Legal Initiatives for VIETNAM

Community-led Assessment of Rights in the Tech Industry

FACEBOOK'S OPERATIONS IN VIETNAM

Hoàng Minh Trang – H' Biap Krong - Trịnh Hữu Long

With support from ARTICLE 19

Date: 31 May 2025

Community-led Assessment of Rights in the Tech Industry: Facebook's operations in Vietnam

31 May 2025

Hoàng Minh Trang – H' Biap Krong - Trịnh Hữu Long

©Legal Initiatives for Vietnam, 2025

US Office: 1520 E. Covell Suite B5 - 426, Davis, California, United States 95616

Taiwan Office: 3rd Floor, RIIC Building, National Chengchi University, No. 64, Sec. 2, Zhinan Rd., Wenshan Dist., Taipei City, Taiwan (ROC) 116

Email address: info@liv.ngo

This work is provided under the Creative Commons Attribution-Non-Commercial-ShareAlike 4.0 license. You are free to copy, distribute and display this work and to make derivative works, provided you:

1) give credit to Legal Initiatives for Vietnam;

2) do not use this work for commercial purposes;

3) distribute any works derived from this publication under a licence identical to this one.

To access the full legal text of this license, please visit:
creativecommons.org/licenses/by-nc-sa/4.0

Cover photo credit: Unsplash.

Suggested citation:

Hoang, Krong, Trinh (2025). Community-led Assessment of Rights in the Tech Industry: Facebook's operations in Vietnam. *Legal Initiatives for Vietnam*.

ACKNOWLEDGEMENT

This report was produced with the support of ARTICLE 19 and Ranking Digital Rights under the Engage Tech for Internet Freedom (ETIF) project.

We extend our thanks to the reviewers and our partners for their thoughtful and critical feedback.

The authors acknowledges the use of ChatGPT and other A.I tools for proofreading, enhancing the language, and translating Vietnamese text into English, with meticulous reviews of the outcomes.

TABLE OF CONTENTS

ABBREVIATIONS 6

1. EXECUTIVE SUMMARY 7

1.1 Introduction 7

1.2 Scope 7

1.3 Methodology 7

1.4 Stakeholder engagement 8

1.5 Impact assessment 8

1.6 Recommendations for demanding government accountability 9

1.7 Recommendations for your company 9

2. INTRODUCTION 12

2.1 Impact 12

2.2 Intent 13

2.3 Incentive 13

3. DISCLAIMER 15

4. METHODOLOGY 16

5. PHASE 1: STAKEHOLDER ENGAGEMENT 18

5.1 Feedback from rightsholders 18

5.2 Feedback from other relevant stakeholders 20

6. PHASE 2: CONTEXT ANALYSIS 21

6.1 Country context 21

6.2 Industry context 27

6.3 Company context 27

7. PHASE 3: IMPACT ASSESSMENT 32

7.1 Priority 1 impacts 34

8. PHASE 4: RECOMMENDATIONS 41

8.1 Pushing the government to protect human rights 42

8.2 Improving the respect and remedy of human rights within your company 43

9. PHASE 5: COMPANY ENGAGEMENT 49

APPENDIX: LIST OF ONLINE SOURCES CONSULTED 50

List of online sources consulted for Country Context Analysis 50

List of online sources consulted for Company Context Analysis 53

List of online sources consulted for Impact Assessment 58

ABBREVIATIONS

ASEAN	Association of Southeast Asian Nations
CLARITI	Community-Led Assessment of Rights Impacts in the Technology Industry
DSA	Digital Services Act
GDPR	General Data Protection Regulation
GNI	Global Network Initiative
HRIA	Human Rights Impact Assessment
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social, and Cultural Rights
LIV	Legal Initiatives Vietnam
UNGPs	United Nations Guiding Principles on Business and Human Rights

1. EXECUTIVE SUMMARY

1.1. Introduction

This Human Rights Impact Assessment (HRIA) is conducted by Legal Initiatives for Vietnam with the aim of informing Meta and Facebook of your impact on users who belong to vulnerable social groups in the country, including independent media professionals, human rights defenders, civil society organisations, oppressed religious communities, and ethnic minorities. We consider Facebook as the most important platform for civil society empowerment, as well as a potential ally in building a better country where human rights are respected. This report focuses on Facebook's handling of the Vietnamese government's requests for content removal and its content manipulation, as well as Facebook's own practices on content promotion.

We hope this report will inform your company of how to improve your transparency, as well as finding a better balance between business and human rights, and between your obligations to the government and your responsibility to society as a whole. We urge you to act decisively on the findings of this report.

1.2. Scope

This report assesses Facebook's operations in Vietnam in three areas: government censorship, Facebook's content moderation based on its own Community Guidelines, and Facebook's content promotion. The assessment was conducted between 1 June 2024 and 31 May 2025.

1.3. Methodology

We used the Community-Led Assessment of Rights Impacts in the Technology Industry (CLARITI) methodology in this assessment. The methodology was developed by Ranking Digital Rights in 2023, with support from ARTICLE 19. This methodology applies the International Bill of Human Rights as its baseline to define human rights and the UN

Guiding Principles on Business and Human Rights (UNGPs) as a guideline to assess companies. Other legal and non-legal requirements, such as the GNI Principles, the Santa Clara Principles, and the EU General Data Protection Regulation (GDPR), are also applied in the analysis of the legal and regulatory context in which your company operates.

1.4. Stakeholder engagement

In addition to undertaking extensive secondary research (see Appendix), we consulted 27 rightsholders: 19 activists/dissidents/human rights defenders, whose work focuses on civil and political rights and environmental activism; 3 church representatives; 1 reporter; 1 former Facebook employee; and 3 civil society organisations. The majority of them live in Vietnam, they use Facebook intensively for work, and they have been significantly affected by Facebook's human rights policies and practices. We also interviewed 2 non-rightsholders – 1 human rights lawyer and 1 law graduate – to gain better insights into the technical, legal, and human rights elements of Facebook's operations in Vietnam. We have not yet attempted to engage with your company, but we plan to do so upon finalising this report.

1.5. Impact assessment

An HRIA was conducted, in line with UNGPs 13, 14, 19, and other impact-assessment best practices. This assessment highlighted the following impacts and causes, which your company needs to address:

1.5.1. Government censorship

- Salience Score: 70/100
- Company Risk Score: 50/100

1.5.2. Content-moderation policy

- Salience Score: 100/100
- Company Risk Score: 67/100

Facebook's content-moderation policies have a profound impact on freedom of expression by failing to adequately differentiate between malicious and genuine users. This leads to both under-enforcement, allowing harmful content to persist, and over-enforcement, which

restricts legitimate content. The result is severe health and safety violations, including cases of human trafficking and psychological distress among users. These impacts are largely irremediable, and there is no public evidence of effective compensation or mitigation efforts by Facebook. The company has significant potential to better address these issues, but current efforts are insufficient.

1.5.3. Content and advertising promotion algorithm

- Salience Score: 70/100
- Company Risk Score: 83/100

Facebook's content and advertising promotion algorithm prioritises government propaganda and sensational content while limiting political and civic content. This practice impacts over 70% of the population, causing relationship damage for regular users and severe discrimination and persecution for vulnerable groups. These impacts are often irremediable, particularly for those facing torture or imprisonment. Despite some mitigation measures, like appeal mechanisms and fact-checking information, Facebook's control over its algorithm means it has high potential leverage to address these issues more effectively. The current approach has significant negative impacts on freedom of expression and fails to protect vulnerable users adequately.

1.6. Recommendations for demanding government accountability

Facebook: We recommend you take immediate action to challenge unlawful state censorship in Vietnam by:

- Requiring the government's requests to satisfy the three-part test by providing detailed information, including specific legal provisions as the basis for action, via request forms.
- Requiring the government's requests to be approved by courts.
- Advocating for the government to abolish the user identity-verification requirement.

1..7. Recommendations for your company

Meta: We make the following further recommendations to your company to better respect and remedy the rights impacts identified above:

- Inform users who have been reported by the government about their rights and the content-moderation process. Clearly explain how they can appeal content-removal decisions to empower users and increase transparency.
- Work with local civil society organisations and human rights groups to understand the impact of content moderation and promote policies and develop better strategies that actively counter state repression.
- Publicise a full list of the government's requests and the rationale behind them.
- Label Vietnam's state-controlled pages and profiles, similar to those of China and Russia.
- Improve detection, prevention, and mitigation of coordinated inauthentic behaviour in Vietnam where authentic accounts act on government orders.
- Expand the trusted flaggers programme in Vietnam to include civil society organisations to help detect state and state-controlled pages/profiles.
- Increase transparency on limiting users' and pages' visibility in Facebook's approach to feed ranking.
- Stop lowering the visibility of unpaid content by nonprofit organisations' pages.
- Improve detection of coordinated inauthentic actors, especially regarding nonprofit content.
- Create an appeal/remedy process for content that nonprofit organisations flag as being limited in visibility.
- Expand the definition of nonprofit organisations to include non-registered civil society actors who are unable to obtain registrations due to persecution and/or bureaucracy.
- Strengthen appeal processes so users can challenge content-removal decisions. Ensure appeals are reviewed by human moderators who understand the local context.

- Avoid over-censorship by carefully considering the context and impact of content before taking action. Train AI systems to better understand the Vietnamese language and culture, using human reviewers with local expertise to evaluate context while providing meaningful appeal mechanisms.
- Provide users with a mandatory, clearly visible opt-out from algorithmic curation, allowing unfiltered chronological feeds, while ensuring this choice does not reduce content visibility or access to essential information.
- Set up an independent board to review content-moderation decisions in Vietnam and other countries ranked as 'Not Free' by Freedom House, especially those involving government requests. This board should ensure decisions follow international human rights and digital rights standards.

