Online Antisemitism:
A Toolkit for Civil Society

About this report

As the online space becomes increasingly centre-stage in the fight against antisemitism, this guide from ISD and B'nai B'rith International, in partnership with UNESCO, aims to build capacity among civil society to tackle this growing threat. Recognising the enormous capacity for positive action that the digital space offers, this practical and action-oriented resource aims to consolidate knowledge and provide a wide range of policy and community avenues for action. The guide provides an overview of the online antisemitism threat landscape, a summary of existing policy responses on an international and national level across a range of European contexts, and a broad set of recommendations for civil society engagement with governments, platforms and wider communities to address this challenge.

About the authors

ISD

Since 2006, ISD has been at the forefront of analysing and responding to extremism in all its forms. ISD's global team of researchers, digital analysts, policy experts, frontline practitioners, technologists and activists have kept the organization's work systematically ahead of the curve on this fast-evolving set of threats. ISD partners with governments, cities, businesses and communities, working to deliver solutions at all levels of society, to empower those that can really impact change. We are headquartered in London with a global footprint that includes teams in Washington DC, Berlin, Beirut, Amman, Nairobi and Paris. ISD's research and insights shape our action programming on the front lines, and informs the training and policy advisory work provided to central and local governments, civil society, front line practitioners and international organisations.

B'nai B'rith International

Established in 1843, B'nai B'rith International is a Jewish advocacy and service organization committed to safeguarding Jewish life, tackling antisemitism, advancing peace and equality for Israel, providing safe and affordable housing for low-income seniors, championing diversity and helping communities in crisis. Through engagement with the United Nations, European Union institutions, the OSCE, the Council of Europe, the Organization of American States, governments, and other relevant stakeholders, we promote human dignity and combat all forms of discrimination. B'nai B'rith pursues both legislative and non-legislative tools to safeguard Jewish life and build more tolerant, inclusive societies. The B'nai B'rith Office of European Union Affairs advances these objectives in Brussels. B'nai B'rith's Office of United Nations Affairs, based in New York, has for decades led Jewish communal engagement at the world body, with associate partner status at UNESCO.

In partnership with UNESCO

UNESCO

The United Nations Educational, Scientific and Cultural Organization (UNESCO) is the specialised agency of the United Nations (UN) aimed at promoting world peace and security through international cooperation in education, the sciences, and culture. The Organization maintains continuous dialogue with civil society through the Collective Consultation of NGOs on Education which has close to 300 national, regional and international member organizations. The private sector, including business enterprises, philanthropic and corporate foundations, and individuals, is also involved as a partner in programme delivery, advocacy and awareness-raising activities.

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Introduction

A grandmother seeing her grandchildren for the first time on Zoom during the COVID-19 pandemic. Families celebrating holidays together remotely across the world. A refugee connected to a host family through an online group. Activists organising on encrypted platforms. Donation drives reaching millions of people. Unprecedented access to information. The opportunities offered by the digital space have enabled some of our greatest qualities of interconnectedness, in the wake of global challenges. Yet the challenges associated with this increasingly ubiquitous medium have accelerated as well. Among them, disinformation, extremist ideologies and conspiracy myths have become commonplace, with considerable implications for real-world social cohesion and public safety.
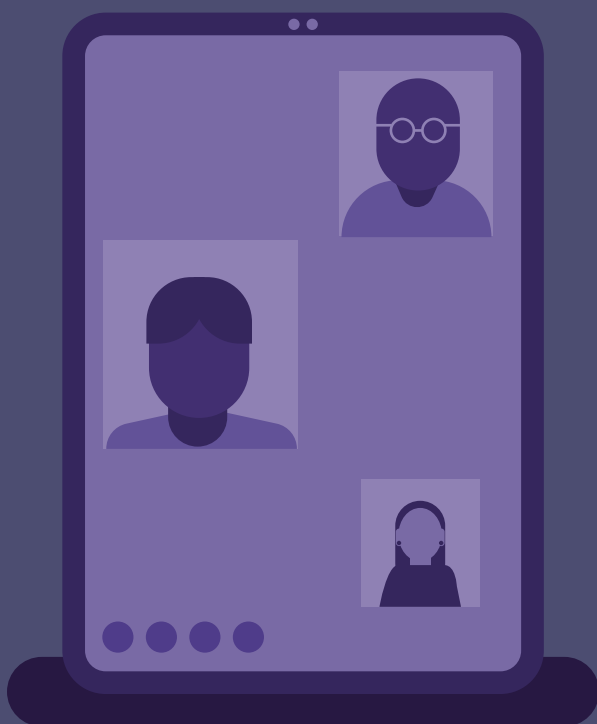
Amid these threats, antisemitism online has been a particular concern. Antisemitic conspiracies around COVID-19 have built on age-old tropes and spread with record speed. A variety of conspiracy myths targeting Jews have been documented, depicting Jews as creators, spreaders and benefactors of the pandemic.[1] During escalations of the Middle-East conflict in May 2021, Jews worldwide have been targeted with online abuse. Some of the most vile antisemitic physical attacks – both against individuals and places of worship – have been live-streamed, while so-called "lone wolf" attackers have been able to connect with like-minded communities and fellow travellers online. Increasingly populist political discourse has leaned with confidence into antisemitic rhetoric and Holocaust distortion.

These are just some of the latest manifestations of online antisemitic harms. But the digital space has long been the most pervasive vehicle for antisemitism experienced by the Jewish community today, specifically in a European context. A survey in 2018 by the Fundamental Rights Agency of the European Union found that among European Jewish respondents, a large majority (89%) considered online antisemitism to be a problem in their country. Many respondents (88%) also believed that antisemitism online had increased over the past five years, with most saying it has increased "a lot". Most survey respondents said they were regularly exposed to negative statements about Jews, and a large majority of respondents across all survey countries (80%) identified the internet as the most common forum for negative statements.[2] Across the world, antisemitism continues to be mainstream in online spaces, across both major platforms and alternative channels, reaching billions of users.

Given these circumstances, the topic of antisemitism online has been elevated among the priorities of Jewish institutions. It has also penetrated the policymaking sphere where legislators have long deliberated on the pressing issues of hate speech and disinformation online. As the latter become key issues within EU institutions and among member states, we also see antisemitic rhetoric increasingly being recognised as a "canary in the coalmine" for these wider threats associated with the democratic erosion challenging Europe today.

At the international level, the rise of antisemitism and the need to prevent it was clearly highlighted by the Secretary General of the United Nations (UN), who declared on this occasion that "anti-Semitism threatens all people's human rights" and "is a menace to democratic values, to social peace and stability".[3] Established in the shadows of the Second World War with a core mandate to build peace in the minds of women and men, UNESCO recognises it's duty to counter the rise of antisemitism. Within the framework of the UN Strategy and Plan of Action on Hate Speech and as part of their core mandate to promote global citizenship education, UNESCO strengthens educational responses to address and prevent contemporary antisemitism, and build the resilience of all people to extremist ideologies and prejudice.

The 2019-2024 European Commission has set as a key priority: "A Europe fit for the digital age", with a "human-centred" approach at its core.[4] Within this context, the Digital Services Act is, at the time of writing this guide, being deliberated. It has received notable unified input from major Jewish advocacy organisations galvanised by B'nai B'rith International, articulating a Jewish perspective towards the challenges at hand. The European Commission has also put forward the first-ever *EU Strategy on combatting antisemitism and fostering Jewish life (2021-2030)*, with its own digital priorities for addressing antisemitism online.[5] But as the policy framework by which to address antisemitism on a European level consolidates, a discussion has also emerged around the proficiencies and capacities required within the Jewish advocacy and community space to tackle this issue.

A new digital landscape: How to harness the good while effectively addressing the bad?

This guide looks to build literacy among Jewish professionals, lay leaders and community members at large – as well as wider allies from across civil society – to tackle antisemitism online. Recognising the enormous capacity for positive action that the digital space offers, it aims to consolidate knowledge and provide a wide range of policy and community avenues for action.

The guide provides an assessment of the online antisemitism threat landscape, an overview of existing policy responses on an international and national level across a range of European countries, and, importantly, a broad set of recommendations for engagement with governments, platforms and within communities to address these issues.

The first chapter provides an overview of the state of antisemitism online, its diverse manifestations, scope and scale. It offers insight into the state of play on specific platforms, and addresses the diverse ideologies, movements and influencers driving this phenomenon. It draws on a wide range of research and conveys the findings from a broad set of consultations held by ISD and B'nai B'rith International with key Jewish civil society organisations (CSOs).

It draws guidance from UNESCO's work to enhance freedom of expression as a contribution to peace, sustainability and human rights,[6] and the guidance published by UNESCO and the OSCE/ODIHR on addressing antisemitism through education.[7]

The second chapter outlines and unpacks the policy landscape relevant to the fight against online antisemitism, both from a governmental and social media platform perspective. Through in-depth case studies, it outlines legislative responses to online antisemitism in specific national contexts – with an eye to their interaction with preceding hate speech laws.

Finally, the third chapter provides a range of concrete paths for civil society action, including engagement with decision-makers and platforms, as well as opportunities for resilience and capacity building within the communities they serve. We address issues related to platform regulation, litigation, victim support, transparency, data access, digital citizenship education, digital hygiene, and coalition building for increased impact.

Jointly authored by ISD and B'nai B'rith International in partnership with UNESCO, this guide brings together expert, communal and intergovernmental voices to provide an accessible and action-oriented guide, which is catered specifically to the needs of the Jewish community and its allies. We hope that this guide may also serve as an easily adaptable reference point to address the needs of all vulnerable communities on the receiving end of online harm.

CHAPTER 1: THE CHALLENGE OF ANTISEMITISM ONLINE

Over the past 15 years, social media has had a transformative effect on our information ecosystems, radically altering and decentralising the public square. Increasingly outlandish and harmful conspiracy theories are gaining currency, large-scale disinformation campaigns have made it near-impossible to find common ground in political debates, and extremist movements are able to reach larger, more international mainstream audiences.

This fracturing of the public square has come as extremists have been emboldened by the rise of populist movements. Many extremists believe that the "Overton window" (the range of views that are acceptable in mainstream political discourse) has shifted in their favour. Far from being content with existing on an isolated fringe, extremists have recognised the power of social media. Drawing on a broad set of tactics, tools and platforms, they are trying to hijack digital communications to normalise their noxious ideas through concerted campaigns.

These campaigns to normalise extremist and "othering" worldviews pose one of the greatest dangers for open societies, with democratic institutions increasingly under siege.[8] This danger is further amplified by a distorted online ecosystem. The attention-driven business model and algorithmic architecture of major social media platforms have skewed the online landscape in favour of polarising and extreme views.

Jewish communities have been one of the key targets of these campaigns – antisemitism has grown exponentially in recent years, both in institutional politics, online discourse, and targeted violence. Social media has provided unprecedented visibility and availability to antisemitic ideas, and enabled antisemites to network with and learn from each other. Entire subcultures online have emerged that draw on long-standing antisemitic tropes, and combine them with references to broader youth, gaming and online subcultures to make them more appealing and digestible. Antisemitism has been weaponised and is inseparably connected with the rising phenomena of disinformation and the amplification of conspiracy theories online, as well as the rising phenomenon of hate speech, which has targeted Jewish communities alongside other groups.[9]

This chapter provides an overview of the current state of antisemitism online. Drawing on a wide range of research,

DEFINITION

ISD defines **extremism** as the advocacy of a system of belief that claims the superiority and dominance of one identity-based "in-group" over all "out-groups." It advances a dehumanising "othering" mindset incompatible with pluralism and universal human rights.

