta safe: New report finds increase in harmful content targeting marginalized groups following policy rollbacks" (previously cited), pp. 5 and 18.

<sup>99</sup> GLAAD, "Make Meta safe: New report finds increase in harmful content targeting marginalized groups following policy rollbacks" (previously cited), p. 5.

<sup>100</sup> European Observatory of Online Hate, "How Meta's new content moderation policies affect gender-based violence" (previously cited).

Key takeaways: "A rise in toxic language began in mid-December 2024, peaking during the holiday season, prior to the January 7th moderation policy change." And: "After Meta changed its new moderation policies in January 2025, average daily toxicity remained significantly elevated, stabilising at 30-40% higher than levels observed in November 2024."

<sup>101</sup> Oversight Board, "Wide-ranging decisions protect speech and address harms" (previously cited); GLAAD, "Make Meta safe: New report finds increase in harmful content targeting marginalized groups following policy rollbacks" (previously cited); European Observatory of Online Hate, "How Meta's new content moderation policies affect gender-based violence" (previously cited).

<sup>102</sup> The Global Network Initiative is a multistakeholder collaboration to protect freedom of expression and privacy in tech. See: <https://globalnetworkinitiative.org/> <https://globalnetworkinitiative.org/>

<sup>103</sup> Online expert interview with Joan Barata, 11 March 2026. Notes on file with Amnesty International.

<sup>104</sup> Oversight Board, "Multiple case decision: Gender identity debate videos" (previously cited).

<sup>105</sup> Oversight Board, "Multiple case decision: Gender identity debate videos" (previously cited).

ideological position rather than a protected characteristic, and that Meta's rules must be framed neutrally to be legitimate.<sup>106</sup>

More than a year after the Board issued these recommendations, Meta's public response indicates that neither has been implemented.<sup>107</sup> In its formal response of June 2025, Meta did not commit to implementing the recommendations, stating only that it would assess the feasibility of implementation.<sup>108</sup> As of March 2026, in Meta's most recent bi-annual report on the Oversight Board, the company's position on the recommendations remained unchanged: it continued to describe itself as "assessing [the] feasibility" of the proposed changes.<sup>109</sup>

Amnesty International was unable to identify any publicly available country-specific assessment by Meta of the impact of the January 2025 changes on LGBTI communities in high-risk contexts such as Hungary. Given the documented deterioration in the rights of LGBTI people in Hungary, Amnesty International expected Meta to be able to demonstrate how those country-specific risks were assessed and addressed.

Amnesty International wrote to Meta on 3 March 2026 asking what measures it had conducted before and after its 2025 policy changes to ensure human rights were protected, specifically asking for information about the risk findings and mitigation plans so any harm could be adequately prevented. In its response sent on 16 March 2026, Meta stated that it "identified and assessed the potential risks associated with the changes" and "confirmed through their assessment it employed reasonable, proportionate, and effective mitigations" to address them, but failed to provide any concrete details, instead referring only to its existing community guidelines.<sup>110</sup> As mentioned above, Meta did not provide a substantive response to these allegations in response to Amnesty International's 28 July 2026 letter.

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<sup>106</sup> Oversight Board, "Multiple case decision: Gender identity debate videos" (previously cited). "The Board observes that gender identity is a protected characteristic recognized under international human rights law, and this is reflected in Meta's listing of protected characteristics in the Hateful Conduct Policy. The Board is concerned that Meta has incorporated the term "transgenderism" into this policy. This term suggests that being transgender is a question of ideology, rather than an identity. For its rules to have legitimacy, Meta must seek to frame its content policies neutrally, in ways that respect human rights principles of equality and non-discrimination. This could be achieved, for example, by stating 'discourse about gender identity and sexual orientation' in place of 'discourse about transgenderism and homosexuality'".

<sup>107</sup> Meta, "Multiple case decision: Gender identity debate videos" (previously cited).

Meta, *Meta's Bi-Annual Report on the Oversight Board: Appendix (H2 2025)*, 19 March 2026, <https://transparency.meta.com/sr/meta-biannual-appendix-h2-2025>

<sup>108</sup> Meta, "Multiple case decision: Gender identity debate videos" (previously cited).

<sup>109</sup> Meta, *Meta's Bi-Annual Report on the Oversight Board, Appendix (H2 2025)* (previously cited).

<sup>110</sup> Meta's written response to Amnesty International, 16 March 2026. On file with Amnesty International.

# 6. HOW META CONTRIBUTED TO ADVERSE HUMAN RIGHTS IMPACTS EXPERIENCED BY LGBTI PEOPLE IN HUNGARY

## 6.1 FACEBOOK AS A VEHICLE FOR ANTI-LGBTI NARRATIVES

Facebook has a central position in Hungary's political and information environment. As the country's most widely used social media platform, it serves as an important space for people to access the news and political information and engage in public debate.<sup>111</sup> Amnesty International's interviews with LGBTI people in Hungary indicate that many continue to rely on Facebook, despite their concerns about the platform, because of its widespread use among friends, family members and professional networks.<sup>112</sup>

**"I try to stay off social media sometimes but, unfortunately, I can only communicate with some family members on Facebook, so I have to get back on it anyway, but I try to limit my use, I try to block people. I noticed when I started blocking transphobes, for a little moment the hate stopped but it eventually came back".<sup>113</sup>**

The prominence of Facebook is significant in the context of Hungary's increasingly hostile environment for LGBTI people, because it makes the platform a key venue through which harmful narratives can be widely disseminated. As described in the Background section, anti-LGBTI rhetoric has featured prominently in

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<sup>111</sup> Media & Journalism Research Center, "Hooked on the feed: An analysis of how Facebook, TikTok, and X shape information consumption in Eastern Europe" (previously cited). For an analysis of the implications of Big Tech's power concentration on human rights, see: Amnesty International, *Breaking Up with Big Tech: A Human Rights-Based Argument for Tackling Big Tech's Market Power* (Index: POL 30/0226/2025), 28 August 2025 <https://www.amnesty.org/en/documents/pol30/0226/2025/en/>. See also: SOMO, "The Big Tech lobby playbook: How Big Tech's power has rewritten digital rules globally", <https://www.somo.nl/big-tech-lobby-playbook/> (accessed 18 August 2026).

<sup>112</sup> Amnesty International, interviews with LGBTI actors in Hungary, March 2026. Notes on file with Amnesty International.

<sup>113</sup> In-person interview with Alex Prekop, 18 March 2026, conducted in Budapest, Hungary, in English.

political discourse in recent years and intensified around the 2026 parliamentary elections.<sup>114</sup> Given Facebook's role in Hungary's information environment, Meta should have reasonably anticipated that LGBTI users would be exposed to hostile narratives on the platform, and responded with adequate risk assessment and mitigation measures.

Amnesty International's social listening research, which monitored discourse on LGBTI issues across six online sources between April 2023 and April 2024, found that Facebook stood out among these as having a particularly negative environment, characterized by elevated levels of hostility, misinformation and fear-mongering directed against LGBTI people.<sup>115</sup>

Separately, in the period surrounding the adoption and enforcement of legislation restricting Pride-related assemblies and the subsequent ban of the 2025 Budapest Pride march, analysis published by The Loop – the blog of the European Consortium for Political Research – found that the share of Facebook posts by Hungarian government officials and ruling-party politicians linking Pride and the rights of LGBTI people to “security” threats and the protection of children nearly tripled – from 1.16% of posts before this period to 3.55% during it.<sup>116</sup>

Taken together, these two independent bodies of evidence – one documenting a hostile discourse environment related to LGBTI issues on Facebook in 2023 and 2024, the other documenting an escalation in security-threat framing by government-aligned accounts around the 2025 Pride ban – point to a sustained, and at points intensifying, pattern of anti-LGBTI narratives on Facebook, and Facebook's importance in the Hungarian context as a venue for LGBTI-related discourse.

## 6.2 PLATFORM DESIGN AND AMPLIFICATION RISKS

Meta's business model relies on systems that recommend and prioritize content based on predicted user engagement.<sup>117</sup> These systems influence what information users encounter and what content receives greater visibility on the platform.<sup>118</sup>

Research referenced in this briefing indicates platform recommendation systems often reward content that elicits strong emotional responses, including outrage, anger and fear, increasing its visibility and distribution.<sup>119</sup>

The design of engagement-based recommender systems may have contributed to users' repeated exposure to harmful anti-LGBTI content even where it was content they did not wish to be exposed to.

Interviewees repeatedly reported encountering anti-LGBTI content despite taking active steps to avoid it, including blocking accounts, reporting content, and indicating that they were not interested in similar content. Several interviewees described feeling unable to effectively control their feeds and reported repeated

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<sup>114</sup> Hungarian Helsinki Committee, “Threat assessment of the 2026 Hungarian parliamentary elections” (previously cited); European Consortium for Political Research, “How Hungary reframed LGBTQ Pride as a national security issue” (previously cited). See also: Political Capital, “Pro-government political advertisements are in record heights in Hungary, promoting hostile narratives against the West”, 25 April 2024, [https://politicalcapital.hu/news.php?article\\_read=1&article\\_id=3364#:~:text=In%20addition%2C%20domestic%20opponents%20of,in%20the%20EU%20and%20NATO](https://politicalcapital.hu/news.php?article_read=1&article_id=3364#:~:text=In%20addition%2C%20domestic%20opponents%20of,in%20the%20EU%20and%20NATO)

EuroNews, “Fabricating proof: The disinformation tactics that shaped Hungary's election” (previously cited).

<sup>115</sup> Amnesty International Hungary, *Rainbow Project: Social Listening Report, April 2023 – April 2024* (previously cited).

<sup>116</sup> European Consortium for Political Research, “How Hungary reframed LGBTQ Pride as a national security issue” (previously cited).