We look forward to collaborating with your company to enhance the protection, respect, and remedy of rights impacts in Vietnam.

2. INTRODUCTION

Legal Initiatives for Vietnam (LIV) is a Taipei-based nonprofit organisation established by Vietnamese activists in 2014. Our aim is to promote human rights, democracy, and the rule of law in Vietnam through independent media, research, and training. We focus on freedom of expression, internet freedom, and criminal justice. As part of Vietnam's independent media movement, we collaborate closely with journalists, human rights defenders, civil society actors, and marginalised religious communities. We use Facebook intensively and on a daily basis, through both individual and organisational accounts, to reach our audience and community.

2.1. Impact

As one of the few independent media organisations in Vietnam, LIV, along with other independent media actors and the oppressed and marginalised communities we work with, has a major interest in how Facebook – the most popular social network – operates. The authoritarian regime in Vietnam, led by the Vietnamese Communist Party, has largely and effectively controlled the physical space for decades, leaving only the virtual space for civic activities. Facebook, as one of the most important online platforms, plays an essential role in creating and maintaining civic space for Vietnamese people. Defending the online space on Facebook means defending the largest and most important part of Vietnam's civil society. In this landscape, independent media and other groups mentioned above are especially vulnerable and need to be treated with extra consideration regarding how Facebook affects their life, safety, and integrity.

Rightsholders that we surveyed, while appreciative of Facebook's technology and efforts, expressed grave concerns about how their content has been moderated wrongfully or inappropriately, leading to authentic and independent sources of content being restricted without proper explanation or transparency. They also worried about

how Facebook cooperates with the Vietnamese government to limit freedom of expression while proactively or unintentionally promoting the government's propaganda and scamming content. Be it Community Standards enforcement or local law compliance, rightsholders – especially nonprofit organisations – are also discouraged to see their content being limited in visibility. The overall picture of Facebook's practices in Vietnam shows little consideration for protecting users' freedom of expression. We are defending our civic space on Facebook not only from the government's illegitimate interference, but also from Facebook's ill-considered policies and decisions.

We hope that by conducting this assessment and engaging with Facebook, we can contribute to making Facebook a better environment for the public good.

2.2. Intent

This assessment serves as the voice of vulnerable social groups in Vietnam, providing the feedback needed for Facebook to improve its human rights practices, including:

- Improving Facebook's human rights practices and increasing transparency regarding its relationship with the Vietnamese government concerning content-removal requests and content manipulation.
- Increasing transparency from Facebook about its relationship with users concerning the enforcement of Community Standards and content promotion.
- Increasing engagement between Meta/Facebook and vulnerable groups in Vietnam.

2.3. Incentive

This HRIA aims to provide constructive feedback to Facebook from the perspective of Vietnamese civil society, with the intention of improving Facebook's human rights practices for the benefit of both sides. By considering this HRIA, Facebook may achieve:

- Additional input to the company's human rights due diligence, allowing it to meet the requirements of UNGP 18 (engagement) and to identify additional human rights impacts for future mitigation.
- A reduction in the company's negative impacts on the rights of

vulnerable social groups in Vietnam, who live under a repressive regime.

- Improved reputation with the community, especially the younger generation, who are significantly more progressive in terms of values and more active on social media than older generations.
- Improved reputation with its employees.
- Improved compliance with any local or international human rights or environmental, social, and governance legal obligations the company may be subject to.

3. DISCLAIMER

This report is prepared by the assessment team's best-effort professional judgement, based on all available primary and secondary information. The assessment team assumes no responsibility or liability for errors or omissions of the information provided by rightsholders or stakeholders, nor any contained in the publicly available sources used. The assessment team welcomes constructive engagement with your company for additional information that may augment and enhance the assessment.

4. METHODOLOGY

This assessment was conducted using the CLARITI methodology. The scope was Facebook's platform and its operations in Vietnam concerning three areas: government censorship, Facebook's content moderation, and Facebook's content promotion.

The assessment took place between 1 June 2024 and 31 May 2025.

The CLARITI methodology was developed by Ranking Digital Rights in 2023, with support from ARTICLE 19, to foster constructive and collaborative engagement between telcos and tech platforms with large user bases and the communities these companies serve. The methodology was guided by the impact-assessment requirements of the UNGPs, literature on company-led and community-led human rights due diligence and impact-assessment methodologies and extensive stakeholder consultations to help provide companies with a complementary, community-based perspective on their human rights impacts. The methodology is designed to assess the extent to which companies are following the UNGPs while simultaneously embedding the UNGP requirements within the assessment itself.

This methodology uses the International Bill of Human Rights as its baseline to define human rights while adopting business and human rights guidelines, principles, and best practices beyond the UNGPs, such as the Global Network Initiative (GNI) Principles, the Santa Clara Principles, and the EU GDPR. It also considers the upcoming requirements likely to be imposed by the EU Digital Services Act (DSA) and Corporate Sustainability Due Diligence Directive.

The methodology consists of five phases:

During Phase 1, we consulted with potentially affected rightsholders and other relevant stakeholders, in line with the requirements of UNGP 18.

During Phase 2, we assess:

- Country context: The legal and regulatory human rights context your company operates in, as well as the role of the government in enforcing this context.
- Industry context: The human rights record of your competitors and potential for collaboration.
- Company context: The legal and non-legal human rights obligations your company is subject to and the performance of your company against these obligations.

During Phase 3, we determine the saliency of specific impacts and your company's management of these impacts, in line with UNGPs 13, 14, 19, and other impact-assessment best practices.

During Phase 4, we suggest recommendations to support your company in maximising its positive human rights impacts while mitigating adverse impacts, prioritised in line with UNGPs 23 and 24.

During Phase 5, we highlight efforts we have made to contact your company's representatives for potential engagement since we started conducting this assessment.

In line with the CLARITI methodology, we have prioritised our assessment on the freedom of expression that is most directly impacted by your company's activities, caused by Facebook's response to government requests, its content moderation, and its content-promotion approaches.

5. PHASE 1: STAKEHOLDER ENGAGEMENT

UNGP 18 requires an HRIA to be conducted through meaningful consultation with potentially affected groups and other relevant stakeholders. We have accordingly identified and consulted various stakeholders throughout the process, starting with the rightsholders whose concerns and interests we represent.

5.1. Feedback from rightsholders

The methodology emphasised the concerns and perspectives of rightsholders potentially impacted by your company's operations. As they are the primary subject of any rights impacts, they are the individuals to be targeted in any mitigation steps your company may take, either as part of your ongoing human rights due diligence or in response to this report. We have paid particular attention to human rights impacts on individuals from groups or populations that may be at heightened risk of vulnerability or marginalisation. The following rightsholders or their representatives were consulted:

- 1 reporter working at a state-owned media agency
- 3 activists whose work focuses on academic freedom
- 5 activists whose work focuses on supporting families of prisoners of conscience
- 2 environmental activists
- 7 dissidents/human rights defenders
- 3 civil society organisations
- 1 Catholic Church representative
- 1 Protestant Church representatives
- 1 former Facebook employee
- 2 indigenous minority activists

During interviews, rightsholders vividly expressed how your company's actions have impacted them.

Facebook used to be considered a helpful tool to spread information quickly among users. However, things are going down the wrong road... As a content creator, my videos are always reported due to copyright infringement without clear explanations even though I have proof that I am the owner of those videos. I think the company does not respect the rights of users and just promotes toxic content such as how to make fake driving licenses or diplomas while restricting content about human rights and environment protection.

A human rights defender, age 36
Nghe An Province

Facebook's human rights record in Vietnam is horrible. Not much to say other than that when it comes to Facebook's decision to compromise with censorship in Vietnam.

An environmental activist, age 23
Outside of Vietnam

Facebook is an unfair online playground for those who use it with good intentions. I was attacked by a community on a Facebook page just because I had a different opinion from them. My account was suspended, this proves that Facebook's algorithm is incapable of distinguishing content; it follows mass reporting with bad intentions to limit the rights of other users.

An indigenous activist
Dak Lak Province

Our Facebook posts on human rights advocacy are frequently flagged and taken down. We believe Facebook needs a better understanding of the human rights situation in Vietnam. Previously, we used Facebook to disseminate information, but after multiple reports, our page's engagement has significantly decreased.

A Vietnamese CSO staff member, 29
Thailand

Those recent censorship makes me a bit angry and concerned about Facebook's behavior when it comes to issues between the Vietnamese government and the people. They show FB can easily disrespect our rights if problems with the government arise.

A reporter, age 32
Hanoi City

We are cautious about posting our church's events annoucement on Facebook because our church is not officially recognized by the state. When we post religious ceremony plans for celebrations, Facebook often delays or hides our posts, which seems to indicate a compromise with the state to limit our rights to expression, and rights to information. This has led to us being summoned by authorities due to our posts. Therefore, we believe Facebook is not a safe platform for us.

An independent church pastor, age 51
Dak Lak Province

5.2. Feedback from other relevant stakeholders

To gain more insight into the country's legal and technical issues and human rights situation, we also consulted the following stakeholders:

- 1 human rights lawyer
- 1 law graduate whose work focuses on business and human rights law



6. PHASE 2: CONTEXT ANALYSIS

6.1. Country context

We present below our understanding of the legal and regulatory human rights context in which your company operates, as well as the role of the government in enforcing this context.

6.1.1. Country background

Vietnam's digital environment is strong. At the start of 2024, it was marked by high connectivity, with 78.44 million internet users and an internet penetration rate of 79.1%. The country also boasts a significant number of cellular connections: 168.5 million – more than the total population – indicating a prevalence of multiple mobile devices per individual. Social media usage is widespread, with 73.3% of the population engaged on various platforms.

