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Good Practices in Digital Platform Governance by European Media Regulators

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An Invitation to Debate

Debates on the vital importance of freedom of expression and access to information for democracies and for the protection and promotion of human rights are by no means new. However, there is no doubt that the advent of information and communication technologies, particularly the expansion of the Internet and more recently the development of artificial intelligence (AI), offers a unique and unprecedented dimension to these discussions. The impact of these developments on democratic life, the respect of human rights, and, ultimately, on the everyday life of every citizen is unprecedented.

As part of the organization's role as a laboratory of ideas, the UNESCO Office in Montevideo offers these Communication and Information Discussion Papers (CIDP).

Produced by leading experts on each subject, their main objective is to provide input for decision-makers and public policymakers to consider different perspectives on issues in the international agenda, always guided by existing international standards.

This publication does not intend to have the last word. On the contrary, the purpose is to contribute to an informed and pluralistic debate on core contemporary issues.

CIDP 32 “Good Practices in Digital Platform Governance: Lessons from European Media Regulators” examines current European experiences in digital platform governance, both in EU and non-EU countries. By focusing on emerging non-statutory practices - that is practices that regulators can implement within the framework of their existing mandates and thus not requiring the extension of their statutory powers - the report can inform the development, debate, and replicability of human rights compliant approaches to platform governance in other global regions.

Enjoy your reading!

The Editor

Abstract

While current debates on effective digital platform governance often focus on emerging laws, many media regulators operate in jurisdictional contexts without enforceable legal frameworks. In these jurisdictions, legal frameworks may take time to develop and implement. Even where legislation may already be developed to combat online harms or reign in the power of ‘big tech’, implementation gaps continue to emerge.

This report identifies current best practices in the form of non-statutory digital platform governance. It draws from responses to a questionnaire completed by representatives of media regulatory bodies from both European Union (EU) and non-EU countries. Conducted in Spring 2025, the report builds on the establishment of the Global Forum of Networks (GFN) in June 2024. The GFN, launched with UNESCO’s support, sets out a cross-border knowledge sharing network for cooperation among media and platform regulators. The establishment of the GFN reflects a growing consensus on the need for shared regulatory approaches and cross-border collaboration to address the global digital platform governance challenges.

Accordingly, this report focuses on non-statutory interventions, including voluntary, collaborative and multi-stakeholder practices spanning different local and international levels of governance. By mapping emerging non-statutory practices, the report can inform the development of scalable, human rights compliant, and contextually adaptable approaches to platform governance. While drawing on current European experiences, its findings inform debates and practices in other global regions.¹

Importantly, the report demonstrates that many promising governance practices emerge in contexts where formal statutory powers are currently limited (or non-existent). Within this context, innovative and flexible multistakeholder-driven examples of digital platform governance are evident. These examples highlight the role of institutional will and ‘whole of society’ collaboration in the development of effective and meaningful approaches to digital platform governance.

While the report is primarily concerned with non-statutory practices, it does not suggest that non-statutory practices should be prioritised over statutory measures. Rather, it acknowledges the urgency of identifying viable approaches where formal legislation may still be under development (or in early planning stages). In many regions, waiting for statutory reforms would delay needed protections. Therefore, this report highlights how regulators can act through voluntary, collaborative, and soft governance mechanisms while statutory systems evolve.

¹ The European region is understood as encompassing both EU and non-EU countries.

1. Introduction

1.1 Background to the study

Large online platforms have become central in setting the tone of public debate and affecting peoples' information diets. A small number of companies now shape what information people see and how it is shared. Their digital infrastructure operates across borders, and many of the rules shaping their decisions are not transparent – take, for example, recommender systems on social media, or content moderation policies and decisions. Illegal hate speech and targeted harassment online have been on the rise in recent years.² Additionally, while not always illegal, content containing misinformation and disinformation affects public health and democratic elections. Automated decision making and artificial intelligence (AI) tools make it easier for harmful actors to mislead the public with distorted audiovisual content, while increasing the difficulty for individuals to distinguish truth from falsehood. Advertising and data processing practices are hard to understand. These developments pose significant risks to fundamental rights, the rights and wellbeing of children and other vulnerable groups. They undermine public trust and safety, while posing risks to equality and democratic freedoms.³

For these reasons, calls have steadily emerged for laws to hold online platforms accountable. Users, civil society, journalists, researchers and public authorities want clearer duties on platforms to assess and reduce risks, while also calling for more transparency relating to how their systems work and more accessible avenues for appealing or fixing mistakes that may occur where platforms seek to address risks. These stakeholders also call for cooperation across borders so that action in one country does not leave gaps in another.

In this report, governance is the umbrella term for how platforms are steered and held to account. Regulation is one tool within a broader range approach to achieve this.⁴ The aim of this report is to inform the development of fair, human rights compliant rules for the systems and processes that shape speech at scale. This report builds upon UNESCO's proactive development of initiatives to combat online harms and safeguard human rights in the digital age. The **2023 Guidelines for the Governance of Digital Platforms (hereinafter, UNESCO Guidelines or Guidelines)**⁵ exemplifies UNESCO's shared direction in this area. Since the publication of these Guidelines, UNESCO has supported the launch of the Global Forum of Networks to assist in building a cross-border knowledge sharing network to share good practice. This report expands upon this work by shedding light specifically on current non-statutory practices from European regulators that can inform work in other global regions.

- 2 EPRS | European Parliamentary Research Service (2024). Hate speech and hate crime: Time to act? <[https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/762389/EPRS_BRI\(2024\)762389_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/762389/EPRS_BRI(2024)762389_EN.pdf)>
- 3 A Beduschi, (2022). Regulatory approaches to online harms and human rights: three case studies <[Regulatory Approaches to Online Harms and Human Rights - Three Case Studies.pdf](#)>
- 4 In this report, 'governance' is the overarching concept, referring to the processes, principles, and practices through which digital platforms are steered and held to account. It includes formal and informal mechanisms such as self-regulation, co-regulation, industry standards, multi-stakeholder initiatives, and statutory frameworks. 'Regulation' is used more narrowly for legally binding rules adopted and enforced by public authorities.
- 5 UNESCO, (2023). Guidelines for the Governance of Digital Platforms. <<https://unesdoc.unesco.org/ark:/48223/pf0000387339>>

In June 2024, UNESCO supported Croatia's Agency for Electronic Media in convening the 'International Conference on Digital Platform Governance: Building a Global Forum of Networks.'⁶ This conference was held on the International Day for Countering Hate Speech (18 June) and hosted a broad variety of global stakeholders representing audiovisual media, online regulators, digital platforms, and civil society.⁷ In total, 236 participants attended either in person or virtually.⁸ A key objective of this event was to bring these stakeholders together to identify ways to tackle the "exponential spread and proliferation of hate speech, discrimination and xenophobia online."⁹ The conference's core outcome was the launch of the **Global Forum of Networks of Regulators** (hereinafter GFN).¹⁰ As a *network of networks*, the GFN represents a collaborative initiative, with the stated aim of bringing together a diverse set of regulatory authorities to enable the exchange of "good practices and the latest developments in the governance of digital platforms with a human rights-based approach" while consolidating and implementing UNESCO Guidelines at scale.¹¹

The launch of the GFN at the Dubrovnik event represented an expansion of UNESCO's ongoing support for countering online harms in a human rights compliant manner. Besides the UNESCO Guidelines, the Dubrovnik conference also followed UNESCO's launch of its 2022 'Internet for Trust' initiative.¹² Aimed at safeguarding fundamental rights while combatting harmful online communications like hate speech and misinformation, the UNESCO Guidelines identify and outline the vital roles for various actors (States, independent regulatory authorities,¹³ digital platforms, inter-governmental organizations, civil society, media, academics, and other stakeholders) to create an environment where freedom of expression and information are at the core of digital platform governance processes. Embracing a **multi-stakeholder approach**,¹⁴ UNESCO proactively engages with global and regional regulatory networks to facilitate the global implementation of UNESCO guidelines and the principles established therein.

Facilitated by UNESCO, this report continues and builds upon these efforts. By launching the GFN, the Dubrovnik conference underscored the need for shared regulatory practices and cooperation, particularly in contexts with fragmented frameworks, such as those found in parts of Europe (take, for example, the EU as opposed to the broader European region, encompassing the Council of Europe (CoE) states) and global regions without harmonised or widely implemented legal

6 For more information on the event, please visit: UNESCO, Building a network of networks (UNESCO Internet Trust Initiative, 2025) <<https://www.unesco.org/en/internet-trust/building-network-networks>>.

7 For more information on the International Day for Countering Hate Speech see <<https://www.un.org/en/observances/countering-hate-speech>>.

8 This conference convened 87 representatives from regulators based in 46 different countries (84 of these attended). UNESCO, Digital platform governance: Building a Global Forum of Networks (UNESCO, 2025) <<https://www.unesco.org/en/articles/digital-platform-governance-building-global-forum-networks>>

9 Ibid.

10 UNESCO will continue facilitating the GFN's core activities to consolidate and implement its Roadmap for Action and support regulators across the world in the implementation of the UNESCO Guidelines. For more information see <<https://www.unesco.org/en/internet-trust/building-network-networks?hub=71542>>

11 See 'About the Global Forum of Networks' <<https://www.unesco.org/en/internet-trust/building-network-networks>>

12 For more information, please see UNESCO, Internet Trust (UNESCO, 2025) <<https://www.unesco.org/en/internet-trust>>

13 UNESCO, (2023). Guidelines for the Governance of Digital Platforms. P. 28. For details on characteristics of independent regulatory authorities, please see p. 30 of the UNESCO Guidelines.

14 UNESCO, (2023). Guidelines for the Governance of Digital Platforms, p. 12.

frameworks.¹⁵ However, while European digital regulation has received widespread legal and political scrutiny, there has been less focus on practical, adaptable strategies that can be used outside of European jurisdictions, including where regulatory mandates are currently in early stages.¹⁶ Accordingly, this report is particularly aimed at identifying promising non-statutory approaches and assess how they might be adapted to other global regions, for example, the Latin America and Caribbean (LAC) region and African regions.¹⁷ Notably, LAC was well represented at the Dubrovnik conference, with the active involvement of the Ibero-American Platform for Regulators of the Audiovisual Sector (PRAI). However, differences in resourcing, regulatory capacity and legal frameworks across regions, including within Europe (EU and non-EU), remain a challenge.

While the report draws on European (both EU and non-EU) experiences, its primary goal is to identify scalable, human rights compliant, and contextually grounded practices that could inform policy beyond Europe. For example, regulators in the LAC region often operate with limited mandates and decentralised systems, relying on voluntary cooperation or soft instruments.¹⁸ By contrast, EU initiatives, including the Audiovisual Media Services Directive (AVMSD), the Digital Services Act (DSA), the European Media Freedom Act (EMFA), and, to a lesser extent, the Artificial Intelligence Act (AI Act), represent more coordinated legal approaches to digital platform governance.¹⁹

Alongside these strictly legislative developments, Europe has seen a wide variety of pioneering self-regulatory initiatives developed in combination with the voluntary cooperation of digital platforms and civil society stakeholders. These include the 2022 Code of Practice on Disinformation.²⁰ As the European legal landscape evolves, however, the distinction between voluntary self-regulation and more formalised co-regulatory efforts can be difficult to identify.²¹ Acknowledging these challenges and developments, this report clarifies how European media regulators distinguish between **statutory and non-statutory interventions** in the field of digital platform governance and identifies **best practices** for digital platform governance, with particular focus on adaptable non-statutory interventions with potential for global application.

In addition to the above-mentioned developments, this report serves to complement analogous UNESCO-led research carried out in non-European regions. An important example is the recent

15 Please note that the term 'Europe' in this report refers to both EU and non-EU Member State jurisdictions in the European region. All media regulators referenced operate within the jurisdiction of the Council of Europe (CoE).

16 In particular, the expansion of EU law into the field of audio-visual media regulation has seen a rise in proactive national media regulators. A list of some of these can be accessed here <<https://digital-strategy.ec.europa.eu/en/policies/audiovisual-regulators>>

17 See, for example, the work of the Network of African Communication Regulatory Authorities (RIARC) <<https://www.acran.org/>>

18 Observacom (2025), *Gobernanza de plataformas digitales: prácticas regulatorias no estatutarias en América Latina; informe de investigación* [Governance of digital platforms: non-statutory regulatory practices in Latin America] <<https://unesdoc.unesco.org/ark:/48223/pf0000395852.locale=en>>

19 See the AVMSD Directive (EU) 2018/1808 here <<https://eur-lex.europa.eu/eli/dir/2018/1808/oj/eng>>; See the DSA Regulation (EU) 2022/2065 <<https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>>; See the European Media Freedom Act (EMFA) 2024/1083 <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1083&qid=1757146657259>>; See AI Act (EU) 2024/1689 here <<https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>>;

20 For more information, please see European Commission, Code of Practice on Disinformation <<https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>>

21 For more information on self-regulation systems, co-regulatory structures and statutory regulation, please see UNESCO, (2023). Guidelines for the Governance of Digital Platforms, p. 27-28.

report *Gobernanza de plataformas digitales: prácticas regulatorias no estatutarias en América Latina; informe de investigación* (2025).²² Published in October 2025, this report reveals insights into digital platform governance in Latin America, a region where statutory mandates over digital services remain limited. Audiovisual regulators in the region often operate without explicit legal jurisdiction over online platforms or audiovisual over-the-top (OTT) services, focusing instead on traditional media such as TV and radio. Despite these constraints, regulators are increasingly engaging in **non-statutory regulatory practices**, defined in the report as administrative decisions, recommendations, guidelines, and voluntary agreements that are not required by or grounded in law but serve as flexible tools for public governance.