This report defines **disinformation** as false or misleading content that is spread with an intention to deceive or secure economic or political gain and which may cause public harm.
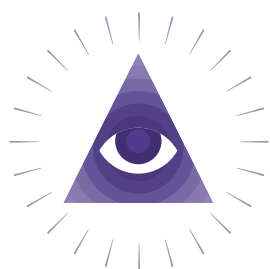
as well as ISD's and B'nai B'rith's consultations with civil society groups working on the issue, it seeks to lay out the greatest challenges from antisemitism online, including the specific platforms, ideologies, groups or influencers driving this phenomenon. The briefing begins by looking at the scope and scale of antisemitism online, before laying out the diverse manifestations of antisemitism.

Scope and Scale of Antisemitism Online

Antisemitism has become increasingly visible in the digital era. 'Despite the constraints faced by researchers and Jewish community organisations due to the limited data provided by companies, antisemitic content can easily be found on all major social media platforms.[10] One study has estimated that more than ten per cent of all tweets about Jews and Israel were antisemitic.[11]

Antisemitic content is shared across a range of text, images, video and audio. At times it will be overt and vulgar, but it is often expressed implicitly through the use of double meanings, codes, dog-whistle vocabulary and conspiracy theories that require significant background knowledge. This enables antisemitic users to maintain the ability to deny being aware of the antisemitic connotation of coded language and veiled keywords ("plausible deniability").

Research has shown that antisemitism online has not only increased in volume, but also severity, over the past decade.[12] It has adapted to new developments such as the COVID-19 pandemic by integrating conspiracy theories about the origins and nature of the virus into an antisemitic world view that identifies Jewish individuals or Jewish people collectively as the culprits behind the crisis. Following the introduction of lockdown measures in the spring of 2020, ISD found a seven-fold and thirteen-fold increase in antisemitic comments across French and German channels respectively over the following year.[13]

Online antisemitism is a cross-platform issue, affecting major social media platforms such as Facebook, Instagram, YouTube, TikTok, Reddit and Twitter, as well as so-called "alternative technology" platforms that may not be as widely known among the general public (e.g. Telegram, Bitchute, 4chan, Gab, Parler, Odysee).

Video-sharing platforms such as YouTube present a particular challenge, often amplifying antisemitic conspiracy theories through recommendations.[14] Antisemitic slurs and hate speech, as well as Holocaust denial, can easily be found on TikTok, a social media platform hugely popular among young people.[15] Online search engines may also be a tool for individuals to access antisemitic content – internet users based in the UK make approximately 170,000 antisemitic Google searches per year.[16] Another medium that has received relatively little attention to date is podcasts, even though such audio material may be a key vector for Holocaust denial and far-right antisemitic conspiracy theories.[17]

At the same time, the volume and nature of antisemitic content vary depending on the extent to which platforms are able and willing to enforce their community guidelines. Some of the most extreme content can be found on smaller, alternative platforms that are either unable (due to a lack of technological or staff capacity) or unwilling to moderate user posts.[18]

A **conspiracy theory** is a belief that events are being secretly manipulated by powerful forces with negative intent. Typically, conspiracy theories involve an imagined group of conspirators colluding to implement an alleged, secret plot.

DEFINITION

Alt tech

One example of the latter is Telegram, even though there are many platforms with similar dynamics including Gab and Bitchute.[19] Telegram is an encrypted messaging platform founded by the Russian tech entrepreneur Pavel Durov. Durov previously founded the social media platform VK (short for VKontakte) which is highly popular in Russia, but was forced out after he refused to comply with orders by the Russian government to provide data about anti-government protesters. Therefore, Telegram has a very libertarian ethos, and barely moderates its community. It often refuses to cooperate with law enforcement, including in democratic countries. While this allows dissidents living in authoritarian states to rely on Telegram, it has simultaneously become a "safe space" for violent extremism (VE) and antisemitism.[20]

DEFINITION

Alt-tech describes social media platforms used by groups and individuals who believe major social media platforms have become inhospitable to them because of their political views. This includes platforms built to advance specific political purposes, libertarian platforms that tolerate a wide range of political positions, including hateful and extremist ones, and platforms which were built for entirely different, non-political purposes such as gaming.
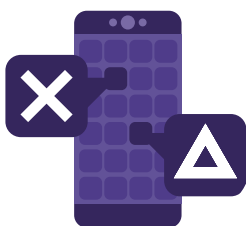
On Telegram, there are hundreds of extreme-right channels openly espousing violent extremist rhetoric, and antisemitism plays a central role within these channels.[21] The absence of consistent content moderation has allowed white supremacists to use Telegram to glorify terrorism, call for violence, spread extremist ideological material and demonise minority groups, often targeting Jewish communities.[22]

Websites

Another key medium for antisemitic ideas, memes and conspiracy theories are "Chan" sites such as 4chan, 8kun and smaller offshoots. Founded in 2003, 4chan was originally designed to exchange Japanese anime comics and images, and developed into a seminal website for the formation of memes, "trolling" and other internet subcultures. During the early 2010's, there was increasing influence of far-right, anti-feminist and antisemitic communities on 4chan discourse, especially within notorious boards (online fora) such as "/pol/".[23] While not all of 4chan is far-right or antisemitic, there are prominent user groups that adopt the transgressive humour, image-based hate and references to video gaming or youth-culture so crucial to 4chan's appeal in order to normalise antisemitic ideas.[24] For example, the QAnon conspiracy theory originated on 4chan. 8kun (formerly 8chan), which was established after a 4chan moderation controversy, was used by far-right terrorists in Christchurch, Poway and El Paso to upload their propaganda materials and livestreams, in which they made references to Chan culture.[25]

Equally extreme and often violent antisemitic content is prevalent on closed forums such as Iron March and Fascist Forge or partially open sites such as Stormfront, one of the oldest neo-Nazi web forums.[26] [27] Iron March was specifically used to establish and organise members of extreme-right

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The UN Strategy and Plan of Action on Hate Speech defines **hate speech** as "any kind of communication in speech, writing or behaviour, that attacks or uses pejorative or discriminatory language with reference to a person or a group on the basis of who they are, in other words, based on their religion, ethnicity, nationality, race, colour, descent, gender or other identity factor".

DEFINITION

terrorist groups such as the Atomwaffen Division and National Action. Stormfront similarly has been connected to real-world violence, with nearly 100 people having been murdered by Stormfront users in politically motivated acts of violence.[28] While Iron March and Fascist Forge were shut down in 2017 and 2020, respectively, Stormfront remains active.[29]

It is crucially important to not only track how antisemitic attitudes manifest in posts targeting Jews, but also Jewish experiences and perceptions of antisemitism. ISD and B'nai B'rith consulted with civil society groups about antisemitism to better understand how this threat is perceived by those working on the frontline of this issue. There was a general belief that this phenomenon is often treated in a tokenistic manner, meaning responses are not necessarily proportionate or tailored to the specific threat. Organisations noted a surge of feeling in recent years among communities that "something must be done" about online threats, without much of a grounding of what constitutes the contemporary landscape of online anti-Jewish hatred.

Some experts attributed this to generational factors in the leadership of Jewish organisations – for example, that those in older demographics were more likely to see the problem in terms of offensive comments on an organisation or individual's Facebook page, rather than understanding the cross-platform landscape of threats and challenges.

Overall, experts spoke about the increasingly arbitrary distinction between "antisemitism" and "online antisemitism". Rather than seeing these as separate phenomena, it is important to understand the real-world impact of such online threats, and recognise that digital abuse can prove as consequential in both the short- and long-term as physical security around synagogues or other Jewish spaces.

Types of Antisemitism

Antisemitism comes in many forms. In an effort to provide guidance on what constitutes antisemitism, the International Holocaust Remembrance Alliance (IHRA) adopted a working definition, widely embraced by the Jewish community and its representative organizations, adopted by 37 countries, endorsed by the European Parliament, Commission and Council, as well as numerous municipalities, universities, police departments and a range of civil society organisations. It states antisemitism is "a certain perception of Jews, which may be expressed as hatred towards Jews. Rhetorical and physical manifestations of antisemitism are directed towards Jewish or non-Jewish individuals and/or their property, towards Jewish community institutions and religious facilities.[30]

As part of the definition, IHRA provides a list of 11 non-exhaustive examples of contemporary antisemitism. These outline specific examples including: calls for violence against Jews, "classical" antisemitic tropes (e.g. myths about a global Jewish conspiracy or blood libel), Holocaust denial, and Israel-related antisemitism.[31]

All of these types of antisemitism can feature online as well, though their prominence on different platforms and among adherents of specific ideologies will differ. Antisemitism can be a common factor in a broad range of extremist movements, and some tropes are remarkably similar across the ideological spectrum (e.g. extreme left- and right-wing movements and violent extremist groups). During our consultations, there was a consensus that to really understand its diverse manifestations, the threat needs to be broken down by distinct ideologies. In particular, organisations pointed to clear waves of online threats, which were highly dependent on news cycles and external events, citing drivers as diverse as coronavirus trends, election cycles, or conflict in the Middle East.

The far right is often responsible for the most visible antisemitic threats online. Antisemitism is a key element of these movements, which draws on the entire spectrum of antisemitic content from calls for violence, classical stereotypes and conspiracies about Jewish supremacy, and Holocaust denial and distortion.

On closed forums and "alternative" platforms with little content, calls for violence against Jews are especially prominent among extreme-right groups online. Far-right engagement has also been supercharged by Covid-19, which drove the proliferation of antisemitic conspiracy theories around the pandemic.[32] In Germany, specific ideologues were central to this phenomenon, with influencers such as the vegan cook Attila Hildmann becoming increasingly radicalised during the Covid-19 pandemic towards antisemitic themes.[33]

Various violent extremist ideologies and conspiracy theories that proliferate online often feed on antisemitism. Within the online propaganda published by violent extremist groups, antisemitism plays a central role, such as in ISIS' English-language magazine Dabiq.[34] Antisemitism is also prominently found in the online discourse of younger Salafi-jihadi extremist communities, who often combine antisemitic ideologies with different elements of gaming, youth and online subcultures – often borrowing from the antisemitic tropes and references of far-right extremists.[35] Beyond such non-state groups, social media is also a vector for antisemitism from states.

Left-wing antisemitism often manifests itself through conspiracy myths alleging the "Jews" or "Zionists" control the media, economy, government and other societal institutions for malevolent purposes. Criticism of Israel may in some cases be informed by antisemitism assumptions and beliefs that are simply applied to Zionism, Israel and the Israeli-Palestinian conflict: by using symbols of classic antisemitism, denying the Holocaust, referring to "lying Jews"; accusing the Jewish people of being responsible for all wars and virtually every catastrophe; denying the Jewish people their right to self-determination; holding Jews collectively responsible for the situation in the Middle East; or excluding individuals based only on their Jewish identity. Antisemitism often rises around the world in response to periods of heightened tension in the Israeli-Palestinian conflict, often equating Israel to the Nazi regime. This type of discourse, that exceeds the boundaries of legitimate criticism of state policies, and seeks to delegitimize and apply double standards to Israel, is categorized as antisemitic within the aforementioned examples of the IHRA working definition (for full definition, please see Annex).[36]

For example, in the context around antisemitism in the Labour party in the UK, concerns about left-wing antisemitism were dismissed merely as "smear campaigns" or presented as conspiracy theories about a "shadowy Israeli, Zionist or Jewish lobby".[37] The UK's Equality and Human Rights Commission "point[ed] to a culture within the party which, at best, did not do enough to prevent antisemitism and, at worst, could be seen to accept it".[38] This type of antisemitism remains visible in diverse, broadly mainstream forums and is often posted with impunity as it is often not challenged by other users.