The rule of law is established to reinforce and broaden national solidarity. The collaboration between the working class and the peasant class forms the essential foundation of this structure, which operates under the guidance of the governing party; the rule of law is a concept that is still evolving. According to the World Justice Project's Rule of Law Index 2021, Vietnam ranked 88 out of 139 countries, showing a slight decrease in its overall rule of law score (by less than 1% from the previous year). The country rose four positions in the global rank compared to the previous report, and was placed 11th out of 15 countries in the East Asia and Pacific region.

Vietnam's legal system is based on communist legal theory and French civil law, and it has undergone significant reforms since 1981. Yet, the government maintains strict control over many aspects of society, including the media and civil society organisations. There have been instances where the government's orders for surveillance and censorship have raised concerns about compliance with local laws and international human rights standards.

The Vietnamese government has made commitments to bring its laws into compliance with international norms, and has ratified several human rights treaties; yet the implementation of these commitments in practice remains a challenge, with reports indicating restrictions on freedom of expression, association, and the press.

Overall, while there are mechanisms in place that reflect the principles of the rule of law, the extent to which they are applied and the government's adherence to these principles can vary, indicating room for improvement in the protection of human rights and the fair treatment of individuals in Vietnam. From the perspective of an ordinary citizen, the supremacy of law is demonstrated by the people's strict adherence to legal regulations. However, based on the current political situation in Vietnam, the majority of individuals and groups who violate the law are lawmakers and legal holders themselves, with numerous reports of corruption and high-level enterprises trampling on the judicial foundation of the Vietnamese state without being punished.

6.1.2. Human rights obligations of Vietnam

The country has ratified key international human rights treaties – including the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; Convention on the Elimination of All Forms of Discrimination against Women; Convention on the Rights of Persons with Disabilities; Convention on the Rights of the Child; International Covenant on Civil and Political Rights (ICCPR); International Covenant on Economic, Social, and Cultural Rights (ICESCR); and International Convention on the Elimination of All Forms of Racial Discrimination – and is a signatory to regional human rights treaties: the ASEAN Human Rights Declaration (signed on 18 November 2012) and the Treaty of Amity and Cooperation in Southeast Asia (signed on 24 February 1976).

However, Vietnam has not ratified other important treaties, such as the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, International Convention for the Protection of All Persons from Enforced Disappearance, and several optional protocols related to disability rights, children's rights, and economic, social, and cultural rights. The country's constitution includes 15 out of 22 human rights components, but a national human

rights institution remains unestablished.

Vietnam's ratification of international human rights instruments indicates a theoretical commitment to human rights protections. However, the absence of a separate human rights law and a credible national human rights institution suggests potential gaps in the enforcement and protection of these rights – and Vietnam has been designated as a country that violated human rights more than average.

In terms of human rights practices, Vietnam's legal system is very stringent, with the government maintaining strong control over various aspects of society. Data protection and privacy are regulated by Decree No. 13/2023/ND-CP (effective from 1 July 2023). The country's legal framework includes the Cybersecurity Law, Decree No. 147/2024/ND-CP, Decree No. 53/2022/ND-CP, which impose strict regulations on online content and have raised concerns about freedom of speech and privacy, as well as penalties for non-compliance.

The government's power to request content removal and to access user data without oversight under these laws has sparked concerns about violations of freedom of speech and privacy. The complexity of digital rights in Vietnam is further highlighted by the government allowing access to technology and social media platforms while enforcing strict regulations that restrict free speech and monitor activists and other internet users.

6.1.3. Human rights reality in Vietnam

Through its National Digital Transformation Program, Vietnam has made digital technology available to everyone, including those in remote areas and disadvantaged groups. This initiative ensures that all Vietnamese people have the right to access, use, and produce information. Most social media apps like Facebook, TikTok, Instagram, Zalo, X, and YouTube are accessible in Vietnam; yet access to independent news outlets, such as RFA, BBC News Vietnamese service, Project 88, and Voice of America Vietnamese service, is restricted.

The government has announced stricter rules for removing harmful content from social media, which is interpreted as including criticism of the government, in addition to legitimate removal of child protection, human trafficking, and other justified policies under the ICCPR. While the

constitution allows for press freedom, many laws limit what journalists and bloggers can publish, especially criticism of the government. Recent regulations demand the quick removal of fake news from social media.

Freedom House reports that Vietnam's digital rights are restricted. Laws and regulations from 2006 and 2013 limit free speech, and a 2018 cybersecurity law requires tech companies to store Vietnamese users' data within the country and helps the government block and remove certain online content. It allows social media platforms only 24 hours to take down content upon the government's request.

Arrests, assaults, administration fines, enforced disappearances, and criminal convictions of journalists and bloggers continued to be reported in large numbers in 2023. According to rights groups, at least 60 bloggers and activists have been convicted of 'making, storing, and disseminating materials against the state' since 2018. The Vietnamese government has also increasingly abducted journalists, bloggers, and other dissidents from outside of Vietnam.

Vietnam has pledged to uphold human rights by signing several international treaties, including seven of the nine core UN human rights treaties (these include the ICCPR and the ICESCR, among others). These obligations require Vietnam to carry out reform measures in legislation, administration, and judiciary to establish a more effective and powerful mechanism for protecting and promoting human rights, including establishing an independent national human rights institution. In line with ASEAN's goals, Vietnam has confirmed its commitment to the bloc's values, especially regarding respecting, safeguarding, and advancing human rights and freedoms. By endorsing the ASEAN Human Rights Declaration, Vietnam has shown its readiness to collaborate regionally to maintain human rights norms and weave them into its domestic policy. Vietnam does not have a national human rights institute; therefore, Vietnam lacks the implementation mechanism to fulfil its legal obligations to national human rights law.

Regarding digital rights, Vietnam faces challenges in systematically violating digital rights and complying with its commitments to human rights. The country has seen a decline in digital rights as it enforces stricter regulations on social media platforms to remove 'toxic' content and misinformation. While Vietnam makes efforts to allow its social

media users to easily access and create accounts on various platforms and applications, the Vietnamese government also blocks independent news sources and has the power to demand that social media providers block the spread of information that displeases the government. Allowing easy access to social media also helps Vietnam monitor the activities of human rights activists in the country. The way Vietnam deals with social media accounts containing information that criticises the state – by completely removing them and harassing the account owners – shows that the Vietnamese government severely violates human rights. This leads to the suppression of the right to information, the restriction of the right to education, and the deprivation of the right to freedom of expression. Freedom House has ranked Vietnam among the worst countries in the world for internet freedom, indicating significant control over the internet, online censorship, and data-collection practices.

Vietnam's adherence to international human rights treaties and their corresponding legal obligations is crucial for fostering cooperation with global entities, particularly those operating in the digital sector. While the nation has the capacity to strengthen human rights and digital rights, there is a noticeable reluctance to fully embrace these international standards, and it has shown no willingness to improve. Current regulatory measures, although intended to protect online users, have prompted serious concerns regarding the infringement of privacy and data rights. Vietnam needs to reconcile its regulatory framework with the protection of fundamental rights, including the right to a free digital space.

6.1.4. Impact of the country context on Facebook

The Vietnamese government uses legal tools and cybersecurity law to influence platforms such as Facebook and YouTube to restrict content. This poses significant questions about its adherence to human rights norms, particularly those enshrined in international treaties like the ICCPR (Article 17). In the context of corporate responsibility, while companies may align with the UNGPs to protect their users, they should also comply with the mandates of the UN Special Rapporteur on the Right to Privacy. Social media companies indirectly deprive users of their privacy and assist in this. Vietnam uses cybersecurity laws and decrees to force social media companies to deprive users of their privacy and directly assist in serious human rights violations in cyberspace. These

social media companies could improve their community standards policy based on the treaties that the Vietnamese state itself is a signatory to, possibly using the tools of international treaties to change community standards policies to ensure users enjoy their rights in cyberspace.

- **Cybersecurity Law 2018:** This law allows the government to request the removal of content it deems 'toxic' and to access user data without independent oversight. It has been criticised for its broad definitions and potential to curb online free speech. It also makes it compulsory for users and platforms to use and verify real identity on social networks, which potentially creates a chilling effect on freedom of expression.
- **Penal Code:** The legal framework in Vietnam includes specific provisions within the Penal Code that are applied to suppress political activism and dissent. It is common for these provisions to be invoked as a means to impose penalties on those who express dissenting views against the government online.
- **Decree 53/2022/ND-CP:** This decree supports the Cybersecurity Law by detailing the implementation of content restrictions on websites, especially those hosting advertisements. It increases administrative fines for companies hosting speech considered illegal by authorities and allows the government to access data without independent oversight.
- **Decree 147/2024/ND-CP:** This is arguably one of the most important legal documents in regulating the internet in Vietnam, and has been scrutinised by legal experts and human rights groups for violating free speech.

These laws and regulations provide the Vietnamese government with the legal framework to request the removal of content, access user data, and impose fines for online activities deemed illegal, which can infringe upon individuals' rights to freedom of expression and privacy. The implementation of these laws has been a subject of concern for international human rights organisations and advocates of internet freedom.

6.2. Industry context

It is fair to say that the tech industry in Vietnam has a mixed record in terms of human rights. On the one hand, foreign social media platforms operating in the country have put some real effort into protecting children and coping with hatred, abuse, bullying, discrimination, and harassment. On the other hand, they have failed to protect other fundamental human rights – such as the right to freedom of expression and the right to privacy – by complying with governments' requests to remove or restrict content. It has been confirmed that Facebook, YouTube and TikTok, which are the most popular social media platforms in Vietnam, comply with over 90% of government requests to remove content.