<sup>117</sup> Meta, *Meta Consumer Profiling Techniques: Digital Markets Act*, 6 March 2025, <https://transparency.meta.com/sr/meta-consumer-profiling-2025#:~:text=and%20additional%20policies%20-,Signals,%2C%20like%20posts%20or%20pages> p. 3. See also: SOMO, “The Big Tech lobby playbook: How Big Tech's power has rewritten digital rules globally” (previously cited); Amnesty International, *Surveillance Giants: How the Business Model of Google and Facebook Threatens Human Rights* (Index: POL 30/1404/2019), 21 November 2019, <https://www.amnesty.org/en/documents/pol30/1404/2019/en/>

<sup>118</sup> Katarzyna Szymielewicz, Panoptykon, “Reclaiming the algorithm: What the DSA can—and can't—fix about recommender systems”, 15 February 2026, DSA Observatory, <https://dsa-observatory.eu/2026/02/15/reclaiming-the-algorithm-what-the-dsa-can-and-cant-fix-about-recommender-systems/>

Kevin Roose, “The making of a YouTube radical”, The New York Times, 8 June 2019, <https://www.nytimes.com/interactive/2019/06/08/technology/youtube-radical.html>

<sup>119</sup> Katarzyna Szymielewicz, “Reclaiming the Algorithm” (previously cited); Kevin Roose, “The making of a YouTube radical” (previously cited); Media & Journalism Research Center, “Hooked on the feed: An analysis of how Facebook, TikTok, and X shape information consumption in Eastern Europe” (previously cited); Hija Kamran, “How algorithmic design of tech platforms normalizes gendered violence”, 23 February 2026, Center for the Study of Organized Hate, <https://www.csohate.org/2026/02/23/algorithmic-design-gendered-violence/>; Amnesty International, *Surveillance Giants* (previously cited); Amnesty International, *The Social Atrocity: Meta and the Right to Remedy for the Rohingya* (Index: ASA 16/5933/2022), 29 September 2022, <https://www.amnesty.org/en/documents/asa16/5933/2022/en/>; Amnesty International, “A Death Sentence for My Father”: *Meta's Contribution to Human Rights Abuses in Northern Ethiopia* (Index: AFR 25/7292/2023), 31 October 2023, <https://www.amnesty.org/en/documents/afr25/7292/2023/en/>

exposure to content they found hostile, distressing or harmful. Ádám Kanicsár, an LGBTI activist, journalist and writer, told Amnesty International:

**“Now my feed is really unhealthy. It is not just one or two videos: it’s a series of videos. Now I only can see that. There is rarely any content from friends.”<sup>120</sup>**

Although these testimonial accounts do not establish how Facebook’s ranking systems operated in any individual case, they are consistent with broader platform research indicating that engagement-optimized systems can repeatedly resurface content because of prior interaction with that content, including where that engagement has been negative or hostile.<sup>121</sup> This is particularly relevant and problematic where users interact with content because they are distressed by it, rather than because they endorse it. In those circumstances, systems that treat interaction as a signal that the content is relevant may risk increasing exposure to precisely the type of content users are trying to avoid.<sup>122</sup>

Wolfram Shypaws, a bisexual cis-man, told Amnesty International:

**“I do see a lot of these government news sites and they are hateful news. Even though I don’t follow them. I’m not interested in them at all, but I still see them. I otherwise miss content from my friends and the groups I follow. And what I see is hateful. If I click on it, it doesn’t mean that I like it, it could mean that I am horrified.”<sup>123</sup>**

Other interviewees noted that interaction motivated by anger or concern appeared to result in similar content being shown repeatedly, irrespective of whether their interaction reflected interests or disagreement.<sup>124</sup>

Internal Meta documents cited by independent researchers have also raised concerns regarding engagement-optimized systems. According to documents discussed by the Knight-Georgetown Institute, Meta itself identified that engagement optimization can exacerbate integrity and safety risks.<sup>125</sup> One internal Meta document cited by the Knight-Georgetown Institute stated that, even where anger may indicate that a user “doesn’t like” a piece of content, Meta nevertheless counted the anger reaction as “4x more important” than a ‘like’ for the purpose of showing the user more similar content.<sup>126</sup>

Taken together, these findings raise concerns that Facebook’s design may have increased LGBTI users’ exposure to harmful anti-LGBTI content in Hungary. Amnesty International cannot determine the precise role played by Facebook’s recommender systems in relation to specific posts or accounts. However, interview evidence and external research suggest that engagement-driven systems may contribute to repeated exposure to harmful and divisive content, even when users express negative reactions to that content.

## 6.3 HUMAN RIGHTS IMPACTS ON LGBTI PEOPLE IN HUNGARY

The LGBTI people interviewed by Amnesty International described a range of adverse impacts associated with their experiences on Facebook. While experiences differed, a recurring theme was the sustained exposure to hostile narratives targeting LGBTI communities and the resulting impact on their sense of safety, well-being and participation in public life.<sup>127</sup>

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<sup>120</sup> In-person interview with Ádám Kanicsár, 18 March 2026, conducted in Budapest, Hungary, in English. Notes on file with Amnesty International.

<sup>121</sup> See Smitha Milli and others, “Engagement, user satisfaction, and the amplification of divisive content on social media”, March 2025, PNAS Nexus, Volume 4, Issue 3, <https://doi.org/10.1093/pnasnexus/pgaf062>. See also: Amnesty International, *Driven Into the Darkness: How TikTok’s ‘For You’ Feed Encourages Self Harm and Suicidal Ideation* (Index: POL 40/7350/2023), 7 November 2023, <https://www.amnesty.org/en/documents/pol40/7350/2023/en/>.

<sup>122</sup> Smitha Milli and others, “Engagement, user satisfaction, and the amplification of divisive content on social media” (previously cited).

<sup>123</sup> In-person interview with Wolfram Shypaws, 19 March 2026, conducted in Budapest, Hungary, in English. Notes on file with Amnesty International.

<sup>124</sup> Amnesty International interviews with LGBTI actors in Hungary, March 2026. Notes on file with Amnesty International. See also: Katarzyna Szymielewicz, “Reclaiming the algorithm” (previously cited); Kevin Roose, “The making of a YouTube radical” (previously cited).

<sup>125</sup> “One internal Meta document referenced by plaintiffs notes that engagement-optimization ‘very frequently creates/exacerbates integrity problems’.” See, Peter Chapman and Matt Steinberg, *Measuring Risk: What EU Risk Assessments and US Litigation Reveal About Meta and TikTok*, February 2026, Knight-Georgetown Institute, <https://kgi.georgetown.edu/research-and-commentary/measuring-risk-what-eu-risk-assessments-and-us-litigation-reveal-about-meta-and-tiktok/> p. 28.

<sup>126</sup> “Meta reportedly treats signals for increasing engagement as more important than what users like, want, or value. One document states ‘even Mark [Zuckerberg] himself has suggested that the anger reaction is a reasonable way to express that you don’t like a piece of content, even as we count it as 4x more important as a less ambiguous ‘like’ for giving you more such content’.” See, Peter Chapman and Matt Steinberg, *Measuring Risk* (previously cited), p. 28.

<sup>127</sup> Amnesty International interviews with LGBTI actors in Hungary, March 2026. Notes on file with Amnesty International.

Several interviewees described experiencing anxiety, frustration and feelings of helplessness and repeated exposure to anti-LGBTI content on Facebook. As one interviewee explained:

**“Facebook is just another piece in the pile of my anxiety, it just puts more on it... to them, [Meta] users are not people, they are just numbers”.<sup>128</sup>**

Some interviewees reported taking breaks from the platform or limiting their participation in public discussions to protect their mental health. Others described engaging in self-censorship because they feared negative reactions if they openly expressed their sexual orientation, gender identity, or support for the rights of LGBTI people.

These experiences engage distinct rights. Self-censorship and withdrawal from participation in public life are consistent with a chilling effect on the right to freedom of expression, understood under Article 19 of the ICCPR to include both the right to impart information and the right to seek and receive it.

Where the burden of this withdrawal falls disproportionately on LGBTI users, it also raises concerns under the right to non-discrimination.<sup>129</sup> LGBTI users appeared to be unable to exercise their freedom of expression on an equal basis in a space that, as set out earlier in this briefing, functions as a primary access point to news, information and political debate in Hungary.

These experiences are consistent with broader research concerning the impact of TfGBV and hostile online environments on marginalized communities.<sup>130</sup> One interviewee said:

**“I feel very sad after seeing all the abuse [on Facebook]. I feel helpless. This impacts my work and my everyday life. It is very hard to bear with this abuse and we [trans people] don’t get any help; we have to fight by ourselves. You have to armour yourself... I can handle it, but it is very hard for my soul. It erodes my soul and I have to rest after these fights. I keep far from Facebook for a week to calm down and when I’m ready then I can take on the next fight”.<sup>131</sup>**

In Hungary’s broader political context, such harms may undermine the ability of LGBTI people to participate freely in public debate, express themselves online, and engage in civic and political life on an equal basis with others,<sup>132</sup> with the psychological impacts described also engaging their right to health, understood to extend to mental health and its underlying determinants.<sup>133</sup>

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<sup>128</sup> In-person interview with Butterfly, 17 March 2026, conducted in Pécs, Hungary, in English. Notes on file with Amnesty International.

<sup>129</sup> ICCPR, Articles 2 and 26.

<sup>130</sup> See: Amnesty International, *Human Rights Implications of Technology-Facilitated Gender-Based Violence: Submission to the Human Rights Council Advisory Committee* (previously cited); OHCHR, *Tackling Discrimination against Lesbian, Gay, Bi, Trans & Intersex People: Standards of Conduct for Business* (previously cited).