However, antisemitic attitudes are not isolated to a small fringe, but are a broader societal phenomenon, beyond overt extremists. The announcement of a proposed football European Super League, for example, was met with antisemitic accusations by fans arguing that Jews were "ruining football."[39] Another instance without an obvious political context involved the high-profile British rapper Wiley who made a series of posts on Twitter that were widely condemned as antisemitic. The British criminal investigation into his comments was stopped after the police learned Wiley had sent the tweets from the Netherlands (and was therefore outside the jurisdiction of UK law enforcement).[40]
  While antisemitic narratives are adapted to fit the contemporary context online, they usually draw on long-standing ideological tropes about the world being supposedly

DEFINITION

ISD defines **far-right** extremism as a form of nationalism characterised by its reference to racial, ethnic or cultural supremacy. Right-wing extremism is the advocacy for a system of belief in inequality based on an alleged difference between racial/ethnic/cultural groups. Far-right extremists commonly exhibit these features: nationalism, racism, xenophobia, anti-democracy and strong state advocacy.

ISD defines **Salafi-jihadism** as the implementation of puritanical interpretations of Islamic governance achieved specifically through a violent interpretation of jihad.

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run by Jewish elites or blood libel allegations. The COVID-19 pandemic, for example, is often portrayed as a "Jewish plot" or even as a "Zionist bioweapon". In parallel, billionaire philanthropist George Soros or the Rothschild family (both frequent targets of antisemitic conspiracies) are accused of being behind the crisis or profiting from the vaccination programme.[41] Soros had previously been accused of masterminding the European refugee crisis in 2015 (especially by the far right), and of bankrolling left-wing groups such as Antifa or the Black Lives Matter movement following the murder of George Floyd in May 2020.[42] Lastly, the QAnon conspiracy theory, which claims that a network of liberal elites is trafficking children to sexually abuse them and harvest "rejuvenation chemicals" from their bodies, frequently draws on antisemitic imagery and tropes related to the blood libel myth. The specific frames for antisemitism may be new, but they are ultimately repackaged versions of the myth that Jews control major political and societal dynamics for nefarious purposes.

Holocaust denial and distortion can also easily be found across mainstream social media and ostensibly fringe platforms. According to an upcoming UNESCO report, 17% of content related to the Holocaust on TikTok either denied or distorted the Holocaust.[43] This is in part due to Holocaust denial remaining within freedom of speech laws in certain countries, while in others - despite existing legislation - most cases are not criminally prosecuted. In fact, Holocaust denial did not violate the community guidelines of major social media companies such as Facebook until 2020, when various reports showed the platform's algorithms were actively recommending Holocaust denial to users.[44] Facebook and TikTok have since partnered with UNESCO and the World Jewish Congress to redirect users to verified and accurate information about the Holocaust on the website AboutHolocaust.Org.
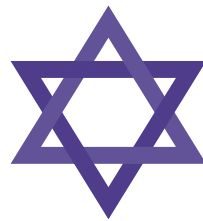
The UN defines **denial or distortion of the Holocaust** as: (a) Intentional efforts to excuse or minimise the impact of the Holocaust or its principal elements, including collaborators and allies of Nazi Germany, (b) Gross minimisation of the number of the victims of the Holocaust in contradiction to reliable sources, (c) Attempts to blame the Jews for causing their own genocide, (d) Statements that cast the Holocaust as a positive historical event, (e) Attempts to blur the responsibility for the establishment of concentration and death camps devised and operated by Nazi Germany by putting blame on other nations or ethnic groups.

DEFINITION

 One related trend during the COVID-19 pandemic has been the use of language and symbols that equate the treatment of Jews under Nazi rule with that of opponents to lockdown measures, vaccination programmes and other public health mandates intended to curb the virus. Protestors in various geographies including Australia, Germany and the US have taken to wearing Yellow Stars to identify themselves as unvaccinated, implying they are being persecuted by state authorities for refusing to wear a mask, socially distance or even disclose their vaccine status to employers. Comparisons with the anti-Nazi resistance are also rife, as well as comparing vaccination programmes with the "final solution". While it is not always clear whether this is a conscious provocation or caused by historical ignorance, these inaccurate analogies distort the history of the Holocaust.[45]

As noted at the beginning of this briefing, antisemitism may be expressed overtly and transparently or signalled via linguistic or numerical codes (e.g. 6MWE = six million weren't enough; 88 = Heil Hitler), implicit statements (claiming that Soros is a "globalist puppet master" aiming to replace "native" Europeans with non-white immigrants, without explicitly mentioning his Jewish identity) or secret symbols (the triple parentheses identifying individuals or organisations as real or imagined Jews, e.g. by claiming that "'(((ISD))) is an anti-white organisation". Antisemitic users are often aware of legal thresholds as well as platform rules, and attempt to play just within the borders of what is considered acceptable or legal. Phrasing posts in this euphemistic way, so that users can then deflect criticism, is often referred to as "plausible deniability."[46]

CHAPTER 2: POLICY RESPONSES TO ONLINE ANTISEMITISM

This section of the guide will unpack the rapidly shifting policy landscape around online antisemitism, exploring both the policy actions taken by social media companies to address the threat, as well as laying out emerging government approaches to tackling antisemitism and other online harms.

In this chapter, we will outline a broad range of legislative efforts and different national approaches from across Europe and North America. We consider the challenges, opportunities and relevance for addressing antisemitism online and the emerging policies around digital safety, as well as how these interact with existing hate speech laws.

Online Antisemitism: from Platform Action to Government Responses

The challenges of rising online antisemitism outlined in the previous chapter come as democracies grapple with urgent questions around how governments can effectively safeguard social cohesion. This includes guarding democratic processes and public safety, and protecting human rights such as freedom of expression and protection from discrimination and incitement.

Over two decades ago, laws such as the Communications Decency Act in the US and the EU's E-Commerce Directive established the orthodoxy that internet service providers were not liable for user-generated content hosted on their platforms, but also had the freedom to moderate content on their platforms.[47] [48] But in subsequent years, growing focus on the threats of disinformation, hate speech and extremism on social media platforms has presented major questions over how best to protect the rights and freedoms outlined above, while preventing their abuse.

Initial responses to these challenges were rooted in self-regulatory or co-regulatory initiatives between government and industry, as policymakers attempted to encourage or cooperate with online platforms to tackle both illegal activity such as terrorism or child abuse, and "legal harms" such as disinformation or self-harm promoting content. Alongside this, a variety of other policy approaches to the challenges of online hate emerged, from counter narratives, to digital and media literacy, and public-awareness campaigns.

However, many felt that improvements from such voluntary or industry-led approaches were limited, and governments have felt compelled to re-open debates on regulating the digital sphere to address these challenges more effectively. This emerging trend towards online regulation can be broadly divided into two categories:

- **Content-based approaches**, often targeting a specific online harm such as hate speech or electoral disinformation, focusing on the effective, timely and proportionate removal of that content where appropriate.

- **Systemic approaches**, where platforms are compelled to show that their policies, processes and systems are designed and implemented with respect to the potential negative outcomes that could occur, across a range of possible harms.

Initial steps: Self-regulation and civil society responses

Many countries have developed established legislative frameworks for codifying the threshold of hateful speech, including towards Jews. Across the EU, laws criminalising hate speech against Jewish people, based on a criminalisation of incitement of hate and violence against people based on their ethnicity, race, religion, or nationality, as well as Holocaust denial and distortion, exist on the statute books in different forms. For instance, under the German criminal code, incitement to hatred of a group based on national, ethnic, religious or racial characteristics in a manner that can disturb public peace is a criminal offence. This includes denial, distortion or condoning of crimes against humanity committed under the political movement National Socialism, as well as the use of propaganda and insignia of unconstitutional organisations. In France, the provocation of hatred or violence against a group on grounds of their origin or (non-)membership of an ethnic or religious group as well as the condoning of crimes against humanity are punishable offences.

But the enforcement of these laws has been patchy in the online space, due to both the scale of illegal content, and the fragmentation of existing legal structures.[49] Therefore, in recent years there have been a variety of government-led initiatives to commit social media companies to fight hate speech on their platforms through self-regulation.[50] In 2016, the European Commission launched a Code of Conduct on countering illegal hate speech online and invited major social media platforms to become signatories, in an attempt to promote collaboration and connect up legal and extra-legal approaches to tackling online hate.[51] Participating companies voluntarily committed to improving their response times to illegal hate speech, requiring them to review hateful speech within a day of receiving a report, as well as bolstering staff training and collaboration with civil society.

Civil society work with tech companies

CSOs consulted for this guide described a mixed picture in their engagement with larger social media companies around tackling online antisemitism. Several organisations said that companies were listening to civil society more than previously, with platforms more open to opportunities to trainings from expert organisations for example.

Experts described that today we see more regular roundtables with senior figures from companies such as Facebook, which can be useful in helping platforms to understand specific elements of the threat landscape (for example the issue of Holocaust denial, or nuances around Israel-related antisemitism). However, it was felt that most platform policy changes ultimately failed to address the wider systems that can feed this ecosystem of hate, such as recommendation algorithms.[52]

Others claimed platforms tended to engage only with larger organisations, meaning that localised manifestations of antisemitism in smaller markets were overlooked. Through schemes like trusted flaggers, relationships were often held with companies, but organisations were usually clear-eyed on limitations, looking simultaneously to work constructively with platforms and work with government to hold companies to account.

Some suggested that while platforms were trying to give the impression of working productively with civil society, the stance of companies was ultimately to placate organisations, and were only ever really swayed to meaningful action by public pressure, while engaging in dialogue tended to lead to more moderate outcomes. Several organisations cited platforms' eventual response to Covid-19 disinformation as an example of what can be done when companies work to address online information challenges more systemically.

Finding their feet: Content-based policy approaches

The perceived limitations of voluntary approaches were felt not only by civil society. Jugenschutz.net – the official German body tasked to monitor industry compliance – found major shortcomings in the removal of hate speech under self-regulatory approaches such as the EU Code of Conduct.[53] The EU, Germany and France have all undertaken content-based legislative efforts, although not always with success. For example, while the Network Enforcement Act (NetzDG) in Germany now obliges large social media platforms to remove certain unlawful content from their services via a notice and action mechanism, a similar proposal in France to counter online hatred saw the majority of the law struck down by the French Constitutional Council for infringing on freedom of speech, with concerns raised around the possibility of disproportionality and the potential for "over blocking" of content – charges also levied at the NetzDG by critics (see case studies on page 18).[54] [55]

Most recently, the Austrian government has proposed a similar law called the Communication Platforms Act (Kommunikationsplattformen-Gesetz – KoPl-G) in September 2020, targeting platforms with more than 100,000 users or annual revenue exceeding €500,000. Alongside potential fines up to €10 million, the Act references indirect financial pressure which could be levied in cases of noncompliance, such as blocking the payment of ad revenue to platforms. To mitigate against claims of "over blocking" the proposal seeks to establish a dedicated complaints procedure for users to have their content reinstated in cases where removal by the platform is deemed unwarranted. Over a dozen other countries have sought to introduce content-based regulation into law, with concerns raised by some activists around their potential for authoritarian abuse.[56]

Looking ahead: Towards systemic policy approaches

Much online antisemitism crosses existing legal thresholds around hate speech, as defined by international standards for the narrow restrictions to freedom of expression as laid out in the International Covenant on Civil and Political Rights and the Rabat Plan of Action. But most still sits in a grey zone of legality, straddling technology company terms of service and national laws which are always having to play catch up with the evolving threat while striking a balance of not restricting legitimate expression. Furthermore, the borderless internet makes attribution a difficult task, as well as the ability to trace the perpetrators of hate speech, extremist content or disinformation.

These issues have led some legislators to look beyond content-based regulation and adopt a cross-harms perspective to online regulation. The aim of these more "systemic" approaches is to develop approaches that include the underlying systems of platforms and an oversight framework that can be used to tackle a plethora of online harms, ranging from hate, extremism and terrorism to child safety, cyber-bullying and disinformation.