Therefore, it can be concluded that the tech industry in Vietnam is not totally rights-respecting. However, this means there is significant room to improve. Big tech companies can protect the rights of people in Vietnam by being more transparent about their content moderation, government requests, and companies' responses to these requests. Even greater improvements could be made if Facebook, YouTube, and TikTok worked together to implement more transparent policies regarding human rights practices in Vietnam.

6.3. Company context

In this section, we first analyse the legal and non-legal human rights obligations your company is subject to.

We then assess your company's human rights record in Vietnam, drawing on assessments and reports made by journalists and civil society, as well as your activities to promote rights.

If your company is operating in a conflict zone, we also assess if and how your company adopts conflict-sensitive business practices.

Due to the limited public availability of some of this information, a best-effort assessment has been made, but the assessment team welcomes your company's engagement and is ready to update the assessment based on any additional information your company may provide.

6.3.1. Facebook's human rights obligations

Obligation	Summary of implications for Facebook
UN Guiding Principles on Business and Human Rights	Facebook, as a multinational company, should respect human rights as well as conduct human rights due diligence and other practices to address and remedy all human rights impacts while doing business.
Laws of Vietnam	As mentioned in the Country Context section, Facebook, as a social media company that has digital-based business with local partners, is: • required by the Cybersecurity Law to remove content deemed 'toxic' or offensive by the government within 24 hours; • covered by Decree No. 147/2024/ND-CP regarding the management, provision, and use of internet services and online information, and obliged to abide by a list of prohibited acts encompassing illegal content on the internet; • obliged to follow Decree No. 53/2022/ND-CP regarding the implementation of the Cybersecurity Law and new regulations that tighten content restrictions on websites hosting advertisements, increasing administrative fines for companies hosting speech considered illegal by authorities.

Constitution of Vietnam	As mentioned in the Country Context section, The right to freedom of expression and access to information is protected under the Constitution of Vietnam. As a company that has local partners, Facebook should respect the country's constitution.
NASDAQ listing	Facebook went public on 18 May 2012. This means the company should consider human rights issues when conducting business activities, as they can impact on the company's reputation and stock market value.
GNI Principles	GNI Principles are based on internationally recognised laws and standards for human rights, including the Universal Declaration of Human Rights, the ICCPR, and the ICESCR. Facebook, as a member of GNI Principles, has the responsibility to respect and promote their users' rights to freedom of expression and privacy. The company must abide by international human rights laws and standards in every country in which it operates. When domestic laws, regulations, or policies fall short of international laws, Facebook should take steps to avoid, mitigate, or address the negative effects of government demands, laws, or regulations, and strive to honour the principles of internationally recognised human rights standards as much as possible.

Investors	The five biggest institutional shareholders of Facebook are Vanguard Group, BlackRock, FMR, State Street, and JP Morgan Chase. These corporations have developed their own human rights policies, and expect their suppliers or vendors to embed human rights in their policies as well. Facebook, as an investee of these shareholders, should honour its shareholders' human rights policies accordingly.
Customers	Vulnerable consumers tend to pay more attention to a company's human rights reputation. Given the context in Vietnam, many vulnerable social media users are human rights defenders and social activists, whose influence is gradually increasing. As such, this group of vulnerable users may not recommend companies with bad human rights records to their audience. Thus, Facebook should consider its users' opinions and attitudes to improve its human rights practices.

6.3.2. Company structures to implement human rights obligations in Vietnam

From a theoretical perspective, Facebook has put real effort into respecting human rights. The company has a governance structure for managing human rights, as the Human Rights team regularly reports to The Audit and Risk Oversight Committee of the Board. It has developed codes of conduct and human rights policies with clear commitments, in accordance with international human rights laws and

standards. The company has also regularly conducted human rights due diligence, HRIAs, and human rights reports in line with the UNGPs. For users, grievance mechanisms are provided in various ways, which are stipulated in the Code of Conduct and the Help Center.

Furthermore, Facebook has also published policies on public disclosure, whistleblowing, content moderation, responsible AI, and data privacy. When it comes to government requests, Facebook has stated that it will assess their legality, necessity, and proportionality, and the company also notifies users about such requests.

6.3.3. Company structures to implement human rights obligations in Vietnam

Regarding Facebook's implementation of human rights in Vietnam, there are two points that need to be mentioned.

First, it must be acknowledged that, on paper, Facebook has tried to create and develop its human rights policies and practices . The company has provided human rights training to its employees, funded initiatives to improve digital rights, and collaborated with experts, relevant stakeholders, and human rights defenders to remedy human rights risks.

However, this does not always seem to be the case when it comes to users' experience and policy implementation. Both content consumers and content creators suffer from Facebook's compliance with the government's requests to remove or restrict content deemed illegal in Vietnam. This has a negative impact on users' right to freedom of expression and access to information. International human rights organisations have also expressed their concerns that Facebook has set a bad practice for human rights policies worldwide. Furthermore, content consumers and content creators have also expressed concerns about content being wrongfully moderated, over or under-enforcement, which leads to authentic and independent content being removed but scamming content getting promoted on the platform. It is also worth noting that Facebook's Community Standards or local law compliance may lead to limited visibility of content, especially nonprofit organisations' pages. Thus, Facebook users not only have their right to freedom of expression and access to information violated, but are also exposed to toxic content.

7. PHASE 3: IMPACT ASSESSMENT

In this section, we apply the approach outlined in UNGP 14 and best-practice human rights due diligence to determine the saliency of specific human rights impacts, and your company's management of these impacts. To evaluate the relative priority of these impacts, we used four factors to create a **Salience Score** (based on UNGP 14 and additional sources):

1. **Scope**: The percentage of the population potentially negatively affected by a given impact on human rights
2. **Scale**: The extent to which human rights are impacted
3. **Remediability**: If an individual's rights are impacted, the ease with which these negative impacts can restore the individual to their prior position
4. **Likelihood**: The likelihood of an impact occurring

A high Salience Score is thus assigned to impacts that:

- Affect over 50% of the population
- Have a serious impact on physical rights
- Are irremediable
- Are certain to happen or are already happening

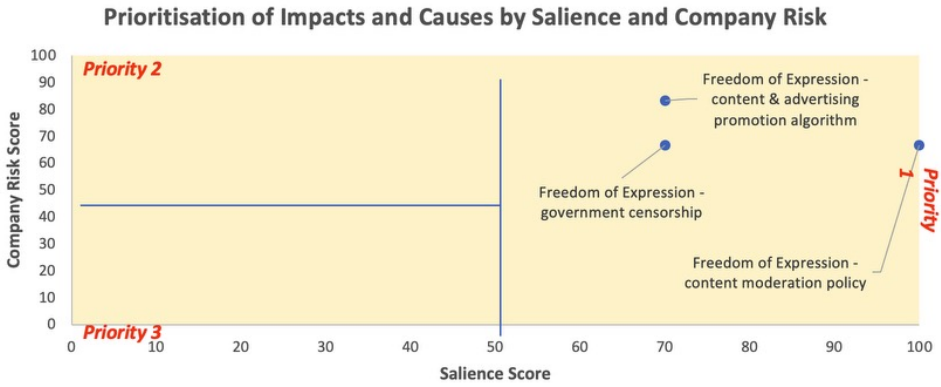
We then evaluate how well your company is managing these impacts by combining three factors into a **Company Risk Score**:

1. **Connection**: Your company's connection with the rights impact (UNGP 13)
2. **Mitigation**: How well your company is mitigating the negative rights impact to date (UNGP 19)
3. **Leverage**: The extent to which your company can mitigate negative rights impacts further, based on a best-effort consideration of your company's internal and external context (UNGP 19)

A high Company Risk Score is thus assigned to impacts and causes that:

- Your company has caused (as defined by UNGP 13)
- Your company is not trying to address, or not doing so publicly
- Exhibit high potential for your company to make an improvement

The prioritisation chart below plots the Salience Score against the Company Risk Score for each potential rights impact and cause. The impacts and causes with higher scores are prioritised over those with lower scores, in line with UNGP 24.



The table below shows the data used to plot the chart above:

No.	Priority	Impacted right and cause	Salience Score	Company Risk Score
1	1	Freedom of expression: government censorship	70	67
2	1	Freedom of expression: content-moderation policy	100	67
3	1	Freedom of expression: content and advertising promotion algorithm	70	83

7.1. Priority 1 impacts

Primary Right Impacted	Cause of Impact	Reason for Salience Score	Reason for Management Score
Freedom of expression	Government Censorship	**Scope**: Because of high internet usage, based on the existing data and based on the answers of phase 4. Facebook had 72.7 million users in Vietnam in early 2024, accounting for about 73% of the population. This indicates that a big portion of the population is online and could be affected by government censorship. If a company follows government censorship requests, it would impact a large number of users.	**Connection**: Contribute. The company is presumed to have established policies and processes to manage government censorship requests, encompassing assessments of legality, necessity, and proportionality. The company adheres to these governmental requests following a thorough compliance evaluation. By adhering to these requests, even post-assessment, the company inadvertently contributes to the adverse effects on freedom of expression and other human rights. Compliance with government censorship requests facilitates the broader suppression of freedom of expression within the country. Consequently, this compliance has led to allegations of the company being complicit in the repression of online freedom and dissent.