<sup>131</sup> In-person interview with Zsófia, 17 March 2026, conducted in Pécs, Hungary, in Hungarian and English through the assistance of a translator. Notes on file with Amnesty International.

<sup>132</sup> Amnesty International, *“Hungary: From Freedom to Censorship”* (previously cited); Amnesty International, “Hungary: Propaganda Law has ‘created cloud of fear’ pushing LGBTI+ community into the shadows” (previously cited); Amnesty International, “Tell Hungary That Trans Rights Are Human Rights”, (previously cited); European Union Agency for Fundamental Rights, “EU LGBTIQ survey III LGBTIQ equality at a crossroads: Country data – Hungary” (previously cited); European Union Agency for Fundamental Rights, “EU LGBTIQ survey III LGBTIQ equality at a crossroads, progress and challenges” (previously cited).

<sup>133</sup> Committee on Economic, Social and Cultural Rights, General Comment 14: The right to the highest attainable standard of health (Article 12), 2000, UN Doc. E/C.12/2000/4, <https://www.ohchr.org/sites/default/files/Documents/Issues/Women/WRGS/Health/GC14.pdf> paras 4 and 11.

# 7. EXAMPLES OF HARMFUL CONTENT AND ENFORCEMENT FAILURES

## CONTENT WARNING

The following section contains examples of harmful online content directed at LGBTI people, including calls for violence, dehumanizing language, and severe hostility based on sexual orientation and gender identity. These examples are included as evidence relevant to the findings of this briefing. Readers may find the material distressing.

### 7.1 CONTENT REPORTED TO META BY HÁTTÉR SOCIETY

As part of this research, Amnesty International interviewed representatives of Háttér Society, a Hungarian organization that has worked since 1995 to support and advocate for the rights of LGBTI people.<sup>134</sup> The organization participated in the SafeNet project, an EU-funded initiative (2023 to 2024) to monitor and report online intolerance, racism and xenophobia across social media platforms, including Facebook.<sup>135</sup>

Through this work, Háttér Society identified and reported harmful content targeting LGBTI people using reporting mechanisms and communication channels available to trusted organizations.<sup>136</sup> The examples shared with Amnesty International included comments advocating violence, dehumanizing LGBTI people, and portraying them as threats to society.<sup>137</sup>

Among the examples provided were comments calling for physical violence against LGBTI people, including statements such as: “Beat them to death immediately”; “I would shoot this”; “Throw them off the bridge”; and “Death to the extreme genderfluid vermin”. Other comments used dehumanizing language, referring to LGBTI people as “rats”, “mutants”, “earthworms” or “scum”, while some explicitly advocated the eradication of transgender people.<sup>138</sup>

Several examples were posted in response to content relating to Pride events, drag performances or public discussions concerning the rights of LGBTI people. Many relied on narratives associating LGBTI people with

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<sup>134</sup> Háttér Society, <https://en.hatter.hu/>

<sup>135</sup> SafeNet, <https://www.inach.net/safenet/> For further detail on Háttér Society's SafeNet reporting data, see Appendix 3.

<sup>136</sup> SafeNet, <https://www.inach.net/safenet/>

<sup>137</sup> All screenshots have been provided to Amnesty International by Háttér Society and are on file with Amnesty International.

<sup>138</sup> All screenshots have been provided to Amnesty International by Háttér Society and are on file with Amnesty International.

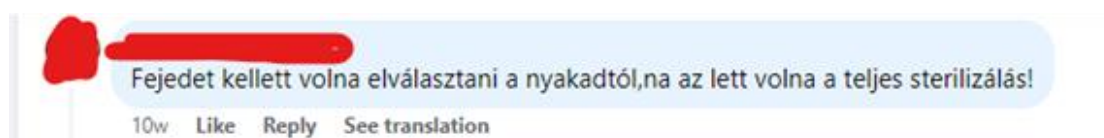
threats to children, public morality or social order, reflecting broader themes documented elsewhere in this briefing.<sup>139</sup>



↑ *Translation of comment: "Beat them to death immediately!" The news article is about a drag queen story-hour event in a library, with the headline: "Barely anyone trusts the public education system anymore because of the spread of the gender madness".*

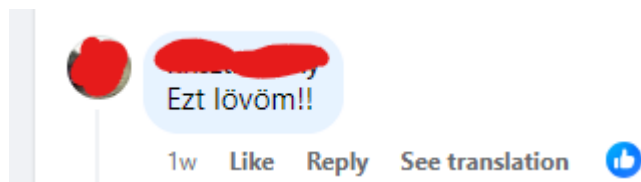


↑ *Translation of comment: "Take them to the bank of the Danube, shoot anyone who can swim so they don't make it to the other side."*

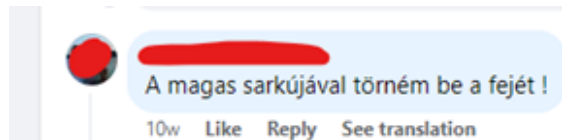


↑ *Translation: "They should have separated your head from your neck — now that would have been a complete sterilization!"*

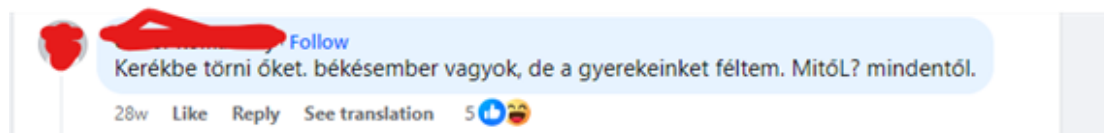
<sup>139</sup> All screenshots have been provided to Amnesty International by Háttér Society and are on file with Amnesty International. Hungarian Helsinki Committee, "Threat assessment of the 2026 Hungarian parliamentary elections" (previously cited); Amnesty International, "Hungary: From Freedom to Censorship" (previously cited); Amnesty International, "Hungary: Propaganda Law has 'created cloud of fear' pushing LGBTI+ community into the shadows" (previously cited).



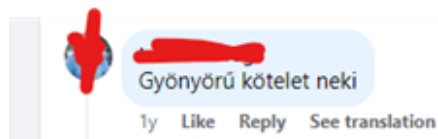
↑ Translation: "I would shoot this!!"



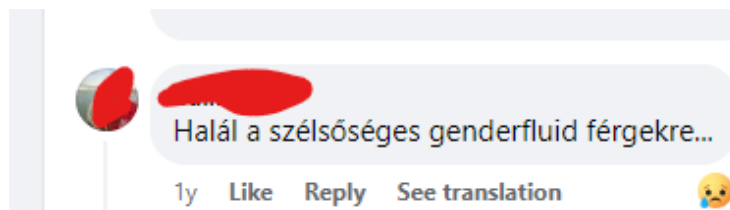
↑ Translation: "I would smash their head in with their high heels!"



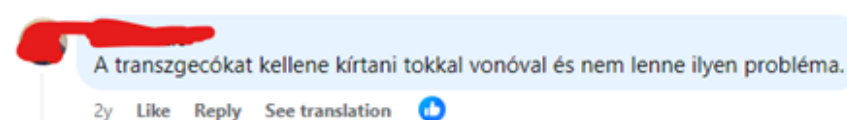
↑ Translation: "Break them on the wheel. I am a peaceful person, but I fear for our children. From what? From everything."



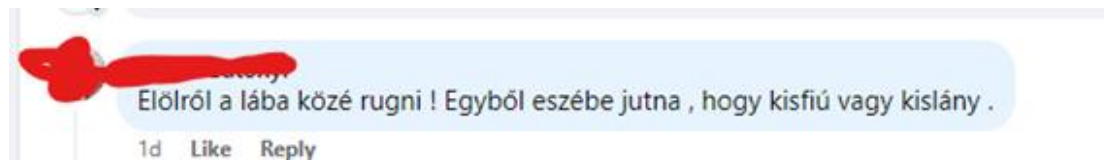
↑ Translation: "A beautiful rope for them."



↑ Translation: "Death to the extreme genderfluid vermin..."



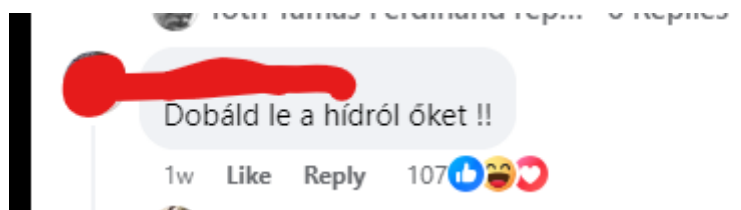
↑ Translation: "The trans-scum should be wiped out with bow and string." ("Tokkal-vonóval" is a Hungarian idiom meaning "completely" or "root and branch," here used to advocate for the extermination of trans people.)



↑ *Translation: "Kick them between the legs from the front! That would immediately remind them whether they are a boy or a girl."*



↑ *Translation: "Brain-dead earthworms."*



↑ *Translation: "Throw them off the bridge!!"*



↑ *Translation: "Papa Smurf, transvestites, and they even brought a little girl so that the paedophiles could feel the solidarity!! The person who organized this should be broken on the wheel!! Shame, disgrace!"*



↑ *Translation: "Genetically damaged mutant..."*

According to Háltér Society, all of the examples shared with Amnesty International in March 2026 had been reported to Meta. When reviewed by Háltér Society in March 2026, some of the examples remained visible on Facebook despite being reported, some were no longer accessible, and others could not be verified.

In its 11 August 2026 response, Meta offered to review and take appropriate action in relation to specific URLs of on-platform content, including these examples.