In the EU, for example, a revision of the E-Commerce Directive is underway in the form of the Digital Services Act (DSA); while the European Democracy Action Plan (EDAP) highlights the need for a combination of regulatory and non-regulatory initiatives to protect elections, safeguard media pluralism and combat disinformation on a European level – all of which require increased cooperation and, in some cases, co-regulation, across public and private sectors. Similarly, in the UK, the Online Safety Bill (OSB), sets out to establish a broad regulatory framework designed to make the UK "the safest place to be online". Even in the case of the content-focused German NetzDG, a proposal to revise the law includes an oversight mandate for the German Federal Office of Justice (see case studies on page 18).

All of these developments indicate that – two decades after the E-Commerce Directive – the new generation of regulatory and non-regulatory initiatives to combat hate speech and other online harms will increasingly throw the internal processes of social media companies into the limelight. Alongside continued debates about what constitutes harmful online content, the emphasis will be on ensuring regulators have the proper tools at their disposal to fulfil their oversight function while safeguarding their operational and functional independence. This is a marked evolution of digital regulation in a space that has to date been dominated by a "notice-and-takedown" model.

Civil society views on government responses

CSOs consulted for this guide, generally saw governments' primary role as legislating and enforcing rules around illegal expressions of antisemitism. There was a general perception that European governments were beginning to legislate more effectively around illegal hate speech, for example, in France where legal precedent around online enforcement of hate speech laws was beginning to be set through prominent court cases, and in Germany, where the NetzDG was generally welcomed by communities as an important tool in countering the sharp tip of online antisemitism.

However, there was a view among some Jewish community organisations that a narrow focus on illegality fails to address the broader underlying factors driving online antisemitism, and this instead needs to be approached as a systemic issue with platforms requiring more robust regulatory action, with a perception that self-regulation has failed to stem the tide. In this context the EU's proposed DSA was presented as an important step in the right direction, although some CSOs said they had been underwhelmed by the latest draft and its specific provisions around hate speech.

But there was also an understanding that when it comes to addressing legal but harmful content, laws have only limited impact. Civil society urged for much more governmental action on areas such as digital media literacy, fact-checking,

counter-narratives, and addressing the broader ecosystem beyond mainstream social media platforms, for example, in addressing antisemitism on "alternative" platforms.[57]

Transparency and Data Access

Unless there is a more complete understanding of the scale and nature of antisemitism online, it is incredibly difficult to understand which potential solutions would be both effective and proportional. There has been growing civil society pressure calling for greater transparency from platforms, to ensure that governments, regulators, civil society and the public are able to better understand the scale and nature of online hate speech.[58]

Governments and regulators need much greater data access to achieve a more complete understanding of the dissemination of antisemitic content, respective company policies, procedures and decisions, as well as the underlying technology, its outputs and potential biases. Civil society, academia, UN agencies and the media would benefit enormously from greater access to data – especially on the reach of content and comments, which is essential for building the evidence base around online hate and providing independent scrutiny of platforms. And while data access is crucial, opaque content moderation and algorithmic processes among social media companies should also be made more transparent.

David Kaye, the former UN Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression (2014-2020), has advocated for a rights-based approach to online regulation, with transparency at its heart. His central claim is that human rights standards as set out in the Universal Declaration of Human Rights should guide content moderation norms.[59] This does not mean that any form of expression should be allowed on social media, but rather that companies' terms of services and government responses should clearly articulate when and why restricting the right to freedom of expression is necessary and proportionate.

The Rabat threshold test and Article 19's hate speech pyramid outlined below, for example, could provide useful guidance to companies when deciding and justifying the proportionality of response. The attempt to regulate only where it is necessary lies at the heart of the risk-based policy approaches outlined earlier. This necessitates "rule-making transparency" as well as "decisional transparency" by clearly laying out the decision-making process behind platform action. This provides the basis for provider and government accountability which the public can scrutinise, and appeal, any decisions made.

To this end, UNESCO has set out a 26-point approach that could help to enhance the transparency of platforms.[60] Proposed measures for these platforms include the recognition of their obligation to protect human rights and increased transparency around the mechanisms in place to counter disinformation, hate speech and incitements to violence.
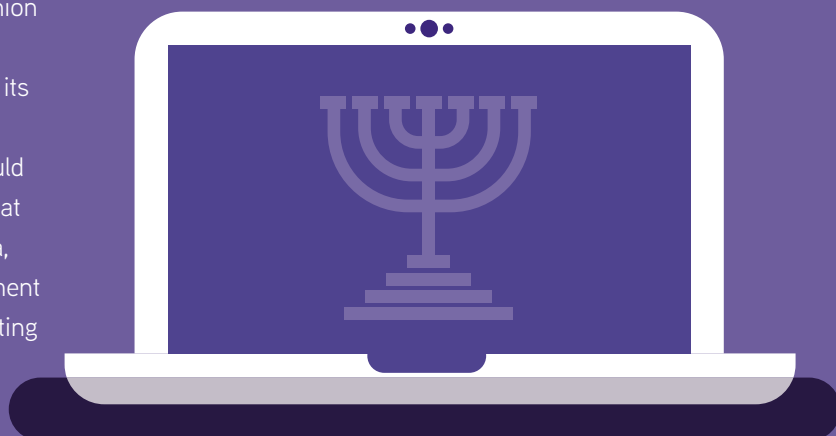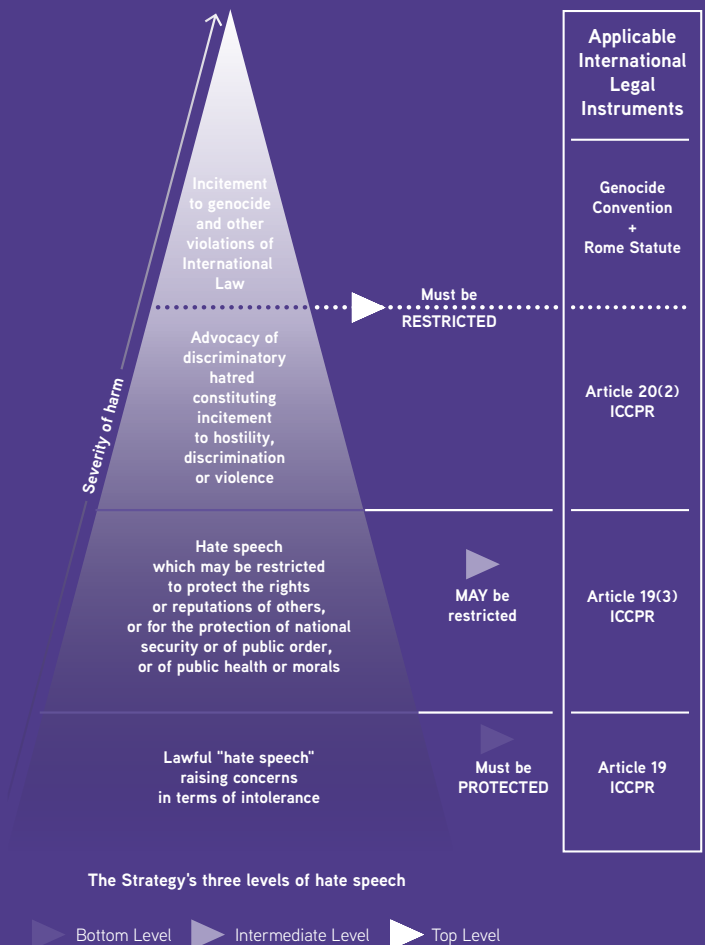
Hate Speech, Dangerous Speech and Incitement to Violence

While we must be careful around debating the ethics around antisemitic hate speech, this topic intersects with a wider conversation around freedom of speech, harmful content and balancing basic rights and the need for proportionality. It is important to distinguish between "hate speech" as an umbrella concept with multiple meanings and legal terminology referring to "hate speech". Notably, there is no clear, universally accepted, legal definition of the concept. It is an ongoing challenge to determine where freedom of expression ends and hate speech starts. At the European level, the Committee of Ministers of the Council of Europe defines hate speech to cover "all forms of expression which spread, incite, promote or justify racial hatred, xenophobia, antisemitism or other forms of hatred based on intolerance."[61]

In a discussion paper on online hate speech, UNESCO addresses the conceptual challenge surrounding hate speech.[62] Its point of departure is Article 19 of the Universal Declaration of Human Rights, which safeguards the individual's right to opinion and expression. Article 20 of the 1966 International Covenant on Civil and Political Rights (ICCPR) formulates limitations to these freedoms, prohibiting "any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence." However, the article stipulates these restrictions must be provided by law and only apply when other important principles are at stake, such as national security and tolerance for others.[63]

As a complementary tool to help identify hate speech, the UNESCO paper draws attention to the Rabat Plan of Action. Here the United Nations Office of the High Commissioner for Human Rights provides a series of recommendations to uphold international human rights standards in matters pertaining to freedom of expression and opinion and guide members states and other stakeholders in implementing the prohibition of incitement to hatred.'[64]

The 'Hate Speech Pyramid'

Severity of harm

Incitement to genocide and other violations of International Law

Advocacy of discriminatory hatred constituting incitement to hostility, discrimination or violence

Hate speech which may be restricted to protect the rights or reputations of others, or for the protection of national security or of public order, or of public health or morals

Lawful "hate speech" raising concerns in terms of intolerance

Must be RESTRICTED

MAY be restricted

Must be PROTECTED

	Applicable International Legal Instruments
	Genocide Convention + Rome Statute
	Article 20(2) ICCPR
	Article 19(3) ICCPR
	Article 19 ICCPR

The Strategy's three levels of hate speech

Bottom Level   Intermediate Level   Top Level

Source: ARTICLE 19, "Hate Speech" Explained: A Toolkit, p.19

ONLINE ANTISEMITISM AND HATE SPEECH POLICIES:

EUROPEAN CASE STUDIES

In the section, we outline some of the key policy initiatives being developed to tackle online antisemitism from across Europe, a region which has seen some of the most wide-ranging and proactive policy initiatives to address this emerging threat.

European Union

The EU has a number of tracks dedicated to challenging antisemitism both through legal tools and through civil society action. The most recent of these is the EU Strategy on Combating Antisemitism and Fostering Jewish Life, which is set to be implemented between 2021 and 2030. The strategy lays out three areas of action: preventing and countering antisemitism, fostering Jewish life, and Holocaust education. The EU plans to support its member states in developing national strategies to counter antisemitism and will assess them by late 2023. The Commission also encourages its members to adopt the International Holocaust Remembrance Alliance's (IHRA) working definition and appoint national envoys for combating antisemitism and fostering Jewish life.[65]

In an effort to tackle online antisemitism, the Commission has committed to creating a union-wide network of trusted flaggers, to support fact-checkers, and assist independent organisations in creating counter-narratives. Furthermore, the Commission will seek cooperation with the tech industry to prevent the sale of illegal Nazi-themed memorabilia. In addition to that, the Commission wants to carry out a comprehensive, data-driven investigation into how antisemitism spreads online. The EU Strategy calls upon member states to support civil society groups who fight against online antisemitism and also increase the capacity of their judiciary to prosecute antisemitism on the internet.