		Scale: Severe mental violation. Government censorship in Vietnam does not just restrict freedom of expression; it has serious and harmful effects on mental health, creating a climate of fear, isolation, and psychological distress. When censorship disrupts the flow of information and communication, it leads to feelings of isolation. This is especially true for activists and journalists who rely on social media platforms like Facebook to connect with their communities and share information. Government censorship reduces their ability to engage with their audience, leading to a loss of support and a sense of being undervalued. Victims of government censorship and harassment often experience psychological trauma, including those who have been tortured or subjected to inhumane treatment due to their online activities. Some church leaders feel that government censorship hampers their ability to share knowledge and conduct their work effectively. They feel monitored, especially after posting plans for religious activities, as they are often subjected to work sessions with authorities regarding their Facebook posts. Many activists isolate themselves socially and suffer from depression due to fear. The consequences can have long-lasting effects on an individual's mental health and social life.	**Mitigation**: Succeeding to some extent. Based on the Transparency Centre, Facebook has shown some transparency by following its policies, community standards, and local laws for content censorship, even if it is sometimes unclear. The company likely has policies and procedures to handle government requests, checking if they are legal, necessary, and proportional to reduce censorship impact. Facebook has also informed international organisations about potential human rights violations by the government, showing its efforts to address and reduce censorship impacts. Additionally, Facebook publishes reports that detail the number of government requests they receive and how they respond to them. It also engages with government officials worldwide to discuss issues related to the rule of law.

		Remediability: To some extent. If the fatalities of censorship were adequately compensated through treatment and medical care, users would recover. Currently, many users do not recover fully and lack compensation or medical care. Facebook users in remote areas often use the platform to seek justice for relatives who were tortured to death, but their posts are quickly deleted at the government's request. This lack of empathy from Facebook leaves lasting psychological wounds, causing fear and anxiety that significantly impact their quality of life and hinder recovery. **Likelihood**: Certain, since censorship is already happening.	**Leverage**: High potential. Since your company has strong links to the government from its licence agreement, Facebook can leverage this relationship to lobby and discuss censorship policies, aiming to minimise negative impacts on freedom of expression. With its strong presence and significant influence, Facebook can affect government decisions, helping to make censorship requests more reasonable and less impactful on freedom of expression. Facebook can show a willingness to cooperate with the government to find reasonable censorship solutions, such as for toxic content, while protecting users' freedom of expression by utilising international human rights laws and treaties that Vietnam has signed. This can compel the government to adhere to international human rights standards, including freedom of expression. Facebook can conduct regular human rights audits and plan to mitigate negative impacts on freedom of expression. This includes ensuring that moderation processes comply with international human rights standards.

Freedom of expression	Content Moderation	**Scope**: >50% of the population. Facebook had 72.7 million users in Vietnam in early 2024, accounting for about 73% of the population. Given this high percentage, it is reasonable to choose >50% of the population as the scope of people whose freedom of expression could be negatively impacted by Facebook's content-moderation policy in Vietnam. **Scale**: Health and safety violation. Facebook's under-enforcement to neglected removal of fraudulent online advertisements has resulted in users falling victim to human-trafficking networks, leading to severe and unpredictable consequences. Victims are subjected to torture at scamming facilities, with some cases resulting in death due to the abuse. Additionally, there have been instances where victims, unable to endure the pressure from scammers, have committed suicide. Facebook's over-enforcement has led to confusion, isolation, and psychological distress. Consequently, users may migrate to other social networks such as X, TikTok, and Instagram. However, these platforms typically have limited reach in Vietnam due to users' familiarity with Facebook. As a result, information dissemination is disrupted and fails to reach a broad audience.	**Connection**: Contribute. The occurrence of both under-enforcement and over-enforcement of Facebook's content moderation policies has contributed to negative impacts on freedom of expression. The company's inability to distinguish between users with malicious intent and genuine users, and its crowd-pleasing algorithms, has violated the rights of users. The company's content moderation creates a paradox where users can easily report others without providing users a right to respond. This lack of clarity makes it difficult to distinguish between users with good intentions and those with malicious intent. **Mitigation**: Succeeding to some extent. The company's ability to fully mitigate negative impacts on freedom of expression is limited because under-enforcement has not improved, and some scam ads are still online. Additionally, the steps to access a human moderator are complicated.

		Remediability: Not at all. The fatalities from fraudulent advertisements have caused victims to lose their lives, and these risks cannot be remedied. There is no public evidence that your company has compensated the victims affected by the fatal incident caused by content-moderation under-enforcement. Although the content affected by over-enforcement moderation is eventually restored after the appeal process, it impacts the sufficiency of life and causes psychological distress, potentially leading to traumatic effects on users' lives. **Likelihood**: Certain. The frequent occurrence of over-enforcement and under-enforcement, coupled with the lack of progress in improving both excessive and insufficient moderation, as well as the algorithm's ability to recognise crowd behaviour, has resulted in no noticeable improvement in the country in the past five years. Certain that freedom of expression being negatively impacted due to the company's content-moderation policy in the country in the next five years.	**Leverage**: High potential. The company generally has a high potential to mitigate its negative rights impacts should it wish to do so. Its control over the algorithm allows it to adjust and improve content-moderation processes to minimise errors and ensure that non-violating content is handled fairly according to the context in Vietnam. Increasing transparency and accountability in content moderation can help mitigate negative effects. Publicising these processes and decisions will foster greater user understanding and trust in the system. By listening to and responding to community feedback, Facebook can further improve moderation processes and reduce adverse impacts.

Freedom of expression	Content Promotion	**Scope**: >50% of the population, given that your company's market share covers almost 73 million users (out of an approximate population of 100 million). **Scale**: Severely mental violation. For regular users, not having their posts seen by friends may lead to relationship damage. For vulnerable social groups, not having their posts seen by friends and followers may lead to more severe forms of discrimination, mistreatment, and persecution by the government. **Remediability**: To some extent. For regular users, relationship damage cannot always be restored to the same position; some may be healed to a certain extent, and some can never be healed at all. For vulnerable social groups, damage done by discrimination, mistreatment, and persecution can hardly be restored to the same position. No remedies can compensate enough for mental disorder and physical damage, especially for those who suffer torture and/or imprisonment.	**Connection**: Caused. Facebook has publicly admitted that on one hand it restricts political content, while on the other it cooperates with the government to promote the government's propaganda. **Mitigation**: Succeeding to some extent. Facebook has implemented several measures to mitigate risks, including providing an appeal mechanism and displaying fact-checking information below mis/disinformation. **Leverage**: High potential. Facebook has absolute control over its algorithm and has no legal entity in Vietnam, and thus no legal obligations to bow to the government's demands – unless it want to profit at the expense of its own users.

		Likelihood: Certain. Facebook has been promoting and accommodating the government's propaganda attacking civic and vulnerable groups and sensational content, while limiting political content and civic/ vulnerable groups. This directly links to the spread of hatred against these groups, which has a lasting impact. We do not anticipate the government changing its strategy toward manipulating Facebook's algorithm in the next five years.	

8. PHASE 4: RECOMMENDATIONS

Based on the context analysis and impact assessment above, we make recommendations to support your company in maximising its positive human rights impacts and mitigating adverse impacts.

These recommendations are classified in line with the UNGPs as follows:

1. **Protect**: Improving the protection of human rights in the country by influencing the government, including but not limited to advocating for improvements in laws, improvements in regulations, or enforcement of these laws and regulations (UNGPs 18, 23).

2. **Respect**: Improving your company's internal environment or activities to minimise rights impacts (UNGP 11).

3. **Remedy**: Attempting to restore the rightsholders to a pre-harm position, or providing compensation or another form of remedy if restoration is not possible (UNGPs 22, 29, 31).

UNGP 24 requires businesses to prioritise mitigations that are most severe, or where delayed response would make the rights impacts irremediable, while UNGP 23 indicates that businesses should comply with all applicable laws and respect internationally recognised human rights, seeking ways to honour internationally recognised human rights principles when faced with conflicting requirements. In a best attempt to consider both these principles, we will prioritise recommendations across two dimensions:

1. **Timeline**: A best-effort consideration of the change possible within the short (within 1 year), medium (within 3 years), and long term (within 5 years). The timeline reflects what should be possible within the country's context to maximise respect for international human rights laws and principles, in line with UNGP 23.

2. **Positive impact of recommendation**: Impact of recommendation on mitigating or remedying any negative rights impacts. Our prioritisation considers UNGP 24, which requires prioritising mitigations based on their severity.

8.1. Pushing the government to protect human rights

According to UNGP 1, governments are responsible for protecting against human rights abuses within their jurisdiction by third parties (including companies). However, in an authoritarian or semi-authoritarian context, we understand the role of the government in protecting human rights may be challenging. In line with UNGPs 18 and 23, we recommend your company explore advocating for positive changes in laws, regulations, government transparency, and rights-respecting government requests. We suggest this could be best done together with cooperative competitors, or in multi-stakeholder alliances ,to maximise the chances of success.

Our specific recommendations to meet this UNGP requirement are as follows:

	Recommendation	Timeline	Impact
1	To require the government's requests satisfy the three-part test by providing detailed information, including specific legal provisions as action's ground, via request forms.	Within 1 year	Low
2	To require the government's requests to be approved by courts.	Within 3 years	Low
3	To advocate for the government to abolish users' identity-verification requirement.	Within 3 years	High

Reasoning:

- **Recommendation 1**: Meta should demand that all content-removal requests from the Vietnam government comply with the three-part test under ICCPR Article 19(3). This means any restrictions must: (1)

be provided by clear and accessible law, (2) pursue a legitimate aim enumerated in the ICCPR, and (3) be necessary and proportionate. Given Vietnam's history of using vague 'national security' pretexts to suppress dissent, Meta should only consider requests that meet these strict criteria.

- **Recommendation 2**: Meta should demand that all content-removal requests from Vietnamese authorities must undergo independent judicial review to comply with international human rights standards. While we recognise the limitations of Vietnam's judicial system, this minimum safeguard would establish crucial documentation of censorship demands and create opportunities for legal challenge. Although judicial approval alone cannot legitimise unlawful restrictions, it could also create a paper trail for accountability.