Non-statutory practices are especially important where regulators lack independence or powers, so binding regulation is hard to achieve. The report highlights the potential of a hybrid regulatory approach, combining statutory clarity with adaptable, collaborative measures. It promotes increased inter-institutional coordination, public engagement, and systematic evaluation. Brazil stands out in this context as an exception, with several legislative initiatives adopted (see, for example, the recently passed ECA Digital (Digital Statute of the Child and Adolescent))²³ or under active parliamentary discussion, aimed at strengthening platform regulation. More generally, Latin America's experience illustrates that meaningful platform governance engagement is possible even in the absence of strong legal mandates. This report builds on and complements these findings.

UNESCO and other international institutions advocate for a **'whole of society approach'** to digital platform governance, which means that governments and other stakeholders, such as the private sector, civil society, academia and individuals, work together to solve complex problems. In this context, this report seeks to identify evidence of practices that are not strictly and exclusively linked to legal mandates.²⁴ In line with UNESCO Guidelines, this report focuses on non-statutory practices that can be implemented in a human rights compliant manner,²⁵ recognising the particular need to balance freedom of expression and access to information with transparent and inclusive regulation. Building on the Dubrovnik conference and the GFN, the report supports UNESCO's vision for cross-national, regional, and sub-regional collaboration and mutual learning, especially among those European and non-European global world regions working to strengthen regulatory approaches, including in the absence of legal mandates.

1.2 Aims and objectives of the study

The core aim of this study is to identify and map best practices in digital platform governance, focusing on practical non-statutory interventions led by media regulators. As noted, regulators may face legal (as well as financial and political) constraints that limit their ability to effectively combat digital harms. Acknowledging these constraints, this report's focus on non-statutory practices aims to complement – rather than replace – statutory regulation. This study is also informed by ongoing UNESCO work which underscores the need for multi-stakeholder and collaborative approaches in digital platform governance. Under this approach, it is important that global stakeholders can access best practices that are not only effective, but also realistic and achievable within varied regulatory and jurisdictional contexts. Given the differences between

22 Observacom (2025), *Gobernanza de plataformas digitales: prácticas regulatorias no estatutarias en América Latina; informe de investigación* <<https://unesdoc.unesco.org/ark:/48223/pf0000395852.locale=en>>

23 Brazilian ECA Digital (Digital Statute of the Child and Adolescent) can be found here: <https://www.planalto.gov.br/ccivil_03/_ato2023-2026/2025/lei/L15211.htm>

24 See the UNESCO 'Six Pillars Framework' <<https://www.unesco.org/en/dtc-financing-toolkit/six-pillars>>

25 UNESCO, (2023). Guidelines for the Governance of Digital Platforms, p. 8-9 and throughout.

European and non-European regions with emerging frameworks, it is particularly important to present the current landscape of non-statutory interventions that can be scaled or adapted globally in line with UNESCO's Guidelines. Informed by these core aims, this study is grounded on the following key objectives:

- Identify current statutory and non-statutory practices in digital platform governance across Europe (encompassing both, EU and non-EU countries).
- Map and analyse best practices in digital platform governance, with a focus on non-statutory, collaborative and voluntary approaches.
- Provide actionable recommendations for regulators in global regions with emerging platform governance frameworks, focusing on adaptable and scalable solutions.

This study recognises the diversity of national and pan-European laws. It focuses on efforts tied to EU legal developments, but also considers approaches beyond EU and Member State statutory and non-statutory measures. The primary focus is the work of European media regulators, given their commitment to and alignment with UNESCO Guidelines and global human rights standards.

In line with UNESCO Guidelines' emphasis on scalable governance models, the report seeks to identify flexible non-statutory interventions that can address digital harms even in the absence of clear legal mandates. Informed by UNESCO's multi-stakeholder vision, the report also aims to highlight practices that encourage dialogue, global peer learning, and capacity-building. The report highlights voluntary coordination, informal cooperation and soft measures, demonstrating that meaningful progress is possible, and already happening, even where mandates are limited.

2. Methodology

This study uses a qualitative, multi-method design to identify and assess good practices in digital platform governance. It focuses on non-statutory measures and how they can help regulators where frameworks are still developing. The approach is inclusive, context-sensitive, and promoting human rights compliance, in line with UNESCO's Guidelines. The research process integrates desk-based legal and policy analysis, targeted stakeholder engagement, and comparative analysis of regulator responses. Together, these components lead to a grounded set of recommendations tailored to regulatory authorities in global regions.

2.1 Desk research and regulatory mapping

The study began with a comprehensive review of international and regional legal frameworks that shape the regulatory environment for digital platforms. These include the UNESCO Guidelines, as well as European Union instruments such as the Audiovisual Media Services Directive (AVMSD), the Digital Services Act (DSA), the European Media Freedom Act (EMFA), and, to a limited extent, the Artificial Intelligence (AI) Act. These frameworks are essential reference points for understanding statutory obligations and institutional mandates that inform both binding and non-binding regulatory approaches. This legal and policy review was complemented by a mapping of key actors involved in platform governance at both the supranational and national levels. At the EU level, the analysis focused on the European Board for Digital Services (under the DSA) and the European Board for Media Services (or the Media Board, created by the EMFA in 2025 to replace ERGA). Both bodies support cross-border cooperation and a consistent application of EU law.²⁶

The study focused on a sample of 12 media regulatory authorities from EU and non-EU States. These were selected for their institutional diversity, degree of engagement with platform-related issues, and involvement in broader networks such as the European Platform of Regulatory Authorities (EPRA), the Ibero-American Platform of Audiovisual Regulators (PRAI), and the GFN. More specifically, the regulatory bodies that contributed to this study include national audiovisual regulators, multi-sector media authorities, and digital service oversight bodies, reflecting a broad spectrum of institutional roles. While some authorities operate under mandates focused on broadcast media or audiovisual content (e.g. under the AVMSD framework), others combine this with broader remits related to telecommunications, digital services, or platform governance. This diversity reflects the evolving regulatory landscape in Europe and beyond, where the boundaries between media, data, and digital platform oversight may not always be readily discernible.

26 It must be noted that the European Board of Media Services now 'replace[s] and continue[s] the work' of ERGA. The European Board for Media Services (Media Board) was established by the European Media Freedom Act and replaced the European Regulators Group for Audiovisual Media Services (ERGA) in 2025. It brings together national media regulators to support consistent application of EU media law. See Commission welcomes new European Board for Media Services | Shaping Europe's digital future <<https://digital-strategy.ec.europa.eu/en/news/commission-welcomes-new-european-board-media-services>> and <https://media-board.europa.eu/index_en>

2.2 Stakeholder engagement and questionnaire-based study

The methodology prioritised qualitative insights, conducting semi-structured questionnaires²⁷ with 12 regulatory authorities in Europe. Respondents²⁸ comprised a range of different media regulators represented diverse governance models, reflecting UNESCO's recommendation for multi-stakeholder diversity. Regulators were asked 23 open-ended questions about non-statutory practices, collaboration with platforms and civil society, and approaches to transparency, accountability, and human rights safeguards which are some of the key principles emphasised by UNESCO's Guidelines.

The semi-structured questionnaire used in this study was designed to explore the evolving role of media regulators in digital platform governance, with a particular focus on non-statutory tools and co-regulatory approaches. The 23 open-ended questions were grouped into five broad categories:

- **Legal and institutional frameworks:** These questions explored regulators' mandates under national and EU laws, including the AVMSD and DSA, and how these frameworks shape their authority to engage with platforms.
- **Governance practices and risk mitigation:** These questions focused on how regulators address systemic risks such as disinformation, hate speech, or platform design impacts, and the measures taken to ensure human rights due diligence and the protection of minors in the digital environment.
- **Collaboration and co-regulation:** Respondents were asked to describe voluntary partnerships with platforms, collaborations with civil society or academia, and views on the appropriate division of responsibility for content moderation.
- **Jurisdictional and structural challenges:** These questions addressed the cross-border nature of platform governance, institutional overlaps, and barriers to effective enforcement.
- **Recommendations and reflections:** Finally, respondents were invited to share promising models or networks and offer any additional insights on effective governance strategies.

A total of 16 media regulatory authorities were contacted to participate in the study. Of these, 12 submitted completed questionnaires, yielding a response rate of 75 percent. Responses were provided in writing. Half of the participating media regulators were contacted by one member of the research team, and half by another, ensuring balanced input and complementary analytical perspectives.

The selection of respondents was guided by inclusion criteria spanning institutional independence, relevance of mandate, demonstrated interest in platform governance, and engagement in non-statutory or co-regulatory approaches, as well as participation in international and regional regulatory networks. The 12 participating media regulators represented a diverse mix of legal traditions, media systems, and institutional capacities.

27 The questionnaire is added as an Annex to the report.

28 In this report, the terms 'participants', 'participating media regulators' and 'respondents' are used interchangeably to refer to all media regulators who completed the questionnaire, including both EU and non-EU authorities.

While some regulators held statutory powers under national law or the AVMSD, others operated primarily through soft law, advisory, or monitoring functions. Many have taken part in transnational forums such as the European Board for Media Services (or the Media Board), EPRA, or the GFN, and several demonstrated longstanding engagement with issues such as electoral integrity, disinformation, child safety, and media literacy in digital environments. Together, this respondent sample offers a diverse dataset that enables comparison across regulatory systems.

Figure 1. Participating National Media Regulatory Bodies

EU Member States	Name of Organization
Catalonia (Spain)	Catalan Audiovisual Council (CAC)
France	Regulatory Authority for Audiovisual and Digital Communication (ARCOM)
Greece	National Council for Radio and Television (NCRTV)
Luxembourg	Luxembourg Independent Audiovisual Authority (ALIA)
Malta	Broadcasting Authority (BA) - RIRM
Netherlands	<i>Commissariaat voor de Media</i> (CvdM)
Portugal	Portuguese Regulatory Authority for the Media (ERC)
Non-EU Member States	Name of Organization
Albania	Audiovisual Media Authority (AMA)
Armenia	Commission on Television and Radio of the Republic of Armenia (CTR)
Norway	Norwegian Media Authority (NMA)
Switzerland	Federal Office of Communications (OFCOM)
United Kingdom	Office of Communications (Ofcom)

For the European map illustrating the participating media authorities, see Figure 2 below. The collected qualitative data was analysed thematically, enabling the identification of recurring patterns and diverging regulatory experiences. Attention was paid to initiatives that fall outside the scope of formal enforcement but that have demonstrable impact in fostering platform accountability,²⁹ user protection, or multi-stakeholder cooperation.

29 In the context of this report, 'platform accountability' broadly refers to the ability of regulatory authorities to assess and influence how digital platforms comply with relevant legal and ethical obligations. This includes areas such as content moderation, protection of minors, transparency reporting, algorithmic practices, advertising standards, and responses to user complaints. Media regulators who participated in this study varied in how they defined and implemented accountability, depending on their institutional mandates and national legal frameworks.

Figure 2. Map of regulators participating in the mapping survey (Europe respondents)³⁰



Source: compiled by the authors using Mapchart.net and Canva

2.3 Comparative analysis and identification of good practices

The final phase of the methodology involved comparative analysis of the questionnaire responses. Data was grouped by theme, enabling the identification of both similarities and context-specific approaches across jurisdictions. In line with UNESCO Guidelines emphasis on human rights compliant governance, case studies were selected to highlight regulatory practices, particularly those clearly aligning with transparency, user protection, and stakeholder collaboration. This selection process aimed at extracting practical, adaptable lessons for regulators in world regions with developing legal frameworks.

The analysis particularly focused on non-statutory practices such as voluntary agreements with platforms, monitoring and reporting mechanisms, digital literacy campaigns, and the use of soft enforcement tools (e.g. public warnings, codes of conduct). These initiatives were evaluated for their potential adaptability to global jurisdictions where statutory powers are limited or fragmented. This comparative analysis forms the basis for the study's final recommendations and highlighted best practices, which are intended to support regulators in developing context-sensitive, human rights compliant, and collaborative approaches to digital platform governance.

³⁰ Please note that Spain is shaded to reflect the participation of the Catalan Audiovisual Council (CAC).

3. Legal and institutional background

Before examining the specific non-statutory practices which currently inform digital platform governance and media regulation in Europe, it is necessary to present the statutory and institutional framework in which respondents operate. Accordingly, this section provides the background on these frameworks while also identifying how the respondents engage with supranational European institutions and domestic regulatory actors.

3.1 Key laws and regulatory mandates

Respondents cited a range of applicable laws and highlighted different regulatory functions when asked to outline the scope of their role in digital platform governance. Generally, a wide and expansive range of legal mandates provides the basis for the regulators' roles. Overall, 92 percent of participating media regulators³¹ operate under a defined legal mandate. One non-EU country respondent is not currently operating under a legal mandate but indicated that this is likely to change in accordance with new draft national legislation.

While respondents highlighted examples of various national and regional laws, EU law dominates as a statutory framework that provides the mandate for how they operate. Significant here is the Audiovisual Media Services Directive (AVMSD),³² a cornerstone for European audiovisual and broadcasting media regulation. EU Member State participants all operate under the AVMSD framework by having transposed the Directive into national laws. AVMSD provisions, in particular, those related to video-sharing platforms, are embedded in these participants' domestic legal environments. This is done either through dedicated media laws (as in Portugal and the Netherlands) or broader audiovisual legislation (as in Greece, Malta, and France).