The strategy recognises that longstanding antisemitic conspiracy myths and disinformation, while not necessarily illegal, are harmful. Addressing the gap of tackling legal but harmful content, the Digital Services Act (DSA) draft obliges very large online platforms (with over 45 million users in the EU) to put in place risk mitigation measures tailored to systemic risks. These are framed, among others, as the dissemination of illegal content, impact on the exercise of fundamental rights, or foreseeable effects on the protection of civic discourse.[66]

Such risks may arise, for example, concerning the design of the algorithmic systems or the misuse of their service through the submission of abusive notices or other methods for silencing speech. The DSA proposal is complemented by the strengthening of the **Code of Practice on Disinformation**, which requires the demonetisation of disinformation as well as more fact-checking – helping to contribute to better fighting antisemitism online.[67]

The 2020 European Democracy Action Plan (EDAP) aims to ensure fair elections and foster democracy in the digital age, as this is vital to counter polarisation and extremism. Antisemitism has been used in the political campaigning of fringe organisations, foreign states interfering in elections, and even domestic parties and their supporters. The EDAP seeks to create more transparency for political advertising and paid-for communications online. The EDAP also mentions the expansion of the list of EU crimes to illegal hate speech' to The EDAP also mentions the expansion of the list of EU crimes to include illegal hate speech.[68] The European Commission plans to list illegal hate speech as such an EU crime, which means there must be minimum standards across the union to prosecute such offences. If this legislation is adopted by the Council of the European Union and the European Parliament, it would create a legal basis to criminalise racist and xenophobic expressions on the internet. The Council's 2008 framework decision "on combating certain forms and expressions of racism and xenophobia by means of criminal law" also requires member states to criminalise hate speech.[69]

Germany

Germany has been at the forefront of driving legislation that compels social media companies to deal with illegal "hate speech" online, grounding such legislation in the German **Criminal Code**. Notably, the Network Enforcement Act (NetzDG) obliges large social media platforms to remove certain unlawful content from their services via a notice and action mechanism. At the EU level, through the proposed DSA, Germany wants to safeguard freedom of expression, user rights, clear reporting procedures, access to platform data for research purposes, and transparency of algorithmic systems. The existing regulatory framework is expected to be reviewed to further align national legislation on hate speech and illegal content with EU rules, outlined below.

In Germany, the primary piece of legislation criminalising hate speech is the **Criminal Code**, which prohibits **incitement to hatred** – verbal abuse, defamation, calls for violent acts or discriminatory treatment of specific groups.[70] The code specifically prohibits **Holocaust denial** and other crimes committed under Nazi rule, criminalising "approving of, denying, or downplaying" an act committed under the rule of National Socialism, either "publicly or in a meeting" and "approving of, glorifying or justifying National Socialist tyranny and arbitrary rule". When establishing the grounds for sentencing, courts may take into account "the **offender's motives and objectives**, in particular including racist, xenophobic or other motives evidencing contempt for humanity". In April 2021, a legislative package to combat hate and hate speech entered into force, which explicitly mentions **antisemitic motives** as an example of motives evidencing contempt for humanity.

The **2017 Network Enforcement Act** obliges social networks to remove "manifestly unlawful content" from their platforms within 24 hours in response to user complaints or complaints sent by other flaggers. The rules apply to social networks with at least two million registered users in Germany. In June 2021, the NetzDG was amended to make notification channels for complaints more user-friendly and accessible, and to extend the information requirements for the half-yearly transparency reports by platforms. Social networks will also be required to notify the Federal Criminal Police Office of posts which contain serious cases of "hate speech" and transfer the content as well as the information about the offender.[71]

A more systemic approach to digital regulation is also reflected in the new **Interstate Media Treaty** (Medienstaatsvertrag or MStV), which obliges social media platforms to be transparent about the central criteria generating content. It is important to factor in the underlying architectural features of platforms, including the algorithmic ranking of content, that might drive users towards conspiratorial, hateful and extremist content, thereby amplifying antisemitism.[72]

The community standards of social media platforms may cover hate speech which is not necessarily illegal, and thereby block or remove content from their platforms via the enforcement of their terms and conditions, irrespective of legislation. In July 2021, the **German Federal Court** ruled that Facebook's terms and conditions regarding the removal of user content and blocking of user accounts for violating community standards (the comments in question violated Facebook's hate speech policy) were invalid as the company did not properly inform the user about its penalties. Importantly, the court did not rule that Facebook cannot be allowed to moderate content beyond illegal content, rather it must be more transparent about its content moderation decisions.[73]

Beyond regulation, Germany has introduced a number of other initiatives to counter antisemitism. The federal programme "Live Democracy!" (Demokratie leben!), facilitated by the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth supports projects and initiatives which are dedicated to promoting democracy and diversity, and work against right-wing extremism, racism, antisemitism, VE and other forms of hostility to democracy and inhuman behaviour, such as violence, hatred and radicalisation.[74] Support is provided all over Germany to local authorities through Partnerships for Democracy and Federal State Democracy Centres (Landes-Demokratiezentren) as well as Competence Centres and Competence Networks (Kompetenzzentren und – netzwerke). In the new phase, which runs until 2024, one important priority is stepping up the fight against right-wing extremism and antisemitism. The second large federal programme "Cohesion through participation", devised by the Federal Ministry of the Interior, supports work on preventing extremism and promoting democracy.[75] It is implemented by the Federal Agency for Civic Education (Bundeszentrale für politische Bildung or BpB), which offers an extensive selection of services ranging from printing services through events to training measures (e.g. for teachers, youth workers and social workers). Both programmes form the key pillars of the Federal Government's Strategy to Prevent Extremism and Promote Democracy and receive annual funding of over €125 million.[76]

France

Article I of the Constitution of the Fifth Republic states that the state has to "ensure the equality of all citizens before the law, without distinction of origin, race or religion."[77] In France, one of the main tools to counter and prosecute antisemitic incitement or discrimination is the **press freedom law,** which regulates not only media outlets but a broad range of public expression.[78] The act bans the defamation, insult and the incitement of discrimination, hate, or violence against others based on their origins or their affiliation or non-affiliation with a specific ethnicity, nationality, race or religion. This includes verbal, visual and written messages in public places as well as public communications via electronic means. In 1990, the Loi Gayssot (Gayssot Law) amendment criminalised the public contestation of crimes against humanity as defined by the 1945 London Charter. Since the London Charter was applied during the Nuremberg Trial to convict Nazi leaders, this amendment effectively criminalises Holocaust denial. Furthermore, the Loi Gayssot contains provisions to punish the denial, minimisation and banalisation of genocides, slavery, other crimes against humanity, and war crimes.[79] The French **Penal Code** also criminalises the public display of Nazi symbols, including the wearing of uniforms or emblems of banned groups.[80]

While there is a variety of laws aimed at combating antisemitic discrimination offline, there is not a specific law in France to implement these rules online. The proposed bill on online hate speech, commonly known as the Loi Avia (Avia Law), was inspired by the German NetzDG and aimed to operate on a similar principle to harmonise the implementation of the law online and offline. In its original form, it would have required social media platforms to remove insulting or inciting content within 24 hours after notification. For terrorist content or child sexual abuse material, the removal period would have been one hour after notification.[81] Furthermore, the law would also have given the government the power to block websites that were hosting illegal material.

However, several key provisions of the law were struck down by the French Constitutional Court, as the short time window given to platforms to assess the legality of reported content could lead to over blocking and interfere with users' right to free expression. The court ruled that while illegal material online could still be prosecuted, the original text of the Loi Avia was neither proportionate nor fit for purpose. The time limits for removal were therefore no longer part of the law when it came into power. However, the bill's demand to create a specialised court to deal with online hate speech remained part of the final version.[82] While there is no legal requirement for tech platforms to remove content, the French government maintains a reporting system called Pharos, where users can report antisemitic expressions as well as ethnic or religious incitement.[83] Since the murder of school teacher Samuel Paty by a jihadist following an online incitement campaign, Pharos became monitored around the clock and the number of staff increased to 54 by October 2021.[84]

United Kingdom

In the UK, the 2010 Equality Act is one of the principal legislative vehicles for tackling hate and discrimination. Race, religion and belief are considered protected characteristics by the Equality Act, which criminalises discrimination, harassment and victimisation based on such attributes. The Act defines discrimination as someone treating another person less favourably because of a protected characteristic. This includes unwanted conduct towards another based on a certain characteristic that results in the violation of human dignity or an intimidating environment.[85]

The Public Order Act 1986 criminalises the use of words, behaviour and display of written material that is intended to stir up racial hatred. The law further penalises the distribution of written material, public performances of plays and showing of recordings if there is an intent to incite hatred. The possession of racially inflammatory material can also be sanctioned if it is distributed.[86] Unlike some European countries, the UK does not have explicit laws against denying the Holocaust or other crimes against humanity. Nonetheless, such cases have been successfully prosecuted under other laws.[87] Alison Chabloz became the first person to be convicted in relation to Holocaust denial on the internet. She was found guilty of sending "grossly offensive communications via a public communications network", after she had posted antisemitic songs online. Campaigners have described the court decision as a precedent for future prosecution of online Holocaust denial. It could also be possible to prosecute Holocaust denial under the Malicious Communications Act 1988 which prohibits the distribution of a "letter, electronic communication or article of any description" with contents that are for example "grossly offensive" or threatening.[88]

Online hate speech will be a major focus of the upcoming Online Safety Bill (OSB), one of the first attempts at systemic platform regulation internationally. A draft published in May 2021 lays out various duties for service providers. For example, they are required to take proportionate measures to minimise the presence, dissemination and temporal availability of illegal content on their platform. Providers will have to remove such content swiftly if they are notified of its presence. They must also carry out an "illegal content risk assessment", which considers multiple variables such as the user base, the level of potential harm posed by illegal content and which functionalities of the platform contribute to the spread of such content.[89]

The upcoming law may include provisions for criminalising the posting of content that might cause "emotional, psychological, or physical harm to the likely audience", with offences potentially resulting in imprisonment. Original provision had also suggested platforms would be required to remove content that is not illegal, but potentially harmful to users. The joint committee report on the OSB published in December 2021 highlighted concerns from expert witnesses about this clause, as it is overly broad and might lead to over blocking of content. Furthermore, it puts the responsibility of defining harms with tech platforms. The committee's report recommends the scrapping of this clause and replacing it with a requirement for platforms to take proportionate measures to minimise foreseeable risks. The definition of harm should be based on criminal offences in the analogue world. Suggested harms include threats, abuse, harassment or stirring up racial hatred.[90]

CHAPTER 3: RECOMMENDATIONS FOR CIVIL SOCIETY – ADVOCACY

A holistic response to antisemitism should be led by governments, who can provide a mandate for appropriate action within tech companies, media regulators and other relevant stakeholders. Nonetheless, CSOs play a crucial role as both advocates and intermediaries for groups most affected. Such entities have first-hand experience of how antisemitism can manifest at the grassroots, from more visible or explicit forms (e.g. vandalism of religious sites; reported hate crime) to those less visible or confined to "private" citizen spaces (e.g. discrimination in local institutions, online abuse, informal segregation in community life).

Articulating these specific, localised cases helps to establish the varied forms of antisemitism at play and the different response mechanisms needed from the top down. The support of CSOs in raising the alarm for new or emerging harms is also crucial and prevents systemic efforts from becoming disconnected from the lived reality of Jewish groups and individuals on- and offline. Such involvement could help to:

- **Ensure that policies are based on dialogue, and reflect the reality on the ground and the diverse perspectives and needs across different stakeholders within the Jewish community;**

- **Increase the accountability of government towards those affected by antisemitism in everyday life;**

- **Help build consensus through transparent, broad-based consultation, reducing tensions during policy implementation;**

- **Create a sense of legitimacy and public buy-in for subsequent measures.**

In the following chapter, we offer some concrete examples of how CSOs can engage with decision-makers to help drive long-term change, as well as support efforts to broaden public understanding around the challenge of online antisemitism. Recommendations have been informed by a consultative process with those working at the grassroots, as well as wider best practices drawn from international case studies.

Government and Policy Advocacy

Digital policy and platform regulation

Governments around the world are considering fresh approaches to digital policy and regulation of social media platforms. This presents a unique opportunity for Jewish organisations to ensure such approaches effectively address the threat of online antisemitism while respecting human rights, based on their collective experience and insight. Advocating for meaningful digital policy shifts by governments and international organisations such as the EU might include calls to:

Address antisemitism in a holistic manner across policy areas. A joined-up, whole-of-government approach must address this challenge across a broad spectrum of interrelated policy areas, ranging from illegal terrorist activity or inciting content, to countering disinformation, as well as wider education and digital literacy efforts.