- **Recommendation 3**: Meta should challenge implementation of mandatory identity-verification requirements (the 2018 Cybersecurity Law and Decree 147), as they violate users' right to anonymous free expression under ICCPR Article 19. It should maintain anonymous account options, challenge government demands for verification data through its Government Dispute Resolution process, and encrypt user communications end-to-end.

8.2. Improving the respect and remedy of human rights within your company

According to UNGP 11, companies should respect human rights by not infringing on the human rights of rightsholders and mitigating adverse human rights impacts. Furthermore, UNGP 29 states that companies should establish or participate in grievance mechanisms, while UNGP 31 establishes eight criteria for effective grievance mechanisms.

Our specific recommendations to meet this UNGP requirement are as follows:

	Recommendation	Timeline	Impact
1	Inform users who have been reported by the government about their rights and the content-moderation process. Clearly explain how they can appeal content-removal decisions to empower users and increase transparency.	Within 1 year	Medium
2	Work with local civil society organisations and human rights groups to understand the impact of content-moderation policies and develop better strategies.	Within 1 year	Medium
3	Publicise a full list of the government's requests.	Within 1 year	Low
4	Label Vietnam's state-controlled pages and profiles, similar to China and Russia.	Within 1 year	High
5	Improve detection, prevention, and mitigation of coordinated inauthentic behaviour in all authoritarian countries where authentic accounts act on government orders.	Within 1 year	High
6	Expand the trusted flaggers programme in Vietnam to include civil society organisations to help detect state and state-controlled pages/profiles.	Within 3 years	High

7	Increase transparency on limiting visibility in Facebook's approach to feed ranking.	Within 3 years	High
8	Stop reducing the visibility of unpaid content on nonprofit organisations' pages.	Within 3 years	High
9	Improve detection of coordinated inauthentic actors, especially regarding nonprofit content.	Within 3 years	High
10	Create an appeal/remedy process for content that nonprofit organisations flag as being limited in visibility.[1]	Within 3 years	High
11	Expand the definition of nonprofit organisations to include non-registered civil society actors who are unable to obtain registrations due to persecution and/or bureaucracy. Any improvements in content visibility for non-profit organisations should also include unregistered ones.	Within 3 years	High
12	Strengthen appeal processes so users can challenge content-removal decisions. Ensure appeals are reviewed by human moderators who understand the local context.	Within 3 years	Medium

1 Reduced visibility due to unpaid nature of non-profit content, content that has been reported (possibly by coordinated inauthentic actors), negative reviews on pages (possibly by coordinated inauthentic actors).

13	Avoid over-censorship by carefully considering the context and impact of content before taking action. Train AI systems to better understand the Vietnamese language and culture.	Within 3 years	Medium
14	Give users the option of opting out of the feed-ranking algorithm entirely and creating a news feed that serves their needs.	Within 5 years	High
15	Set up a new independent board to review all content-moderation requests by the government of Vietnam and other countries ranked as 'Not Free' by Freedom House. This board should ensure decisions follow international human rights and digital rights standards.	Within 5 years	High

Reasoning:

- **Recommendations 1, 3**: Meta should uphold transparency by immediately notifying users when their content is restricted due to government requests, disclosing the legal basis and issuing entity. It should publicly log all censorship demands, redacting only legitimate security details, to enable scrutiny of Vietnam's systemic overreach. By exposing the scale of unjustified takedowns (e.g. 95% compliance with Vietnam's demands), Facebook can leverage documented abuses to resist unlawful pressure while empowering users to challenge censorship.
- **Recommendation 5**: Meta should urgently enhance its detection systems to counter Vietnam's sophisticated online manipulation efforts, particularly through Task Force 35, which uses authentic accounts to suppress dissent and spread state propaganda. It should invest in identifying and restricting these inauthentic behaviours and detect patterns of mass false reporting and coordinated pro-

regime content sharing. This should be complemented by enhanced investigative capacity, including partnerships with local civil society to identify state-affiliated accounts. By publicly labelling state-affiliated influence operations and disclosing government requests facilitating such manipulation, it can better protect users' right to free expression and access to information.

- **Recommendations 7, 8, 9, 10**: Limiting visibility has been a long-standing practice that Facebook imposes on users and pages, presumably for business purposes. It is unclear whether political pressure influences your decisions regarding visibility limits. We suggest that Facebook lifts visibility limits on pages owned by nonprofit organisations, as these entities serve public interests using public funding and private donations, and are often under budget constraints. It is reasonable to allow these pages to be visible to all of their followers instead of requiring them to pay for advertising.

- **Recommendation 11**: Meta should expand its definition of nonprofit organisations to include unregistered civil society groups in Vietnam, given the government's systematic denial of registration to critical voices. While Vietnamese law imposes burdensome requirements under Decree 58/2022 – including foreign funding restrictions and mandatory state approval – these should not determine platform eligibility, as they contravene ICCPR Article 22 on freedom of association. Meta should recognise organisations verified by trusted registered partners and waive registration documentation where state obstruction is documented. An alternative validation process could involve cross-checking activity histories, international donor partnerships, and peer-organisation attestations.

- **Recommendation 14**: Despite its benefits, Facebook's feed-ranking algorithm has negatively impacted how users consume information, reinforcing echo chambers and amplifying political polarisation in Vietnam. It also damages users' personal relationships by determining which friends' content appears on their newsfeed and when. Giving users the option to opt out of algorithms or customise their newsfeed according to their preferences would make the newsfeed much more useful, ensuring they see the kind of content they want to see, rather than having Facebook make this decision for them.

- **Recommendation 15**: Countries categorised as 'Not Free' by Freedom House are nations with undemocratic regimes that show no or little respect for human rights. Facebook should not treat them the way it treats democratic nations, as doing so would make Facebook complicit in human rights violations and effectively put the company on the side of oppressors. Requests from 'Not Free' countries such as Vietnam are often arbitrary and disrespectful to basic human rights standards; they deserve to be scrutinised by an independent board of experts before Facebook takes action. We recommend that such a board reviews all government requests from these types of countries to compensate for the lack of national checks and balances, and that the board recommends appropriate actions to Facebook. In turn, Facebook should inform the board of its decisions and publicise them.

9. PHASE 5:
COMPANY ENGAGEMENT

The core purpose of the CLARITI methodology – and of this report – is to enhance our engagement with your company to improve its human rights practices in the areas of government censorship, content moderation, and content promotion.

Since this is our first HRIA on Facebook's operations in Vietnam, we conducted this assessment to gain a proper and comprehensive understanding of the company before we make any contact. Thus, this report not only informs Facebook but also informs our advocacy. We understand that without the company's inputs, this assessment will not be as fair and comprehensive as it should be. However, we believe it provides community feedback that meets Facebook's obligations for stakeholder engagement as part of its human rights due diligence, which the company may find useful.

We wish to discuss this report with Facebook to enhance both our understanding of the company and the company's understanding of Vietnamese civil society.

APPENDIX:
LIST OF ONLINE SOURCES CONSULTED

List of online sources consulted for Country Context Analysis

No.	Organisation	Page title	URL
1	Amnesty International	Countries	https://www.amnesty.org/en/countries/
2	Baker McKenzie	Global Data Privacy & Security Handbook	https://resourcehub.bakermckenzie.com/en/resources/data-privacy-security
3	Constitute	Constitutions	https://constituteproject.org/constitutions?lang=en.
4	Council of Europe	Complete list of the Council of Europe's treaties	https://www.coe.int/en/web/conventions/full-list
5	DataReportal	Complete Report Library	https://datareportal.com/library
6	Freedom House	Countries and Territories	https://freedomhouse.org/countries/freedom-world/scores
7	Global Network Initiative (GNI)	Country Legal Frameworks Resource (CLFR)	https://clfr.globalnetworkinitiative.org/
8	Office of the United Nations High Commissioner for Human Rights	View the ratification status by country or by treaty	https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Lang=en
		Assessing the Effectiveness of National Human Rights Institution	https://www.ohchr.org/sites/default/files/Documents/Publications/NHRIen.pdf
9	Inter-American Commission on Human Rights	Basic Documents in the Inter-American System	https://www.oas.org/en/IACHR/jsForm/?File=/en/iachr/mandate/basic_documents.asp
10	South Asian Association for Regional Cooperation (SAARC)	Agreements & Conventions	https://www.saarc-sec.org/index.php/resources/agreements-conventions?limit=20&limitstart=20
11	African Union	OAU/AU Treaties, Conventions, Protocols & Charters	https://au.int/en/treaties

12	Association of Southeast Asian Nations (ASEAN)	Human Rights	https://asean.org/our-communities/asean-political-security-community/rules-based-people-oriented-people-centred/human-rights/
13	United Nations Conference on Trade and Development	Data Protection and Privacy Legislation Worldwide	https://unctad.org/page/data-protection-and-privacy-legislation-worldwide
14	US Department of State	Country Reports on Human Rights Practices	https://www.state.gov/reports-bureau-of-democracy- human-rights-and-labor/country-reports-on-human-rights-practices/
15	World Bank	Classification of Fragile and Conflict-Affected Situations	https://www.worldbank.org/en/topic/fragilityconflictviolence/brief/harmonized-list-of-fragile-situations
16	World Justice Project	WJP Rule of Law Index	https://worldjusticeproject.org/rule-of-law-index/global/2022
17	DATAREPORTAL	Digital 2024: Vietnam	Digital 2024: Vietnam – DataReportal – Global Digital Insights
18	SAARC	Agreements & Conventions	Agreements & Conventions (saarc-sec.org)
19	Constitute	Viet Nam 1992 (rev. 2013)	Viet Nam 1992 (rev. 2013) Constitution - Constitute (constituteproject.org)
20	Country Legal Framework Resource	Provision of Real-time Lawful Interception Assistance	Myanmar | Global Network Initiative
21	DLA PIPER	Data Protection Laws of the World	Law in Vietnam - DLA Piper Global Data Protection Laws of the World (dlapiperdataprotection.com)
22	Acclime	Personal Data Protection obligations in Vietnam – Decree 13, legal framework and 2023 obligations	Personal Data Protection Obligations In Vietnam – Decree 13, Legal Framework And 2023 Obligations | Acclime Vietnam
23	The Vietnamese Magazine	Restricted Cyberspace: Vietnam Uses Cybersecurity Laws to Muzzle Online Speech	Restricted Cyberspace: Vietnam Uses Cybersecurity Laws to Muzzle Online Speech (thevietnamese.org)
24	Freedom House	Freedom on the Net 2022	Vietnam: Freedom on the Net 2022 Country Report | Freedom House