It has also become clear that EU law such as the AVMSD also informs activities of non-EU Member State participants. For example, Albania's AMA highlighted that its mandate has expanded to include platform governance, particularly as regards the activities of video sharing platforms, to ensure compliance with EU standards. Similarly, Norway's NMA operates in a national legislative framework where changes have been made in accordance with the revised AVMS Directive and the associated supervision of Norwegian Video Sharing Platforms (VSPs).

Aside from the AVMSD, respondents cited other secondary EU legislation as contributing to their mandate and activities. These include:

- The Digital Services Act (DSA).³³

31 In this report, the terms 'participants', 'participating media regulators' and 'respondents' are used interchangeably to refer to all media regulators who completed the questionnaire, including both EU and non-EU authorities.

32 'Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive)'. See here <<https://eur-lex.europa.eu/eli/dir/2018/1808/oj/eng>>

33 'Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act)'. See here <<https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>>.

- The Artificial Intelligence (AI) Act.³⁴
- The Regulation on Political Advertising Transparency.³⁵
- The European Media Freedom Act (EMFA).³⁶

EU law not only shapes many of the participants' legal mandates but also appears to influence how the participants define their own supervisory roles in digital platform governance. For example, 67 percent of participants expressed that their activities involved alignment between national digital platform laws with relevant secondary EU legislation. Such activities include formal supervision of compliance with EU Directives or a less formal alignment with EU standards on audiovisual communication and digital platform regulation. An overall majority of participants stated that they operate under national audiovisual media legislation. Often, the participants' legal mandate involves overlapping obligations under national and regional legislation.

As EU competences in digital platform regulation expand, participants report broader supervisory tasks. These include oversight of influencers (for example, YouTubers and vloggers), transparency of online political advertising, action on illegal content, and risk mitigation for **'harmful but legal'** content such as disinformation.³⁷ This is in addition to traditional duties on licensing and broadcast codes.³⁸ Across this varied activity, a consistent priority is **the protection of minors**. For example, 58 percent of participants explicitly referenced the protection of either 'minors' or 'children' as shaping their mandate and activities. Other commonly cited activities included oversight of influencers, advertising transparency, content moderation and media pluralism.

Participant views highlight several common patterns. Most regulators currently operate under a framework grounded in the AVMSD, with varying degrees of engagement with the DSA and other new EU instruments. Moreover, responses signify a growing attention to platform transparency and content moderation. At the same time, the scope of participants' public authority appears to vary. While some regulators have broad statutory mandates covering multiple dimensions of audiovisual governance, others have a far narrower (and in some cases non-statutory) role. Several regulators are currently in the process of preparing for significant mandate expansions, as the regulatory landscape evolves to address new forms of online communication such as influencer content and AI-generated media.³⁹

34 'Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).' See here <<https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>>.

35 'Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising.' See here <<https://eur-lex.europa.eu/eli/reg/2024/900/oj/eng>>.

36 'Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act)' See here <<https://eur-lex.europa.eu/eli/reg/2024/1083/oj/eng>>.

37 For an overview on the regulation of disinformation by national regulators (and media pluralism roles), see 'The role of National Regulatory Authorities in tackling disinformation' (European University Institute Centre for Media Pluralism, 2019) <<https://cmpf.eui.eu/the-role-of-national-regulatory-authorities-in-tackling-disinformation/>>

38 It is worth noting that the AVMSD is subject to an upcoming evaluation. See 'Upcoming evaluation of the AVMSD: Council addresses key issues for public service media' (European Broadcasting Union, 13 May 2025) <<https://www.ebu.ch/news/2025/05/upcoming-evaluation-of-the-avmsd-council-addresses-key-issues-for-public-service-media>>

39 UNESCO has been proactive in responding to this trend. See, for example, Examining Media and Information Literacy Responses to Generative AI: A UNESCO Policy Brief (2 February 2024) <<https://www.unesco.org/en/articles/examining-media-and-information-literacy-responses-generative-ai-unesco-policy-brief>>

While there is no single model for platform governance among European regulators, the responses show a wide range of different approaches. Some regulators, like Ofcom in the United Kingdom, have strong legal powers and cover several areas under national laws such as the Online Safety Act. Others use co-regulation, like Catalonia’s CAC, which works closely with platforms on issues like disinformation and media literacy. In some cases, regulators rely on voluntary or informal tools because they have fewer legal powers. For example, Albania’s AMA has built a non-binding but structured partnership with TikTok, supported by national law but without EU-level coordination.

Many regulators also explained how their responsibilities are growing. Luxembourg’s ALIA shared that it is now responsible for implementing the Digital Services Act (DSA). Catalonia’s CAC highlighted its new work on influencer oversight and media literacy. This variety of roles and practices shows that there are different ways to improve platform governance, depending on national needs and capacity. In this study, it helps highlight practical ideas that could work in other parts of the world, including regions with fewer legal resources or less regional cooperation.

3.2 Challenges, cross-border cooperation, and non-statutory approaches

Participating media regulators highlighted a number of challenges that they face in the course of their activities. Such challenges **relate to the protection of human rights, the struggle to keep pace with evolving technologies, and inadequate funding**. As the respondents often operate within a complex range of legal frameworks, many highlighted that **jurisdictional issues** pose challenges to their effective digital platform governance. 83 percent of participating media regulators noted that they have encountered some form of jurisdictional challenge. Some examples of encountered challenges include:

- Identifying relevant platforms or media entities that meet the legislative criteria for supervision in the respondents’ jurisdictions.
- Enforcing of national and regional laws against platforms in a respondent’s jurisdiction.
- Circumventing the fragmentation of competencies for digital platform governance across different jurisdictions.

These challenges reflect the **ongoing geographical and structural limitations** that national media regulators face when dealing with global digital platforms. For example, Greece’s NCRTV noted that many major platforms are **not legally established** in Greece, limiting its ability to apply DSA rules. Even when platforms fall under the DSA’s scope, they may primarily operate as marketplaces, which do not fall within NCRTV’s traditional focus on audiovisual and radio services. In Catalonia, the CAC identified **language as another barrier to effective oversight**, pointing out the limited availability of content in Catalan and the resulting challenges in ensuring **culturally relevant moderation** and platform responsiveness.

Several respondents noted that their lack of enforceable statutory mandates makes it inherently challenging to hold platforms accountable. The absence of statutory mandates appears to influence how non-EU Member State respondents interpret their ongoing challenges. As one explained, without a legal framework in force and the related obligations, they face challenges in getting a good overview of systemic risks and experience issues when contacting and engaging with these platforms. Similarly, another non-EU Member State respondent highlighted how it has proven challenging to get in direct contact with the providers as they so far do not have an obligation to register with that particular regulator.

Several authorities highlighted **cross-border coordination challenges**, particularly when identifying jurisdictional responsibility for multinational digital platforms. As advised by UNESCO’s

Guidelines on international cooperation and dialogue, regulators such as Luxembourg's ALIA and Portugal's ERC actively engage in regional, sub-regional, and European networks to address jurisdictional challenges. These include the European Platform of Regulatory Authorities (EPRA),⁴⁰ the Mediterranean Network of Regulatory Authorities (MNRA),⁴¹ the Ibero-American Platform of Audiovisual Regulators (PRAI),⁴² the European Media Board (under the EMFA)⁴³ and the European Board for Digital Services (under the DSA).⁴⁴ Regulators also take part in sub-regional forums such as the Trimediale (bringing together regulators from Germany, France and the United Kingdom), the Central and Eastern European Regulators Platform,⁴⁵ the Black Sea Regulators Platform,⁴⁶ and the Baltic Regulators Platform. Together, these examples highlight the usefulness and necessity of multi-level cooperation, as advocated by the UNESCO Guidelines.

As many challenges concern geographical and jurisdictional fragmentation, it is important to note the strong consensus regarding how participating media regulators place value on **structured co-operation or information sharing** between regulators. 50 percent of respondents explicitly cited some form of structured international co-operation as a method that they have adopted to meet these challenges. While national, regional, sub-regional and international networks and working groups were consistently cited as examples of best practice, the level of formality varies across these examples. For instance, Luxembourg's ALIA noted its engagement in a formal cooperation agreement with Luxembourg's Digital Services Coordinator (DSC) (the Competition Authority) and five other national regulators.⁴⁷ Similarly, the Dutch CvdM highlighted its regularly engagement with international working groups and national cooperation forums such as the Digital Regulation Cooperation Platform (SDT), as well as regular bilateral exchanges with peer regulators. Less formally, Armenia's CTR highlights its participation in international conferences to gather the best practices from relevant stakeholders.

Participating media regulators generally **favour cross-border cooperation as a way of mitigating jurisdictional challenges**. 83 percent of respondents cited their current formal commitment to cross-border initiatives. Two outliers attributed their lack of formal cross-border engagement to jurisdictional impediments. Nonetheless, one of them maintains regular ad-hoc exchanges with other national regulators. On the other hand, some regulators, such as France's ARCOM are active participants in several cross-border cooperation initiatives.⁴⁸ As part of its role as France's Digital Services Coordinator (DSC), ARCOM is also a proactive participant in the DSA Board, coordinating with other national DSCs and supporting the Commission's oversight of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs). The wide range of actors under France's jurisdiction necessitates both vertical (national) and horizontal (EU-level) coordination, especially given the complexity of enforcement tools under the DSA. Similarly, a

40 European Platform of Regulatory Authorities: EPRA. See: <<https://www.epra.org/>>

41 Mediterranean Network of Regulatory Authorities (MNRA). See: <<https://www.rirm.org/en/accueil-2/>>

42 Ibero-American Platform of Audiovisual Regulators (PRAI). See: <<https://prai.tv/>>

43 European Board for Media Services. See: <https://media-board.europa.eu/index_en>

44 European Board for Digital Services. See: <<https://digital-strategy.ec.europa.eu/en/policies/dsa-board>>

45 Central European Regulatory Forum – CERF. See: <<http://cerfportal.org/>>

46 BRAF | Black Sea Broadcasting Regulatory Authorities Forum. See: <<https://www.braf.info/EN/Home>>

47 Digital Services Coordinators (DSCs) are competent authorities responsible for the implementation of the DSA in EU Member States and for coordination of the DSA across the region. So far in the EU these coordinators are often media authorities – like the ARCOM in France, or other authorities competent on digital matters – as in Luxembourg.

48 This is linked to France's law on digital regulation ("SREN") which designates Arcom as France's DSC, alongside two other competent French authorities.

formal obligation to engage in cross-border cooperation is also embedded into the legal mandate for the UK's Ofcom.⁴⁹

However, not all measures adopted by participating media regulators necessarily stem from legal mandates. For example, European regulators frequently combine statutory frameworks (such as the DSA and AVMSD) with innovative non-statutory interventions. Catalonia's CAC and Albania's AMA have both successfully integrated statutory mandates with voluntary industry cooperation, showing how regulators can use UNESCO's principles locally. Echoing UNESCO's recognition of complementary statutory and voluntary mechanisms, this hybrid governance approach promises to allow for greater flexibility, responsiveness, and practical effectiveness.

While France's ARCOM has an extensive legal mandate, **it stands out for its multifaceted cross-border cooperation infrastructure**, including via non-statutory engagements. For example, ARCOM is an active member of several international bodies such as the EPRA,⁵⁰ the European Board for Media Services,⁵¹ and the Global Online Safety Regulators Network (GOSRN).⁵² These platforms facilitate information-sharing, joint working groups, and the development of best practices, including on media literacy, AI, protection of minors, and systemic risk. ARCOM also chairs the *Réseau francophone des régulateurs des médias* (REFRAM)⁵³ and supports regional frameworks such as the Abidjan Declaration and the Villers-Cotterêts Call,⁵⁴ which aim to extend EU-level protections into Francophone and African contexts. These initiatives have led to the signing of voluntary commitment protocols with major platforms (Meta, X, TikTok), and the establishment of an annual ad hoc forum for structured dialogue with regulators. Alongside these commitments, ARCOM signs formal agreements with counterparts such as the National Audiovisual Council of Romania (CNA) and maintains a wide range of **informal bilateral relationships** through meetings, calls, and emails. These channels are used for knowledge exchange and solving shared regulatory challenges related to platforms and their governance.

Alongside the example of France's ARCOM, other participating media regulators also listed their extensive involvement in **non-statutory cross border initiatives**. For example, Catalonia's CAC is an active member of international regulatory platforms such as EPRA, MNRA, and PRAI. Similarly, Greece's NCRTV collaborates through the Memorandum of Understanding between members of the European Board for Media Services (or the Media Board) and via mechanisms established under the EMFA and the DSA. Other respondents indicated that most of the cross-border cooperation they engage in is done on an ad hoc basis. A visual summary of notable cross-border initiatives is presented below.