Beyond calling for the removal of expressly illegal content, CSOs might **make the case for policy approaches that consider how platform design features help amplify antisemitism**. This may include algorithms that prioritise sensational, polarising and often harmful content (both legal and illegal), including extremist or conspiracy theory content. Policy approaches ensuring a **risk-based or duty of care type approach for companies** (outlined in the chapter above) could help counter the amplification of such borderline content, while also preserving rights to speech and expression.

Address antisemitism across all social media platforms, including alternative platforms and service providers. While major social media companies have taken significant voluntary steps to counter online hate, individuals and networks of extremists have migrated to smaller, alternative platforms, which often receive less scrutiny than larger online services.

Encouraging regulatory approaches tiered to platform sizes, as we've seen with the EU Commission's DSA and UK's OSB. These provide examples of approaches that might help to address the "long tail" of platforms hosting antisemitic content, beyond the more established tech giants.

Developing mechanisms for policy engagement

In this context, CSOs form part of a **growing and increasingly well-networked constellation** of actors involved in advocacy around tech regulation (e.g. the EU's DSA; the UK's OSB; the German NetzDG). This includes **organisations focusing on a range of online harms**, from **hate speech** and **disinformation to data privacy and human rights**. Over time, such groups have come together to formulate shared policy positions with a unified or mutually-reinforcing evidence base.

Incorporating the specific perspectives of those dealing with online antisemitism would only strengthen such efforts, **where avenues for joint advocacy may include**: social media campaigns, open letters, policy papers or reports, earned and paid media engagement, webinars and in-person events, policymaker briefings, public surveys, and petitions or other crowdsourced calls to action.

In particular, Jewish CSOs may benefit from **partnering with entities that represent other marginalised or vulnerable groups**, for example, those working on behalf of at-risk youth, refugees, the Muslim community, the Roma community and other ethnic minorities. While the harms faced by each constituency will of course differ, there is likely crossover in their experiences and the desired response from both government and social media platforms.

Once regulatory efforts have been established, such coalitions could then co-develop systems to **monitor their effectiveness and hold enforcement bodies to account**. For example, CSOs might contribute to periodic "state of play" reports that pool testimony, data and insight across a range of online harms and discrimination, including but not limited to antisemitism.

By aligning their advocacy with groups in other areas, Jewish organisations can ensure that antisemitism is central to larger debates. For example, around "safety/prevention by design" principles or issues concerning legal but harmful content. In turn, they will also benefit from the **best practice and lessons learned by those tackling parallel (albeit distinct) online trends**, creating a feedback loop to their own work at the grassroots.

Litigation

While enshrining rights-respecting policies to prevent the promotion of online antisemitism is crucial, **effective prosecution and litigation can also be a key instrument for curbing and deterring illegal hate speech** on the internet. However, many CSOs have **expressed concerns over a lack of clarity regarding the threshold of illegality** for online antisemitism.

Governments are **beginning to legislate more specifically around illegal hate speech online** – with legal precedents starting to be set through court cases around online antisemitism in countries including France and Germany. But there are often **gaps in online enforcement of relevant existing laws**, ranging from **incitement to prohibitions of Holocaust denial**. In the UK, for example, the Law Commission has found that **existing laws have not kept pace with the evolution of digital communications**, and are **ill-suited to addressing online harm** because they are often unclear for internet users, tech companies and law enforcement agencies respectively.

As online platforms play an ever greater role in Jewish communities' experiences of antisemitism, it is **crucial that existing laws to curb illegal hate speech are applied consistently and proportionately in online spaces**, while respecting freedom of expression. By highlighting the scale of illegal hate that communities face online, **Jewish CSOs can help make the case for more robust enforcement**, as well as **push for greater clarity around legal thresholds** for online antisemitism.

Victim support

Beyond prevention approaches, the government has a crucial role in mitigating the harmful impact of online antisemitism and providing effective support to those affected, as well as the possibility of redress. This includes **legal and victim support** to those targeted not just by violence but by intimidation, dehumanisation and the undermining of rights through online antisemitism. Support mechanisms must be established for those on the receiving end of harm – whether that harm is physical or manifests as incitement, intimidation or harassment. While support may come through **statutory services**, if it is provided by civil society then it must be **underpinned by proper training, support and protection** for the organisations on the frontline.

Civil society should make clear that it must not be left to deal with the effects of online antisemitism alone – but rather that a **whole-of-society approach** is enshrined which engages a range of relevant services. This will ensure that individuals and communities that are impacted by such harms have proper recourse to legal assistance and victim support.

Many organisations already provide victim support in either explicit/formal or implicit/informal ways. This includes entities that are not specific to antisemitism but focus on hate or discrimination for a given community, as well as Jewish CSOs who operate in other areas (e.g. religious education, youth work, social action) but whose core audiences are struggling with antisemitism online. Jewish CSOs could help to **bolster understanding around the specific trends and experiences of antisemitism** among their counterparts. For example, through bystander training, sharing direct testimony, or creating reference guides on hateful language and iconography identified in the local area. This could also be applied to official institutions such as law enforcement, social and mental health workers and prosecution services.

As highlighted in the Organisation for Security and Cooperation in Europe's (OSCE) Policy Brief on Enhancing Stakeholder Awareness and Resources for Hate Crime Victim Support, this process is vital to ensure support services are grounded in the needs and wants of those most affected.[91] In the latter instance, Jewish CSOs might engage more proactively with actors who specialise in **trauma counselling, legal aid or other forms of victim support**, linking their audience with those that have a greater precedent and technical background on such topics. In both respects, civil society is being upskilled in its ability to support victims of antisemitism wherever they are found, without requiring each organisation to be an expert.

Ongoing communication between government and communities

It is important that **two-way channels of communication are established between government, civil society and communities** to discuss threats on an ongoing basis. CSOs pointed out that such mechanisms are especially crucial **during periods of potential tension and polarisation**, for example in the context of escalating armed conflict in the Middle East or attacks on places of worship. In particular, it is important to establish a clear government point of contact through which to **communicate relevant updates around emerging security threats to those at risk**.

Engaging with Social Media Platforms

CSOs consulted for this guide described a mixed picture in their engagements with social media companies around tackling online antisemitism. Generally, it was felt that **social media companies were listening to civil society more than previously**, for example, through trusted flaggers schemes and providing opportunities for training.

Organisations working on online antisemitism described periodic roundtables with platforms, which were useful in helping platforms to **understand specific elements of the threat landscape** (for example, the issue of Holocaust denial, or nuances around Israel-related antisemitism). However, it was felt that small platform policy changes ultimately failed to address broader systemic issues on platforms that were feeding online antisemitism.

Meanwhile smaller CSOs claimed **platform engagement tended to centre around larger outfits**, meaning that localised manifestations of antisemitism in smaller markets were often overlooked. This is a potential opportunity for international coalition-building among CSOs, to work beyond their national and linguistic domains, and provide insights for a specific geography or context that may otherwise be excluded from the discussion.

Understanding points of entry and those with pre-existing links to local Policy or Trust and Safety teams is critical in this regard. Companies may benefit in particular from any of the following: a) end-user testimony relating to antisemitic hate on their platform; b) analysis around the prevalence or nature of antisemitism in a given context; c) insight into emerging terminology, iconography and other content-based signals for online antisemitism; d) recommendations to improve victim support and redress mechanisms.

Overall, it is crucial that we move beyond ad-hoc engagement between social media companies, Jewish organisations and individuals on the threats from online antisemitism. **Meaningful partnership and collaboration facilitated between platforms** and a broad range of CSOs will **ensure that content moderation and platform policies are aligned with the needs of communities**. Meaningful partnership and collaboration facilitated between platforms and a broad range of CSOs will ensure that content moderation and platform policies are aligned with the needs of communities, and a human rights-based approach.[92]

Clear definitions to capture the broad spectrum of harmful antisemitism

In part one of this guide, we lay out the diverse manifestations of online antisemitism across a broad range of harms, from conspiracy myths to disinformation to VE. However many **platforms currently enforce a very narrow definition of antisemitism** focused exclusively on overt "hate" or violent incitement.

Several useful tools have been developed, which could help platforms to navigate nuanced issues like coded manifestations of antisemitism. For example, the **IHRA's working definition of antisemitism**, has been used by the UK regulator Ofcom to ensure that regulation **moves beyond just the most egregious examples** of antisemitism online, but rather addresses the **full spectrum of targeted hate against Jewish communities**. Advocating for the adoption by platforms of the IHRA working definition of antisemitism continues to be a key priority for a number of Jewish organisations, as a way to ensure that the platforms' understanding of the issue matches communities' lived experience.

In parallel, CSOs can play a crucial role in the **education of content moderators** around contemporary antisemitism, functions which require proper resourcing. Alongside resources such as the IHRA's working definition of antisemitism as a reference point, CSOs might provide

training to help human moderators understand the varied manifestations, examples and impacts of antisemitism. Meanwhile, expert input on moderation and detection tools and policies could help to ensure an effective and holistic approach to addressing antisemitism online.

Greater transparency around the scale and nature of antisemitism on platforms

Unless there is an **informed understanding of the scale and nature of antisemitism online**, it is incredibly difficult to understand which potential solutions would be both effective and proportional.

Jewish CSOs have been at the forefront of **advocating for social media platforms to improve their transparency practices**, to ensure that governments, regulators, civil society and the public at large are able to better understand the scale and nature of online hate speech.

CSOs should continue their campaign for improved transparency, including calls for **greater insights into how hate speech complaints are managed and resolved**, as well as insights on the **accuracy and performance of platforms' content moderation approaches specific to different forms of online hate**.

A particularly crucial avenue for advocacy cited by many CSOs in our consultation was the need for platforms to **make AI-based processes more transparent**. Improved transparency around algorithm outcomes, in both content recommendations and moderation, will be essential to enabling independent experts to understand the **ways platform design features may be funnelling users from mainstream content towards antisemitic conspiracies and extremism**.

Improved data access for researchers

Civil society, academia and the media would benefit enormously from **greater access to data**, which is **essential for building the evidence base around online hate, and providing independent scrutiny of platforms**.

CSOs have played a crucial role in advocating for platforms to prioritise the development of **affordable, accessible and user-friendly tools and approaches to help monitor and detect hate speech** across a diverse range of linguistic and cultural contexts.

As well as allowing a more complete understanding of company policies, procedures and decisions, and the underlying technology, its outputs and potential biases, such data access is also **crucial for helping to respond to emerging antisemitic threats and campaigns in real-time**, through counter-communications and targeted disruption.

CHAPTER 4: RECOMMENDATIONS FOR CIVIL SOCIETY – ACTION

While it should not be incumbent on Jewish organisations and individuals to take the lead in countering antisemitism online – this is after all primarily a job for government and platforms – there are nonetheless meaningful ways for civil society to engage in improving literacy and broadening public understanding around these challenges.

Awareness-raising

One of the primary avenues for civil society action to tackle online antisemitism is in **ongoing awareness-raising activities**, shining a light on the broad issue and specific emerging threats, as well as the impact on Jewish communities and wider society. Specific approaches might include social media campaigns, highlighting trends on non-mainstream platforms, the sharing of research (including in local languages), accessible information and resources on online antisemitism, as well as responding to announcements about governmental policymaking, social media platform actions and CSO work in this domain.

Educating to address antisemitism

While it should not fall to Jewish communities to educate the public on antisemitism, there are several ways civil society can bolster initiatives crucial to preventing antisemitic hate online. This includes **strengthening the material and approaches used by educators, brokering links with victims or survivors** of antisemitism to support more direct learning, and **devising innovative ways to bring these discussions or interventions into public life**.

