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Mr Mark Zuckerberg
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15th November 2022

Dear Prime Minister, Mr Musk and Mr Zuckerberg,

Tackling Online Abuse and the FIFA World Cup

In the coming weeks, the FIFA World Cup in Qatar will be the focus of global attention. The last World Cup was watched by more than 3.5 billion people. Football has evolved beyond the 90 minutes of live action to a 24/7 socially connected experience fuelled by social media with the last World Cup generating over 200 billion social media impressions.

Around 130 players at the last World Cup played their professional club football in the English Premier League or the EFL, the largest contribution of any country. The tournament itself is a global spectacle but is one to which English football makes a huge contribution. This year, we can expect similar levels of global attention and presence of English football.

We all hope that the social engagement around the tournament will be positive and that the people who play, watch and work in the game will be protected from racism, homophobia, misogyny, and other discriminatory abuse. However, to expect that would be the triumph of hope over bitter experience. We all know that abuse will happen. It is just a question of when, who is targeted, the scale and viciousness of the abuse and the scale of the harm it will cause. Recent research from FIFA and FIFPRO suggest that 1% of all football related posts are discriminatory, typically concentrated on a very small number of target victims. Assuming the same level of social media engagement as at the last World Cup, in the coming weeks discriminatory abuse could be viewed over 2 billion times. That equates to about 800 people witnessing abuse every second of every day during the tournament.

Online is not a parallel universe. Our culture is set by the worst behaviour we accept. That worst behaviour may start online but it does not end online. At Kick It Out, in the 2021-22 football season we saw a 40% increase in complaints of discrimination at grassroots football. In the first 3 months of the 2022-23 season, we have already seen another 50% increase with verbal abuse escalating into physical assaults. This abuse mirrors language that has become normalised online. So, if we accept it in our social feeds, we must expect it in our local parks and playgrounds.

A culture of impunity has developed on social media with a lack of meaningful consequences. You have the ability to change this. We are calling on you to do so. We will be asking people who play, watch or work in football to join our call for you to take action.

What do we want you to do?

Prime Minister, the Online Safety Bill has been under discussion for the best part of 5 years. We welcome its ambition to make the UK the safest place in the world to be online. However, the frustrating delays mean it will likely now be overtaken by the Digital Services Act in the EU so it will not achieve the ambition to be a global leader. We risk being left behind, with players and others in Spain, Italy, France or Germany better protected and safer. We ask the government to move faster.

Together with our partners across sport, law and technology, we recently conducted research on historic abusive online content, mapping this content to the proposed framework under the Bill to consider how it would be treated under the new laws. We identified an initial list of 50+ posts that would not be illegal under the Bill but would fall into the category of content harmful to adults (so called "legal but harmful" content). We are sharing some of those example posts with you with this letter. Some of these examples are aggressively abusive including suggestions that black footballers should not be in the England team and a torrent of homophobic abuse aimed at England players.

We recognise that there have been legitimate concerns expressed around balancing freedom of speech with privacy. Both are important rights. Neither is more important than the other and neither is absolute. We also understand that there has been particular anxiety around the sections of the Bill on "legal but harmful" content and provisions on this may be dropped from the Bill itself.

In legislating against online abuse, we must meet the world where it is, not where it used to be. Social media is no longer simply the digital equivalent of the town square. The functionality has developed. It mirrors how we congregate in the real world. It is a combination of public spaces (like the town square), private spaces (like your living room) and semi-public spaces (like a restaurant).

To find that balance, and for the protection of people who play, watch and work in football who are so often the victims of this casual culture of normalised abuse, we ask you to confirm that the following provisions in the Bill will remain in substantively their current form:

1. ***Provisions around illegal content:*** bringing the online world into line with the real world (so that if it is illegal to say in the real world, it should be illegal online). This includes the proposed new offences around rape and death threats (which particularly affect women in the game)
2. ***Social media platforms required to conduct risk assessments supervised by Ofcom:*** Ofcom is used to assessing risk of harmful content from its experiences overseeing broadcast and other media so reflects its existing role and expertise.
3. ***Social media platforms must ensure that access to harmful content is age restricted and appropriate:*** many of those 200 billion impressions during the World Cup will involve children and young people.
4. ***User empowerment safeguards:*** users must have more control over what they wish to see to enable them to make informed choices. Just because you have freedom of speech does not mean you have the right to force me to hear it. That right does not exist in the real world. Why should it exist online?
5. ***Ofcom to oversee social media compliance with their own terms and conditions:*** In our experience, social media companies already prohibit online abuse, but the application of those rules is inconsistent and opaque. They should be transparent, consistent and accountable to Ofcom.

It is essential that Ofcom and law enforcement are adequately resourced and able to partner with civil society, safety tech and other private entities. Enforcement of current laws

is regionally fragmented and inconsistent causing victims of abuse (such as high-profile footballers) to have very low trust in law enforcement. In our letter to the Home Secretary in July 2020, we set out suggestions for a specialist multi-disciplinary national enforcement unit. This would be a much more efficient use of public resources and could restore lost public confidence. We urge the government to reconsider this approach and would welcome a discussion.

To Mr Musk and Mr Zuckerberg, the Online Safety Bill and the Digital Services Act are coming. You do not have to wait for them to come into force, you can begin to take meaningful action now. Upon acquiring Twitter, Mr Musk acknowledged that "Twitter obviously cannot become a free-for-all hellscape where anything can be said with no consequences! In addition to adhering to the laws of the land, our platform must be warm and welcoming to all, where you can choose your desired experience according to your preferences". When can we expect the technology to be available on your platforms that enables us each to have the online experience that we wish to have? For many of us, this means an experience free from exposure to racist, homophobic, misogynistic, or other discriminatory abuse.

Many of us across sport are asking for a safer, more enjoyable online experience that is free from unwelcome abuse. We do not think that this is too much to ask.

Yours sincerely

Sanjay Bhandari,
Chair, Kick It Out

This letter is endorsed and supported by the following individuals and organisations:

- The EFL
- Dr Malcolm Clarke, Chair, Football Supporters' Association
- Richard Bevan, CEO, League Manager's Association
- Yvonne Harrison, CEO, Women In Football
- Steve Parish, Chairman, Crystal Palace FC
- Jon Varney, CEO and Thomas Frank, Head Coach, Brentford FC
- Tony Bloom, Chairman and Paul Barber, Deputy Chairman and Chief Executive, Brighton and Hove Albion FC
- Scott Duxbury, Chairman and CEO, Watford FC
- West Ham FC
- Zoe Brough, HR Director, Wolverhampton Wanderers FC
- Leon Mann, MBE