# 8. META'S HUMAN RIGHTS RESPONSIBILITIES AND DSA OBLIGATIONS

## 8.1 FAILURE TO DEMONSTRATE ADEQUATE HUMAN RIGHTS DUE DILIGENCE

As outlined in the UN Guiding Principles, Meta is expected to identify, prevent, mitigate and account for actual and potential adverse human rights impacts arising from its operations, products or services, including impacts to which the company may be linked through its business relationships.<sup>140</sup>

Meta states that it maintains processes to assess human rights impacts associated with its products and policy decisions and that its Human Rights Team reviews policy proposals as part of the company's policy-development process.<sup>141</sup> The company has further stated that, prior to implementing its January 2025 policy changes, it identified and assessed the potential risks associated with those changes and confirmed that appropriate mitigation measures had been adopted.<sup>142</sup>

However, Meta has not publicly disclosed meaningful information regarding the risks it identified, the impacts it anticipated on marginalized groups, or the measures it adopted to address those risks.<sup>143</sup> This lack of transparency is particularly significant given that the January 2025 changes reduced certain protections previously afforded to LGBTI people and other groups exposed to discrimination and abuse.<sup>144</sup>

The evidence gathered by Amnesty International indicates that Meta did not adequately assess the potential impacts of the January 2025 changes on communities facing heightened risks, including LGBTI people. Amnesty International was also unable to identify publicly available information indicating that affected stakeholders, including LGBTI organizations in Hungary or other groups representing people exposed to heightened risks, were consulted regarding the potential impacts of the January 2025 changes. We

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<sup>140</sup> UN Guiding Principles, Principle 17, which requires companies to conduct human rights due diligence to identify, prevent, mitigate and account for how they address adverse human rights impacts.

<sup>141</sup> Meta, *Regulation (EU) 2022/2065 Digital Services Act (DSA) Systemic Risk Assessment and Mitigation Report for Facebook*, August 2025, <https://transparency.meta.com/reports/regulatory-transparency-reports/> p. 11, Section 3: A Balancing Act: Respecting rights and mitigating risk: "As a part of the policy development process, the Human Rights Team conducts separate rights-based analysis and due diligence of proposed policies, submits analysis to policy leadership and presents views to each Policy Forum. Human rights impacts and mitigations are a consistent consideration in the policy development process."

<sup>142</sup> Meta, *Regulation (EU) 2022/2065 Digital Services Act (DSA) Systemic Risk Assessment and Mitigation Report for Facebook* (previously cited), p. 12: "Before introducing the changes, we identified and assessed the potential risks associated with the changes. We also confirmed through the assessment that we employed reasonable, proportionate, and effective mitigations to address the potential risks associated with the changes".

<sup>143</sup> Meta, *Regulation (EU) 2022/2065 Digital Services Act (DSA) Systemic Risk Assessment and Mitigation Report for Facebook* (previously cited); Oversight Board, "Wide-ranging decisions protect speech and address harms" (previously cited).

<sup>144</sup> GLAAD, "GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program" (previously cited). See also: The Associated Press, "Meta rolls back hate speech rules as Zuckerberg cites 'recent elections' as a catalyst" (previously cited).

requested this information directly from Meta in our letter dated 28 July 2026 but did not receive a substantive response.

Meaningful engagement with affected stakeholders is a core component of human rights due diligence as detailed in the UN Guiding Principles and the DSA.<sup>145</sup> This concern is reinforced by the Oversight Board's observation that no public information was provided regarding any human rights due diligence undertaken prior to the policy changes.<sup>146</sup>

## 8.2 FAILURE TO ADEQUATELY RESPOND TO HEIGHTENED RISKS IN HUNGARY

International business and human rights standards recognize that companies should undertake enhanced due diligence where individuals or groups face heightened risks of discrimination, exclusion, violence or other human rights harms.<sup>147</sup> The OHCHR Standards of Conduct for Business specifically emphasize that companies should undertake more extensive due diligence in countries where higher levels of human rights violations against LGBTI people have been documented.<sup>148</sup>

Meta's Corporate Human Rights Policy states that it pays particular attention to the rights and needs of users from groups or populations that may be at "heightened risk of becoming vulnerable or marginalized", and that it is committed to "identifying relevant such groups for each context" and meaningfully engaging with them.<sup>149</sup>

Hungary represented a context in which the risks facing LGBTI people were especially pronounced. Prior to the 2026 elections, anti-LGBTI rhetoric featured prominently in political discourse, Pride-related assemblies faced legal restrictions, and civil society organizations repeatedly documented hostility towards LGBTI communities.<sup>150</sup>

Despite these circumstances, Amnesty International was unable to identify evidence that Meta adopted an enhanced approach specifically tailored to the heightened risks facing LGBTI people in Hungary.<sup>151</sup> Amnesty International wrote to Meta on 3 March 2026 to enquire about the due diligence processes conducted in relation to Hungary's 2026 elections. Meta replied on 16 March 2026, stating that it "recognizes the importance of enabling the rights to freedom of expression, to vote and to participate in public affairs" and outlining its core approach to elections, stating that it "deploy[s] it in all countries where our services are used, adapting our strategy to local needs and risks" and that it considers, for example, "the type of election, the size of the country relative to our userbase, risks of political violence, targeting of vulnerable groups and our operational capacity."<sup>152</sup> Meta did not confirm whether it adopted an enhanced approach specifically tailored to the heightened risks facing LGBTI people in Hungary. Amnesty International put this question directly to Meta on 28 July 2026. On 11 August 2026, Meta replied stating that, given the scope and detail of the findings presented, it could not share a response within the stipulated timeline.

This absence of publicly demonstrated country-specific mitigation is particularly notable given international guidance indicating that companies should undertake enhanced due diligence where higher levels of human rights violations against LGBTI people have been documented.<sup>153</sup> Hungary's legal and political environment, including restrictions on Pride-related activities, anti-LGBTI legislation, and sustained hostile political rhetoric, presented several indicators that heightened safeguards may have been warranted. Amnesty International was unable to identify any publicly available country-specific assessment explaining how Meta evaluated the impact of its January 2025 policy changes in environments where LGBTI communities face elevated levels of discrimination and hostility.

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<sup>145</sup> UN Guiding Principles, Commentary to Principle 18; DSA, Recital 90.

<sup>146</sup> Oversight Board, "Wide-ranging decisions protect speech and address harms" (previously cited).

<sup>147</sup> UN Guiding Principles, Principle 18 and Commentary.

<sup>148</sup> OHCHR, Tackling Discrimination against Lesbian, Gay, Bi, Trans & Intersex People: Standards of Conduct for Business (previously cited).

<sup>149</sup> Meta, *Corporate Human Rights Policy*, <https://humanrights.fb.com/policy/> (accessed 19 August 2026).

<sup>150</sup> European Consortium for Political Research, "How Hungary reframed LGBTQ Pride as a national security issue" (previously cited); Hungarian Helsinki Committee, "Threat assessment of the 2026 Hungarian parliamentary elections" (previously cited); Amnesty International, "*Hungary: From Freedom to Censorship*" (previously cited); Amnesty International, "Hungary: Propaganda Law has 'created cloud of fear' pushing LGBTI+ community into the shadows" (previously cited).

<sup>151</sup> Meta, *Regulation (EU) 2022/2065 Digital Services Act (DSA) Systemic Risk Assessment and Mitigation Report for Facebook* (previously cited).

<sup>152</sup> Meta's written response to Amnesty International, 16 March 2026. On file with Amnesty International.

<sup>153</sup> OHCHR, Tackling Discrimination against Lesbian, Gay, Bi, Trans & Intersex People: Standards of Conduct for Business (previously cited).

The experiences described by interviewees, and the continued visibility of harmful anti-LGBTI content (even when reported by users) raise concerns regarding the effectiveness of Meta's mitigation efforts in practice.<sup>154</sup>

## 8.3 CONTENT MODERATION AND ENFORCEMENT FAILURES

As mentioned above, Hättér Society told Amnesty International that a number of the examples of anti-LGBTI content remained visible after being reported through Meta's reporting mechanisms. These examples include comments calling for physical violence, extermination, and other forms of serious harm directed at LGBTI people.<sup>155</sup>

While the status of individual examples varied when subsequently reviewed, the information provided by Hättér Society indicates that some harmful content remained accessible for a period of time after being reported, including content that was still available when checked in March 2026.<sup>156</sup> The continued availability of such content indicates shortcomings in the consistency and effectiveness of Meta's enforcement systems.

These concerns are reinforced by the experiences shared by LGBTI users interviewed by Amnesty International, several of whom reported frustrations with reporting processes, uncertainty regarding outcomes, and a perception that harmful content often remained available despite being reported.

As Marlena Wisniak, member of GLAAD's Social Media Safety Index Advisory Committee and Head of Digital at the European Center for Not-for Profit Law, observed:

**"The LGBTI community is disproportionately impacted by policy violations. There are too many false negatives, meaning content that should be removed but stays online because it promotes engagement. At the same time, it is also disproportionately impacted by removal of legitimate speech. They are disproportionately impacted by both false positives and false negatives. So queer people who actually organize online or express themselves or even counter the other hate will be silenced. Transphobic and homophobic voices are elevated while the other ones are silenced."**<sup>157</sup>

Taken together, this evidence suggests that Meta's content moderation systems did not consistently and effectively identify, review and address harmful anti-LGBTI content in Hungary.