UNESCO and the Organization for Security and Cooperation in Europe's Office for Democratic Institutions and Human Rights (OSCE/ODIHR), have jointly developed a policy guide, entitled *Addressing Anti-Semitism through Education*, which suggests concrete ways to engage, within a human rights framework.[93] It provides policymakers with tools and guidance to ensure that education systems build the resilience of young people to antisemitic ideas and ideologies. Civil society can encourage governments to proactively address antisemitism in and through education, but also consider digital and media literacy within their programmes or outreach.

It is important that education about antisemitism is made available across relevant disciplines to all pupils and students at the appropriate age, in **formal, non-formal and informal education settings**, as well as via adult education and higher education, national curricula, codes of conduct and school/university policies. Teachers and learners require high-quality educational materials, such as textbooks, digital tools and lesson plans to support learning about antisemitism.

CSOs can support educational institutions by providing insights on the forms, manifestations and impact of antisemitism faced by Jews and Jewish communities. They can also play an important role in **reviewing curricula, textbooks and other educational materials** to ensure that human rights, inclusiveness and gendered research and approaches are reflected, that they are free of stereotypes, and that Jewish history, life and culture are presented in a comprehensive and nuanced manner.

Education efforts to prevent antisemitism must fostering critical thinking, promote the skills, competencies and values

of global citizenship education in order to enable young people to resist, counter and challenge antisemitic prejudices and stereotypes. Partnerships with civil society can enhance the impact of other educational activities by offering the opportunity for contact and communication with experts and representatives of the Jewish community, which can build empathy and dialogue.

Civil society can also encourage the introduction of local authority, parliamentary and independent mechanisms to **support, monitor and evaluate antisemitism education**.

Educators must also be equipped to respond to antisemitic incidents in educational establishments through the **development of policies, procedures and proactive planning** that build practitioners' capacity to respond effectively to critical incidents. Teachers require professional in-service and pre-service training opportunities that utilise and promote effective, research-based pedagogies to address antisemitism through education, and establish a system of **ongoing support for educators to facilitate information exchange**. To support teachers and school directors in preventing and addressing antisemitism in schools, UNESCO and OSCE/ODIHR have published a set of four framework curricula for teacher trainers, entitled *Addressing Antisemitism in Schools: Training Curricula*.[94] The curricula were developed with the support of University College London's Institute for Education and are designed for trainers of primary and secondary education teachers, vocational education teachers, and school directors.

It is crucial that **Holocaust education** also reflects contemporary narratives of antisemitism and the legacy of historical genocides within society today. In 2017, UNESCO released a policy guide on education about the Holocaust and preventing genocide, to provide effective responses and recommendations for education stakeholders.[95] Repeated studies have found an alarming number of people worldwide have either never heard of the Holocaust or disbelieve historical accounts of the period – this includes the scale of the Holocaust, or the surrounding culture of antisemitism that enabled such violence.[96] Community voices, and in particular survivors, play a key role in bringing these stories to life, and explaining the dangers of eroding democratic norms, and how disinformation and conspiracy theories can lay the groundwork for genocidal violence.

Digital citizenship education

Digital citizenship education is defined by UNESCO as the ability to "find, access, use and create information effectively, engage with other users and with content in an active, critical, sensitive and ethical manner, as well navigate the online and ICT environment safely and responsibly, being aware of one's own rights". Digital citizenship education also should develop **media and information literacy** to advance critical thinking and the evaluation and ethical use of information, and enhance understanding of how media functions. It can help internet users understand the **harmful effects of online hate speec**h, raise young people's **awareness of online safety**, as well as **fostering active participation**, and understanding of rights and responsibilities online. Online bystander training is crucial for training internet users on how to report threats, and contributing to a safer online environment. Civil society organisations play a key role in advocating for the elevation of such digital citizenship as essential learning in schools.

Educational approaches should not stop with young people but include adults, as digital antisemitism cuts across generations. To reach adult audiences, civil society organisations can have a greater impact by partnering with businesses that play a central role in providing people with lifelong learning, digital skills and building inclusive and integrated workplaces – all key to building resilience across society. The Business Council for Democracy (BC4D) programme provides a model for training adult workers on hate speech, targeted disinformation and conspiracy narratives. It provides knowledge and skills that strengthen personal responsibility and show clear ways to protect oneself and others against digital threats.'[97]

Building a civil society research toolkit for online antisemitism

As a UNESCO guide recently noted, to inform evidence-based policymaking to curb online hate speech – and to prevent hate speech from translating into violence while also safeguarding freedom of expression – it is critical to **recognise, monitor, collect data on and analyse hate speech trends** to identify appropriate strategies to address them.[98]

Our consultation revealed the extent to which CSOs were increasingly playing a crucial role as intermediaries for reporting incidents as well as observatories for mapping online antisemitism. As noted above, there is a **clear need to clarify the roles and responsibilities of government and platforms**, so CSOs are not left to fill gaps in researching antisemitism online.

However, we must also recognise civil society's **unique ability to drive independent, cross-platform, comprehensive online research**, in ways rooted in human experience and rights-based approaches, connected with the real impact of these issues among marginalised voices and communities. Not every organisation can or should become an online antisemitism monitor. But as online antisemitism can threaten the activities, objectives and individuals associated with civil society groups, it can be useful for organisations to establish a **baseline understanding of the evolving set of threats** and how to spot them while conducting their work. It is important that such **efforts are standardised and professionalised as part of a pan-civil societal response**, and to the greatest extent possible characterised by cooperation and pooled capabilities. ISD has previously laid out the key elements of such a unified civic-tech capability around other areas of online harm.[99]

Within the broader disinformation domain, ISD has provided toolkits laying out an approach that organisations can undertake to track online manipulation, with a low barrier to entry, using either over-the-counter or free-to-use social listening tools.[100] A similar research toolkit for online antisemitism research could help to **establish common approaches and encourage better sharing of research findings** and useful tools across contexts, while also ensuring the proper safeguarding of researchers exposed to potentially harmful content.

Within this emerging area of analysis, there are a number of **priority research questions that need answering to help focus responses to online antisemitism**. A more granular understanding of the threat is required to address vulnerabilities in ideologies and platforms, while cross-platform research is essential for understanding the networks, behaviours and audiences that comprise the ecosystem of online antisemitism, to inform effective responses. There is a need to better understand the demographic details of the audiences for antisemitic content to inform more effective interventions with these constituencies, as well as more evidence around the offline impacts of online antisemitism.

Security considerations for countering antisemitism online

Unfortunately, another important consideration for CSOs is to ensure **effective security and safeguarding** against the harms of online antisemitism. Our consultations with Jewish organisations showed that important learnings and best practice can be drawn from the practical experience of dealing with mental health challenges, especially among young people, from routine exposure to mainstreamed antisemitism online.

In parallel to maintaining physical security of community infrastructure, organisations should also proactively consider online safety for their members, including digital hygiene to **minimise exposure to upsetting or even potentially traumatic content**, degraded mental health, or in extreme cases **risks to personal safety** (for example, from "doxing", the non-consensual sharing of personal information online, or targeted online harassment).

Organisations should have **a robust overview of local support mechanisms available**, both those specific to online antisemitism and more general resources for those at risk (for more practical guidance, see the step-by-step guide at the end of this section on what to do if you or your organisation is targeted by antisemitism online).

Building alliances and establishing unified civil society responses

There have been **growing opportunities for coalition-building with other communities** and civil society partners to help tackle online harms in a unified and holistic manner. In particular, some younger organisations consulted for this guide expressed strong beliefs that coalition building is where the most value is gained in the civil society sector, being able to join forces across borders and issue areas helps to make the case and strengthen arguments.

A holistic response should **include both antisemitism focused work, as well as broader work on other forms of discrimination**, for example, anti-Roma and anti-Muslim hate speech, including convening multi-stakeholder dialogues on wider hate speech trends and insights on how to counter these challenges. Such multi-stakeholder coalitions are crucial for the sharing of data and expertise, as well as contextualising the specific challenges around online antisemitism within broader social issues and online harms. Across the wider civic sector, CSOs might also consider how to deliver impact through partnerships with academia and universities, fact checkers, human rights experts and media organisations, as well as national and international organisations.

Youth engagement

Young people are self-driven, motivated agents of progress when given the right support. **Improving the quality of engagement with young people and strengthening mechanisms by which they can participate in the civic space is essential in shaping a future generation of positive and proactive citizens**. Globally, youth face substantial challenges: high unemployment and inequality, war and acute violence, the rise of authoritarianism, mental health crises driven by social media, increasingly unreliable information, and an impending climate catastrophe – delivered to their newsfeeds and television screens more effectively than ever. In the absence of meaningful engagement, young people can become understandably disillusioned, disaffected and disinterested in constructive progress. These feelings open the door to malicious forces – grooming, recruitment, disinformation campaigns, hateful messaging – working their way insidiously into the lives of young people.

Open and transparent dialogue involving young people is essential when discussing multi-stakeholder approaches to issues like antisemitism. Therefore, it is important to recognise the **central role young people play in shaping both the present and the future of our global community**. We should build their capacities and confidence to address prominent social challenges like antisemitism and enhance their resilience in responding to future crises. They should be included in decision-making, equipped with skills and resources to take autonomous action themselves, and engaged through meaningful and authentic dialogue. Opportunities for meaningful engagement with youth include:

- Building young people's understanding of civic processes **through formal and informal civic education**. This effort should enhance their understanding of the role of national and local government, civil society, and themselves, emphasising the various ways a citizen can impact policy and effect change in their community while setting reasonable expectations.

- Proactively including a diverse range of young people. Take opportunities and projects directly to young people who historically do not take part, rather than relying on them to come to you. **Work in places that youth occupy** and don't take for granted that they will immediately see the value your work has for them. Instead, be targeted, patient and transparent to build trust and a shared understanding.

- Recognise **that "youth" is not a homogenous group**. Young people have a wide range of needs, experiences, expectations, frustrations, and barriers. Work with a variety of young people to explore different approaches that will suit them and their life.

- **Balance top-down delivery with bottom-up opportunities**. In addition to creating programmes that are for youth, create opportunities for young people to design and lead their own initiatives through small grants and dedicated support.

ANNEXE I

Responding to Specific Incidents of Antisemitism Online

Steps to take if you or your organisation are targeted by antisemitism online

1. Assess

What is the nature of the antisemitism you are targeted with?

- If there is an immediate threat of harm to you, your team or another individual, contact the police via their emergency number.

- If there is no immediate threat but you are otherwise concerned about your safety or the safety of your team, contact the police's non-emergency number or a third party reporting service. In the UK, for example, you can contact the Community Security Trust.

2. Report

Report the incident to the platform or website's administrators:

1. **Social media**: most social media platforms have formal procedures that you must follow to report content.
   For Think U Know's guidance per platform, click here.

2. **Website hosting company**: if someone targeted you on a website or blog, you can report this to the company that hosts that website or blog. To find this out, use Hosting Checker: hosting checker.

3. **Third party**: if it is unclear how to report an incident to the platform or website's administrators, report it to a third party. Examples include the International Network Against Cyber Hate and Stop Hate UK.

3. Respond

If you were previously in contact with the user that sent you or your organisation abusive content, **end any ongoing communication** you have with them. If you were targeted via social media, use PureVPN to block the account(s) that targeted you. Be sure to block them on organisational accounts, and individual business and personal accounts.

4. Support

Engage the internal and external staff well-being resources you have access to, like your human resources team and/or a counsellor. Some countries have counselling services (like the independent VBRG) specifically for victims of antisemitism to help address the emotional impact the incident may have had on you and your team. Consider organising group and one-to-one discussions about the incident.