49 The relevant section of the UK Online Safety Act is Section 114.

50 European Platform of Regulatory Authorities (EPRA). See: <<https://www.epra.org>>

51 European Board for Media Services. See: <<https://digital-strategy.ec.europa.eu/en/news/commission-welcomes-new-european-board-media-services>>

52 Global Online Safety Regulators Network (GOSRN). See: <<https://www.ofcom.org.uk/about-ofcom/international-work/gosrn>> The GOSRN facilitates international cooperation among online safety regulators, supporting the exchange of best practices and alignment of regulatory strategies. For more information, see Olaizola Rosenblat, M., Agrawal, A., & Yap, I. (2025). *Online Safety Regulations Around the World: The State of Play and The Way Forward – A Resource Guide*. NYU Center for Business and Human Rights. Available at: <<https://bhr.stern.nyu.edu/publication/online-safety-regulations-around-the-world-the-state-of-play-and-the-way-forward-a-resource-guide/>>

53 Réseau francophone des régulateurs des médias (REFRAM). See: <<https://www.refram.org>>

54 The Villers-Cotterêts Call for an honest, trustworthy digital space in the Francophone world (4 October 2024). See: <<https://www.diplomatie.gouv.fr/en/french-foreign-policy/francophony-and-the-french-language/news/article/the-villers-cotterets-call-for-an-honest-trustworthy-digital-space-in-the>>

Figure 2. List of cross-border initiatives mentioned by the respondents

Initiative	Establishing framework (if any)
European Platform of Regulatory Authorities (EPRA)	Informal collaboration (established in Malta in 1995)
Mediterranean Network of Regulatory Authorities (MNRA)	Proposal of the French <i>Conseil supérieur de l'audiovisuel</i> and the <i>Consell de l'Audiovisual de Catalunya</i> in Barcelona on the 29th of November, 1997
Ibero-American Platform of Audiovisual Regulators (PRAI)	Informal collaboration (established in Colombia in 2014)
European Media Board	Article 8 of the EU EMFA
European Board for Digital Services	Established under the EU DSA
Global Forum of Networks	UNESCO
Global Online Safety Regulators Network (GOSRN)	Informal collaboration
Workshops organised by the Council of Europe (CoE)	Council of Europe

3.3 Institutional roles, inter-agency cooperation, and jurisdictional limits

Participating media regulators widely acknowledged the essential function of inter-agency and (sub-)regional cooperation for effective digital platform governance. 92 percent of respondents highlighted their engagement with other governmental bodies or agencies within their own jurisdiction. For example, Greece's NCRTV coordinates with two other competent authorities under the Digital Services Act (DSA) – the Hellenic Telecommunications and Post Commission (EETT, acting as Digital Services Coordinator) and the Hellenic Data Protection Authority (DPA) – under a formal cooperation agreement. Other EU Member States, including Portugal, France, and the Netherlands, cited their engagement with other national bodies. This often arose either in connection with the respondent's role as the DSC or their obligation to share information with the designated DSC under the DSA. While this engagement often arises from the DSA framework, all non-EU Member State respondents cited their involvement in inter-agency cooperation within their own jurisdiction. This is a comparatively higher figure than EU Member State respondents who cited such cooperation (83 percent).

Non-EU Member State participants tended to draw from **ad hoc** and **informal examples** when sharing their domestic inter-agency engagement. For example, Albania's AMA coordinates with other national regulatory and monitoring authorities to ensure a coherent and comprehensive approach to digital platform governance. Such coordination, principally related to data protection, consumer rights, and market competition, is not legally mandated but is often carried out through formal agreements and joint consultations. Other bodies, such as Armenia's CTR, cites its attempt in trying to collaborate with the competent bodies that operate in Armenia, such as the Ministry of Education, Science, Culture and Sports, and the Ministry of High-Tech Industry. Even the Swiss OFCOM (noted for its lack of any specific current legal mandate for digital platform governance) has consulted all the relevant Swiss offices to coordinate with its own drafting of new legislation. Other respondents, such as the United Kingdom's Ofcom, pursues a blend of statutory and

voluntary inter-agency cooperation through its participation in the Digital Regulation Cooperation Forum (DRCF).⁵⁵

Several respondents highlighted notable features of their jurisdiction when describing their institutional coordination. For example, Luxembourg's ALIA's need for cross-border cooperation is heightened by Luxembourg's role as the host country of Amazon, a designated Very Large Online Platform (VLOP) under the DSA. This makes it essential for ALIA to engage not only at the national level but also with the European Commission, which retains primary oversight over VLOPs. The dual nature of national and EU-level responsibility is a central feature of ALIA's regulatory engagement. This reflects a similar position for the Dutch CvdM. The Netherlands is home to several major global streaming services, including Netflix and Disney+, though these are primarily considered audiovisual content providers rather than interactive digital platforms. This distinction has regulatory implications, as streaming services do not fall under the same rules as platforms with user-generated content. Nevertheless, the growing dominance of direct-to-consumer services from large US media companies reinforces the importance of coordinated supervision. For example, Snapchat has multiple legal establishments in Europe – a Dutch entity registered with the CvdM under the EU Audiovisual Media Services Directive and a UK entity under Ofcom's jurisdiction. In relation to that, CvdM noted that Snapchat, the first video-sharing platform under its direct supervision, is simultaneously regulated by UK's Ofcom, highlighting the need for cross-border collaboration.

It should be noted that, when asked whether participating media regulators had distinctive jurisdictional features, some respondents focused on the dominant role of digital platforms within their jurisdiction at certain time-periods, such as elections. A notable example here is Portugal's ERC. Though Portugal does not host major global tech companies, platforms like Google, Meta, and TikTok have significant influence in the Portuguese media and advertising markets. ERC's regulatory approach reflects this, combining global oversight challenges with the protection of the domestic media ecosystem. During election periods, ERC therefore contributes to national efforts to combat disinformation, which involves coordinated action with other public bodies.

The issue of co-ordination and fragmented institutional roles relates to the above-mentioned jurisdictional challenges that continue to hinder respondents' digital platform governance. A recurring theme is the difficulty in determining which national regulator holds authority, especially where platforms operate through multiple entities across EU Member States or beyond. For example, **the country-of-origin principle**,⁵⁶ a cornerstone of EU digital regulation, is cited as both a tool for legal certainty (as in Luxembourg) and a source of disagreement (as noted by Portugal's ERC and France's ARCOM). In some cases, regulators perceive risks of *forum shopping*, where platforms may choose a base jurisdiction which is considered more lenient or advantageous to avoid stricter oversight.⁵⁷ Outside the EU, such as in Albania and Armenia, limited legal mandates and the lack of cross-border enforcement tools amplify jurisdictional constraints. These regulators increasingly rely on voluntary cooperation and alignment with EU frameworks (such as AVMSD and DSA) to bridge jurisdictional gaps. On the other hand, countries with clearer mandates or smaller digital markets, such as Norway and Switzerland, report fewer jurisdictional problems, often because enforcement is focused on domestic actors or influencers. In sum, while

55 For more information, please see: <<https://www.drpf.org.uk/>>

56 The 'country-of-origin' principle is a principle under EU law whereby the primary responsibility for regulating an online platform belongs to the EU Member State in which that platform is established. In many cases, this is likely to be Ireland. The Court of Justice of the European Union (CJEU) has held that any exception to the 'country-of-origin' principle must be interpreted strictly. See *Probst*, C-119/12 and *Ligue de droits humains*, C-817/19.

57 On this topic see *Tracing Forum Shopping within the DMA's Private Enforcement: Seeking Equitable Solutions* (Kluwer Competition Law Blog, 14 December 2023) <<https://competitionlawblog.kluwercompetitionlaw.com/2023/12/14/tracing-forum-shopping-within-the-dmas-private-enforcement-seeking-equitable-solutions/>>

regulatory collaboration and voluntary mechanisms help navigate these difficulties, there is a need for more harmonised legal frameworks, shared enforcement mechanisms, and clarity in jurisdictional responsibilities, particularly as digital services continue to evolve rapidly across national boundaries.

4. Non-statutory tools in action

There was a strong consensus as regards how the participating media authorities **distinguished between statutory and non-statutory interventions**. Generally, the media authorities identified this distinction **with reference to legal mandates that support interventions**.⁵⁸ For EU-Member State respondents, statutory tools are grounded in national or EU law and involve binding enforcement (ranging from investigations to sanctions) typically associated with transpositions of the AVMSD or the more recently adopted DSA and EMFA. In contrast, non-statutory measures encourage good practice, improve transparency, or stimulate dialogue. These include soft law instruments like guidelines, research, or participation in multi-stakeholder fora. Similarly, one respondent distinguished between non-statutory interventions as involving dialogue and guidance and statutory interventions as involving formal sanctions as reactions to infringements of regulations. Another participant also noted that it delineates between statutory interventions as involving regulatory powers in national legislation and non-statutory interventions as involving recommendations and cooperation-based approaches. Notably, they further described their use of non-statutory interventions to promote ‘voluntary compliance’ with national legislation. One respondent specifically noted that they have a range of non-statutory tools which may be used in response to a potential compliance concern instead of opening an investigation.

These responses **reflect how non-statutory activities may serve to complement or reinforce legal and policy goals**. For example, of the participating media authorities who reported that they engage in non-statutory activities, 75 percent noted that they do so as a means of (either in whole or in part) supporting the enforcement or implementation of a national or EU legal framework. The responses from EU Member State respondents are particularly informative in this regard. Several EU Member State regulators, including Catalonia, Luxembourg, Portugal, and France, reported active engagement in **non-statutory activities to complement their legal responsibilities**. These efforts typically fall into three broad categories:

- **Voluntary agreements.** France’s ARCOM provides a particularly rich example. It oversees multiple voluntary commitments on child protection, advertising and health, and combating disinformation, developed with platforms and civil society. These agreements function as soft tools and represent complementary voluntary (but structured) non-statutory governance mechanisms backed by public accountability. ARCOM also publishes detailed reports, such as the annual *Observatoire de la haine en ligne*⁵⁹ and agreements with major platforms like Meta, TikTok, X.
- **Informal platform engagement.** Luxembourg’s ALIA, Portugal’s ERC, and Catalonia’s CAC all describe regular dialogue with platforms, used to build trust, exchange information, and encourage good practices. ALIA, for instance, runs projects on disinformation and media literacy.⁶⁰ ERC organises working groups on harmful content and the ethics of

58 Both for EU and non-EU Member State respondents.

59 Arcom, *Observatoire de la haine en ligne* (annual reports). Available at: <<https://www.arcom.fr/nous-connaitre-nos-missions/superviser-les-plateformes-en-ligne-et-les-reseaux-sociaux/observatoire-de-la-haine-en-ligne-analyser-pour-mieux-lutter>>

60 ALIA, *Médias et désinformation* and media literacy projects. Available at: <https://www.alia.lu>

digital communication and publishes reports on media pluralism and disinformation.⁶¹ CAC holds frequent bilateral exchanges with platforms and monitors harmful content in the Catalan-language context.⁶²

- **Public-facing transparency and awareness initiatives.** The CAC in Catalonia publishes reports on disinformation, including in electoral contexts,⁶³ and has issued guidelines on media literacy⁶⁴ and digital skills.⁶⁵ Portugal's ERC similarly works through working groups with various stakeholders, and has published research and recommendations on media literacy and misinformation.⁶⁶ Luxembourg's ALIA also contributes to public education initiatives, particularly around media literacy and combating disinformation.⁶⁷

The complementary role of non-statutory interventions is also reflected in responses from non-EU Member State respondents. For example, Norway's NMA described how their non-statutory activities generally involved the provision of information and guidance as an important part of their enforcement of the law. The UK's Ofcom noted that they have established a platform supervision team to help ensure that the largest and/or riskiest services have appropriate systems and processes. Specifically, this involves a process whereby supervised services have a dedicated supervisor and participate in regular bilateral meetings with a regulator to help the regulator understand, assess and improve services' measures. While this involves a process where platforms agree to be supervised on a voluntary basis, this initiative has been established to achieve the key outcomes intended by the domestic law.

While acknowledging the extensive influence of statutory mandates on how participating media regulators engage with platforms, **responses highlight how not all forms of effective digital platform governance necessarily emerge on a statutory basis.** 67 percent of all respondents indicated that they engage in some form of non-statutory activities.

61 ERC, *Estudos e publicações sobre desinformação e literacia mediática*. Available at: <https://www.erc.pt>

62 CAC, *Informes sobre desinformació i continguts nocius*. Available at: <https://www.cac.cat/en/cac-reports-internet>

63 CAC, *Informe sobre la desinformació en períodes electorals*. Available at: <https://www.cac.cat>. Please also see the EduCAC programme, available here: <https://www.educac.cat/portada> It provides teaching resources, recommendations to families, a monthly newsletter, summer courses and many other initiatives to support teachers and families in promoting media education among children and adolescents.

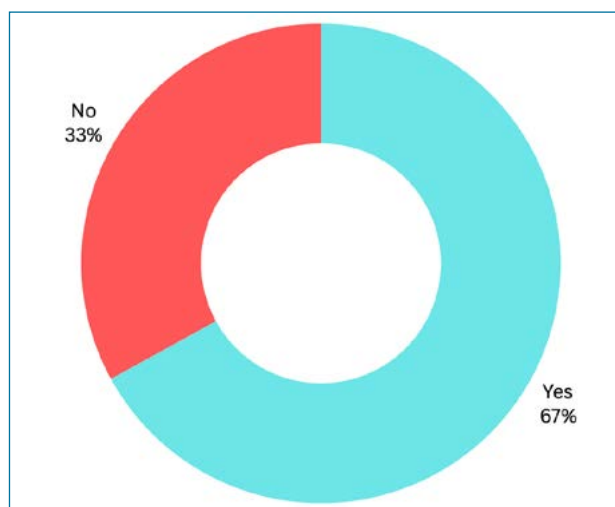
64 The *Plataforma per a l'educació mediàtica* under the CAC's umbrella is available here: <https://www.plataformaeducaciomediatca.cat/>. This platform has 60 members that are relevant stakeholders working in the field of the media literacy. This platform operates in several working groups producing interesting initiatives like the recommendations on children's first mobile phone.