## 8.4 TRANSPARENCY AND ACCOUNTABILITY

The DSA seeks to ensure that platforms provide sufficient information to allow regulators, researchers and affected communities to understand how risks are assessed and mitigated.<sup>158</sup>

Meta's public reporting provides only limited information regarding how the effectiveness of mitigation measures is assessed in practice.<sup>159</sup> While Meta describes policies, tools and governance structures, it provides relatively little information regarding how specific interventions reduce harm or how decisions are made when balancing competing objectives;<sup>160</sup> for example, between maximising user engagement and giving weight to what users actually value or find harmful. Internal Meta documents referenced earlier in this briefing indicate that engagement-optimization "reportedly treats signals for increasing engagement as more important than what 'users like, want, or value'".<sup>161</sup> Meta's public regulatory reporting does not disclose this kind of internal deliberation, leaving regulators, researchers and affected communities unable to assess how such trade-offs are addressed in practice.

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<sup>154</sup> Amnesty International Hungary, *Rainbow Project: Social Listening Report, April 2023 – April 2024* (previously cited).

<sup>155</sup> All screenshots have been provided to Amnesty International by Hättér Society and are on file with Amnesty International.

<sup>156</sup> All screenshots have been provided to Amnesty International by Hättér Society and are on file with Amnesty International.

<sup>157</sup> Online interview with Marlena Wisniak, 26 March 2026, conducted in English. Notes on file with Amnesty International.

<sup>158</sup> DSA, Articles 34 (1), 35, 40 and 42.

<sup>159</sup> Meta, "Regulatory and other Transparency Reports", <https://transparency.meta.com/reports/regulatory-transparency-reports/>; Center for Democracy and Technology, "Civil society responds to DSA Risk Assessment reports: An initial feedback brief", 17 March 2025, <https://cdt.org/wp-content/uploads/2025/03/RA-Report-Assessment-Report.pdf>

<sup>160</sup> Meta, "Regulatory and other Transparency Reports" (previously cited); Center for Democracy and Technology, "Civil society responds to DSA Risk Assessment reports: An initial feedback brief" (previously cited).

<sup>161</sup> Peter Chapman and Matt Steinberg, *Measuring Risk* (previously cited), p. 28.

Similarly, Meta's independent audits acknowledge important limitations regarding the review of the company's algorithmic systems.<sup>162</sup> These limitations restrict the ability of external stakeholders to assess how recommender systems may contribute to risks affecting marginalized groups.<sup>163</sup>

In addition, although Meta reports engaging with external experts and civil society organizations – including human rights, women's safety and youth safety stakeholders – publicly available information provides limited insight into how stakeholder input influences risk assessments and mitigation decisions in practice. Nor does Meta publicly explain whether LGBTI organizations or experts were consulted in relation to risks affecting LGBTI people.<sup>164</sup>

As a result, meaningful independent scrutiny of Meta's risk assessment and mitigation processes remains difficult.

## 8.5 META'S CONTRIBUTION TO ADVERSE HUMAN RIGHTS IMPACTS

The concept of "contribution" to adverse human rights impacts stems from the involvement framework set out in the UN Guiding Principles. Guiding Principle 13 establishes that a business enterprise's responsibility to respect human rights requires the company to avoid causing or contributing to adverse impacts through its own activities, and to seek to prevent or mitigate adverse impacts directly linked to its operations, products or services by its business relationships.<sup>165</sup>

The Commentary to Guiding Principle 13, read together with Guiding Principle 19(b), differentiates the responses required depending on the nature of the enterprise's involvement. Where an enterprise contributes to an adverse impact, it is expected to cease or prevent its contribution and use its leverage to mitigate any remaining impact.<sup>166</sup>

The accompanying OECD Due Diligence Guidance for Responsible Business Conduct directs enterprises to assess, for each identified impact, whether they caused it, contributed to it, or are directly linked to it through a business relationship, and to prioritize action accordingly.<sup>167</sup> Where an enterprise is found to be

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<sup>162</sup> "Our examination was limited to certain aspects of the audited service's algorithmic systems, to the extent needed to obtain evidence of the audited service's compliance with the relevant DSA Specified Requirements as required by Regulation (EU) 2022/2065. This did not include all of the algorithmic systems that Facebook operates, nor all aspects of the algorithmic systems for which we performed audit procedures. Furthermore, algorithms may not consistently operate in accordance with their intended purpose or at an appropriate level of precision. Because of their nature and inherent limitations, algorithms may introduce biases of the human programmer resulting in repeated errors or a favoring of certain results or outputs by the model. Accordingly, we do not express an opinion, conclusion, nor any form of assurance on the design, operation, and monitoring of the algorithmic systems." See, Ernst & Young, *Independent Audit on Facebook - Digital Services Act, for the period of 1 July 2024 to 30 June 2025*, 2025, <https://transparency.meta.com/reports/regulatory-transparency-reports/>, p. 6.

<sup>163</sup> Amnesty International, *What the EU's Digital Services Act Means for Human Rights* (previously cited); Peter Chapman and Matt Steinberg, *Measuring Risk* (previously cited), p. 29.

<sup>164</sup> Meta, "Regulatory and other Transparency Reports" (previously cited), p. 16, Section 4.1: External Stakeholder Engagement, and p. 22 Sub-section 4.2.5: Gender-based violence; Center for Democracy and Technology, "Civil society responds to DSA Risk Assessment reports: An initial feedback brief" (previously cited).

<sup>165</sup> UN Guiding Principles, Principle 13: "The responsibility to respect human rights requires that business enterprises: (a) Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts."

<sup>166</sup> UN Guiding Principles, Commentary to Principle 13: "Business enterprises may be involved with adverse human rights impacts either through their own activities or as a result of their business relationships with other parties. Guiding Principle 19 elaborates further on the implications for how business enterprises should address these situations. For the purpose of these Guiding Principles a business enterprise's "activities" are understood to include both actions and omissions; and its "business relationships" are understood to include relationships with business partners, entities in its value chain, and any other non-State or State entity directly linked to its business operations, products or services."

UN Guiding Principle 19(b): "In order to prevent and mitigate adverse human rights impacts, business enterprises should integrate the findings from their impact assessments across relevant internal functions and processes, and take appropriate action... Appropriate action will vary according to: (i) Whether the business enterprise causes or contributes to an adverse impact, or whether it is involved solely because the impact is directly linked to its operations, products or services by a business relationship; (ii) The extent of its leverage in addressing the adverse impact."

<sup>167</sup> OECD Due Diligence Guidance, Section 2.3. "Assess the enterprise's involvement with the actual or potential adverse impacts identified in order to determine the appropriate responses (see 3.1 and 3.3). Specifically, assess whether the enterprise: caused (or would cause) the adverse impact; or contributed (or would contribute) to the adverse impact; or whether the adverse impact is (or would be) directly linked to its operations, products or services by a business relationship".

contributing to an impact caused by another entity, the Due Diligence Guidance specifies that it should cease or prevent its own contribution and use leverage to mitigate the remaining impact.<sup>168</sup>

OHCHR has offered further interpretive guidance on what constitutes “contribution”, notably in its 2017 response to a request for interpretation on the application of the UN Guiding Principles to the banking sector. This note clarifies that a bank’s “own activities”, for the purposes of causation and contribution, include actions and omissions involving third parties, such as providing financial products and services to clients.<sup>169</sup>

The OHCHR interpretation letter treats inadequate due diligence as a route into “contribution” via the “facilitating” prong. It states that an entity may facilitate harm “if it knows or should have known that there are human rights risks associated with a particular client or project, but it omits to take any action to require, encourage, or support the client to prevent or mitigate these risks” and that the entity’s “failure to act upon information that was or should have been available to it may create a facilitating environment for a client to more easily take actions that result in abuses”.<sup>170</sup> In this context, Meta’s failure to conduct adequate human rights due diligence can be understood as failing to act upon information that was or should have been available to it regarding well documented risks to LGBTI people, therefore facilitating and contributing to harm.

This briefing outlines adverse human rights impacts experienced by LGBTI people in Hungary, including impacts on the rights to freedom of expression and non-discrimination. These impacts manifested through exposure to discriminatory and hostile content on Facebook, detrimental effects on mental health and well-being, self-censorship, and withdrawal from online spaces due to hostility.

Taken together, the evidence reviewed by Amnesty International suggests that Meta contributed to these adverse impacts through the following actions and omissions:

- Meta implemented policy and enforcement changes in January 2025 that reduced certain protections for groups facing heightened risks of discrimination, despite having reason to know of the risks these changes posed;
- Meta failed to publicly demonstrate that adequate human rights due diligence was conducted before introducing the January 2025 changes;
- Meta failed to publicly demonstrate that it undertook enhanced risk assessment and mitigation measures in Hungary, a jurisdiction where risks to LGBTI people were foreseeable and well documented; and
- Anti-LGBTI narratives were visible on Facebook, with harmful content remaining visible following reporting, and several interviewees experienced repeated exposure to such content despite attempts to avoid it.

In summary, Meta’s policies, platform design choices and content governance systems contributed to adverse human rights impacts experienced by LGBTI people in Hungary.<sup>171</sup>

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<sup>168</sup> OECD Due Diligence Guidance, Section 3.1.h: “In cases where the enterprise is contributing to adverse impacts or risks that are caused by another entity, it should take necessary steps to cease or prevent its contribution as described above, also building and using leverage to mitigate any remaining impacts to the greatest extent possible”.

<sup>169</sup> OHCHR, “OHCHR Response to Request from BankTrack for Advice Regarding the Application of the UN Guiding Principles on Business and Human Rights in the Context of the Banking Sector”, 12 June 2027, p. 4: “A bank’s ‘own activities’ in this context includes actions and decisions (including omissions) involving third parties, such as providing financial products and services to clients.” <https://www.ohchr.org/sites/default/files/Documents/Issues/Business/InterpretationGuidingPrinciples.pdf>

<sup>170</sup> OHCHR, “OHCHR Response to Request from BankTrack for Advice Regarding the Application of the UN Guiding Principles on Business and Human Rights in the Context of the Banking Sector” (previously cited), p. 8: “However, a bank may facilitate a client or other entity to cause harm if it knows or should have known that there are human rights risks associated with a particular client or project, but it omits to take any action to require, encourage or support the client to prevent or mitigate these risks. The bank’s failure to act upon information that was or should have been available to it may create a facilitating environment for a client to more easily take actions that result in abuses. Conversely, if the bank knows about a human rights risk associated with a particular project and takes reasonable steps to prevent and mitigate these risks, the situation would instead in principle be one of ‘linkage.’”