5. Record

Keep an internal record of the incident, including the date and time it occurred, the nature of the incident, and how
you and your organisation responded. This gives you something to refer back to if the police or platform administrators require more information, or if you or
your organisation is targeted again.

ANNEXE II

Full definition of the International Holocaust Remembrance Alliance's (IHRA) non-legally binding working definition of antisemitism

In the spirit of the Stockholm Declaration that states: "With humanity still scarred by … antisemitism and xenophobia the international community shares a solemn responsibility to fight those evils" the committee on Antisemitism and Holocaust Denial called the IHRA Plenary in Budapest 2015 to adopt the following working definition of antisemitism.

On 26 May 2016, the Plenary in Bucharest decided to:

Adopt the following non-legally binding working definition of antisemitism:

> Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

To guide IHRA in its work, the following examples may serve as illustrations:

Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that leveled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for "why things go wrong." It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.

- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.

- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.

- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).

- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.

- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.

- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavor.

- Applying double standards by requiring of it a behavior not expected or demanded of any other democratic nation.

- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.

- Drawing comparisons of contemporary Israeli policy to that of the Nazis.

- Holding Jews collectively responsible for actions of the state of Israel.

Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

Criminal acts are antisemitic when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries.

Endnotes

1 Community Security Trust, Coronavirus and the plague of antisemitism, 2020.

2 European Union Agency for Fundamental Rights, Experiences and perceptions of antisemitism – second survey on discrimination and hate crime against Jews in the EU, 2018.

3 United Nations, Secretary-General's remarks to High-Level Event on the Power of Education for Countering Racism and Discrimination: The Case of anti-Semitism, 2018.

4 European Commission, A Europe fit for the digital age

5 European Commission, EU Strategy on combatting antisemitism and fostering Jewish life (2021)

6 UNESCO, Fostering Freedom of Expression

7 OSCE/UNESCO, Addressing Anti-Semitism Through Education: Guidelines for Policymakers (manual), 2018.

8 UNESCO, Reimagining our futures together: a new social contract for education, 2021.

9 Wardle, Claire, and Hossein Derakhshan., Thinking about 'information disorder': formats of misinformation, disinformation, and mal-information, UNESCO, Journalism, 'fake news' & disinformation, 2018.

10 Hope not Hate, Expo, and Amadeu Antonio Stiftung., Antisemitism in the digital age: Online antisemitic hate, Holocaust denial, conspiracy ideologies and terrorism in Europe, 2021.

11 Jikeli, Gunther, Damir Cavar, and Daniel Miehling., Annotating antisemitic online content. towards an applicable definition of antisemitism, 2019.

12 Schwarz-Friesel, Monika, Antisemitism 2.0 and the net culture of hate: antisemitism as a cultural constant and collective emotional value in the digital age, 2018.

13 ISD, The rise of antisemitism online during the pandemic: A study of French and German content, 2020.

14 Allington, Daniel., Beatriz L. Buarque., and Daniel Barker Flores., Antisemitic conspiracy fantasy in the age of digital media: Three 'conspiracy theorists' and their YouTube audiences, 2021.

15 ISD, Hatescape: An in-depth analysis of extremism and hate speech on TikTok, 2021.

16 The Guardian, Britons make 170,000 antisemitic Google searches a year, study finds, 2019.

17 Sky News, Antisemitism, racism and white supremacist material in podcasts on Spotify, investigation finds, 2021.

18 ISD, The online ecosystem of the German far-right, 2020.

19 Community Security Trust, Hate fuel: The hidden online world fuelling far-right terror, 2020; Jasser, Greta, and others, 'Welcome to #GabFam': far-right virtual community on Gab, 2021.

20 ISD, A safe space to hate: White supremacist mobilisation on Telegram, 2020.

21 ISD, A safe space to hate: White supremacist mobilisation on Telegram, 2020.

22 ISD, A safe space to hate: White supremacist mobilisation on Telegram, 2020.

23 Nagle, Angela., Kill all normies: Online culture wars from 4chan and Tumblr to Trump and the alt-right. John Hunt Publishing, 2017.

24 Finkelstein, Joel., and others, A quantitative approach to understanding online antisemitism, 2018.

25 Centre for Research and Evidence on Security Threats, Memetic irony and the promotion of violence within Chan cultures, 2020; Baele, Stephane J., Lewys Brace, and Travis G. Coan., Variations on a theme? Comparing 4chan, 8kun, and other Chans' far-right "/pol" boards, 2021.

26 Scrivens, Ryan, and others., Examining online indicators of extremism in violent right-wing extremist forums, 2021.

27 Lee, Benjamin, and Kim Knott., Fascist aspirants: Fascist forge and ideological learning in the extreme-right online milieu, 2021.

28 Beirich, Heidi, White homicide worldwide, Southern Poverty Law Center Intelligence Report, 2014.

29 The Guardian, Leaks from neo-Nazi site could identify hundreds of extremists worldwide, 2019; Counter Extremism Project, Will a Fascist Forge successor emerge?, 2020.

30 The Combat Antisemitism Movement (CAM) & The Kantor Center for the Study of Contemporary European Jewry at Tel Aviv University, IHRA Working Definition of Antisemitism Worldwide Adoption & Endorsement Report, 2022

31 International Holocaust Remembrance Alliance, Antisemitism.

32 ISD, The rise of antisemitism online during the pandemic: A study of French and German content, 2020; Institute for Freedom of Faith & Security in Europe, Pandemic hate: COVID-related antisemitism and islamophobia, and the role of social media, 2021.

33 ISD, Anti-lockdown activity: Germany country profile, 2022.

34 Rickenbacher, Daniel., The centrality of antisemitism in the Islamic State's ideology and its connection to anti-Shiism, 2019.

35 ISD, Islamogram: Salafism and alt-right online subcultures, 2021.

36 James Bloodworth, The resurgence of anti-Semitism on the left and right is a warning to us all, New Statesman, 2021.

37 Community Security Trust, Engine of hate: The online networks behind the Labour Party's antisemitism crisis, 2019.

38 BBC News, What does the Labour antisemitism report say?, 2020.

39 The Jewish Chronicle, Plan for European super league triggers wave of antisemitic abuse, 2021.

40 The Jewish Chronicle, Police drop Wiley antisemitism probe, 2020.

41 Global Network on Extremism & Technology, Online antisemitism in times of COVID-19, 2020.

42 ISD, Anti-Soros conspiracies on Facebook and Twitter surge during George Floyd protests, 2020.

43 UNESCO, TikTok joins forces with UNESCO and the WJC to combat denial and distortion of the Holocaust online, 2022.

44 ISD, Hosting the 'Holohoax': A snapshot of Holocaust denial across social media, 2020.

45 ISD, The rise of antisemitism online during the pandemic: A study of French and German content, 2020.

46 The Feminist Internet, Antisemitism and the internet: Coded hate speech in online memetics, 2021.

47 Congress.gov, Communications Decency Act of 1995, 1995.

[48] European Parliament, Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market (Directive on electronic commerce), 2000.

[49] European Parliament, Online platforms' moderation of illegal content online, 2020.

[50] UNESCO, Addressing hate speech on social media: contemporary challenges, 2021.

[51] European Commission, The EU Code of Conduct on countering illegal hate speech online, 2016.

[52] Council of the European Union, The role of algorithmic amplification in promoting violent and extremist content and its dissemination on platforms and social media, 2020.

[53] European Commission, Countering illegal hate speech online: 6th evaluation of the Code of Conduct, 2021.

[54] German Federal Ministry of Justice and Consumer Protection, Law to improve law enforcement in social networks (Network Enforcement Act – NetzDG), 2017.

[55] EDRi, French Avia law declared unconstitutional: What does this teach us at EU level?, 2020.

[56] New York Times, An experiment to stop online abuse falls short in Germany, 2021.

[57] UNESCO, Countering online hate speech, 2015.

[58] UNESCO, Letting the sun shine in: transparency and accountability in the digital age, 2021

[59] UN General Assembly, Human Rights Council, Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, 2018.

[60] UNESCO, Letting the sun shine in: Transparency and accountability in the digital age, 2021.

[61] Council of Europe, Recommendation No. R (97) 20 of the committee of ministers to member states on "hate speech, 2016.

[62] UNESCO, Addressing hate speech on social media: contemporary challenges, 2021.

[63] OSCE, International covenant on civil and political rights, General Assembly Resolution 2200A, 1966.

[64] UN Human Rights Council, Rabat Plan of Action on the prohibition of advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence, 2013. https://www.ohchr.org/sites/default/files/Documents/Issues/Opinion/SeminarRabat/Rabat_draft_outcome.pdf

[65] European Commission, EU strategy on combating antisemitism and fostering Jewish life (2021-2030), 2021.

[66] European Commission, Proposal for a regulation of the European Parliament and of the Council on a single market for digital services (digital services act) and amending directive 2000/31/EC, 2020.

[67] European Commission, Code of practice on disinformation.

[68] European Commission, The Commission proposes to extend the list of 'EU crimes' to hate speech and hate crime, 2021.

[69] European Commission, Council framework decision 2008/913/JHA of 28 November 2008 on combating certain forms and expressions of racism and xenophobia by means of criminal law, 2008.

[70] German Federal Ministry of Justice and Consumer Protection, German Criminal Code, 2019.

[71] German Federal Ministry of Justice and Consumer Protection, Law to improve law enforcement in social networks (Network Enforcement Act – NetzDG), 2017.

[72] Bavarian State Chancellery, Media state treaty, 2020.

[73] Federal Court of Justice, Federal Court of Justice on claims against the provider of a social network that has deleted posts and blocked accounts on charges of "hate speech", 2021.

[74] German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth, "Live Democracy!".

[75] German Federal Ministry of the Interior and Community, Civic engagement program and democratic action.

[76] German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth, Federal government's strategy to prevent extremism and promote democracy, 2017.

[77] Légifrance, Constitution of October 4, 1958.

[78] Légifrance, Law of July 29, 1881 on freedom of the press, 2021.

[79] Légifrance, Law no. 90-615 of July 13, 1990 aimed at repressing any racist, antisemitic or xenophobic act, 1990.

[80] Légifrance, Code pénal

[81] National Assembly, Law proposition aimed at combating hateful content on the internet, 2019.

[82] Légifrance, Law no. 2020-766 of June 24, 2020 aimed at combating hateful content on the internet (1), 2020.

[83] French Ministry of the Interior, Pharos

[84] France Inter, Pharos, 9,720 requests to remove terrorist internet content since January, 2021.

[85] UK Government, Equality Act 2010.

[86] UK Government, Public Order Act 1986.

[87] European Parliament, Holocaust denial in criminal law: legal frameworks in selected EU member states, 2022.

[88] UK Government, Malicious Communications Act 1988.

[89] UK Government, Draft Online Safety Bill, 2021.

[90] UK Parliament, Joint committee on the draft Online Safety Bill, 2021.

[91] Victim Support, Policy brief: specialist support for hate crime victims, 2020.

[92] Transparency International, Civil society guide: UNCAC and the private sector, 2013.

[93] OSCE/UNESCO, Addressing antisemitism through education: guidelines for policymakers, 2018.

[94] OSCE/UNESCO, Addressing antisemitism in schools: training curricula, 2020.

[95] UNESCO, Education about the Holocaust and preventing genocide: a policy guide, 2017.

[96] NBC News, Survey finds 'shocking' lack of Holocaust knowledge among millennials and Gen Z, 2020.

[97] ISD, The Business Council for Democracy (BC4D) gives the private sector a role in building resilience and protecting democracy.

[98] UNESCO, Addressing hate speech on social media: contemporary challenges, 2021.

[99] ISD, Developing a civil society response to online manipulation, 2020.

[100] ISD, Developing a civil society response to online manipulation, 2020.

Notes