25	Global Compliance News	New amendments to draft regulations on internet services, online information and online games	Vietnam: New amendments to draft regulations on internet services, online information and online games - Global Compliance News
26	ARTICLE 19	Advocating for internet freedom before the UN Human Rights Committee	Vietnam: Advocating for internet freedom before the UN Human Rights Committee - ARTICLE 19
27	VOV World	Vietnam prioritizes equal access to digital technology for all	Vietnam prioritizes equal access to digital technology for all (vovworld.vn)
28	Bloomberg	Vietnam Weighs 3-Hour Pulldown of Some 'Toxic' Internet Info	Vietnam Considers Mandate to Remove 'Toxic' Internet Info Within 3 Hours - Bloomberg
29	The Diplomat	Vietnam Introduces 24-Hour Take-Down Requirement for Social Media Platforms	Vietnam Introduces 24-Hour Take-Down Requirement for Social Media Platforms – The Diplomat
30	Reuters	Vietnam to require 24-hour take-down for 'false' social media content	Vietnam to require 24-hour take-down for 'false' social media content | Reuters
31	World Justice Project (WJP)	Vietnam ranked 88 out of 139 countries on rule of law, rising four positions	Vietnam_ 2021 WJP Rule of Law Index Country Press Release_1.pdf (worldjusticeproject.org)
32	Wikipedia	Law of Vietnam	Law of Vietnam - Wikipedia
33	McCain Institute	Human Rights, Democracy and Rule of Law in Vietnam: Making the Case	Human Rights, Democracy and Rule of Law in Vietnam: Making the Case - McCain Institute

List of online sources consulted for Company Context Analysis

No.	Organisation	Page title	URL
1	Association of Accredited Public Policy Advocates to the European Union	Biggest tech associations representing digital companies	https://www.aalep.eu/biggest-tech-associations-representing-digital-companies
2	Amnesty International	What the EU's Digital Services Act means for human rights and harmful Big Tech business models	https://www.amnesty.org/en/wp-content/uploads/2022/07/POL3058302022ENGLISH.pdf
3	Business & Human Rights Resource Centre	Mandatory Due Diligence	https://www.business-humanrights.org/en/big-issues/mandatory-due-diligence/
4	CIRIGHTS	CIRIGHTS	https://cirights.com/
5	Digital Trust & Safety Partnership	Best Practices Framework	https://dtspartnership.org/best-practices/
6	Electronic Frontier Foundation	Who Has Your Back? Censorship Edition 2019	https://www.eff.org/wp/who-has-your-back-2019
7	Fierce Telecom	Who are the wireless and wired telecom trade associations?	https://www.fiercetelecom.com/telecom/who-are-wireless-and-wired-telecom-trade-associations
8	Ranking Digital Rights	The 2022 Telco Giants Score Card	https://rankingdigitalrights.org/tgs22/
		The 2022 Big Tech Score Card	https://rankingdigitalrights.org/bts22/
		2020 Ranking Digital Rights Corporate Accountability Index	https://rankingdigitalrights.org/index2020/

		Governance and Management Oversight	Tech: https://rankingdigitalrights.org/bts22/indicators/G2 Telco: https://rankingdigitalrights.org/tgs22/indicators/G2
		Governments and regulations	https://rankingdigitalrights.org/index2020/indicators/G4a
		Processes for policy enforcement	https://rankingdigitalrights.org/index2020/indicators/G4b
		Targeted advertising	https://rankingdigitalrights.org/index2020/indicators/G4c
		Algorithmic System	https://rankingdigitalrights.org/index2020/indicators/G4d
		Access to terms of service	https://rankingdigitalrights.org/bts22/indicators/F1a
		Process for terms of service enforcement	https://rankingdigitalrights.org/bts22/indicators/F3a
		Scorecards and Rankings	https://rankingdigitalrights.org/rankings-report-cards/
9	The Santa Clara Principles	The Santa Clara Principles	https://santaclaraprinciples.org
10	United Nations Global Compact	Our Participants	https://unglobalcompact.org/what-is-gc/participants
11	World Benchmarking Alliance	Digital Inclusion Benchmark	https://www.worldbenchmarkingalliance.org/publication/digital-inclusion/companies/
12	World Benchmarking Alliance	Digital Inclusion Benchmark	https://www.worldbenchmarkingalliance.org/publication/digital-inclusion/companies/

13	World Favor	The ultimate guide to Human Rights Due Diligence laws – who's affected and how to comply	https://blog.worldfavor.com/the-complete-list-of-national-human-rights-due-diligence-laws-whos-affected-and-how-to-comply
14	Amnesty International	Viet Nam: Tech giants complicit in industrial-scale repression	https://www.amnesty.org/en/latest/press-release/2020/12/viet-nam-tech-giants-complicit/
	Amnesty International	Viet Nam: Let us breathe! Censorship and criminalization of online expression in Viet Nam	https://www.amnesty.org/en/documents/asa41/3243/2020/en/
15	BlackRock	BlackRock's approach to engagement on corporate human rights risks	https://www.blackrock.com/corporate/literature/publication/blk-commentary-engagement-on-human-rights.pdf
16	European Parliament	European Parliament legislative resolution of 24 April 2024 on the proposal for a directive of the European Parliament and of the Council on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937	https://www.europarl.europa.eu/doceo/document/TA-9-2024-0329_EN.html
17	Facebook	Community Standards	https://www.facebook.com/business/help/2193703447560909?id=208060977200861
	Facebook	Secure the Internet Grants request for proposals	https://research.facebook.com/research-awards/secure-the-internet-grants/

	Facebook	Corporate Human Rights Policy	https://about.fb.com/wp-content/uploads/2021/03/Facebooks-Corporate-Human-Rights-Policy.pdf
	Facebook	Approach to Facebook Feed Ranking	https://transparency.meta.com/features/ranking-and-content/
	Facebook	Building a Better News Feed for You	https://about.fb.com/news/2016/06/building-a-better-news-feed-for-you/
	Facebook	Guidelines for Accurate, Authentic Content	https://www.facebook.com/business/help/538391223253327?id=208060977200861
18	Fidelity Investment	Fidelity's Slavery and Human Trafficking Statement	https://institutional.fidelity.com/app/proxy/content?literatureURL=/9889089.PDF
19	Financial News	BlackRock, Vanguard, Fidelity among fund groups called out over failure to tackle human rights abuses	https://www.fnlondon.com/articles/blackrock-vanguard-fidelity-among-fund-groups-called-out-over-failure-to-tackle-human-rights-abuses-20230510
20	Freedom House	Freedom in the World 2022	https://freedomhouse.org/country/vietnam/freedom-world/2022
21	Human Rights Watch	Vietnam: Facebook, Pressured, Censors Dissent	https://www.hrw.org/news/2020/04/23/vietnam-facebook-pressured-censors-dissent
22	Human Rights Watch	2023 World Report	https://www.hrw.org/world-report/2024/country-chapters/vietnam
23	JP Morgan Chase	JP Morgan Chase Business and Human Rights	https://www.jpmorganchase.com/about/our-business/human-rights
24	Meta	2022 Human Rights Report	https://humanrights.fb.com/wp-content/uploads/2023/09/2022-Meta-Human-Rights-Report.pdf

	Meta	An Update on Meta's Civil Rights Progress	https://about.fb.com/news/2023/03/an-update-on-metas-civil-rights-progress/
	Meta	The Code of Conduct	https://about.meta.com/en/code-of-conduct/
	Meta	Information for law enforcement authorities	https://about.meta.com/actions/safety/audiences/law/guidelines
	Meta	Government Requests for User Data	https://transparency.meta.com/reports/government-data-requests/data-types/
	Meta	Promoting safety and expression	https://about.meta.com/actions/promoting-safety-and-expression/
	Meta	Responsible AI	https://ai.meta.com/responsible-ai/
	Meta	Privacy Policy	https://www.facebook.com/privacy/policy/
25	State Street	State Street Human Rights Statement	https://www.statestreet.com/web/about/our-impact/documents/human-rights-statement.pdf
26	Vanguard Group	Sustainability, Diversity, Equity, and Inclusion	https://corporate.vanguard.com/content/corporatesite/us/en/corp/who-we-are/we-care-about/index.html
27	VnEconomy	Meta committed to helping unlock Vietnam's growth	https://vneconomy.vn/meta-committed-to-helping-unlock-vietnams-growth.htm
28	Legal Initiatives for Vietnam	How foreign tech companies have failed to uphold human rights in Vietnam	https://www.liv.ngo/new-report-new-seminar-how-foreign-tech-companies-have-failed-to-uphold-human-rights-in-vietnam/