65 CAC, *Programes de alfabetització mediàtica i guies educatives*. Available at: <https://www.cac.cat/en/acords-recerca/recomanacions-als-mitjans>

66 ERC, *Relatórios e recomendações em literacia mediática*. Available at: <https://www.erc.pt>

67 ALIA, *Programmes d'éducation aux médias et lutte contre la désinformation*. Available at: <https://www.alia.lu>

Figure 3: Do you engage in non-statutory activities?



Almost all participating media authorities (92 percent) said they have supported or encouraged some form of self-regulation or co-regulation in their work on digital platforms. However, the level of involvement varied. Some respondents reported only limited activity, while others described a much broader and more active role in promoting non-statutory measures. Consistent with UNESCO’s advocacy for proactive oversight, regulators in EU and non-EU Member States have implemented some kind of monitoring and risk assessment approaches. As monitoring and risk assessments emerged as a recurrent example of non-statutory practices, it is useful to examine these in further detail and extract best practice examples below.

4.1 Monitoring and risk assessment practices

Some media regulators surveyed in this report function primarily as audiovisual regulators, while others are tasked with broader digital or communications oversight. This diversity often shapes how they interpret their role in platform governance and the types of non-statutory practices they can pursue. While the scope and scale of oversight activities vary across respondents, there is a general tendency for media regulators (both from EU and non-EU States) to identify as engaging in some form of risk monitoring function. Together, these examples offer an overview of non-statutory governance in action and highlight innovative practices that align with international standards, including the UNESCO Guidelines.

Platform monitoring and risk assessment may be linked to statutory mandates but, based on respondent perspectives, often occurs on a non-statutory basis. For example, Albania’s AMA notes its proactive engagement with civil society and media organizations as part of its broader approach to platform monitoring. While this is provided for under the AMA’s legal mandate, the AMA’s activities appear to have expanded beyond this mandate in the form of its involvement in the monitoring of audiovisual content during election periods to prevent the spread of misinformation and promote balanced and pluralistic political media coverage. During election periods, AMA monitors audiovisual content to ensure fair and balanced coverage, prevents the spread of misinformation, and upholds political pluralism. While the AMA does not formally require platforms to conduct rights impact assessments or risk assessments, it proactively encourages risk mitigation measures that align with the broader principles of human rights protection, especially in relation to the protection of minors, prevention of harmful content, and non-discrimination. In addition to the examples discussed above, the CAC’s detailed monitoring of harmful content

and disinformation⁶⁸ provides another strong example of UNESCO-aligned practice, focusing on safeguarding freedom of expression through targeted intervention. The CAC's approach reflects a wider trend amongst participants regarding how risks to minors and elections are identified as priority areas.

While monitoring and risk mitigation is often associated with formal legal requirements, the identification and mitigation of risks is likely to require ongoing collaboration and dialogue between regulators and platforms on a voluntary (and non-statutory) basis. This is reflected in respondent perspectives.

For non-EU Member States, non-statutory activities involve voluntary 'consultative processes' with civil society organizations and awareness-raising initiatives aimed at promoting media literacy among users. Participating media regulators from EU-Member States cited their involvement in non-statutory activities to promote common standards in the audio-visual media sphere. For example, as explained in more detail above, Catalonia's CAC noted that they use soft regulatory tools to both inform public debate and indirectly influence platform-related standards, especially in areas such as minors' protection and linguistic inclusion. Similarly, Luxembourg's ALIA engages in voluntary cooperation agreements, including by working on new frameworks with the Luxembourg Press Council to align media and digital governance efforts, particularly concerning professional ethics and content standards in the online sphere.

Best practice example:

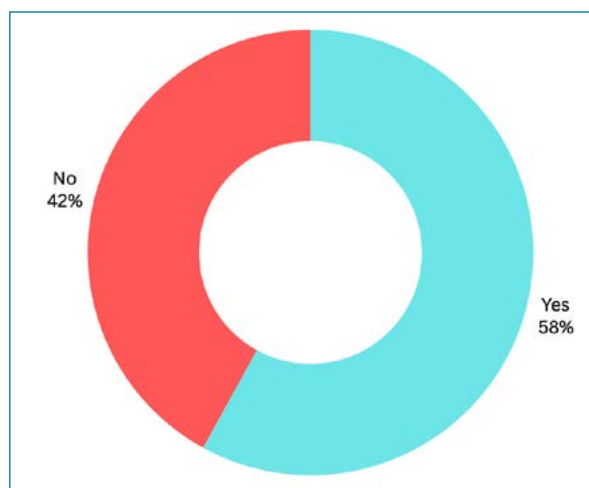
A prominent example of proactive but non-statutory involvement in risk monitoring is seen in Portugal's ERC. It noted its active participation in working groups, informal exchanges, and technical discussions with digital platforms. These engagements focus on topics such as transparency, platform accountability, media pluralism, and the fight against disinformation. While not legally binding, these activities foster alignment between media regulators and platforms and promote more responsible self-governance. ERC also uses these spaces to raise awareness of regulatory expectations and support the development of standards beyond formal legal obligations.

68 The CAC has promoted the analysis and identification of potentially harmful content for human rights in the digital environment by producing specific monitoring reports on topics related to public health, protection of minors, gender (and gender-based violence) and disinformation. Please see: <<https://www.cac.cat/en/cac-reports-internet>> In parallel, the Council has analysed the advertising present on various digital platforms. For more information, please see: <https://www.cac.cat/sites/default/files/2024-02/Acord_3_2024_ca.pdf>. This work has placed special emphasis on the protection of children and adolescents with regard to advertising content on children's and adolescents' YouTube channels, presence of advertising in Tiktokers' video content, presence of advertising for foods and beverages high in fats, trans fatty acids, salt and/or sugars in influencers video content. The CAC's recurring reports on toy advertising during the Christmas campaign on digital platforms have also focused on the protection of minors, with particular attention to the risks arising from covert advertising and the perpetuation of gender stereotypes. In this area, a number of reports have been produced and they are all accessible on the CAC website. With the publication of these reports, the Council sought to raise awareness in society about the risks involved in the presence of this content in the digital environment, given its potential to violate fundamental rights. It also communicated the detection of this content to the platforms and requested its removal or correction.

4.2 Direct voluntary platform engagement

58 percent of participating media regulators indicated that they had established some form of direct communication with digital platforms.⁶⁹ Those who have not established any direct communication with platforms generally attributed this to the absence of defined legal mandates to do so. For example, the Greek NCRTV reported that it has not yet established direct communication channels with digital platforms as its work in digital platform governance remains preliminary, with implementation of platform governance responsibilities still underway. Malta has not been able to establish any direct communication channels with digital platforms, in line with its more limited jurisdictional role. Switzerland's OFCOM repeatedly highlighted the absence of any concrete Swiss regulatory framework for digital platform governance, and stated that they have not established direct communication channels with digital platforms apart from ad hoc email correspondence and meetings. Similarly, Armenia's CTR highlighted that its lack of direct communication was due to such communication falling outside of their competencies.

Figure 4. Have you established direct communication channels with digital platforms?



Legislative provisions often provide the basis (and competence) for how participating media regulators establish communication channels with platforms. For example, the Dutch CvdM has developed a structured communication framework with platforms such as Snapchat, which falls under its supervisory remit as a video-sharing platform. This is managed through an 'account coordination framework', where designated internal account holders act as the primary liaison between the regulator and the platform. A similar example of proactive platform engagements is France's ARCOM. ARCOM highlighted its involvement in several direct communication channels with platforms, addressing online harms and digital platform transparency. These engagements are not only regular and detailed but also strategically timed to match periods of elevated risk (e.g., elections, major sporting events). They represent a mature model of regulator–platform cooperation, balancing voluntary coordination with transparency demands. These engagements typically involve:

- Content moderation standards.
- Transparency and systemic risk reporting.
- Election integrity and crisis response.
- Protection of minors and vulnerable groups.

⁶⁹ Out of these, 71 percent were affiliated with EU Member States.

- Media literacy initiatives.

Best practice example:

Albania's AMA provides an instructive example of proactive non-statutory collaboration with platforms. Specifically, the AMA has established a direct communication channel with TikTok and has used this to provide Albanian users with a direct communication channel for reporting and removing harmful and illegal content, directly facilitated by AMA and TikTok. While the AMA itself notes that this has been used to generate awareness of local legal requirements and encouraging voluntary compliance with AMA's guidelines, it may also be noted that such communication channels are likely to overlap with several provisions under the DSA. The AMA, in public correspondence, has communicated that this collaboration with TikTok would allow ordinary citizens to report any content that incites violence, contains hate speech, violates the rights of children and communities. While this collaboration has raised some concerns about potential infringements on users' freedom of expression, the AMA's proactive establishment of communication links with a major technological platform stands out amongst non-EU affiliated States in particular.

Another practical example comes from Catalonia. The CAC documented several instances where platforms, particularly YouTube, responded constructively to formal takedown requests regarding pseudoscientific content, videos sexualising minors, or material inciting gender-based violence. Success rates were high, suggesting that targeted and well-documented moderation requests can lead to concrete outcomes. This can be seen as a clear example of voluntary co-regulation in action, aligned with UNESCO Guidelines' collaborative governance principles.

Beyond such bilateral efforts, a few regulators, including the Dutch CvdM and French ARCOM, participated in broader voluntary campaigns, such as ERGA's (now the Media Board) media literacy initiative during the European elections.⁷⁰ Although such collaborations were often more ad hoc and less formalised, they demonstrated how EU-level coordination can enhance visibility and effectiveness in platform engagement.

4.3 Building media and information literacy ecosystems

Media literacy initiatives emerged as a critical, widely endorsed non-statutory practice among respondents, reflecting UNESCO's prioritisation of informed and resilient society.⁷¹ Notable examples include Luxembourg ALIA's collaborative literacy campaigns and the Dutch CvdM participation in the European Board for Media Services (or the Media Board) media literacy initiatives, which effectively combine educational objectives with platform engagement. Notably, these practices were not always grounded in a formal statutory mandate. Rather, they were driven by internal leadership, cross-institutional collaboration, and a recognition of shared public responsibilities. It may be noted here that UNESCO has played a key role in promoting collaboration on good practices for media literacy initiatives. Most recently, through the mapping of media and information literacy initiatives in Ibero-America.⁷²

70 For more information, please see European Commission (2023), Guidelines pursuant to Article 33a(3) of the Audiovisual Media Services Directive on the scope of Member States' reports concerning measures for the promotion and development of media literacy skills (2023/C 66/02) <[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023XC0223\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023XC0223(01))>

71 UNESCO Guidelines.

72 See UNESCO (2023), Mapping of media and information literacy initiatives in Ibero-America <<https://www.unesco.org/en/articles/mapping-media-and-information-literacy-initiatives-ibero-america-2023>>

83 percent of participating media regulators highlighted examples of media literacy initiatives that they are currently (or have previously been) engaged in. Several respondents who claimed to have no statutory mandate to lead such initiatives still highlighted their efforts to support non-statutory organizations (such as NGOs) in areas related to the promotion of media literacy. The promotion of media literacy appears to be an area of activity which precedes many of the contemporary national and regional laws that are otherwise guiding the activities (both statutory and non-statutory) of many of the respondents.

For example, the UK's Ofcom highlighted how media literacy has been an important part of Ofcom's role since it was established in 2003 when the Communications Act directed Ofcom to research and promote media literacy across the UK.⁷³ Similarly, Catalonia's CAC has developed a comprehensive and long-standing media literacy programme through its initiative EduCAC.⁷⁴ This programme offers a broad range of educational tools for families, teachers, and students to build critical digital skills.

While these examples demonstrate how some respondents have engaged in media literacy initiatives in a long-standing manner, it appears highly likely that new and emerging national and regional laws will play a key role in steering future media literacy programmes. For example, Ofcom's future efforts are now heavily informed by its 'Three-Year Media Literacy Strategy',⁷⁵ while Catalonia's CAC has expanded new educational materials to address issues such as algorithmic curation, influencer culture, and platform responsibility. In terms of themes that the respondents appear to target in their efforts to promote media literacy, the most common priorities include responding to online disinformation, threats to minors and societal threats posed by artificial intelligence.

Direct engagement with **influencers** stands out as an example of how media regulators are appearing to promote media literacy through targeted initiatives. The participating media regulators share concerns not only about the volume of harmful content in modern audiovisual media but also the role of key individuals in influencing user engagement with such content.⁷⁶ In that context, several participating media regulators highlighted their engagement with influencers.

For example, Greece's NCRTV has previously collaborated with the Advertising Self-Regulation Council of Greece (a member of the European Advertising Standards Authority (EASA)) to co-develop a code on influencer marketing, with plans to sign a memorandum of understanding. Catalonia's CAC has also oriented its focus on influencers. In 2020, the CAC began working with Google as a Trusted Flagger, monitoring YouTube for potentially illegal or harmful content. Its focus areas included protecting minors, tackling disinformation, hate speech, sexualised content, cyberbullying, and the promotion of suicide. Similarly, Norway's NMA collaborated with the Norwegian Consumer Authority to facilitate an initiative to create ethical guidelines for influencers, agencies and advertisers to prevent marketing that could lead to negative body image. As a result of this work, a self-regulatory body called '*Fagutvalget for influencermarkedsføring*' (Expert Committee for Influencer Marketing, FIM) was established, but ceased operations in July 2025.