<sup>171</sup> OECD Due Diligence Guidance, pp. 70-72; UN Guiding Principles, Principles 17, 18, 19 and 20; GLAAD, “GLAAD response: Meta and Mark Zuckerberg remove long-standing anti-LGBTQ hate speech policies after announcing end of fact-checking program” (previously cited). See also: The Associated Press, “Meta rolls back hate speech rules as Zuckerberg cites ‘recent elections’ as a catalyst” (previously cited).

## 8.6 META'S COMPLIANCE WITH SYSTEMIC RISK ASSESSMENT AND MITIGATION OBLIGATIONS UNDER THE DSA

Articles 34 and 35 of the DSA require VLOPs such as Facebook to identify, analyse and assess systemic risks arising from the design, functioning and use of their services, including risks to fundamental rights, and to implement reasonable, proportionate and effective mitigation measures tailored to those risks.<sup>172</sup>

The evidence reviewed by Amnesty International raises serious questions regarding whether Meta has complied with these obligations in relation to risks affecting LGBTI people in Hungary.

Under Article 34, Meta is required to assess foreseeable systemic risks associated with its services, including risks to the rights to equality and non-discrimination, freedom of expression, privacy and human dignity. It also requires that the assessment take into account specific regional or linguistic aspects, including when specific to a member state. The risks facing LGBTI people in Hungary were foreseeable, heightened and well documented. Prior to and during the period examined, Hungary experienced increasing restrictions on the rights of LGBTI people, including intensified political debate surrounding Pride-related assemblies and the 2026 election.

Meta's own public disclosures acknowledge that "certain communities, including the lesbian, gay, bisexual, transgender, queer (LGBTQ+) may face challenges when engaging on our platforms", and that "for our assessment of gender-based violence risks in 2025, we identified that the risk landscape could be impacted by the high number of elections in the EU, which may lead to hateful conduct and bullying and harassment on the platform".<sup>173</sup> However, Amnesty International was unable to identify publicly available evidence demonstrating that Meta conducted a country-specific assessment of the risks facing LGBTI people in Hungary or assessed how the January 2025 policy changes could affect those risks in a high-risk environment.

These shortcomings are particularly significant given that Meta introduced changes in January 2025 that reduced certain safeguards for groups facing heightened risks of discrimination and abuse and did so despite warnings from civil society organizations, researchers and Meta's own Oversight Board regarding the potential adverse impacts on LGBTI communities.<sup>174</sup>

Article 35 requires VLOPs to adopt reasonable, proportionate and effective mitigation measures in response to identified systemic risks. The evidence reviewed by Amnesty International raises concerns regarding the effectiveness of Meta's mitigation measures in Hungary.

Amnesty International's research found that harmful anti-LGBTI content, including content advocating violence and using dehumanizing language, remained visible on Facebook despite being reported.<sup>175</sup> Interviewees described repeated exposure to hostile anti-LGBTI content, even after taking active steps to reduce such exposure through blocking certain profiles, reporting content, and adjusting their preferences. In addition, Amnesty International was unable to identify publicly available information that Meta implemented mitigation measures tailored to the heightened risks facing LGBTI people in Hungary.

Taken together, the evidence suggests that Meta has failed to publicly demonstrate compliance with its obligations under Articles 34 and 35 of the DSA. In particular, Meta has not demonstrated that it adequately assessed foreseeable risks affecting LGBTI people in Hungary, nor that it adopted reasonable, proportionate and effective measures to mitigate those risks. The findings of this briefing indicate potential non-compliance with key DSA obligations relating to systemic risk assessments and mitigation, and warrant further scrutiny by the European Commission.

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<sup>172</sup> DSA, Articles 34 and 35.

<sup>173</sup> Meta, *Regulation (EU) 2022/2065 Digital Services Act (DSA) Systemic Risk Assessment and Mitigation Report for Facebook* (previously cited), pp. 21-22.

<sup>174</sup> Oversight Board, "Wide-ranging decisions protect speech and address harms" (previously cited); Oversight Board, "Multiple case decision: Gender identity debate videos" (previously cited); GLAAD, "Make Meta safe: New report finds increase in harmful content targeting marginalized groups following policy rollbacks" (previously cited); European Observatory of Online Hate, "How Meta's new content moderation policies affect gender-based violence" (previously cited).

<sup>175</sup> See Sections 6 and 7 above ("How Meta Contributed to Adverse Human Rights Impacts Experienced by LGBTI People in Hungary" and "Examples of Harmful Content and Enforcement Failures").

## 8.7 DSA ENFORCEMENT AND PENALTIES

The DSA provides the European Commission with significant enforcement powers in relation to VLOPs, including Facebook, which is owned by Meta and was designated a VLOP by the Commission in April 2023. Where there are indications of non-compliance, the Commission may require access to information and data, conduct interviews and inspections, and adopt interim measures where necessary to prevent serious harm.<sup>176</sup>

The Commission may also adopt decisions requiring a platform to take specific measures to bring its practices into compliance with the DSA. These may include changes to risk assessment processes, mitigation measures, recommender systems, transparency practices, or other aspects of a platform's operation.<sup>177</sup>

Where a provider of a VLOP is found to have infringed the DSA, the Commission may impose fines of up to 6% of the provider's total worldwide annual turnover. The Commission may also impose periodic penalty payments of up to 5% of the provider's average daily worldwide turnover to compel compliance with its decisions or requests for information.<sup>178</sup>

The availability of these enforcement measures reflects the importance attached by the European Union to ensuring that VLOPs effectively identify, assess and mitigate systemic risks affecting fundamental rights. Robust enforcement is particularly important where failures in risk assessment or mitigation may contribute to discrimination, exclusion or other adverse human rights impacts affecting groups facing heightened risks, including LGBTI people.

Given the findings set out in this briefing, Amnesty International considers that the European Commission should further scrutinize whether Meta has complied with its obligations under Articles 34 and 35 of the DSA in relation to risks affecting LGBTI people in Hungary. Where non-compliance is identified, the Commission should make full use of its enforcement powers to ensure effective remediation, meaningful risk mitigation, and non-repetition.

## 8.8 ACCESS TO REMEDY

Access to remedy is a core pillar of the corporate responsibility to respect human rights. As outlined in the UN Guiding Principles, where a company causes or contributes to adverse human rights impacts, it should provide for or cooperate in their remediation through legitimate processes.<sup>179</sup> The responsibility to provide remedy is not limited to situations where a company acts alone; it also applies where a company's actions or omissions contribute to harms alongside those of other actors.<sup>180</sup>

The OECD Due Diligence Guidance similarly provides that, where an enterprise has contributed to an adverse impact, it should cease or prevent its contribution and participate in remediation appropriate to the nature and extent of its involvement.<sup>181</sup>

Effective remedy may take various forms. Depending on circumstances, this can include acknowledgement of harm, public apologies, restitution, rehabilitation, financial or non-financial compensation, guarantees of non-repetition, and institutional reforms designed to prevent similar harms from recurring.<sup>182</sup> In the context of social media platforms, effective remedy may also require changes to platform policy, improvements to content moderation systems, reporting channels, appeals mechanisms, stakeholder engagement processes, and risk assessment and mitigation measures.<sup>183</sup>

The evidence collected for this briefing raises concerns regarding the effectiveness of existing reporting and complaint mechanisms for LGBTI people in Hungary. Interviewees described difficulties obtaining meaningful responses after reporting harmful content, while Háttér Society reported that harmful content

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<sup>176</sup> DSA, Articles 67-70 (Requests for information; Interviews and statements; Power to conduct inspections; Interim measures).

<sup>177</sup> DSA, Article 73 (Non-compliance decisions).

<sup>178</sup> DSA, Article 74 (Fines) and Article 76 (Periodic penalty payments).

<sup>179</sup> UN Guiding Principles, Principle 22 and Interpretive Guide, p. 7.

<sup>180</sup> OECD Due Diligence Guidance, pp. 70-72.

<sup>181</sup> OECD Due Diligence Guidance, p. 72.

<sup>182</sup> UN Guiding Principles, Principle 25 (Access to remedy); OHCHR, "Frequently asked questions about the UN Guiding Principles on Business and Human Rights" (previously cited), Question 38; UN General Assembly, Basic Principles and Guidelines on the Right to Remedy and Reparation.

<sup>183</sup> See, for example, BSR, *A Human Rights-Based Approach to Content Governance*, March 2021, [https://www.bsr.org/reports/A\\_Human\\_Rights-Based\\_Approach\\_to\\_Content\\_Governance.pdf](https://www.bsr.org/reports/A_Human_Rights-Based_Approach_to_Content_Governance.pdf)

remained visible on Facebook despite being reported to Meta both by individual users and by Háttér Society through mechanisms available to organizations participating in the EU-funded SafeNet project.