List of online sources consulted for Impact Assessment

No.	Organisation	Page title	URL
1	Access Now	How's your country on Net Neutrality?	https://www.accessnow.org/hows-your-country-on-net-neutrality/
		Five excuses governments (ab)use to justify internet shutdowns	https://www.accessnow.org/five-excuses-governments-abuse-justify-internet-shutdowns/
		The impact of forced data localisation on fundamental rights	https://www.accessnow.org/the-impact-of-forced-data-localisation-on-fundamental-rights/
2	CSO	The 15 biggest data breaches of the 21st century	https://www.csoonline.com/article/534628/the-biggest-data-breaches-of-the-21st-century.html
3	Daily Dot	What is zero-rating?	https://www.dailydot.com/debug/zero-rating/
4	European Commission	What personal data is considered sensitive?	https://commission.europa.eu/law/law-topic/data-protection/reform/rules-business-and-organisations/legal-grounds-processing-data/sensitive-data/what-personal-data-considered-sensitive_en
5	Facebook	Our Approach to Facebook Feed Ranking	https://transparency.fb.com/features/ranking-and-content/
6	Freedom House	Countries	https://freedomhouse.org/countries/freedom-net/scores
7	GDPR Text	Article 29 Working Party Guidelines on transparency under Regulation 2016/679	https://gdpr-text.com/guidelines/transparency/
8	GDPR	GDPR Overview	https://gdpr.eu

9	Baker McKenzie	Global Data Privacy & Security Handbook	https://resourcehub.bakermckenzie.com/en/resources/data-privacy-security
10	Global Network Initiative (GNI)	Country Legal Frameworks Resource (CLFR)	https://clfr.globalnetworkinitiative.org/
		Defining Direct Access: GNI calls for greater transparency and dialogue around mandatory, unmediated government access to data	https://globalnetworkinitiative.org/defining-direct-access-2/
		Implementation Guidelines For The Principles of Freedom Of Expression And Privacy	https://globalnetworkinitiative.org/wp-content/uploads/2018/08/Implementation-Guidelines-for-the-GNI-Principles.pdf
11	Internet Society	Global Internet Shutdowns	https://pulse.internetsociety.org/shutdowns
12	NetBlocks	Reports	https://netblocks.org/reports
13	PayPal	List of Third Parties (other than PayPal Customers) with Whom Personal Information May be Shared	https://www.paypal.com/ie/legalhub/third-parties-list
14	Ranking Digital Rights	The 2022 Telco Giants Scorecard	https://rankingdigitalrights.org/tgs22/
		The 2022 Big Tech Scorecard	https://rankingdigitalrights.org/bts22/
15	TechTarget	Top 10 customer data privacy best practices	https://www.techtarget.com/searchcustomerexperience/tip/Top-customer-data-privacy-best-practices
16	The Santa Clara Principles	The Santa Clara Principles	https://santaclaraprinciples.org/
17	Twitter	A new era of transparency for Twitter	https://blog.twitter.com/en_us/topics/company/2023/a-new-era-of-transparency-for-twitter

18	United Nations Conference on Trade and Development	Data Protection and Privacy Legislation Worldwide	https://unctad.org/page/data-protection-and-privacy-legislation-worldwide
19	Advanced Television	Vietnam online piracy among highest in SE Asia	Survey: Vietnam online piracy among highest in SE Asia | Advanced Television (advanced-television.com)
20	BBC	Facebook and Google 'complicit' in censorship	Vietnam: Facebook and Google 'complicit' in censorship (bbc.com)
21	BusinessNewsAsia	New survey shows Vietnam among highest in online piracy in Southeast Asia	New survey shows Vietnam among highest in online piracy in Southeast Asia (businessnewsasia.com)
22	UN News Global perspective Human stories	Hate speech on Facebook poses 'acute challenges to human dignity - UN expert	Hate speech on Facebook poses 'acute challenges to human dignity' – UN expert | UN News
23	United Nations Human Rights Office of the High Commissioner	In Dialogue with Viet Nam, Experts of the Committee on the Elimination of Racial Discrimination Commend the Representation of Ethnic Minorities in the National Assembly, Ask about the Criminalisation of Political Defectors and of Religious Activities by Minorities	In Dialogue with Viet Nam, Experts of the Committee on the Elimination of Racial Discrimination Commend the Representation of Ethnic Minorities in the National Assembly, Ask about the Criminalisation of Political Defectors and of Religious Activities by Minorities | OHCHR
24	Meta	Facebook community standards	Facebook Community Standards | Transparency Center (meta.com)
25	Meta	How Meta enforces its policies	How we enforce our policies | Transparency Center (meta.com)
26	Meta	Our Continuing Commitment to Transparency	Our Continuing Commitment to Transparency | Meta (fb.com)
27	New America	Everything in moderation: Case study: Facebook	Everything in Moderation: Case Study: Facebook (newamerica.org)

28	Yale Law School The Justice Collab-oratory	Report Of The Facebook Data Transparency Advisory Group	dtag_report_5.22.2019.pdf (yale.edu)
29	Facebook	How does Facebook use artificial intelligence to moderate content?	How does Facebook use artificial intelligence to moderate content? | Facebook Help Centre
30	The Washington Post	Facebook helped bring free speech to Vietnam. Now it's helping stifle it.	Meta's Facebook pressured by Vietnam's government to censor dissent - The Washington Post
31	ALJAYEERA	Facebook, YouTube accused of complicity in Vietnam rights abuses	Facebook, YouTube accused of complicity in Vietnam rights abuses | Technology News | Al Jazeera
32	Business & Human Rights Resource Centre	Vietnam: Amnesty report finds Facebook & YouTube are increasingly complicit with state censorship of online content	Vietnam: Amnesty report finds Facebook & YouTube are increasingly complicit with state censorship of online content - Business & Human Rights Resource Centre (business-humanrights.org)
33	European Data Protection Board (EDPB)	1.2 billion euro fine for Facebook as a result of EDPB binding decision	1.2 billion euro fine for Facebook as a result of EDPB binding decision | European Data Protection Board (europa.eu)
34	The Record Recorded Future News	Southeast Asian scam syndicates stealing $64 billion annually, researchers find	Southeast Asian scam syndicates stealing $64 billion annually, researchers find (therecord.media)
35	Electronic Frontier Foundation	Who Has Your Back? Censorship Edition 2019	Who Has Your Back? Censorship Edition 2019 | Electronic Frontier Foundation (eff.org)
36	Meta	Oversight Board	Oversight Board| Transparency Center (meta.com)
37	Facebook	Appeal a Facebook content decision to the Oversight Board	Appeal a Facebook content decision to the Oversight Board | Facebook Help Centre

38	University of Sydney, University of Queensland	Facebook: Regulating Hate Speech in the Asia Pacific	2021_Facebook_hate_speech_Asia_report.pdf (r2pasiapacific.org)
39	DataReportal	Digital 2024: Vietnam	Digital 2024: Vietnam – DataReportal – Global Digital Insights
40	World Population Review	Population of Vietnam	Vietnam Population 2024 (Live) (worldpopulationreview.com)
41	Human Rights Watch	Vietnam Events of 2020	World Report 2021: Vietnam | Human Rights Watch (hrw.org)
42	Amnesty International	Tech giants complicit in industrial-scale repression	Viet Nam: Tech giants complicit in industrial-scale repression - Amnesty International
43	Gadgets360	How Facebook Is Damaging Freedom of Expression in Vietnam	How Facebook Is Damaging Freedom of Expression in Vietnam | Gadgets 360
44	Amnesty International	Big Tech's Censorship Shame in Viet Nam	Big Tech's censorship shame in Viet Nam (amnesty.org)
45	Freedom House	Freedom in the World	Vietnam: Freedom in the World 2024 Country Report | Freedom House
46	Freedom House	Freedom on the Net 2023	Vietnam: Freedom on the Net 2023 Country Report | Freedom House
47	Meta	Amount of requests we received	Government Requests for User Data | Transparency Center (meta.com)
48	Meta	Removing Coordinated Inauthentic Behavior From Russia, Iran, Vietnam and Myanmar	Removing Coordinated Inauthentic Behavior From Russia, Iran, Vietnam and Myanmar | Meta (fb.com)
49	Meta	Removing Coordinated Inauthentic Behavior From Georgia, Vietnam and the US	Removing Coordinated Inauthentic Behavior From Georgia, Vietnam and the US | Meta (fb.com)
50	Meta	Amount of content we restricted	Content Restrictions Based on Local Law | Transparency Center (meta.com)

51	US Department of State	2022 Country Reports on Human Rights Practices: Vietnam	Vietnam - United States Department of State
52	Freedom House	Freedom In The Net 2022	Vietnam: Freedom on the Net 2022 Country Report | Freedom House
53	Amnesty International	Let us breathe! Censorship and criminalization of online expression in Viet Nam	Viet Nam: Let us breathe! Censorship and criminalization of online expression in Viet Nam - Amnesty International
54	Meta	Explaining Our Community Standards and Approach to Government Requests	Explaining Our Community Standards and Approach to Government Requests | Meta (fb.com)
55	Pen America	UN Submission Documents Vietnam's Serious Free Expression Violations	UN Submission Documents Vietnam's Serious Free Expression Violations - PEN America
56	Project88	FREEDOM OF EXPRESSION IN VIETNAM	Final_Factsheet_Freedom-of-expression-in-Vietnam_88P_UCGHRC_211028-1.pdf (the88project.org)
57	Meta	Global Government Requests Report	Global Government Requests Report | Meta (fb.com)
58	Amnesty International	Facebook must cease complicity with government censorship	Viet Nam: Facebook must cease complicity with government censorship - Amnesty International

Community-Led Human Rights Impact Assessment On Facebook's Operation in Vietnam

31 May 2025

Legal Initiatives for VIETNAM

© Legal Initiatives for Vietnam
(www.liv.ngo)