73 See the UK's Communications Act 2003 <<https://www.legislation.gov.uk/ukpga/2003/21/contents>>

74 See <<https://www.educac.cat>>

75 See 'Ofcom's three-year media literacy strategy' (Ofcom, 29 April 2024) <<https://www.ofcom.org.uk/media-use-and-attitudes/media-literacy/ofcoms-three-year-media-literacy-strategy>>

76 See the report by the European Audiovisual Observatory, 'How are social media influencers and their activities covered by European and national law?' (28 April 2025) <<https://www.obs.coe.int/en/web/observatoire/-/how-are-social-media-influencers-and-their-activities-covered-by-european-law-#:~:text=Influencers%20are%20in%20any%20case,in%20Switzerland%20and%20the%20UK.>>

Best practice example:

Efforts to promote media literacy increasingly target young internet users. A notable example is Norway's NMA. The NMA has developed guidelines for labelling commercial content aimed at influencers, while also developing guidelines for Youtubers and Vloggers about the proper labelling of advertisements.

Similarly, Catalonia's CAC has sought to expand its long-standing EduCAC initiative through enhanced collaborations with influencers and streamers to promote awareness campaigns and relatable content. This has been used to support subject specific media literacy campaigns, such as the #AMiNoMenganyen, addressing disinformation and digital well-being, with participation from Catalan youth influencers. CAC's expanded educational materials also include specific information on influencer culture.

The Dutch CvdM regularly plans information sessions for influencer managers, designed to clarify regulatory expectations and improve advertising transparency and co-regulation compliance in influencer marketing. Even respondents who claimed to have challenges in the field of media literacy due to a lack of legislative competence, such as Armenia's CTR, explicitly stated their regret in not yet being able to engage specifically with the YouTubers or Instagram influencers.

Other promising practices include youth-focused roundtables (the Dutch CvdM), influencer engagement (Catalonia's CAC), and digital literacy initiatives targeting teachers, parents, and vulnerable communities (Albania's AMA, Portugal's ERC). Many regulators linked these efforts to the broader policy objective of countering disinformation and promoting critical engagement with online content.

Alongside this general focus on the role of influencers, several participating media regulators appear to have been proactive in their involvement in co- and self-regulatory mechanisms in order to protect election integrity. This appears to be an important area in which both EU and non-EU media regulators attend to targeted media literacy activities in the context of maintaining informed citizens in their capacity as voters. For example, during election periods, Albania's AMA monitors audiovisual content to ensure fair, balanced, and accurate media coverage while preventing the spread of misinformation and issuing public warnings to media service providers and platforms. Similarly, Portugal's ERC cited its extensive engagement with digital platforms, other regulators, and civil society to support voluntary commitments around content moderation and transparency under the self-regulatory framework of the EU Code of Practice on Disinformation.

Other participating media regulators build on these media and information literacy efforts by engaging with civil society organizations in a variety of ways. Portugal's ERC plays a leading role in the Group for Intervention in Media Literacy (GILM), a public-private initiative that brings together multiple actors to promote digital literacy.⁷⁷ Luxembourg's ALIA and Norway's Medietilsynet are working with academic institutions on issues such as AI-generated content and systemic risk.⁷⁸ In the UK, Ofcom has developed a forward-looking research agenda on online safety and is working on researcher access to platform data under the Online Safety Act.⁷⁹ Albania's AMA regularly engages civil society organizations focused on human rights and child protection as

77 Group for Intervention in Media Literacy (GILM), Portugal. For more information, please see: <<https://www.gilm.pt/en/>>

78 Medietilsynet (Norway) – guidance on labelling advertising/influencer marketing, available at: <<https://www.medietilsynet.no/globalassets/engelsk-dokumenter-og-rapporter/engelsk-youtube-veileder.pdf>>;

79 Ofcom – Online Safety hub (research agenda, consultations, codes). More information is available at: <<https://www.ofcom.org.uk/online-safety>>

part of its oversight model.⁸⁰ Catalonia's CAC also places strong emphasis on academic and public engagement, notably through its *Quaderns del CAC* electronic scientific journal on audiovisual communication,⁸¹ the annual CAC Awards for research in audiovisual communication,⁸² and its leadership of the Media Education Platform.⁸³ Other regulators, like the CTR in Armenia and CvdM in the Netherlands,⁸⁴ are taking steps towards more structured stakeholder engagement, particularly as they expand their remit under the DSA and related laws.

4.4 Transparency and public oversight

Transparency and accountability were widely regarded by respondents as key principles that inform their activities, in line with UNESCO Guidelines. Participating media regulators reported a generally proactive but varying level of engagement with transparency reporting. Respondents appear particularly proactive where efforts to promote platform transparency form part of their responsibility to implement new EU rules, such as the DSA's provisions on platform transparency. Under the DSA, media regulators oversee compliance by some platforms with transparency obligations,⁸⁵ including the publication of transparency reports. These reports must also include statements of reasons for content moderation decisions, which are made publicly available via the European Commission's DSA Transparency Database.⁸⁶ France's ARCOM plays an active role in overseeing DSA compliance, supporting the implementation of transparency reporting obligations and contributing to enforcement mechanisms.⁸⁷ While the Dutch CvdM does not yet require platforms to submit national-level transparency reports, it plans to examine these as part of its upcoming DSA supervision strategy – for example, by reviewing Snapchat's reports, since Snapchat is the only video-sharing platform (VSP) under Dutch jurisdiction. Other respondents, such as Portugal's ERC, do not yet require the formal submission of transparency reports, but anticipate platforms to adhere to transparency standards laid out in the AVMSD and the DSA.

Concerns about ensuring transparency are linked to how participating media regulators perceived the extent to which their legal frameworks empowered them to ensure platform accountability. 80 percent of non-EU Member State respondents noted that they did not possess a full legal mandate

80 AMA (Albania) – institutional site (news and cooperation notes, incl. TikTok partnership): <<https://www.rirm.org/en/ama-audiovisual-media-authority-2/>>

81 *Quaderns del CAC* (electronic scientific journal on audiovisual communication), Catalan Audiovisual Council (CAC), available at: <<https://www.cac.cat/en/acords-recerca/revista-quaderns-del-cac>>

82 CAC Awards for research in audiovisual communication (annual call and laureates), Catalan Audiovisual Council (CAC). Available at: <<https://www.cac.cat/en/node/3329>>

83 Media Education Platform (Plataforma per a l'Educació Mediàtica), Catalonia. Please see more information at: <<https://www.plataformaeducaciomediatca.cat/>>

84 Dutch Digital Regulation Cooperation Forum, more information available at: <<https://www.acm.nl/en/about-acm/collaboration/national-cooperation/dutch-digital-regulation-cooperation-forum>>

85 Depending on the platform's size (Articles 15, 24, 42 DSA). ARCOM has also held dedicated workshops with platforms to support compliance and clarify expectations around these reporting duties. The regulator also explained that smaller companies (under 50 employees and less than €10 million turnover or assets) are exempt from certain obligations under the DSA.

86 The DSA Transparency Database and the reports published therein are available here: <<https://transparency.dsa.ec.europa.eu/?lang=en>>

87 See, for example, ARCOM's review of the resources and measures implemented by online platforms to combat the dissemination of hateful content: <<https://www.arcom.fr/se-documenter/etudes-et-donnees/etudes-bilans-et-rapports-de-larcom/lutte-contre-la-diffusion-de-contenus-haineux-en-ligne-bilan-des-moyens-mis-en-oeuvre-par-les-plateformes-en-ligne-en-2022-et-perspectives>>

to ensure platform accountability. Out of these respondents, there was a strong consensus that the lack of a legally binding mandate fails to empower the respondent bodies to broadly ensure platform accountability. This sentiment was not only expressed by respondents who had no statutory powers (such as the Swiss OFCOM) but also by respondents such as Albania's AMA, which described itself as operating without a fully binding legal mandate. AMA also reiterated the jurisdictional challenge surrounding their limited ability to enforce compliance when platforms do not fall directly under the body's domestic territorial or licensing authority. Similarly, Norway's NMA noted its own significant challenges regarding the global tech giants and their compliance with national laws.

Notwithstanding these concerns, participants appear proactive in attempting to promote transparency across platforms. For example, Norway's NMA, while not requiring platforms to submit transparency reports under national law, still assesses transparency reports as part of co-regulatory mechanisms such as the Code of Practice on Disinformation. Portugal's ERC also cited its engagement with platforms and civil society stakeholders in supporting voluntary commitments around content moderation and transparency under the self-regulatory framework of the EU Code of Practice on Disinformation. Similar efforts were reported by the Swiss OFCOM. As part of ongoing work from the Switzerland's Federal Chancellery to raise awareness of the threat posed by influence activities and to discuss possible protective measures in 2019 and 2023 elections, the Swiss OFCOM was involved in arranging 'privileged access' with Google, Meta and TikTok, providing for direct contacts in the event of any manipulation and ensuring that official election information was prominently displayed on these platforms. This highlights a recurring focus on transparency and accountability in the specific context of preventing misinformation and disinformation in election periods. Other respondents, such as the UK's Ofcom, supplies supplementary draft guidance regarding what type of information platforms should include in transparency reports as well as draft guidance for Ofcom's own production of transparency reports.

Respondents presented a mixed picture regarding low-cost and easily implementable practices. Several authorities, especially those with more advanced mandates or longer-standing engagement in digital governance, could point to practical initiatives, while others, particularly those in earlier stages of mandate expansion, did not report relevant examples. Regulators such as Catalonia's CAC, Portugal's ERC, and Albania's AMA identified concrete, replicable low-cost practices. These included awareness campaigns, media literacy programmes, and collaborative workshops, that is, initiatives requiring minimal financial investment but capable of reaching wide audiences and supporting public understanding of digital risks.

Best practice example:

Even in the absence of full legal mandates, several regulators showcased low-cost, practical approaches to promoting transparency and accountability. Catalonia's CAC, Portugal's ERC, and Albania's AMA implemented awareness campaigns, public education efforts, and stakeholder forums to encourage responsible platform behaviour.

4.5 Human rights safeguards, risk mitigation and crisis response

Human rights safeguards, emphasised by UNESCO's Guidelines, were mostly addressed through some regulators' approaches to crisis response and platform governance. Catalonia's CAC demonstrates an approach that is designed to be human rights compliant by systematically identifying and mitigating content-related risks to vulnerable groups. Other regulators, while not

formally mandated, have taken steps to encourage platforms to consider human rights and risk mitigation measures. Portugal's ERC, for example, described its role in promoting transparency and accountability as part of broader EU obligations, although it lacks the authority to impose such requirements independently. The Portuguese regulator encourages platforms to voluntarily engage in human rights due diligence and collaborates with other European regulators to promote best practices. Luxembourg's ALIA similarly reported that while it does not yet have a mandate to require such assessments, the introduction of the DSA is expected to introduce legally binding obligations in this area, particularly for the most influential digital platforms – Very Large Online Platforms (VLOPs).⁸⁸ At this stage, ERC's engagement with risk-related governance is described as supportive rather than supervisory.

Best practice example:

Catalonia's CAC provided one of the most substantive examples of a regulator actively engaging with human rights compliant content monitoring. While it does not require formal impact assessments, it has produced a broad series of monitoring reports covering topics such as gender-based violence, disinformation, and advertising practices that perpetuate harmful stereotypes, particularly concerning children and adolescents. Through these reports, the CAC highlights potential risks and communicates findings to platforms, sometimes requesting content removal or correction. This is an example of a non-statutory, monitoring-based approach to risk assessment aligned with fundamental rights.

At the EU level, France's ARCOM referred to the obligations laid out in the DSA, particularly Articles 34 and 35, which require **systemic risk assessments** and **mitigation measures** by VLOPs and VLOSEs⁸⁹, including those related to freedom of expression and gender-based violence.⁹⁰ The first systemic risk and audit reports were published at the end of 2024, forming part of an evolving framework designed to iteratively identify and reduce risks. The Netherlands' CvdM indicated that it expects platforms under its supervision, such as Snapchat, to carry out risk assessments under Article 28b (3) of the AVMSD. Some participants also noted that co-regulatory codes of conduct must be broadly accepted by stakeholders, including NGOs, implying a level of participatory oversight.

While not affiliated with an EU Member State, the UK's Ofcom stood out as an example of demonstrating an advanced risk assessment framework. Under the UK Online Safety Act (OSA), regulated services are legally required to conduct a range of risk assessments, including illegal harms risk assessments, children's access assessments, and specific children's risk assessments.⁹¹

88 Art 34(1) DSA defines VLOPs as platforms providing services 'to a number of average monthly active recipients of the service in the Union equal to or higher than 45 million'.

89 Very Large Online Search Engines (VLOSEs) are defined in Article 33(1) DSA as online search engines that have an average of at least 45 million monthly active recipients of the service in the EU (which corresponds to 10% of the EU population).

90 For a useful breakdown see Q&A on risk assessment reports, audit reports and audit implementation reports under DSA <<https://digital-strategy.ec.europa.eu/en/faqs/qa-risk-assessment-reports-audit-reports-and-audit-implementation-reports-under-dsa>>

91 For a breakdown of risk management duties under the OSA, see <<https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/risk-assessment-guidance-and-risk-profiles.pdf?v=390984>>.

Category 1 services (the largest and highest-risk online platforms)⁹² must also carry out and publish impact assessments addressing freedom of expression and privacy.

While the concept of human rights due diligence (HRDD) is central to the UNESCO Guidelines and increasingly embedded in international platform governance frameworks, the regulatory landscape across European and non-European jurisdictions remains fragmented and uneven in its implementation. A first key insight is the clear distinction between jurisdictions with formal legal mandates and those relying on soft law or voluntary engagement. The UK approach to risks assessments and HRDD, described above, contrasts with other regulators, which report no legal basis or engagement in this area, often due to jurisdictional or resource limitations.