The concerns identified by Amnesty International extend beyond the removal of individual pieces of content. The findings set out in this briefing point to a broader pattern of concerns relating to Meta's policies, content moderation shortcomings, risk assessment processes and approach to mitigating harms affecting groups at heightened risk of discrimination. Similar concerns have been identified in other research.<sup>184</sup> The adverse impacts documented in this briefing therefore cannot be addressed solely through the removal of individual pieces of content. Effective remedy therefore may require broader institutional measures aimed at addressing the underlying factors that enabled those harms to occur, including improvements to reporting mechanisms, transparency, stakeholder engagement and risk mitigation.<sup>185</sup>

The DSA provides additional avenues for redress and accountability. Users have access to complaint and appeal mechanisms relating to content moderation decisions, and the DSA requires platforms to establish internal complaint-handling systems and provide access to certified out-of-court dispute settlement mechanisms.<sup>186</sup> The DSA also provides for users to seek compensation for damage suffered as a result of infringements of the regulation where the relevant legal conditions are met.<sup>187</sup>

However, the existence of formal mechanisms does not by itself guarantee effective remedy. International business and human rights standards require that remedy be accessible, transparent, predictable, rights-compatible and capable of addressing the actual harms experienced by affected individuals and communities.<sup>188</sup>

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<sup>184</sup> See, for example, Amnesty International, *The Social Atrocity: Meta and the Right to Remedy for the Rohingya* (previously cited); Amnesty International, *"A Death Sentence for my Father": Meta's Contribution to Human Rights Abuses in Northern Ethiopia* (previously cited).

<sup>185</sup> UN Guiding Principles, Principle 22 and Commentary.

<sup>186</sup> DSA, Articles 20, 21, and related provisions on internal complaint handling and out-of-court dispute settlement.

<sup>187</sup> DSA, Article 54 (Compensation).

<sup>188</sup> UN Guiding Principles, Principle 31 (effectiveness criteria for grievance mechanisms).

# 9. CONCLUSION AND RECOMMENDATIONS

This briefing found that, independently and prior to Meta's January 2025 policy changes, LGBTI people in Hungary faced an elevated risk of discrimination, hostility and exclusion, arising from an increasingly restrictive political and legal environment. Over more than a decade, government actors and government-aligned voices promoted narratives portraying LGBTI people as threats to children, families and Hungarian values, contributing to a climate of stigmatization and hostility.

Facebook has a uniquely influential position within Hungary's information environment. Amnesty International's social listening research, conducted from 2023 to 2024, found that Facebook stood out among the platforms monitored as having a particularly negative environment for LGBTI-related discourse, marked by elevated hostility, disinformation and fear-mongering. Interviews conducted in 2026 further found that many LGBTI people felt unable to avoid Facebook despite concerns about the harms they experienced there.

Amnesty International's research indicates that Meta has not publicly demonstrated that it adequately identified and mitigated foreseeable human rights risks affecting LGBTI people in Hungary. These concerns are particularly significant given Hungary's status as a heightened risk environment for LGBTI people, and Meta's own commitments to consider the experiences of groups facing elevated risks of discrimination and abuse.

The January 2025 changes to Meta's content moderation policies and enforcement systems further increased these concerns. Civil society organizations, researchers and Meta's Oversight Board warned that the changes could adversely affect groups already exposed to discrimination, including LGBTI people. Despite these warnings, Amnesty International was unable to identify publicly available evidence that Meta conducted or publicly disclosed a meaningful assessment of how the changes would affect LGBTI people in high-risk contexts such as Hungary.

The findings further indicate that Meta has failed to publicly demonstrate compliance with key obligations under Articles 34 and 35 of the DSA. Meta has not demonstrated that it adequately assessed systemic risks affecting LGBTI people in Hungary or implemented mitigation measures proportionate to those risks.

Amnesty International also identified evidence suggesting shortcomings in Meta's mitigation, enforcement and remedy processes. Harmful anti-LGBTI content, including content advocating violence and using dehumanizing language, remained visible on Facebook despite being reported both by individual users and by Hátter Society. Interviewees similarly described frustration with reporting mechanisms and a lack of confidence that harmful content would be addressed effectively.

The evidence suggests that Facebook's design, content moderation practices and policy decisions contributed to increased exposure of users to harmful anti-LGBTI content and to the adverse human rights impacts documented in this briefing, including exposure to discriminatory and hostile content on Facebook, adverse impacts on mental health and well-being, self-censorship and withdrawal from online spaces due to hostility.

Meta has not demonstrated that it adopted reasonable, proportionate and effective measures commensurate with the heightened risks facing LGBTI people in Hungary. This concerned core aspects of how Facebook governed, ranked, moderated and responded to harmful content in a context where risks to LGBTI people

were foreseeable and well documented. As a result, Amnesty International concludes that Meta contributed to adverse human rights impacts experienced by LGBTI people in Hungary and has failed to demonstrate that it met its responsibilities as outlined by the UN Guiding Principles on Business and Human Rights and related standards. As mentioned above, Meta has not provided a response to these allegations but expressed interest in discussing Amnesty International's concerns and recommendations and reiterated its commitment to the UN Guiding Principles.

The findings also have implications beyond Meta. Hungary's recent political transition presents an opportunity for the government to take meaningful steps to protect the rights of LGBTI people online and offline and to reverse the broader climate of hostility and exclusion documented in this briefing. Effective implementation of the DSA, including through independent and adequately resourced oversight, should form an important part of that response.

## **9.1 RECOMMENDATIONS TO META**

### **9.1.1 HUMAN RIGHTS DUE DILIGENCE**

#### **META SHOULD:**

- Conduct and publish human rights due diligence for significant policy changes that may affect groups facing heightened risks of discrimination and abuse, including LGBTI people.
- Conduct enhanced human rights due diligence in contexts where there is credible evidence that LGBTI people face elevated risks of discrimination, hostility, exclusion or violence.
- Develop and implement procedures requiring country-specific human rights due diligence where political, legal or social conditions indicate elevated risks for particular communities.
- Meaningfully consult LGBTI organizations, digital rights groups, affected users and other relevant stakeholders as part of risk identification, assessment, mitigation and remedy design.
- Demonstrate how stakeholder engagement has informed risk assessments and mitigation decisions, including in Hungary.

### **9.1.2 RISK MITIGATION**

#### **META SHOULD:**

- Assess whether its existing content moderation, enforcement and governance systems adequately identify and mitigate harms affecting LGBTI people in high-risk contexts.
- Implement additional mitigation measures where evidence shows heightened risks to affected LGBTI communities.
- Publish information explaining how the effectiveness of mitigation measures is assessed and how identified shortcomings are addressed.
- Conduct and publish a country-specific explanation of how systemic risks affecting LGBTI people in Hungary have been identified, assessed and mitigated under its DSA obligations.

### **9.1.3 JANUARY 2025 POLICY CHANGES**

#### **META SHOULD:**

- Conduct and publish a public assessment of the human rights impacts of its January 2025 policy changes on groups facing heightened risks of discrimination including LGBTI people, with specific attention to high-risk countries.
- Publish the findings of that assessment and the mitigation measures adopted in response.
- Review, amend or reverse policy provisions where evidence demonstrates that they contribute to adverse human rights impacts.

- Publicly report on actions taken in response to recommendations issued by the Oversight Board concerning the January 2025 policy changes.

## 9.1.4 CONTENT MODERATION AND ENFORCEMENT

### **META SHOULD:**

- Review enforcement practices relating to anti-LGBTI abuse, harassment and advocacy of hatred.
- Ensure that content advocating violence against LGBTI people is identified and addressed consistently and effectively.
- Conduct periodic audits of enforcement outcomes affecting LGBTI users and publicly report aggregate findings.
- Assess whether reductions in proactive enforcement have adversely affected the identification, review, and appropriate actioning of harmful content targeting LGBTI people.

## 9.1.5 TRANSPARENCY

### **META SHOULD:**

- Publish more detailed information regarding the human rights risks identified through its DSA risk assessment processes.
- Provide greater transparency regarding how recommender systems may contribute to risks affecting marginalized groups.
- Publish information that enables external stakeholders to evaluate the effectiveness of risk mitigation measures.
- Improve transparency regarding how decisions are made when balancing competing considerations, including freedom of expression, non-discrimination and user safety.

## 9.1.6 REMEDY

### **META SHOULD:**

- Strengthen reporting and appeals mechanisms for users facing anti-LGBTI abuse.
- Ensure users receive clear information regarding reporting outcomes and available avenues for appeal.
- Establish mechanisms to assess and remediate adverse human rights impacts which Meta has caused, contributed to, or may contribute to through its products and services.
- Provide access to effective remedy where Meta's actions or omissions have caused or contributed to adverse human rights impacts.

# 9.2 RECOMMENDATIONS TO THE EUROPEAN COMMISSION

### **THE EUROPEAN COMMISSION SHOULD:**

- Investigate whether Meta's assessment and mitigation of risks affecting LGBTI people complies with its obligations under the DSA.
- Examine the impact of Meta's January 2025 policy changes on systemic risks relating to discrimination, civic participation and human rights.
- Require Meta to demonstrate how risks affecting groups facing heightened discrimination have been identified, assessed and mitigated.

- Develop and publish detailed guidance on DSA systemic risk assessments, including expectations regarding country-specific assessments and assessments concerning groups facing heightened risk of discrimination.
- Scrutinize whether Meta has adequately considered country-specific risks in contexts where marginalized groups face heightened levels of discrimination and hostility.
- Ensure robust enforcement of DSA obligations relating to risk assessment, transparency, auditing and mitigation.
- Ensure that enforcement measures and penalties imposed under the DSA are effective, proportionate, dissuasive, and sufficient to prevent recurrence of non-compliance.
- Prioritize enforcement actions concerning platform impacts on communities facing heightened risks of discrimination and exclusion.
- Ensure that initiatives aimed at simplifying EU digital regulation do not weaken the DSA's core accountability, transparency and risk mitigation obligations.