A second trend is the **emerging alignment with the Digital Services Act (DSA)** in several EU countries. Authorities in Luxembourg, the Netherlands, and France referenced obligations under the DSA as a turning point for requiring systemic risk assessments and transparency reporting. While enforcement powers often remain with the European Commission for VLOPs, national regulators are preparing to support and complement these obligations at a domestic level.

Another insight concerns **indirect or non-statutory efforts to promote risk awareness and human rights considerations**. Portugal's ERC encourages platforms to adopt risk mitigation and transparency measures, even without binding legal authority. The Catalanian CAC, meanwhile, engages in extensive content monitoring and reporting (especially on gender stereotypes, disinformation, and child protection) highlighting risks and seeking redress through platform engagement.

Finally, some regulators (particularly Albania's AMA) operate in a hybrid space, promoting **risk-based platform governance through sectoral regulation** (e.g. special obligations for video-sharing platforms) without explicitly framing these efforts as HRDD. Their focus on content moderation, discrimination prevention, and minor protection demonstrates that meaningful human rights compliant regulation is possible even in the absence of comprehensive HRDD mandates.

92 Under the UK Online Safety Act, 'Category 1 services' are the largest and highest-risk online platforms, designated by Ofcom, and subject to the strictest obligations including illegal harms, children's risk, and freedom of expression and privacy assessments, alongside enhanced transparency and user empowerment duties.

5. Cross cutting themes: Collaborative and multi-stakeholder approaches

The concrete examples outlined in the previous section show that media regulators across Europe are developing a broad range of non-statutory tools to complement their formal responsibilities. When these examples are viewed together, several cross-cutting themes emerge. These themes sit between the concrete practices described earlier and the recommendations that follow. They help explain why non-statutory practices matter, how they are used in practice, and what makes them effective in different institutional contexts.

5.1 Sharing responsibility between regulators and platforms

First, regulators increasingly view platform governance as a shared responsibility. While platforms hold the primary responsibility for day-to-day moderation, risk mitigation, and the design of safe systems, regulators play a crucial role in setting expectations, ensuring human-rights compliance, and providing oversight. This idea was framed in various ways: as a ‘complementary’ or ‘shared’ responsibility (Luxembourg’s ALIA, Portugal’s ERC), a ‘layered approach’ that includes media literacy and self-regulation alongside statutory tools (Catalonia’s CAC), or a systemic risk-based framework grounded in the DSA (Dutch CvdM, Norway’s Medietilsynet).

Respondents emphasised that platforms’ influence over content curation and visibility is not neutral and that their systems have clear societal implications. Most respondents viewed platforms as best positioned to act swiftly and at scale, particularly in moderating harmful or illegal content, protecting vulnerable groups, and assessing algorithmic impacts. Several regulators underlined that their oversight focuses on whether platforms have effective and transparent systems in place, rather than on the assessment of individual items of content. Such systems may involve clear internal policies, trained staff, and well-resourced moderation infrastructure. Some authorities, including Malta’s BA and Catalonia’s CAC, also stressed that platforms’ algorithmic systems (such as recommendation and curation tools) act in practice like editorial functions, influencing what users see and how information circulates. Therefore, this editorial role should be recognised and addressed through appropriate regulatory frameworks.

5.2 Voluntary cooperation and co-regulatory approaches

Many regulators described practical examples where voluntary engagement with platforms has led to meaningful outcomes. Such cooperation works best when it is well-structured, clearly communicated, evidence-based, and embedded in ongoing relationships with platforms and other stakeholders. Regulators reported that platforms are more likely to act when requests for cooperation are specific, documented, and linked to clear public interest goals. While voluntary cooperation is not a replacement for legal frameworks, it is important, especially when laws are still evolving or when enforcement capacity is limited.

5.3 Working with civil society and academia

Several regulators described how partnerships with researchers and civil society organizations support their monitoring work, public engagement, and policy development. Multi-stakeholder collaboration is not necessarily dependent on statutory power but on institutional willingness and strategic prioritisation. Even authorities without explicit legal mandates to work with external actors reported that such collaboration strengthens legitimacy, helps with evidence gathering and identifying emerging risks. This underscores one of UNESCO Guidelines' key principles: multi-stakeholder cooperation is an important part of effective digital governance.

5.4 Addressing jurisdictional difficulties

Jurisdictional limitations were a frequent concern, particularly for regulators whose mandates do not extend to platforms that operate from outside their national territory. Some regulators noted gaps in authority or difficulties engaging with global platforms that do not have an established presence in their jurisdiction. At the same time, they stressed that limited mandates do not prevent action. Many described how voluntary cooperation, public communication, and non-binding guidance have enabled them to respond to emerging challenges, even in the absence of stronger statutory powers.

5.5 The importance of regional, sub-regional and global networks

Nearly all regulators described regional, sub-regional, and international networks as essential, not supplementary, to their work. For EU-based authorities, bodies such as the European Board for Digital Services, the European Media Board, EPRA, and the Mediterranean Network of Regulatory Authorities provide important platforms for joint enforcement, shared interpretation of legal provisions, and alignment on cross-border issues. Non-EU regulators also highlighted the value of peer networks, including EPRA, MNRA, and other initiatives that support knowledge-exchange and capacity-building. Respondents also referred to the important role of global initiatives, such as UNESCO's Global Forum of Networks (GFN and GOSRN), in strengthening cooperation across regions.

5.6 Transferable approaches for regulators in developing legal frameworks

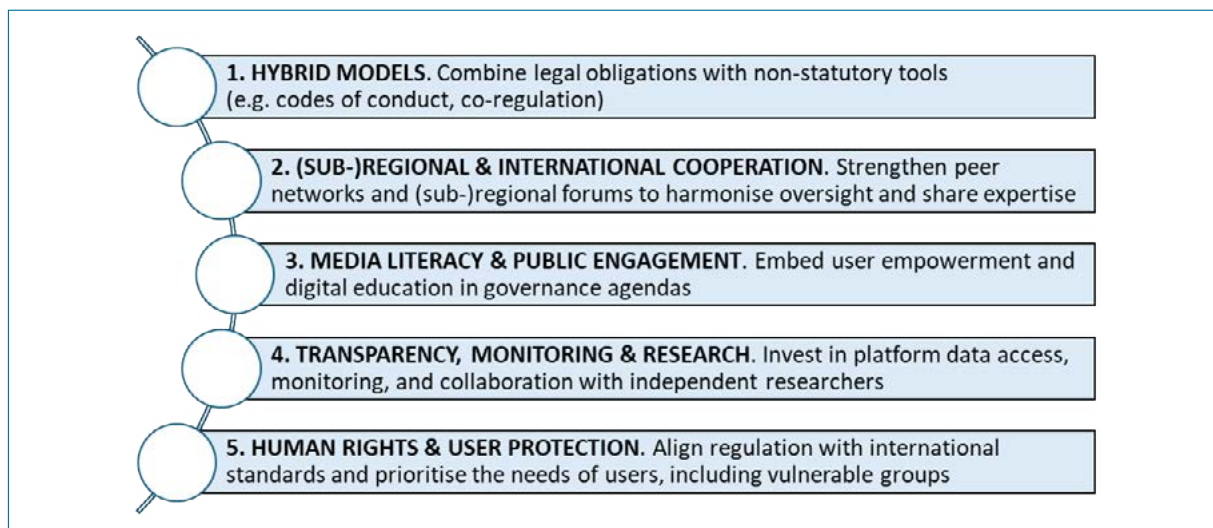
The examples and insights summarised in this report point to several transferable approaches for regulators in regions where legal and institutional frameworks are still developing. Respondents emphasised the value of starting with clear mapping of national digital ecosystems, working closely with other public bodies, prioritising media and information literacy, adopting flexible codes of conduct, and building strong links to regional and global networks. These steps can help regulators begin to respond to digital platform governance challenges even where statutory powers are still limited or under development.

Together, these cross-cutting insights provide a bridge between the more detailed non-statutory practices in Section 4 and the recommendations that follow. They highlight a shared understanding across jurisdictions: that effective platform governance requires a combination of statutory and non-statutory approaches, grounded in collaboration, transparency, public interest, and fundamental rights.

6. Recommendations for regulators with developing frameworks

This study identifies five core recommendations or pillars for strengthening digital platform governance across regions with developing regulatory frameworks. These recommendations reflect both the challenges and opportunities of digital platform governance and are designed to support regulators in developing adaptive, human rights compliant, and context-appropriate governance strategies. These include: (1) building hybrid governance models that combine legal mandates with flexible, non-statutory tools; (2) fostering (sub-)regional and international cooperation through shared frameworks and networks; (3) institutionalising media literacy and public engagement to support an informed digital society; (4) investing in transparency, monitoring, and research to ensure accountable oversight; and (5) aligning all interventions with fundamental rights and the protection of vulnerable users.

Figure 5. Five pillars of effective digital platform governance



The research conducted for this report has revealed a wide spectrum of governance approaches and priorities across the jurisdictions surveyed, from well-established statutory models to innovative non-statutory interventions. Despite contextual diversity, the responses collectively point to a shared understanding: that effective digital platform governance must be grounded in enforceable rules, complemented by collaborative, adaptable, and human-centred strategies. While the recommendations are informed by a sample of EU and non-EU media and digital platform regulators, they are designed to be relevant across different institutional settings, including those with hybrid or evolving mandates. The recommendations below refine these insights into a set of actionable priorities for regulatory bodies operating in regions and countries with emerging governance practices, while remaining sensitive to potential differences in institutional capacity, legal infrastructure, and regional integration.

Recommendation 1. Build hybrid governance models

Regulators should combine statutory obligations with non-statutory tools to ensure both accountability and flexibility. Co-regulatory frameworks should be promoted, where platforms take primary responsibility for compliance under regulator oversight. Regulators should also use informal leadership and innovation to act even when no explicit legal mandate exists.

A central finding from across jurisdictions is that **neither legal mandates nor voluntary measures alone are sufficient to ensure accountable platform governance**. Regulators consistently stressed the need for a hybrid model, combining enforceable legal obligations with informal and voluntary mechanisms that promote flexibility and trust-building. In line with UNESCO's Guidelines regulatory authorities should explicitly adopt hybrid governance models that effectively integrate statutory, self-regulatory, and co-regulatory mechanisms, ensuring clear accountability, meaningful transparency, and multi-stakeholder collaboration. For regulators, this might include advocacy for clear laws and baseline obligations (e.g. on transparency, risk management, and content moderation), development of complementary non-statutory tools such as codes of conduct, guidance, and voluntary agreements, and promotion of co-regulation, where platforms manage day-to-day compliance under regulatory oversight and enforceable safeguards.

In this context, it is crucial to recognise **the value of informal leadership**, internal innovation and initiative. Many good practices documented in this study (including multi-stakeholder dialogues, public education campaigns, and voluntary cooperation with platforms) were developed without explicit legal mandates. Therefore, regulators are encouraged to proactively explore their institutional flexibilities and pursue action-oriented collaborations where possible.

Recommendation 2. Strengthen (sub-)regional and international collaboration

Regulators should engage actively in sub-regional, regional and international networks to share experience and build collective influence. Joint responses are needed to address cross-border platform risks.

In the absence of an EU-style institutional framework, **regional collaboration** emerged as a particularly relevant strategy for regulators in regions with developing regulatory frameworks. Several respondents pointed to the importance of **peer learning networks** such as EPRA, MNRA, and UNESCO's GFN. These platforms facilitate shared enforcement approaches, collective engagement with global platforms, and the dissemination of practical tools.

For regulators in regions with emerging governance practices, it may be beneficial to enter alliances that can offer the scale and coherence that individual regulators often lack, enhancing both negotiation power and technical capacity. This may include the creation or reinforcement of multistakeholder forums for audiovisual and platform regulators, the coordination of responses to cross-border issues (e.g. disinformation and the protection of minors), the organization of joint training, peer reviews, and policy dialogue; and collaboration with international bodies (e.g. UNESCO, OHCHR, Council of Europe) to apply global (including non-statutory) standards.

Recommendation 3. Institutionalise media and information literacy and public engagement

Regulators should make media and information literacy (including a digital focus) a core part of their work and collaborate with educators, civil society, and digital platforms to inform users.

Almost every participating media regulator emphasised the importance of media literacy, especially as a potentially low-cost (online), high impact complement to statutory regulation. Education and awareness are seen not as secondary efforts but as fundamental pillars of digital platform accountability. UNESCO Guidelines also underscore their importance in supporting informed and resilient societies.

Sustained media and information literacy programmes also serve to build long-term societal resilience and democratic participation in the face of evolving risks associated with digital platforms. In this context, key priorities include developing national strategies with clear roles for the responsible bodies, including media and communication regulators. It is also important to build strong partnerships with educators, civil society, academia, and digital platforms to support coherent and sustainable initiatives. These efforts should be accessible to everyone, including young people, marginalised groups, and communities with lower levels of digital literacy.

Recommendation 4. Invest in transparency, monitoring and research

Regulators should set clear standards for digital platform transparency and build partnerships to ensure independent monitoring and data access.

There is strong support for measures that improve **insight into digital platform systems and behaviours**. Media regulators call for systems-level supervision and evidence-based monitoring to engage platforms and assess risk. In line with UNESCO Guidelines' transparency recommendations, regulators should set clear, minimum standards for digital platforms regarding disclosure practices.

Without visibility into platforms' algorithms, business models, and moderation systems, regulators remain limited in how they identify and respond to risks. Strengthening transparency and accountability therefore requires regular transparency reporting from platforms, independent monitoring and content audits, and collaboration with researchers and civil society to analyse and interpret available data. It is also important to enable safe researcher access to platform data under appropriate safeguards, ensuring that oversight is informed, evidence-based, and aligned with public interest objectives.

Recommendation 5. Align practice with human rights and the protection of users

Regulators should ensure that *all activities* centre on human rights, privacy, freedom of expression, and non-discrimination, while giving special protection to children and vulnerable groups.

The responses repeatedly underscored the importance of **anchoring digital platform governance in fundamental rights**, with particular attention paid to the rights of children, minorities, and other at-risk communities. The respondents in this study expressed a strong consensus in favour of human rights compliant digital platform governance. Reflecting UNESCO's Guidelines, regulators

should integrate human rights due diligence as a core part of digital platform governance, ensuring regular risk assessments and the involvement of affected communities and civil society experts in designing and evaluating policies.

Therefore, regulators in regions with developing frameworks should ensure that platform governance is firmly grounded in fundamental rights. This includes embedding obligations on freedom of expression, privacy, and non-discrimination in platform rules, and promoting human and children's rights and age-appropriate design in both regulatory approaches and platform systems. Regulators should also require risk assessments that address disproportionate impacts on society, particularly on children and vulnerable communities. Finally, civil society and human rights experts should be involved in shaping and evaluating governance frameworks to ensure that these interventions are both effective and rights-respecting.

7. Conclusions

This report has gathered a wide range of perspectives from EU and non-EU media regulators and mapped key themes in digital platform governance. It shows that participating media regulators are engaged in a diverse mix of statutory and non-statutory activities. The study identified **five pillars for effective digital platform governance**:

1. Building hybrid digital platform governance models that combine statutory and non-statutory tools.
2. Strengthening (sub-)regional and international cooperation through networks and peer forums.
3. Expanding media literacy and public engagement initiatives.
4. Developing transparency and research measures that encourage meaningful data access.
5. Protecting human rights and vulnerable users by aligning both statutory and non-statutory initiatives with international standards.

A standout conclusion is the current central role of EU law in digital platform governance. Most participating media regulators, whether in EU Member States or not, already work under EU statutory mandates or are adapting their governance frameworks to align with EU standards. EU legislation strongly shapes both national law and non-statutory initiatives, as many voluntary measures are designed to ensure compliance with EU rules. **Good practices therefore often combine statutory and non-statutory elements.**

At the same time, the study also identified many examples of non-statutory practices that stand on their own, not simply as complements to legal obligations. These include voluntary agreements, public education campaigns, and informal dialogues with digital platforms. Because they do not depend on a specific legal framework, such practices can be adapted and applied across different regions and sub-regions.

Another clear theme is the importance of **cross-border cooperation between media and communication authorities**. Regulators see regular exchange as vital for tackling jurisdictional gaps, sharing lessons learned, and addressing common risks. These practices provide a cost-effective way to share information and develop joint responses. They also align with UNESCO Guidelines' call for globally networked, multi-stakeholder governance, especially now that digital platforms face legal duties under national and regional laws to assess and mitigate risks.

Finally, human rights concerns are expanding, and non-statutory interventions can be a double-edged sword: they can create risks if poorly designed (for example, voluntary moderation policies that restrict freedom of expression without appropriate safeguards), but they also play a crucial role in protecting human rights where statutory measures are weak or unenforced. Clear standards and benchmarks are needed to guide human rights-compliant interventions when it comes to digital platform governance and the reconciliation of different human rights in cases of conflicting rights. In line with UNESCO's Guidelines, digital platform governance strategies should remain transparent, participatory, and rooted in human rights due diligence, with special attention paid to vulnerable and marginalised groups.

Annex. Questionnaire on statutory and non-statutory best practices on the governance of digital platforms

Section 1: Background & Statutory Practices

- Q1. Please provide a brief overview of your regulatory body's **role(s)** in platform governance. What is (if any) **the legal mandate** of your regulatory body and in which **key areas** does it operate?
- Q2. What is **the legal framework** in which your regulatory body operates (domestic, EU laws etc.)? If there are several legal frameworks, please mention or describe these.
- Q3. What are the main **challenges** your organization faces in the governance of digital platforms? How does your organization approach those challenges?
- Q4. How does your regulatory body **coordinate** with other national or regional regulators (e.g., data protection agencies, competition authorities, consumer protection bodies)? Please also explain if there is any notable feature of the **jurisdiction** where your authority operates. For example, does your country have a strong market presence from major digital platforms (e.g., Ireland with many tech company headquarters)? If so, does this influence regulatory engagement?
- Q5. Does your regulatory body engage in any **cross-border cooperation** (e.g. information-sharing) with other *regulators* on digital platform issues?

Section 2: Non-statutory Approaches

- Q6. How (if at all) does your organization distinguish between **statutory** and **non-statutory** interventions in the context of digital platform governance?
- Q7. *Beyond* legal mandates or co-operation with other regulatory authorities, does your organization engage in **non-statutory activities** (e.g., voluntary agreements, soft regulation, platform engagement)?
- Q8. Has your regulator established **direct communication channels with digital platforms** (e.g., for crisis response, content moderation discussions, transparency requirements)? If yes, what kind of channels and how effective have they been?
- Q9. Do you engage in **media literacy initiatives** targeting platforms, influencers, or the general public? If yes, please describe these.
- Q10. Has your organization **encouraged, facilitated or overseen self-regulatory or co-regulatory mechanisms** related to platform governance? For instance, has your organization fostered any voluntary initiatives as part of a multi-stakeholder approach to digital platform governance? If so, please describe these initiatives (e.g., voluntary codes of conduct with platforms, advisory roles, dialogues with various stakeholders).

Section 3: Transparency & Accountability

- Q11. Does your regulator require platforms to provide **transparency reports** or share data on content moderation, algorithmic decision-making, ad policies or other data?
- Q12. What **challenges** have you encountered in ensuring platform accountability without a legally binding mandate?
- Q13. Are there any **low-cost, easily implementable practices that have worked well** in your jurisdiction and could be replicated in other countries?
- Q14. Does your regulatory authority require or encourage platforms to conduct human rights due diligence, impact assessments, or risk mitigation measures related to platform governance? If so, could you describe any frameworks or requirements in place (including, for example, assessments related to gender-based challenges)?

Section 4: Platform Engagement

- Q15. Has your regulator played a role in **responding to digital crises** (e.g., election misinformation, emergency public health responses, hate speech escalations)? If so, please elaborate.
- Q16. How do you see the appropriate **division of responsibility** between regulators and platforms in **content moderation**?
- Q17. Have you had **successful collaborations with digital platforms on voluntary initiatives**? If so, could you share examples?
- Q18. Does your regulatory body engage with civil society, media, or independent researchers in overseeing or evaluating platform governance practices? If so, how?
- Q19. Has your organization encountered any **jurisdictional issues** (e.g. competence, geographic scope) when collaborating with other stakeholders?

Section 5: Recommendations

- Q20. What **recommendations would you give to LAC regulatory authorities and bodies** seeking to develop **effective non-statutory approaches** to platform governance?
- Q21. Do you believe that it would be beneficial for regulatory bodies in the LAC region to proactively **advocate** for more robust **legal measures** or should their efforts focus on **voluntary / collaborative/ multi-stakeholder solutions**? Do you think a combination is required? Please elaborate.
- Q22. Are there any **specific initiatives, models, or regulatory networks** you believe we should look into for this study?
- Q23. Is there anything else you think is important for us to consider regarding **best practices in digital platform governance**? Please feel free to contact us if you do later.
- Q24. Would you be open to providing follow-up clarifications or sharing relevant documentation with us?

Glossary

Term	Definition
African Communication Regulation Authorities Network (ACRAN)	A collaborative project for cooperation and information exchange between African national communication regulatory bodies (established in 1998).
Artificial Intelligence Act (AI Act)	A comprehensive European Union (EU) regulation establishing a common regulatory framework for Artificial Intelligence within the EU.
Audiovisual Media Services Directive (AVMSD)	An EU law which coordinates national legislation regarding audiovisual media services, including traditional TV broadcasts, on-demand services, and video-sharing platforms.
Council of Europe (CoE)	An intergovernmental organization founded in 1949, with 46 Member States across Europe. The CoE works to uphold human rights, democracy, and the rule of law. In the media regulation and digital platforms space, the Council plays several roles, including issuing guidelines and recommendations (such as on media governance and platform regulation), promoting the independence of media regulatory authorities, and supporting cooperation among member states to safeguard media plurality, freedom of expression, protection of minors, and transparency.
Digital Services Act (DSA)	A comprehensive EU regulation designed to update and modernise the existing e-commerce Directive by addressing illegal content, transparent advertising and disinformation. It aims to create a safer and more transparent online environment for users.
European Media Freedom Act (EMFA)	An EU regulation designed to protect media freedom and pluralism within the European Union. It intends to safeguard journalistic independence and editorial freedom, ensure the independent functioning of public service media, and promote transparency in media ownership.
European Regulators Group for Audiovisual Media Services (ERGA)	An advisory body composed of heads or high-level representatives from national regulatory bodies overseeing audiovisual media services in EU Member States.
European Board for Digital Services (DSA Board)	An independent advisory group established by the Digital Services Act (DSA). Composed of representatives of national Digital Services Coordinators, the Board supports consistent supervision and enforcement of the DSA across the EU. It issues opinions, advises the European Commission, and fosters cross-border cooperation on systemic risks and platform compliance.

European Board for Media Services (Media Board)	An independent advisory body that was established by the European Media Freedom Act (EMFA) and replaces the ERGA. Like the ERGA, the Media Board consists of representatives from national media regulators of EU member states and works to ensure the consistent and effective application of EU media law.
European Platform of regulatory authorities (EPRA)	An advisory knowledge hub forum for independent media regulatory authorities to exchange information, best practices, and discuss regulatory challenges.
European Advertising Standards Authority (EASA)	A body that coordinates advertising self-regulation organizations in Europe and promotes responsible advertising practices and ensuring high standards. It acts as the single voice for advertising self-regulation in Europe and internationally, fostering collaboration among various stakeholders like advertisers, agencies, and media.
European Union (EU)	A political and economic union of 27 Member States located primarily in Europe. The EU develops common legislation in areas such as the digital economy, data protection, media regulation, and platform governance. Its regulatory frameworks, including the GDPR, AVMSD, DSA, EMFA, and AI Act, have strong influence both inside and outside the EU.
Francophone Network of Media Regulators (REFRAM)	A network of media regulatory authorities from French-speaking countries. It was established to foster solidarity and cooperation among its members, promoting the rule of law, democracy, and human rights within the media landscape. REFRAM serves as a platform for debate, information exchange, and training related to media regulation.
Global Forum of Networks (GFN)	A collaborative project (and non-binding forum) composed of various international regulatory authorities.
Global Online Safety Regulators Network (GOSRN)	A global forum where independent online safety regulators collaborate to share information, expertise, and best practices, aiming to foster a more coherent approach to global online safety regulation.
Guidelines for the Governance of Digital Platforms (UNESCO Guidelines)	A global framework published by UNESCO in 2023 that sets out roles, responsibilities and principles for states, digital platforms, regulators, civil society, and other stakeholders to ensure platform governance respects international human rights standards. The Guidelines promote a multi-stakeholder approach and outline nine core themes, including freedom of expression, transparency, safety, cultural diversity, and accountability. They are intended to guide regulation, policy-making, platform design, and public engagement to safeguard freedom of expression, access to information, and equity online.
Human Rights Due Diligence (HRDD)	A process undertaken in order for enterprises to identify, prevent, mitigate and account adverse effects on human rights.
Latin America and Caribbean (LAC)	The geographical region including Central and South America, Mexico, and the Caribbean islands.

Mediterranean Network of Regulatory Authorities (MNRA)	A cooperative platform bringing together audiovisual media and communication regulators from countries across the Mediterranean region.
Non-statutory interventions	Actions and initiatives undertaken by regulators or other stakeholders that are not based on binding legal mandates. These include voluntary agreements, codes of conduct, informal dialogues with platforms, public awareness campaigns, and multi-stakeholder cooperation mechanisms.
Over-the-top (OTT) services	Media or content (typically accessed through apps or websites) delivered directly to viewers over the internet, bypassing traditional cable, satellite, or broadcast platforms.
(Digital) platforms	Digital services or intermediaries that host, organise, or distribute user-generated content, media, or online services (for example, social media networks, video-sharing services, or search engines).
Platform of Ibero-American Audiovisual Regulators (PRAI)	An international network (established in 2014) that facilitates collaboration among independent regulatory bodies overseeing the audiovisual sector in Ibero-America.
Regulators (and media authorities)	Independent or statutory public authorities tasked with overseeing specific sectors, such as audiovisual media, communications, or online platforms.
Trusted Flagger	An individual or organization recognized by online platforms for their expertise and reliability in identifying and reporting illegal or harmful content, helping platforms take faster and more accurate moderation actions (established under Article 22 DSA).
Very Large Online Platform (VLOP)	An online platform that has more than 45 million active users in the European Union. These platforms are subject to stricter regulations and obligations under the DSA.
Very Large Online Search Engine (VLOSE)	Search engines with more than 45 million monthly active users in the EU and are subject to the highest tier of regulatory requirements under the Digital Services Act.



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