## 9.3 RECOMMENDATIONS TO THE HUNGARIAN GOVERNMENT

### THE GOVERNMENT OF HUNGARY SHOULD:

- Repeal laws, policies and practices that discriminate against LGBTI people or otherwise violate international and European human rights standards.
- Ensure the rights to freedom of expression, peaceful assembly, association, privacy, and non-discrimination are respected and protected for all people, including LGBTI people.
- Refrain from political rhetoric and public communications that stigmatize or vilify LGBTI communities. Develop and implement measures to prevent and address discrimination, hostility and violence targeting LGBTI people both online and offline.
- Ensure meaningful consultation with LGBTI organizations and affected communities when developing laws and policies that may affect their rights.
- Ensure robust and effective national enforcement of the DSA, including cooperation with the European Commission on matters relating to very large online platforms.
- Ensure that the designated Digital Services Coordinator is independent, politically neutral, adequately resourced and equipped with the necessary expertise to oversee DSA implementation.
- Consider examining the extent to which Meta's market position within Hungary limits meaningful alternatives for users.

# 10. APPENDIX 1

## META'S RESPONSES TO AMNESTY INTERNATIONAL

1



March 16, 2026

██████████  
Amnesty International  
Peter Benenson House  
1 Easton Street  
London, WC1X 0DW  
United Kingdom

██████████

Thank you for your letter regarding Meta's business operations in Hungary and your questions about our January 2025 changes to our Community Standards, the introduction of Community Notes, and our preparations for the Hungarian elections (TC EUR 27/2026.7543). We welcome the opportunity to engage with you on these important questions and are grateful for your work protecting and advancing human rights globally. We hope that this response will address your questions.

### 2025 Policy Changes and Response to Oversight Board

First, on the January 2025 changes to our Hateful Conduct community standards and related guidance. These changes were made to enable more public debate and discussion about social issues of political and social importance, as well as to reduce possible over-enforcement. Before introducing the changes, we identified and assessed the potential risks associated with the changes. We also confirmed through the assessment that we employed reasonable, proportionate, and effective mitigations to address the potential risks associated with the changes.

Our extensive set of community standards continue to cover attacks against protected characteristics, violence and incitement, bullying and harassment, coordinating harm, and sexual solicitation and sexually explicit language. Each of these policy areas is relevant to

mitigating hate speech as defined by article 20 of the ICCPR, as well as multiple other rights including the right to non-discrimination.

We further note that Meta provides dedicated reporting channels for users in the EU to submit legal removal requests to Meta when they believe the content violates applicable hate speech laws, or other applicable laws in their jurisdiction. We collaborate with external stakeholders, such as governments, watchdog groups, and Trusted Partners, to help us identify instances of hateful conduct. We also engage with multiple governments during rollouts of EU hateful conduct tests to collect feedback for improvements regarding perception of hostile speech mitigation measures on our platforms and services.

In April 2025, the Oversight Board made a number of recommendations to Meta relating to ongoing human rights due diligence on potential adverse impacts of our January 2025 Hateful Conduct policy changes, including on LGBTQIA+ communities, in the [South Africa's Apartheid-Era Flag](#) case, the [Criticism of EU Migration Policies and Immigrants](#) case, and the [Gender Identity Debate Videos](#) case. Meta responded that we were assessing the feasibility of this multi-part recommendation and that we would provide updates in future reports to the Oversight Board.

#### **Community Notes**

Second, on Community Notes. I note that the Community Notes product has at this stage launched only in the United States. I draw your attention to the recent public announcement that the Oversight Board has accepted Meta's request for a policy advisory opinion on its approach to expanding the Community Notes program outside of the United States. In brief, Meta has requested the Oversight Board's guidance on the country-level factors we should consider when deciding whether any country should be omitted from our Community Notes expansion as well as how to weigh those factors in relation to one another in a way that can be applied on a large scale. Further details are available [here](#), with an associated public comments process.

#### **Hungarian Elections Preparations**

Meta has [previously](#) explained our approach to identifying countries with the highest risk of offline harm, including violence. This is complemented by an [infographic](#) in our 2024 annual human rights report.

On our elections preparations in Hungary. Meta recognizes the importance of enabling the rights to freedom of expression, to vote and to participate in public affairs. Meta has iterated our core approach to elections over the past several years. We deploy it in all countries where our services are used, adapting our strategy to local needs and risks. We may deem some elections as higher risk, requiring additional preparation, extra resources and bespoke work. We consider, for example, the type of election, the size of the country relative to our userbase, risks of political violence, targeting of vulnerable groups and our operational capacity. The additional efforts may include setting up dedicated monitoring efforts and temporary risk response measures that can be designed and applied across countries and languages.

Meta publishes relevant information about our elections work in the Disinformation Code report in accordance with applicable laws and regulations in the EU, including the Digital Services act.

I look forward to continuing to engage with you on these vital issues.

Yours sincerely,





August 11, 2026

[REDACTED]  
[REDACTED]  
International Secretariat, Amnesty International  
1 Easton Street, London, WC1X 0DW, United Kingdom

Reference: TC EUR 27/2026.7812

[REDACTED]

Thank you for your letter of 28 July 2026. We appreciate your continued engagement with Meta on these issues, building on our previous correspondence of 16 March.

We are reviewing your letter and Annex A carefully. Given the scope and detail of the findings presented, I'm afraid we can't share a further response within the stipulated timeline.

However, we are happy to discuss the concerns you raise in your letter and your recommendations in more detail in a meeting at a mutually convenient time.

In the meantime, please share any specific URLs of on-platform content, including examples cited in the Annex, and we will review and take appropriate action.

Meta remains committed to respecting human rights as set out in the UN Guiding Principles on Business and Human Rights. We look forward to continuing our engagement with Amnesty International.

We have shared your report with Meta Platforms Ireland Limited, which is the sole entity responsible for the provision of the Facebook service throughout the European Union, including Hungary.

Yours sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

Cc:

[REDACTED]

# 11. APPENDIX 2

## SOCIAL LISTENING RESEARCH

Amnesty International Hungary commissioned a social listening study of public discourse on LGBTI issues in Hungary, conducted by an external researcher between April 2023 and April 2024.

The research used two tools to capture data across six online sources. Brandwatch was used to analyse broader public discourse across blogs, websites, Reddit and Twitter (X), capturing more than 380,000 mentions from approximately 29,000 unique authors over the one-year period. CrowdTangle was used to analyse public posts and engagement on Facebook and Instagram specifically, covering 13,685 public Facebook posts (generating 1.7 million interactions) and 1,030 public Instagram posts (generating 537,051 interactions).

Data was cleaned to remove spam, irrelevant content and sexually explicit material, then coded thematically into four main categories: Rights & Justice, Family & Child (Protection), Government & Law, and Anti-Woke & Anti-Western Sentiment, using Boolean search queries designed to capture English and Hungarian language discussion of LGBTI issues. Sentiment analysis was applied to categorize discourse as positive, negative or neutral, and engagement metrics (interactions, comments, shares and reactions) were used to assess the reach of specific narratives.

This research supported comparative claims about the tone of discourse across platforms. Drawing on the CrowdTangle data, the research found that Facebook exhibited a comparatively hostile environment relative to Instagram.

In relation to discourse about the LGBTI community, the social listening research identified the following patterns:

- Conspiracy and “foreign agenda” framing. Government-aligned commentators promoted narratives claiming that the European Union was pursuing an agenda encompassing war, migration and gender issues to destabilize Hungary and impose foreign values. Related fear-mongering narratives, echoed among right-wing users more broadly, claimed that political change would allow the LGBTI community to “take over” and erode traditional values.
- The protection of children was frequently invoked as a central argument. Family and Child Protection was the single largest discussion category identified in the research, accounting for more than one third of categorized mentions. The protection of children was frequently invoked as a pivotal argument, framing support for LGBTI rights and progressive politics as a direct threat to Hungary’s youth and future generations.
- Reach across audience segments. These narratives reached both committed government supporters and undecided audiences – including those who felt alienated by progressive rhetoric or considered themselves independent thinkers.

# 12. APPENDIX 3

## HÁTTÉR SOCIETY AND THE SAFENET INITIATIVE

As part of this research, Amnesty International interviewed representatives of Háttér Society, a Hungarian organization that has worked since 1995 to support and advocate for the rights of LGBTI people. The organization, together with the Subjective Values Foundation, is the Hungarian partner in the SafeNet project, an EU-funded initiative (January 2023 to December 2024), that monitored and reported online intolerance, racism and xenophobia across social media platforms, including Facebook.<sup>189</sup>

During the project, Háttér Society and its partner identified and reported nearly 2,000 instances of hate speech to social media platforms.<sup>190</sup> Facebook received the substantial majority of these reports – 1,344 of approximately 1,969 reports – far exceeding reports made to other platforms. Across all reports filed, hate based on sexual orientation was consistently the largest category, at 29.76% by the project's conclusion. The project's own summary found that social media platforms frequently left reports unanswered, leaving users without clarity on whether reported content would be addressed.

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<sup>189</sup> SafeNet, <https://www.inach.net/safenet/>

<sup>190</sup> SafeNet, *Fact sheet Number 10, Hungary*, <https://www.inach.net/wp-content/uploads/Fact-sheet-No.-10-Hungary-Hatter-Tarsasag-Szubjektiv-Ertekek-Alapitvany.pdf> (accessed 19 August 2026) (in Hungarian).

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# **'IT ERODES MY SOUL'**

## **META'S CONTRIBUTION TO ANTI-LGBTI DISCOURSE IN HUNGARY**

This briefing examines the impact of Meta's operations on LGBTI people in Hungary. Amnesty International found that anti-LGBTI content was visible on Facebook, contributing to anxiety, self-censorship, and withdrawal from online participation by LGBTI people. The briefing concludes that Meta failed to adequately assess and mitigate foreseeable risks to LGBTI people and raises concerns regarding compliance with obligations under the EU Digital Services Act.